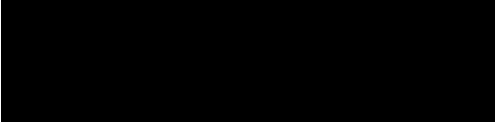



Comment

Consultee	
Email Address	
Address	Unspecified
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Salisbury & Wilton Swifts
Comment ID	1354870
Response Date	07/05/24 11:49 AM
Status	Processed
Submission Type	Web
Version	0.2

To which part of the Salisbury Neighbourhood Development Plan does your comment relate?

Page 76, Policy 11 - Biodiversity Net Gain and paragraph 178; Page 74, Policy 10 Safeguarding and enhancing green and blue infrastructure and paragraphs 181 & 201.

Comment:

Page 76, Policy 11 - Biodiversity Net Gain:

Policy 11 should be consistent with Wiltshire's Local Plan, which requires a minimum of **two integrated bricks per dwelling**:

Suggested wording:

- Provision for swifts should be provided at a rate of **at least two** swift integral nest bricks per residential unit. Non-residential buildings should be in accordance with best-practice guidance. (include reference to Wiltshire's Draft LP)
- Alternatively: Provision for swifts should be provided at a rate of **at least one** swift integral nest bricks per residential unit. Non-residential buildings should be in accordance with best-practice guidance.

In more detail, Wiltshire Council Local Plan Pre-Submission Draft (Cabinet Version) 2020-2038 September 2023 https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000, page 243, 5.136: *'Designing in space for nature is critical as highlighted by recent population trends of some of the UK's most threatened species that inhabit our built environment. The recent BS 42021:2022 guidance should be followed with regards to integral nest boxes, **with the exception of the minimum required ratio of integral nest boxes to dwelling given this policy outlines a greater minimum ratio than that stated within The British Standard.** The British Standard has demonstrated*

high occupancy rates of such features and Wiltshire Council seeks to ensure the best outcomes for wildlife within the built environment. The advice of a professional ecologist should be sought when determining the appropriate boxes for the area.'

Policy 88 Biodiversity and Geodiversity (page 246) – Biodiversity in the Built Environment: **'As a minimum, the following are required within new proposals: ...1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;'**

Page 76, Paragraph 178:

Guidance should include reference to best-practice BS42021, and to extensions to clarify that these are included.

Suggested wording:

Enriching habitat and improving connectivity in urban areas is very beneficial for wildlife. New housing development will require permeable garden boundaries including hedges so that amphibians, hedgehogs and other small mammals can develop territories needed to support viable populations. Integral swift bricks, also described as universal nest bricks for a variety of small cavity nesting birds, will require to be specified and installed in accordance with best-practice guidance such as BS 42021 for all new development including extensions. Purpose designed boxes for bats and other bird species are required where recommended by an ecologist, and the presence of well-designed green infrastructure will be required, i.e. a network of hedges, shrubs and trees.....

Page 74 Policy 10: Safeguarding and enhancing green and blue infrastructure & Page 76 Policy 11 - Biodiversity Net Gain:

Salisbury's NHP should aim to be in line with Wiltshire's Local Plan Pre-Submission Draft (Cabinet Version) 2020-2038 September 2023 which states as Policy 89 Biodiversity net gain - *Development must achieve a minimum of 20% biodiversity net gain, or higher as stipulated in national legislation and/or policy or supplementary guidance, over the pre-development biodiversity value as measured by the latest Biodiversity Metric. Exempted development must achieve no net loss of biodiversity and should achieve appropriate net gains, aspiring to deliver at least 20% biodiversity net gain.*

Paragraphs 181 and 201 of the guidance uplifted from 10% to 20% to be in line with Wiltshire's Draft Local Plan.

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Address	Salisbury Salisbury Salisbury
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	[REDACTED] (1125515)
Comment ID	2
Response Date	5/9/24 12:05 PM
Status	Processed
Submission Type	Web
Version	0.2
To which part of the Salisbury Neighbourhood Development Plan does your comment relate?	Policies 18 & 26.

Comment:

With regard to policy 18, I do not believe that this is sufficiently robust and specific to reflect the statements made regarding healthcare facilities. There is a clearly stated need for additional primary and community care facilities in the city and the policy statement needs to more definitely state that development which do not include provision of such facilities, or a suitable contribution towards them, will be opposed.

Furthermore, with the key NHS stakeholder requirements consultation now being almost three years old, and Wiltshire community services currently being out to competitive tender, the information contained in the document regarding the need for healthcare facilities may be out of date and should be reviewed before publication.

With regard to policy 21 I have some grave concerns about the statements made and the references used. Firstly the Wiltshire Playing Pitch Strategy is woefully out of date, having been published in 2017. The document even cites an expected revision in 2023. Section 287 states that 'current requirements have largely met' through the provision of a 3G pitch at Sarum Academy. I dispute this fact. The privately run 3G pitch is too expensive to be viable for many local sports teams and although is very welcome, there is much greater demand and need than this has provided for. As the manager of local football team and executive committee member of there are inadequate and insufficient pitches available resulting in reduced participation locally. The policy statement should be amended to mandate the provision of sporting facilities, or a contribution to their provision.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organization	Canal & River Trust
Address	[REDACTED]
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Canal & River Trust [REDACTED] 1012318)
Comment ID	3
Response Date	5/10/24 10:58 AM
Status	Processed
Submission Type	Email
Version	0.3

Comment:

Please find attached our response to the Draft Salisbury Neighbourhood Development Plan (2020 – 2038).

Kind regards

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? No



**Canal &
River Trust**

Making life better by water

neighbourhoodplanning@wiltshire.gov.uk

Your Ref

Our Ref CRTR-POL-2024-41602

Friday 10 May 2024

Dear Case Officer,

Draft Salisbury Neighbourhood Development Plan (2020 – 2038)

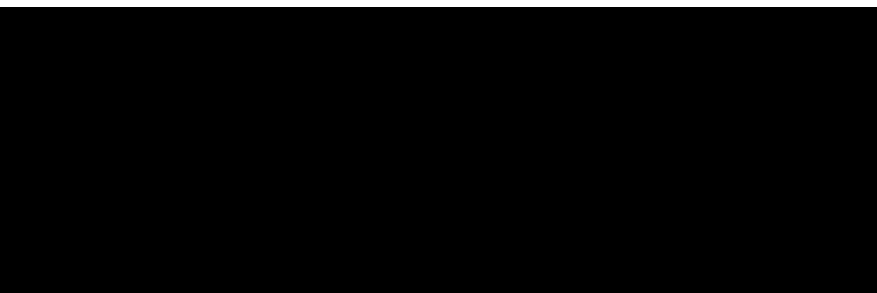
Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,



Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	[REDACTED] (1356720)
Comment ID	4
Response Date	5/28/24 10:16 AM
Status	Processed
Submission Type	Web
Version	0.2
To which part of the Salisbury Neighbourhood Development Plan does your comment relate?	Brownfield sites

Comment:

I gather that the recommended use of brownfield sites to be developed for housing has been omitted from the SNDP and that, as a consequence, fertile, greenfield sites, such as sites 8 and 9 south of Harnham, are being considered. Given that the originally proposed brownfield sites can accommodate up to 480 properties, it seems extraordinary to have removed these from the plan without any reasonable explanation or rationale. I note that the leaders of both main political parties are fully behind brownfield site development over the exploitation of productive farmland.

Sunak: "We pledged to build the right homes in the right places – protecting our precious countryside and building more in urban areas where demand is highest". (The Guardian 13th February 2024)

Starmer: "My Labour government will build on brownfield land first and make sure green spaces are protected." (X 19th April 2024)

Such reassurance from the political leaders should encourage the Council to think again about concreting over productive, fertile fields around the beautiful city of Salisbury - particularly, as noted above, sites 8 and 9 south of Harnham.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	[REDACTED] (1356720)
Comment ID	5
Response Date	5/28/24 10:36 AM
Status	Processed
Submission Type	Web
Version	0.2
To which part of the Salisbury Neighbourhood Development Plan does your comment relate?	Windfall sites

Comment:

The number of windfall sites which could be developed in Salisbury has been significantly downgraded. This apparently random diminution appears to fly in the face of given and projected statistics for the development of such sites on identifiable brownfield land. A revision of these numbers to bring them in line with th realistic estimates would negate the need to concrete over the fertiler, productive farmland around our beautiful city, particularly sites 8 and 9 to the south of Harnham which is in line for ruthless exploitation.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Comment

Consultee

Email Address

Address

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

(1356720)

Comment ID

6

Response Date

5/28/24 11:05 AM

Status

Processed

Submission Type

Web

Version

0.2

To which part of the Salisbury Neighbourhood Development Plan does your comment relate?

Brownfield sites

Comment:

SNDC have dropped the possibility of building 480 houses on brown field sites in Salisbury with no explanation or sound reasoning. While it may be more complicated to build on brown field sites due to access etc once the building is complete it will go toward regenerating the city without extending it.

By removing brown field sites, space will have to be found on green field sites outside the city limits. At the moment sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan) are prime agricultural land and would be lost forever.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal?

Yes

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346832)

Comment ID

7

Response Date

5/27/24 1:40 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Dear Sir,

Please find attached comments form on plan

Regards,

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

Documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

x

Comment:

I am disappointed that green field sites such as land South of Harnham (Sites 8 & 9) are included in the plan and both Brownfield sites and Windfall sites have been removed.

Wiltshire council appear to be ignoring a potential significant number of potential homes on Brownfield and Windfield sites.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

27-May-24

Thank you for completing this form.

Data Protection

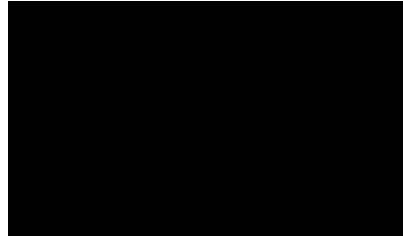
Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346580)

Comment ID

8

Response Date

5/27/24 2:11 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Here is my response as requested.
Regards

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

tick

Comment:

Reference to Brownfield Sites.

I find it very difficult to understand why the Wiltshire County Council would have “deleted”/ Not allowed the Salisbury Council notes/comment/proposals on the use of BROWNFIELD SITES to remain in the “Neighbourhood Development Plan”

Why is this “Deletion”/“Omission” not fully explained or justified. ?

Some 480 homes could have been accommodated/built on these sites and the Deletion smacks of Dogma !!

As a result many more homes are proposed on GREENFIELD SITES. Unnecessarily.

It is essential the Brownfield sites ARE included so the sites such as 8 & 9 (South of Harnham) could then be removed.

Reference to Windfall Sites

Similarly. Why has the allocation for Windfall Sites (included in the Councils’s March 2023 plan) been ignored/not reflected in the Draft Wiltshire Council Local Plan.

These documents showed substantial use of Windfall sites and would be invaluable in reducing the use of Greenfield sites referred to above.

Surely the full amount of Windfall sites should be included in both the SNDP & Local plans.

Future notification

I wish to be notified of the decision on the draft
Salisbury Neighbourhood Development Plan:

YES

Signature:

Date:

27/5/24

Thank you for completing this form.

Data Protection

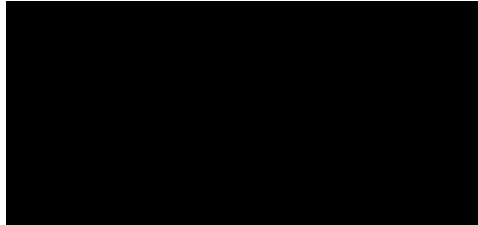
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347455)

Comment ID

9

Response Date

5/27/24 2:18 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find enclosed my response to the Salisbury Neighbourhood Development Plan - Consultation.
The form is dated 27th May 2024.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

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Title		
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Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		

Telephone Number		
Email Address		

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

In response to the Salisbury Neighbourhood Development Plan (SNDP) Consultation I wish to raise two key points: brownfield sites and ‘windfall’ sites.

‘Brownfield Sites’

I believe that three sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes - that were included in the earlier Regulation 14 version of the SNDP - have been dropped from this version of the SNDP. Wiltshire Council has not explained why these important brownfield sites have been removed from the SNDP.

Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham.

I therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

‘Windfall Sites’

The SNDP identifies the potential for significantly greater numbers of ‘windfall’ completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 ‘windfall’ dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 ‘windfall’ dwellings over the remaining 15-year period of the Local Plan and is three times the total number of ‘windfall’ allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council’s own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield ‘windfall’ sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

I recommend, therefore, that the correct large ‘windfall’ allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[Redacted Signature]

Date:

27/05/24

Thank you for completing this form.

Data Protection

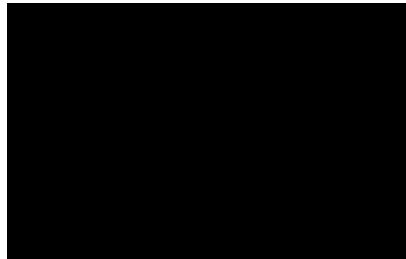
Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1356768)

Comment ID

10

Response Date

5/27/24 5:38 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my SNDP response form.

Regards,

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

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Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

I have purchased a house in Harnham and will be moving in mid July. I have become aware of the prospective development in Site 8 and Site 9 of the Local Plan which directly affects Harnham which I oppose for the following reasons.

Brownfield sites

I wish to question why development is proposed for these greenfield sites when brownfield sites are available. A further explanation is needed as to why three brownfield sites have been dropped by the plan. It can be argued that the proposed volume of houses for site 8 and site 9 could be accommodated within these brownfield sites. Brownfield sites should be included in the draft Wiltshire Council Local Plan so that greenfield sites, such as the land South of Harnham (Sites 8 and Site 9), can be removed from the Local Plan

'Windfall' sites

It is not clear why the housing allocation for 'windfall' sites in this plan and the Council's own Housing Land Supply Statement [dated March 2023] have not been reflected in the draft Wiltshire Council Local Plan. These documents show 2 to 3 times the number of 'windfall' sites compared with the Local Plan. This means that plans for greenfield sites are unnecessarily included in the Local Plan. Higher 'windfall' numbers should be included in the Local plan so that greenfield sites, such as the land South of Harnham (Sites 8 and Site 9), can be removed from the Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[REDACTED]

Date:

27/5/24

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	[REDACTED] (1347393)
Comment ID	11
Response Date	5/27/24 9:22 PM
Status	Processed
Submission Type	Email
Version	0.4

Comment:

Dear Sirs,

Please find attached my completed "Consultation Response Form" with reference to the "Draft Salisbury Neighbourhood Development Plan (2020 - 2038)"

I would be grateful if you would acknowledge receipt of this form.

Yours faithfully,

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

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By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

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	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites

While I support the objectives of the SNDP, I am disheartened by the omission of three brownfield sites (Quidhampton Quarry, Brown Street, and Churchfields), which were originally allocated for 480 homes in the earlier Regulation 14 version of the SNDP. Wiltshire Council has yet to provide a reason for the exclusion of these critical sites from the current version of the SNDP.

Additionally, the SNDP plans for 200 homes in the Maltings and Central Car Park, yet these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement highlights that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available, necessitating greenfield site allocations.”

The removal of these brownfield sites has resulted in the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (Policy 27 & Policy 28), which proposes the construction of over 300 homes on valuable agricultural greenfield land south of Harnham.

Therefore, it is recommended that these brownfield sites be reinstated in both the SNDP and Local Plan. This would eliminate the need for development on Sites 8 & 9 and help ensure the Local Plan's integrity.

‘Windfall Sites’

I also observe that the SNDP projects a much higher potential for ‘windfall’ completions on brownfield sites compared to the draft Wiltshire Council Local Plan. The SNDP data shows that from 2016 to 2021, Salisbury saw the completion of 579 ‘windfall’ dwellings on brownfield land, both large and small sites. This suggests a potential for over 1,700 ‘windfall’ dwellings over the next 15 years, which is three times the 410 homes currently projected in the Local Plan.

Furthermore, the Council’s Housing Land Supply Statement from March 2023 indicates that more than 400 homes could be developed on large brownfield ‘windfall’ sites during the 15-year span of the Local Plan, compared to just 60 homes outlined in the draft Local Plan. This would eliminate the need to build over 300 houses on Sites 8 & 9 in Harnham, noted as Policy 28 and Policy 29 in the Local Plan.

Therefore, I recommend that the correct allocation for large ‘windfall’ sites be accurately reflected in both the SNDP and the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

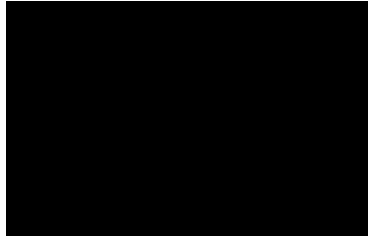
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346687)

Comment ID

12

Response Date

5/28/24 6:52 AM

Status

Processed

Submission Type

Email

Version

0.5

Comment:

Dear Sirs/Madam,

Herewith please find comments to the latest version of the SNDP.

Best regards

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

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Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

Brownfield Sites

Please clarify why the three brownfield sites at : Quidhampton Quarry, Brown Street & Churchfields have not now been included in the latest version of the SNDP. Surely, regeneration of populating city centre locations, and use of brownfield locations in preference to greenfield areas, has to be a more positive contribution to the environment than building housing on greenfield site (Sites 8 & 9).

Further, I am extremely concerned that a grid-locked traffic system within the Salisbury area is being significantly exacerbated by Wiltshire Council's total disregard of the current day traffic situation and the impact of the proposed buildout Sites 8 &9, (in addition to the extreme number of additional housing currently being built at Harnham). Traffic management analysis undertaken for the Harnham housing developments is (and has been) woefully lacking in reality in regards to the current day situation and assumptions utilized in the undertaken studies/analyses.

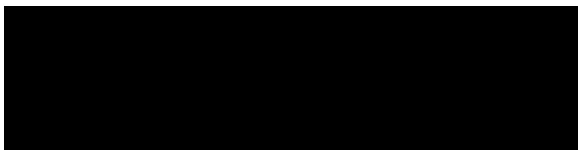
Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

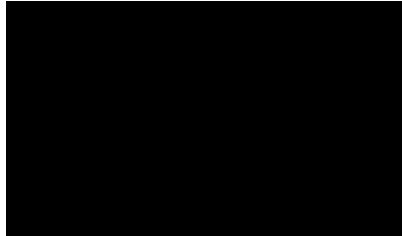
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347454)

Comment ID

13

Response Date

5/28/24 11:55 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my response to the Draft Salisbury Neighbourhood Development Plan (2020 – 2038)

Kindest regards

Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

x

Comment:

Please find below my comments regarding the Draft Salisbury Neighbourhood Development Plan (2020-2038):

It seems to me that there is no clear clear explanation, or rationale for why three brownfield sites with the capacity to build 480 homes have been removed from the plan. This means that greenfield sites have been unnecessarily included in the Local Plan.

I also believe it is not clear why the housing allocation for 'windfall' sites in this plan and the Council's own Housing Land Supply Statement [dated March 2023] have not been reflected in the draft Wiltshire Council Local Plan. These documents show 2 to 3 times the number of 'windfall' sites compared with the Local Plan. Once again plans for greenfield sites are unnecessarily included in the Local Plan.

I therefore contend that brownfield sites and 'Windfall' sites are included in the draft Wiltshire Council Local Plan so that greenfield sites, in particular the land south of Harnham (Sites 8 & 9) can be removed from the local plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

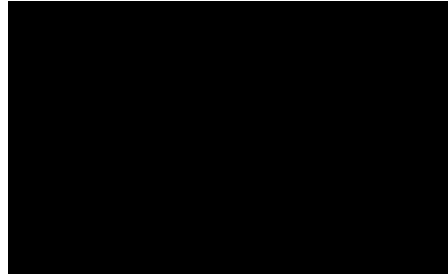
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1356787)

Comment ID

14

Response Date

5/28/24 12:00 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Dear Sirs

Please find attached my response to the above consultation.

Kind regards

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Paragraph:

Other:

Comment:

There appears to be no provision for additional infrastructure to accommodate all these new houses, especially Site 8 (Policy 27) which would subsequently put huge pressure on access to Salisbury District Hospital (SDH). Newbridge Road, A338 and A354 already sees considerable congestion at busy times of day and the addition of another 215-300 houses would exacerbate this and make emergency access to the hospital incredibly difficult and slow.

Both sites 8 and 9 are greenfield sites and it seems a huge mistake to be building on this quality agricultural land when there are areas around Salisbury, brownfield and windfall sites, which should be adopted. I believe there were brownfield and windfall sites included in the original Housing Land Supply Statement (dated March 2023) and these should be reinstated in the Salisbury Neighbourhood Development Plan (SDNP) and the greenfield sites 8 and 9 removed.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Framework



YES

NO:

Signature:



Date:

Thank you for completing this form.

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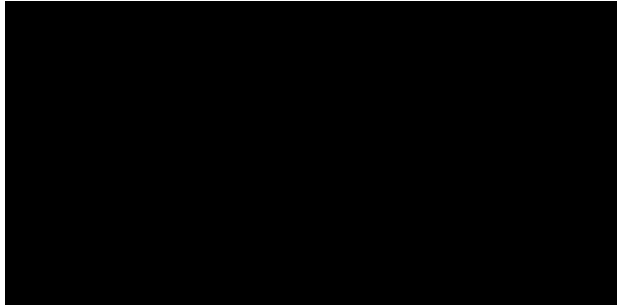
Comment

Consultee

Email Address

Company / Organization

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by



Comment ID

15

Response Date

5/28/24 2:12 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached representations on behalf of Hallam Land Management Ltd.

SALISBURY NEIGHBOURHOOD PLAN REGULATION 16 REPRESENTATIONS | LAND AT LAVERSTOCK

Dear Sir or Madam,

Representations to the Salisbury Neighbourhood Development Plan (2020-2038), Regulation 16 Consultation (June 2024)

This representation, provided by Hallam Land Management Limited ('Hallam'), relates to the land off Milford Mill Road, Laverstock ('the Site') (shown in figure 1). The Site lies outside the Salisbury Neighbourhood Plan boundary, however it is referenced on some of the draft Neighbourhood Plan maps.

Figure 1 – Land under option to Hallam Land ('the Site')



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 as a suitable and sustainable location for housing.

The Site comprises three land parcels (10.65ha combined) located either side of Milford Mill Road. The land is a mixture of grade 2 / 3 very good – moderate grade agricultural land. It adjoins the built-up settlement edge of Laverstock to the north and Petersfinger to the south, bordered by the rail line. It 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

It has capacity for approximately 70 houses.

Comments on the Salisbury Neighbourhood Plan (Regulation 16 Draft)

Hallam Land is **objecting** to the Regulation 16 Draft Salisbury Neighbourhood Plan (hereby after 'SNP R.16') plan as it is **unsound** as it is **not justified** or **consistent with national policy**. The SNP R.16 is aiming to seek control of the use of land outside its remit and allocate land not compatible with land owner promoted uses. Justification for these objections are provided below.

The SNP R.16 sets out that the 'plan seeks to protect all that people love best about our city whilst accepting that there must be some controlled growth for it to thrive'. To achieve this the SNP R.19 plan sets out policies relating to climate change, biodiversity loss and air pollution (2), the built environment (3), green and blue infrastructure (4), living (5), transportation and movement (6) and working (7). Hallam's comments are focused on green and blue infrastructure (4) as it is the only chapter of direct relevance to the Site.

Policy 10 'Safeguarding and Enhancing Green and Blue Infrastructure' states that 'development proposal that contribute to the greening of Salisbury and deliver elements of the Salisbury green and blue infrastructure vision shown in Figure 14 (extracted below) will be supported'.

Figure 2 – Copy of Figure 14 'What the future for GBI might look like...' of the SNP R.16 Plan

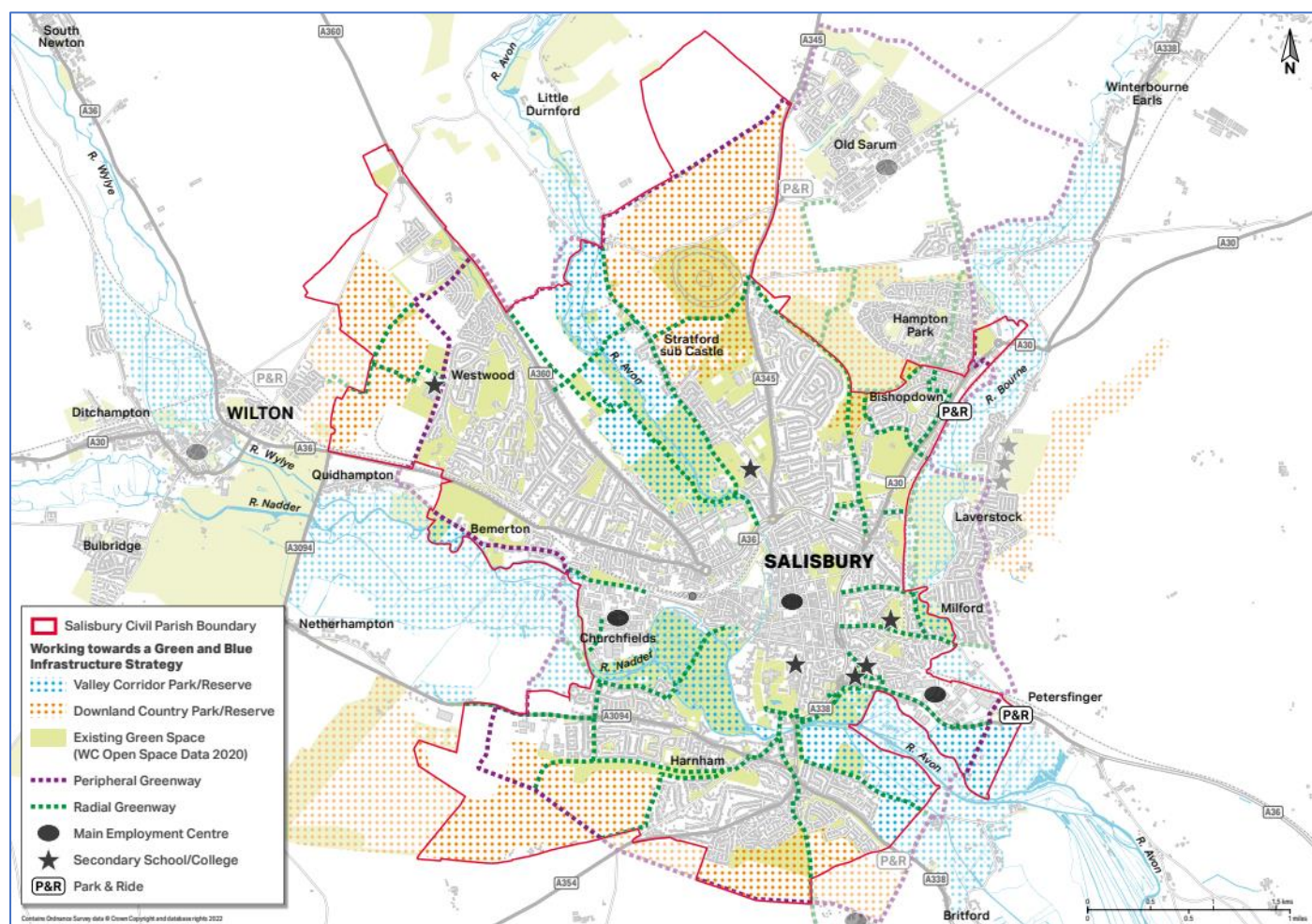
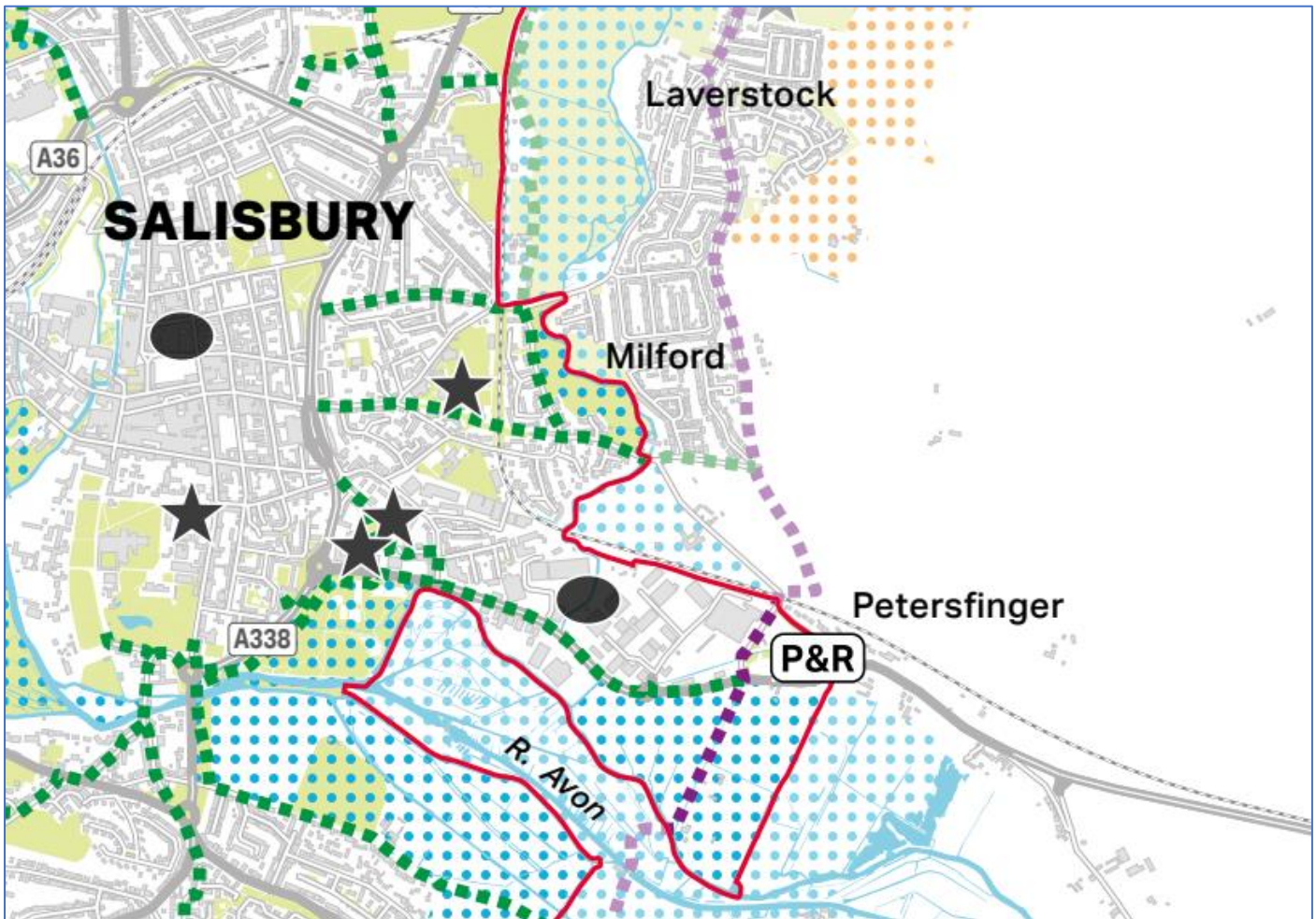


Figure 3 – Extract of Figure 14 ‘What the future for GBI might look like...’ of the SNP R.16 Plan



As indicated on Figure 3, land to the south of Milford Mill Lane, has been identified as Valley Corridor Park / Reserve. Paragraph 156 of the SNP R.16. ‘The GBI Vision’ sets out that ‘Figure 14 illustrates the potential for safeguarding the green and blue spaces in the river valley corridors and on the high ground within and around the city. Working with landowners, this could be achieved by creating a series of country parks and/ or reserves and there is also potential to establish a network of dedicated mainly off-road routes or greenways’ [our emphasis added].

Furthermore, paragraph 158 notes that identified ‘country parks and/or reserves could ideally 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’ [our emphasis added].

The proposed Valley Corridor Park / Reserve designation is not appropriate or compatible with Hallam’s vision for housing.. This is considered to evidence the fact that the designation has not been made in collaboration with landowners as inferred in paragraph 156.

Hallam’s concerns with Policy 10 of the SNP R.16 plan and supporting text are two-fold: firstly the land in question, is located outside of the designated area of the plan and secondly, the Valley Corridor Park / Reserve is not consistent with the aspiration to deliver much needed housing in a sustainable location.

Salisbury Neighbourhood Plan Designated Area

The SNP R.16 plan area and the indicative location of Site is set out in Figure 4, below. The Site is located within the Laverstock and Ford Neighbourhood Plan designated area (Figure 5) and not within the SNP R.16 designated area. The made Laverstock and Ford Neighbourhood Plan (2022) does allocate some parcels of land as green spaces to be retained, however, it does not allocate the Site in Hallam’s control as green space or a valley corridor, rather it does not allocate the land at all. the Laverstock and Ford Neighbourhood Plan aligns with the Wiltshire Core Strategy and emerging Wiltshire Local Plan in this respect.

Planning for the future of the Site is the responsibility of Wiltshire Council and the Laverstock and Ford Neighbourhood Plan and as such there is no justification for the inclusion of the land within the SNP R.16. Overlap of these documents and inconsistencies will cause future confusion within the Development Plan for the area.

Figure 4 – Salisbury Neighbourhood Plan Area Boundary – Site indicatively shown in yellow

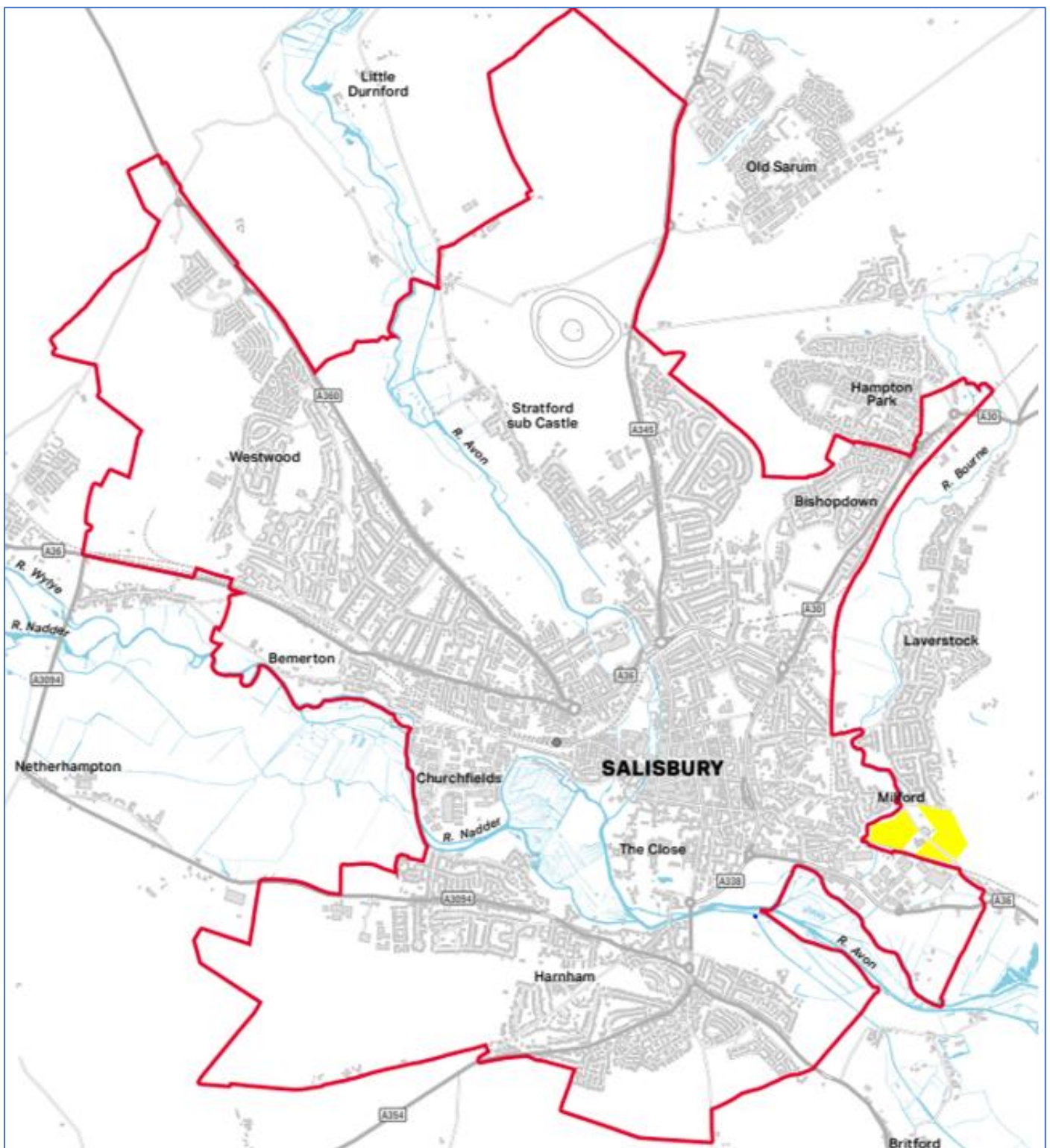


Figure 5 – Extract of the Laverstock and Ford Neighbourhood Plan Area Boundary – Site indicatively shown in yellow



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' (Paragraph: 039 Reference ID: 41-039-20161116) [our emphasis added].

As such Hallam stress the importance of the Site being removed from the SNP R.16 plan in order to comply with National Planning Policy Guidance and streamline the future Development Plan.

Justification for a Valley Corridor Park / Reserve

Hallam 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 SNP R.16 area and NPPG criteria, as set out above, designating all of the land to the south of Milford Mill Road as a Valley Corridor Park / Reserve will prejudice the delivery of much needed housing in the Salisbury HMA, as evidenced in our representations to the Wiltshire Local Plan R.19 consultation and act to prevent sustainable development.

Conclusion

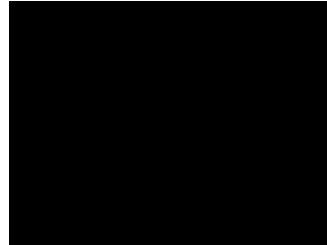
As above, Hallam Land **objects** to the SNP R.16 plan as it is unsound as it is not justified or consistent with national policy. The SNP R.16 is aiming to seek control of the use of land outside its remit, despite clear guidance being provided within the PPG and while it states it is aiming to work with landowners has designated a use for the Site which contradicts Hallam's promotion to deliver housing, something that is critical to a 5YHLS in Wiltshire and sustainable growth in the Salisbury HMA.

Comment

Consultee

Email Address

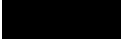
Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347220)

Comment ID

16

Response Date

5/28/24 4:11 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my response to the current SNDP consultation.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Postcode		
Telephone Number		N/A

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites – Omission

While I support the objectives of the SNDP, I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street, and Churchfields), which were allocated for a total of 480 homes in the earlier Regulation 14 version of the SNDP, have been omitted from the current version. Wiltshire Council has not provided an explanation for the removal of these important brownfield sites from the SNDP.

Additionally, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement highlights that "the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary."

The exclusion of these brownfield sites has led to the unnecessary inclusion of Sites 8 and 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 and Policy 28), which proposes building over 300 homes on prime agricultural, greenfield land south of Harnham.

Therefore, it is recommended that these brownfield sites be included in both the SNDP and the Local Plan. This would eliminate the need for development on Sites 8 and 9 and help ensure the soundness of the Local Plan.

Windfall Sites - Incorrect Allocation

I also note that the SNDP identifies the potential for significantly more 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Data accompanying the SNDP shows that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (both large and small sites) in Salisbury. This suggests the potential for over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan, which is three times the number currently reflected in the Local Plan (410 homes).

Furthermore, an analysis of the Council's own Housing Land Supply Statement dated March 2023 indicates that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan period, compared to just 60 homes in the draft Local Plan. This discrepancy alone would negate the need to build over 300 houses on Sites 8 and 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Therefore, I recommend that the correct large 'windfall' allocation be reflected in both the SNDP and the Local Plan.

Traffic – In adequate Plans

I also note that Wiltshire Council has been unable to develop a strategy or plan to address the projected increase in traffic at the Harnham Gyratory resultant from the planned development on Sites 8 & 9 in Harnham, and in Britford, not to mention the traffic associated from the Netherhampton Road development. These developments will see Harnham increase in size by one third.

The Council's own Transport Evidence base shows that the Gyratory is projected to reach 97% as a result of the increased traffic from these developments. This means gridlock at the Gyratory. The recent plans presented by the Council in the Autumn for minor improvements to the Gyratory – which appear unfunded and probably impracticable – won't even scratch the surface in terms of addressing the projected traffic throughput.

It is recommended that both the SNDP and Local Plan is amended to reflect the removal of Sites 8 & 9 (Policy 27 & 28) from the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

28/05/2024

Thank you for completing this form.

Data Protection

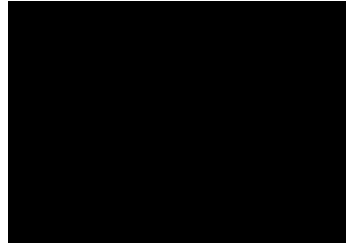
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1345849)

Comment ID

17

Response Date

5/28/24 5:58 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

I have attached my completed "Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form" for your consideration.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

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Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

BROWNFIELD SITES

I agree with the objections of the SNDP, but find it unacceptable that three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields), which were included in the earlier Regulation 14 version of the SNDP, have now been deleted. These sites have the potential to accommodate 480 homes. Wiltshire Council has not provided a reason, which seems quite undemocratic, the more so since developing greenfield sites is highly controversial when there are alternative solutions.

The SNDP plans for 200 homes in the Maltings and Central Car Park. However, these are not included in the draft Wiltshire Council Local Plan. The Basic Conditions Statement argues that the Local Plan incorrectly assumes a shortage of brownfield land, necessitating greenfield site allocations.

Dropping these brownfield sites has led to the unnecessary inclusion of Sites 8 and 9 (Policies 27 and 28) in the draft Wiltshire Council Local Plan, which proposes over 300 homes on prime agricultural greenfield land south of Harnham.

WINDFALL SITES

The SNDP projects significantly more 'windfall' completions on brownfield sites than the draft Wiltshire Council Local Plan. Between 2016 and 2021, 579 'windfall' dwellings were built on brownfield land in Salisbury, suggesting over 1,700 such dwellings could be delivered in the remaining 15 years of the Local Plan. This is three times the 410 'windfall' homes currently allocated in the Local Plan.

Additionally, the Council's Housing Land Supply Statement (March 2023) indicates over 400 homes could be built on large brownfield sites, compared to just 60 in the draft Plan. This could eliminate the need for 300+ houses on Harnham Sites 8 and 9 (Policies 27 and 28). Therefore, the SNDP and Local Plan should accurately reflect the potential for large 'windfall' allocations and that would make these plans sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

28.05.24

Date:

Thank you for completing this form.

Data Protection

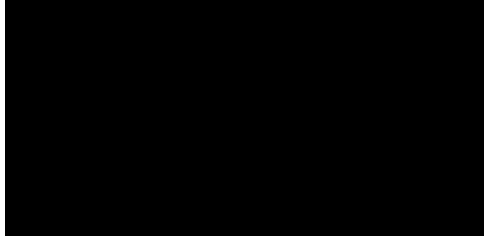
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by

 (1346672)

Comment ID

18

Response Date

5/28/24 6:17 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find enclosed my attached response to the neighborhood development plan.

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

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First name		
Last name		
Job title (where relevant)		
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Address Line 1		
Address Line 2		
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Postcode		
Telephone Number		
Email Address		

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Why are the three brownfield sites, which could accommodate 480 homes, dropped from this plan?

If the brownfield sites were included the greenfield sites are unnecessary in the Local Plan.

Brownfield sites should be included in the draft Wiltshire Council Local Plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan.

Comment sheet 2. [REDACTED]

Similarly, I recommend, therefore, that the correct large 'windfall' allocation of 400 houses is reflected in both the SNDP and Local Plan, so that land south of Harnham can be removed from the plan as these houses more than meet the numbers proposed on the Greenfield site.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date: 28.5.24



Thank you for completing this form.

Data Protection

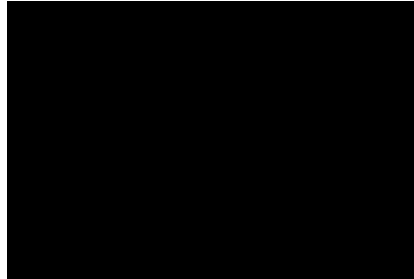
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1356871)

Comment ID

19

Response Date

5/28/24 6:19 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find attached, two representations on the SNDP.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

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Organisation (where relevant)		
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Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites: I do not understand why brownfield sites have been omitted from this the Salisbury Neighbourhood Development Plan (SNDP). Specifically, the three brownfield sites at Quidhampton Quarry, Brown Street & Churchfields. Brownfield sites should be top of the list for development for regenerating our community without destroying the environment. What on earth possessed Wiltshire Council to remove these sites when they should be focussing on finding more.

Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

If these brownfield sites are not included, this will bring added unwelcome pressure to the greenfield sites that are extremely valuable to the local community, especially Sites 8 & 9 in south of Harnham as defined in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28).

The Council must add back these brownfield sites in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Windfall Sites: I fail to understand why you are ignoring historical norms when defining the numbers of windfall sites. The data shows windfall sites over the past 5 years alone can meet the housing demand. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), **579** 'windfall' dwellings were delivered on brownfield land in Salisbury.

The Council's own Housing Land Supply Statement [dated March 2023] suggests that over **400** homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan. However, you are allocating only **60** homes in the draft Local Plan. Recalibrating the availability of windfall sites based on the historical facts will alleviate pressure to build on greenfield sites that are extremely valuable to the local community and specifically the 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

The Council should re-assess the windfall opportunities based upon historic norms and ensure a significantly larger 'windfall' allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

28 May 24

Thank you for completing this form.

Data Protection

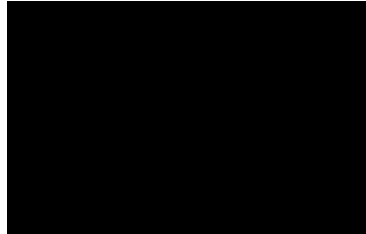
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347017)

Comment ID

20

Response Date

5/29/24 12:43 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Hi,

Please find attached a couple of completed Representation forms.

Kind Regards,

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? No

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

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Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

Brownfield Sites

Three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes have been omitted from this version of the SNDP. They were previously included in the Regulation 14 version of the SNDP. No explanation for the removal of these important brownfield sites from the SDNP has been given. This is clearly very disappointing. Additionally, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

The impact of these brownfield sites being dropped is the totally unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham. A wholly undesirable and ill-thought out idea.

It is therefore recommended that the above identified brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

29/5/24

Thank you for completing this form.

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Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

<p><u>Windfall Sites</u></p> <p><i>The SNDP identifies the potential for a much larger of ‘windfall’ completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 ‘windfall’ dwellings were delivered on brownfield land (large and small sites) in Salisbury. If extrapolated, this equals over 1,700 ‘windfall’ dwellings over the remaining 15-year period of the Local Plan and is three times the total number of ‘windfall’ allocations currently reflected in the Local Plan (410 homes).</i></p> <p><i>Analysis of the Council’s own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield ‘windfall’ sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).</i></p> <p><i>Therefore, the appropriate figure for large ‘windfall’ allocation should be used in both the SNDP and Local Plan.</i></p>

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

29/5/24

Thank you for completing this form.

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Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organization	Highways England
Address	Unknown Unknown Unknown
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Highways England ([REDACTED] - 1221626)
Comment ID	21
Response Date	5/29/24 12:57 PM
Status	Processed
Submission Type	Email
Version	0.3

Comment:

Dear Neighbourhood Plan team

Thank you for providing National Highways with the opportunity to comment on the submission version of the Salisbury Neighbourhood Development Plan. As you are aware, National Highways is the strategic highway authority 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 01/2022 *The strategic road network and the delivery of sustainable development*, as well as the guidance set out within *Planning for the future – A guide to working with 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 current Salisbury Transport Strategy and Central Area Framework.

Having reviewed the 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.

In terms of specific policies where we consider there is the potential for proposals to impact on the safe and efficient operation of the A36 we offer the following comments.

- . Section 5 Living – Policy 17 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 17 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.
- . Section 7 Working - Policy 30 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 01/2022.

It is noted that the current Reg 16 version of the plan no longer proposes to allocate specific sites for development and the Section 8 Site Allocations and associated policies that were contained within the Reg 14 draft have been removed.

If it would be helpful to discuss any of the above, please don't hesitate to contact us.

Comment

Consultee

Company / Organization

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by



Comment ID

22

Response Date

5/29/24 1:35 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find attached NHS BSW ICB response to the Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16. Should you have any questions, please do not hesitate to contact NHSPS as the agent representing BSW ICB.



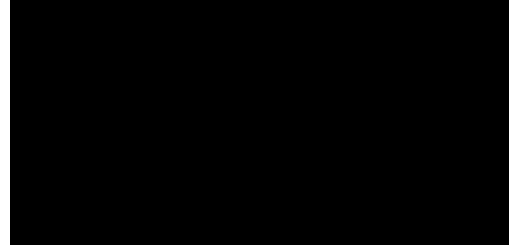
**Bath and North East Somerset,
Swindon and Wiltshire**
Integrated Care Board



Property Services

Neighbourhood Planning
Planning and Economic Development
Wiltshire Council
County Hall
Bythesea Road
Trowbridge BA14 8JN

NHS Bath and North East Somerset
Swindon and Wiltshire ICB



29 May 2024

BY EMAIL ONLY

neighbourhood.planning@wiltshire.gov.uk

RE: Consultation on Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS) on behalf of Bath and North East Somerset, Swindon and Wiltshire (BSW) ICB. Our comments on the Neighbourhood Plan consultation reflect how the ICB and various system partners are working together at the system level to deliver the health priorities as articulated within the BSW Integrated Care Strategy.

NHS Bath and North East Somerset, Swindon and Wiltshire ICB

The NHS BSW ICB covers a large and varied geographical area that includes the densely populated and growing town of Swindon to the north, the historic city of Bath, Salisbury plains to the south, and the rolling Mendip Hills to the west. The ICB commissions (plans, designs, and purchases) many of the health services that the local population use, including medicines, hospital care, urgent and emergency services, mental health care, GP services, community pharmacy, dentistry, general ophthalmology (eye care services), and various community services.

To ensure that our health and care services meet the healthcare needs of the population living across BSW, we have three localities, each represented by place-based partnerships called Integrated Care Alliances (ICAs). Each ICA is made up of local doctors, hospital chief executives, clinical commissioners, council officers, patient and voluntary and social enterprise sector groups who lead the detailed design and delivery of integrated services across their localities and neighbourhoods. The ICB and its partners are therefore well placed to identify the implications of the Local Plan on healthcare infrastructure and services in the local area.

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Neighbourhood Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Neighbourhood Plan in a way that supports sustainable growth.

Policy 18 Healthcare Facilities

We appreciate that the SNDP Steering Group engaged in early discussion with the NHS and healthcare providers to understand the potential scope of health infrastructure required to support the projected growth and development across the Neighbourhood Plan area. We welcome the standalone healthcare facilities policy (Policy 18) that recognises the needs of healthcare infrastructure providers and supports efficient use of the estate. We recommend the Council continues to engage with the NHS and healthcare providers in the area to have an effective implementation mechanism so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development.



**Bath and North East Somerset,
Swindon and Wiltshire**
Integrated Care Board

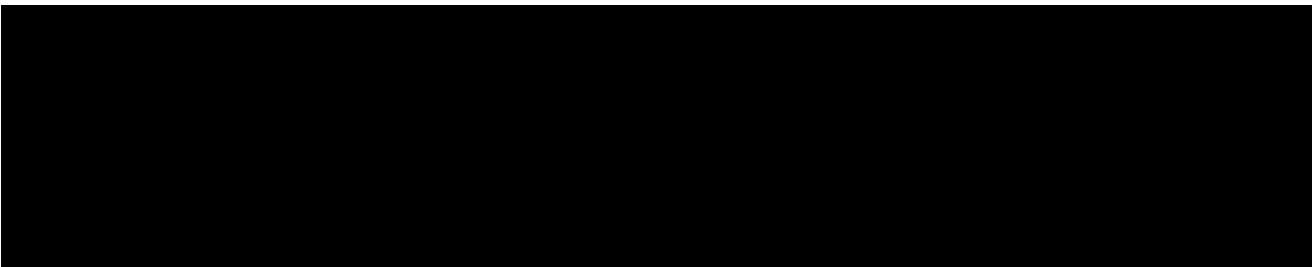


Property Services

Conclusion

NHS BSW ICB thank Salisbury City Council for the opportunity to comment on the on Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the plan. Should you have any queries or require any further information, please contact us at BSWICB@property.nhs.uk.

Yours sincerely,

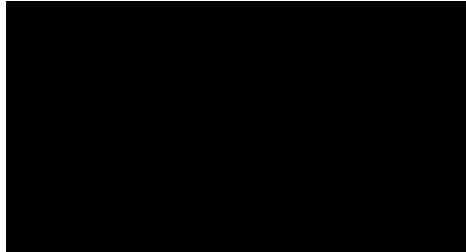


Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346857)

Comment ID

23

Response Date

5/29/24 2:53 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my comments for your consideration with regards to the SNDP.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

Documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites

Disappointingly three brownfield sites (Quidhampton Quarry, Brown street and Churchfields) have been dropped from the Plan.

There appears no sound reasoning why these valuable sites, which could accommodate 480 homes are not currently being considered. Also the SNDP includes the provision of 200 homes in the Maltings and Central Car Park, but these allocations are not reflected in the draft Wiltshire Council Local Plan. These potential central locations would be hugely beneficial to people living, working and commuting from the centre; alleviating the usage of cars, which would otherwise be necessary for commuting from housing developments outside of the city. These central allocations would also greatly benefit city centre businesses.

Omission of these brownfield sites result in unnecessary inclusion of greenfield sites being utilised instead, such as land South of Harnham (Sites 8/9) for 300+ homes. This would result in loss of prime agricultural land, loss of natural habitat, destruction of outstanding landscape and detrimental impact to an already over capacitated infrastructure.

With logic and foresight, brownfield sites should be included in the draft Wiltshire Council Local Plan, in order for greenfield sites, such as land South of Harnham (Sites 8/9) to be removed from the Local Plan. This would make the Plan sound.

'Windfall' sites

The SNDP indicates the possibility of greater numbers, 2 to 3 times, of 'Windfall' completions on brownfield sites, which is in contrast to the draft Wiltshire Council Local Plan. Therefore resulting in plans for greenfield sites being unnecessarily included in the Local Plan.

The significantly larger 'Windfall' numbers should be included in the Local Plan, in order for greenfield sites, such as land South of Harnham (Sites8/9) to be removed from the Local Plan. This would make the Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk .”

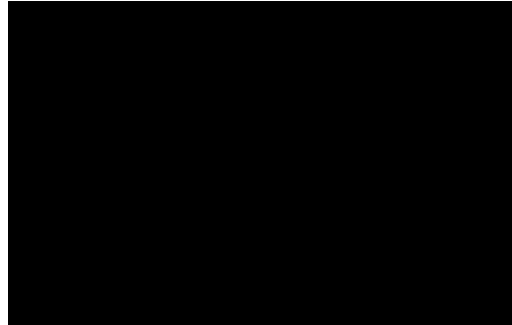
Comment

Consultee

Email Address

Company / Organization

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by



Comment ID

24

Response Date

5/31/24 5:48 AM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find Natural England's response in relation to the above mentioned consultation attached.

Date: 31 May 2024
Our ref: 473179
Your ref: Salisbury Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Neighbourhood Planning
Wiltshire Council

BY EMAIL ONLY

neighbourhoodplanning@wiltshire.gov.uk

Dear Sir/Madam

Salisbury Neighbourhood Development Plan (2020 – 2038) Regulation 16 Consultation

Thank you for your consultation on the above dated 16 April 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

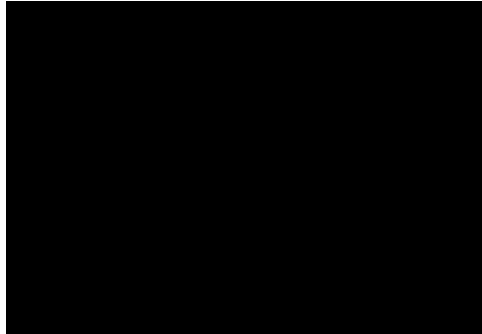
Comment

Consultee

Email Address

Company / Organization

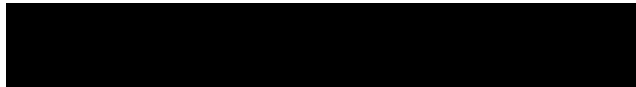
Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by



Comment ID

25

Response Date

5/31/24 8:07 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Good morning

Please find attached a response from the Cathedral to the consultation on the Salisbury Neighbourhood Plan.

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

Documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		

Telephone Number		
Email Address		

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

<p>We welcome the statement that “the presence of Salisbury Cathedral and the city’s proximity to Stonehenge make Salisbury an international tourist destination and this brings significant revenue to the city”.</p>
--

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

We support the objective that views of the Cathedral from a distance, on the approaches to the city, should be preserved.

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Number:

Comment:

We question the description of the Cathedral Precinct as having a character of “quiet formality”. As described in point paragraph 19, the Cathedral is an international tourist destination attracting hundreds of thousands of visitors and is similarly well used by local residents. The Cathedral’s approach to managing the Close is one of openness and inclusivity and we would discourage enshrining a view within the Neighbourhood Plan of the Close as being exclusive which we think the term “quiet formality” might suggest.

The text in paragraph 86 refers to a “series of grand houses ranging in date from the 13th to the 18th century”. This does not reflect the fact that there are many buildings in the Close which originated in the 19th and 20th centuries. The Close has been subject to continual development and conservation across its existence. More than a third of the construction dates from the 20th century onwards. This is borne out by the statement on page 46, section 88 which refers to the Close “with its building history spanning eight centuries

The text in paragraph 86 should therefore be amended to read “This is surrounded by a series of grand houses ranging in date from the thirteenth to the eighteenth century, and several buildings of 19th and 20th century origins”. This is a more accurate summary.

The text in paragraph 88 of this section includes a bullet point that references the “Views of the Cathedral”. It is not clear what “processional views” means.

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

The comments below relate to the whole section on the Close and its Liberty. We would note that although the Cathedral is responsible for managing the Close, no one from the Cathedral was involved in drafting this section of the Neighbourhood Plan. It is our view that the way the Close is currently portrayed in this section does not reflect that it accommodates numerous organisations and is a busy, diverse space which attracts many hundreds of thousands of visitors each year.

As a general point we also note that there is Church of England legislation which the Cathedral has to adhere to in relation to the fabric of the Cathedral and its setting within the Close. This section would benefit from a brief statement that the Cathedral and the Close are managed by a governing body (the Chapter) in accordance with its responsibilities in this respect, as well as its general responsibilities as a landowner and employer.

107 – “Tranquil” is a subjective term, and whilst it is acknowledged that the relatively low traffic environment of the close is more tranquil than the rest of the city, because of the limited vehicle movements, it is not strictly accurate given the number of visitors the Cathedral receives every year. There is a mix of uses that ensures that there is constant activity during the day, with people moving around on foot through and around the area.

It is also inaccurate to state that there are no commercial enterprises within the Close as there are. We suggest the following more accurate text for this section – ***The Close is a complex historic urban open space. At its heart is the Cathedral which has drawn thousands of worshippers and visitors since the thirteenth century. Around the church itself, there are acres of beautiful green space which can be freely enjoyed by local people and visitors. Also within the Close are many residential properties, four museums, three educational institutions and several businesses.***

108 – We suggest removing the word “tranquil” for the reasons already noted. It is also not accurate to say that there are “issues with increasing loss of mature trees due to age and dieback.. The number lost as a proportion of the whole is very small.

112 – It is debatable whether the Close Wall delineates the curtilage of the Cathedral. For example, listed buildings to the north of North Walk will have their own curtilage so may form part of the setting of the Cathedral but not part of its curtilage.

113 – It is the case that the Cathedral was largely built to a single design and the layout of the Close dates from the time of the Cathedral’s foundation. However, as already noted, the Close has seen a significant amount of development since then. Figure 10 bears this out.

115 – We refer back to the comment about curtilage made in 112 above.

116 – The Cathedral’s Strategic Plan 2024-2029 has been finalised and sets out its priorities for how it will conduct mission and ministry alongside sustaining a rich architectural, cultural and artistic sense of place. This paragraph should be updated to reflect this latest document.

118 - The reference to a ‘tension between maintaining or even increasing high visitor footfall...and the protection of this unique setting’ should not be overstated. The tension between visitor footfall and the protection of the setting is well managed by the Cathedral which works successfully to achieve a sensitive balance in this regard. This paragraph should be reworded accordingly:

Accommodating high visitor footfall whilst protecting this unique setting is well managed by the Cathedral’s governing body, which works successfully to achieve a sensitive balance in this regard. The SDNP provides an opportunity to support this.”

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

56

Paragraph:

Other:

Policy 7

Policy 7 - point 2 of the policy is incorrect. As stated above, the Close and Cathedral is a busy, thriving, international tourist destination and a key economic force for the city of Salisbury. There are a number of commercial enterprises that operate within the Close. We are concerned that, if adopted, this point might impact on non-residential proposals within the Close and have associated negative consequences for the city. Its overall character is not predominantly residential, but rather is dominated by the magnificent cathedral at its heart and the scale of the space around it.

Traffic is restricted, which means less vehicle movements than in the rest of the city, but there are large numbers of people moving around on foot throughout the day, going about their business in the Close, visiting or passing through. It is a busy hub of many different activities, including those associated with the Cathedral's administration, educational activities, museums, the works yard, small businesses, and the visitors who come to see the Cathedral. The use of the Cathedral as a venue for concerts, recitals, festivals, and other forms of artistic activity also brings people to the area. The result is that the Close is a place of commercial, residential and cultural activity, and there is a constant flow of people for much of the day. **Point 2** should therefore be reworded to state:

2 Recognise the Cathedral and its Close's significance as an internationally important visitor destination and cultural hub, and a place of work and education for many, and the economic and social benefits this brings, whilst acknowledging the residential character of parts of The Close.

Similarly point 4 refers to tranquillity and contemplation to the exclusion of the reality of the character of the area as a whole as a busy hub of activities. The Cathedral recognises that tranquillity and contemplation are an important part of the experience offered by the Cathedral and the Close and that such opportunities should remain and be protected. It should be recognised however, that these are not the defining characteristics of the Close that should drive planning policies, given the range of activities that take place. Much of the tranquillity in the Close is as a result of the traffic restrictions that exist, a point that is made in the conservation area appraisal. Maintaining this position is an appropriate goal of the plan. **Point 4** should be reworded to say:

4. Avoid harm to the special character and distinctiveness of The Close as a place of national archaeological and architectural significance with a relatively low traffic environment.

Point 5 requires that development proposals should demonstrate "outstanding design merit". The Cathedral questions whether this is an appropriate approach as it could be taken to mean 'very remarkable' or 'impressive', that 'stands out'. Given that on many occasions it may be more appropriate to have design that is low key and understated (which by definition would not stand out, but rather would blend in) it would seem that this approach would lead to unnecessary restrictions on designers. There is already policy 6 in the Neighbourhood Plan, which requires high quality and well-designed buildings, and which would not impose a need to stand out. Point 5 should therefore be deleted as it is not necessary, given the content of policy 6, and may lead to unintended consequences of unnecessary and unwelcome over-design when low key and understated approaches are needed..

We note reference in the policy that 'Proposals for advertising in The Close will normally be deemed inappropriate in this Area of Special Control of Advertising' (ASCA). However, we also note that such areas simply impose a stricter degree of advertisement control, not a blanket ban, and applications for advertisement consent will be required for some types of advertising where deemed consent might otherwise apply. Each application would then need to address any restrictions on size, location and related matters that might apply and then should be considered on merit in accordance with the relevant regulations. Hence whilst particular care is taken over the control of design and type of advertisements in such areas, it is not appropriate to say that proposals for advertising will normally be deemed inappropriate. Also, as the Area of Special Control of Advertising extends across much of the city, it seems unusual to have a policy just for the Close.

This statement about advertising should be removed from the policy entirely. The ASCA and the advertising consent process will operate effectively to provide relevant and proportionate controls.

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

This paragraph references the historical link between “the Cathedral Spire” and Old Sarum. We think this should state “The Cathedral” rather than just the Spire.

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

The reference to “Dean and Chapter” should just read “Chapter”. The Dean is not separate to the Chapter.

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: **137**

Paragraph: **348**

Other: **Core Policy 40**

Comment:

We welcome Core Policy 40, recognising that the current limitations of Salisbury's hotel offer suppresses the potential economic benefits of tourism.

Paragraph 348. It should be noted that the Experience Salisbury website and social media channels has now been created specifically to improve 'knowledge and provision of information on Salisbury's qualities and offer.'

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

The Cathedral Green – we have noted the reference to the “potential for additional tree planting and alleviation of compaction around existing trees”. There are limitations within the Close in respect of new tree planting, the Cathedral has a policy regarding this. We would therefore ask that the comments are amended in light of this to avoid any confusion.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

31 May 2024

Thank you for completing this form.

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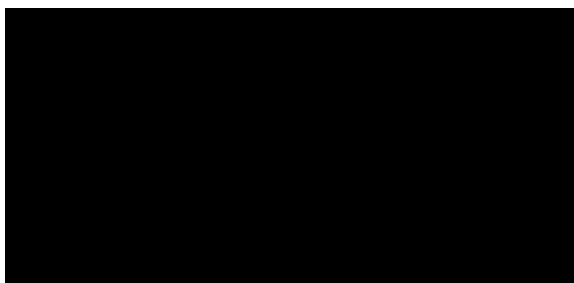
Comment

Agent

Email Address

Company / Organization

Address



Consultee

Redrow Homes (1357448)

Email Address



Company / Organization

Redrow Homes

Address

c/o Agent

GL7 1RQ

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

Redrow Homes (Redrow Homes - 1357448)

Comment ID

30

Response Date

6/1/24 9:24 AM

Status

Processed

Submission Type

Web

Version

0.3

To which part of the Salisbury Neighbourhood
Development Plan does your comment relate?

Policy 1

Comment:

“Major development will aim to provide a minimum of 30% of the total site area of tree canopy cover after the first 15 years from completion of the development. Where this is not possible, provision may be made offsite according to Policy 12.”

As detailed in our representations to Policy 10 (Safeguarding and enhancing green and blue infrastructure), the Salisbury Neighbourhood Plan once made only constitutes part of the Development Plan for the designated neighbourhood plan area it relates to. Legislation stipulates that a neighbourhood development plan may not relate to more than one neighbourhood area.

Notwithstanding the above, concern is raised as to the application of the policy as drafted.

The NPPF at paragraph 136 states that:

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined (unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate), that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.”

The figure of 30% tree canopy cover as required by SNDP policy 1 is a recommendation from the Woodland Trust Emergency Tree Plan for the UK, rather than being any nationally adopted target.

However, in reality development proposals will be assessed based on the detailed submission material on a case by case basis. This includes a requirement to meet the target of biodiversity net gain taking into account existing green infrastructure and local landscape character considerations.

National Planning Practice Guidance states:

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106.”Paragraph 001 Reference ID: 10-001-20190509.

The SNDP does not appear to include an assessment of viability, and specifically on the requirement for 30% tree canopy cover.

Furthermore, the Regulation 19 draft of the Wiltshire Local Plan Review at draft Policy 98 largely repeats the NPPF. It is inappropriate for the SNDP to set a policy requirement more onerous than that set out in national policy and the emerging Local Plan.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

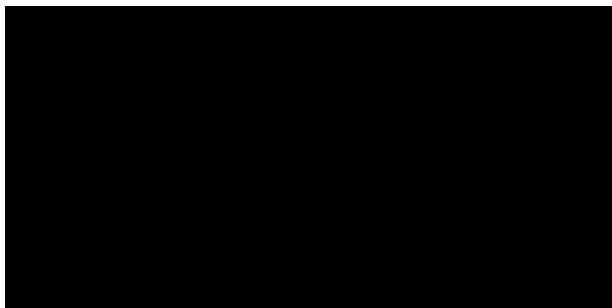
Comment

Agent

Email Address

Company / Organization

Address



Consultee

Redrow Homes (1357448)

Email Address



Company / Organization

Redrow Homes

Address

c/o Agent
. .
GL7 1RQ

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

Redrow Homes (Redrow Homes - 1357448)

Comment ID

31

Response Date

6/1/24 9:27 AM

Status

Processed

Submission Type

Web

Version

0.2

To which part of the Salisbury Neighbourhood Development Plan does your comment relate?

Policy 10 Figure 14

Comment:

SNDP Figure 14 includes extensive areas identified as 'Downland Country Park/Reserve' both within and beyond the Neighbourhood Plan boundary.

Paragraph 156 explains that Figure 14 "illustrates the potential for safeguarding the green and blue spaces in the river valley corridors and on the high ground within and around the city".

Paragraph 156 then explains, "Working with landowners, this could be achieved by creating a series of country parks and/ or reserves and there is also potential to establish a network of dedicated mainly off-road routes or greenways".

Policy 10 states that "Development proposals that contribute to the greening of Salisbury and deliver elements of the Salisbury green and blue infrastructure vision shown in Figure 14 will be supported". However, it then goes onto state:

Major development will have a green infrastructure plan which may be part of the design and access statement setting out how the development will contribute to Salisbury's green and blue infrastructure according to the national Green Infrastructure Framework 15 Green Infrastructure Principles and the Green Infrastructure Standards.

The proposal should also set out how on-site green and blue infrastructure will be maintained and managed over the life of the scheme, but at least 25 years.

Major development will meet the National Urban Greening Factor of at least 0.3 for commercial development, 0.4 for residential development, and where appropriate, 0.5 for residential greenfield development.

All major development will be required to obtain professional landscape and ecological design input and/or be subject to an independent landscape review.

Developments should have no net detrimental impact on the green and blue infrastructure network. Where harm is unavoidable and the harm is outweighed by the need for the development, the harm must be mitigated with at least a net 10% improvement according to Policy 11 and preferably according to Policy 12. Developments should avoid loss of visual amenity or visual access to blue and green infrastructure and loss of quality of routes due to development.

As drafted Policy 10 make no clear distinction between application of the Policy within or without the Salisbury Neighbourhood Development Plan area. The policy refers to Salisbury's green and blue infrastructure network, which by reference to Figure 14 includes areas beyond the neighbourhood plan boundary.

Redrow Homes are particularly concerned that the land north of the Beehive P&R at Old Sarum is identified on Figure 14 as 'Downland County Park / Reserve'. The Regulation 19 draft of the Wiltshire Local Plan allocates approximately 100 dwellings on land north of the Beehive Park & Ride, Old Sarum (Policy 22 and Figure 4.15). Therefore, in this respect, the Salisbury Neighbourhood plan is not in accordance with the emerging Local Plan.

Section 38B(1)(c) of the Planning and Compulsory Purchase Act 2004 (as amended) makes it clear that a neighbourhood development plan may not relate to more than one neighbourhood area. Clause 2 stipulates that only one neighbourhood development plan may be made for each neighbourhood area.

The Laverstock and Ford Communities Neighbourhood Plan 2021-36 was made in October 2022. Therefore, by law, the Salisbury City Local plan cannot apply to that area.

Furthermore, neither the Wiltshire Core Strategy or the Laverstock and Ford Communities Neighbourhood Plan 2021-36 designate areas as Downland Country Park.

Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for, inter alia, conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation (our emphasis).

Paragraph 13 of the NPPF outlines the role of neighbourhood plans in supporting sustainable development:

“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.

Paragraph 18 draws the distinction between strategic and non-strategic matters:

Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies(our emphasis).

Only a draft neighbourhood Plan that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. Clause (e) stipulates that the making of the order (or neighbourhood

plan) should be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

As the Downland Country Park has no status within the Wiltshire Core Strategy (or emerging Local Plan) the Salisbury Neighbourhood Plan fails to meet the basic condition in this respect

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

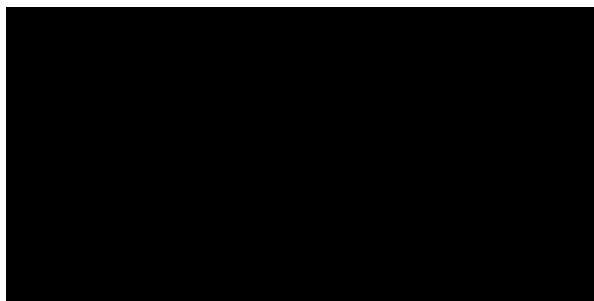
Comment

Agent

Email Address

Company / Organization

Address



Consultee

Redrow Homes (1357448)

Email Address



Company / Organization

Redrow Homes

Address

c/o Agent

GL7 1RQ

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

Redrow Homes (Redrow Homes - 1357448)

Comment ID

32

Response Date

6/1/24 9:28 AM

Status

Processed

Submission Type

Web

Version

0.2

To which part of the Salisbury Neighbourhood
Development Plan does your comment relate?

Page 12, Paragraph 21

Comment:

Paragraph 21 states that:

“Many of the SNDP policies affect these surrounding parishes, particularly in matters of blue and green infrastructure and connectivity.”

As detailed in our representations to Policy 10 (Safeguarding and enhancing green and blue infrastructure), the Salisbury Neighbourhood Plan once made only constitutes part of the Development Plan for the designated neighbourhood plan area it relates to. Legislation stipulates that a neighbourhood development plan may not relate to more than one neighbourhood area.

Paragraph 21 should be amended, for the avoidance of doubt, to make it clear that polices contained within Salisbury Neighbourhood Development Plan only apply within the designated Salisbury Neighbourhood Plan area.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

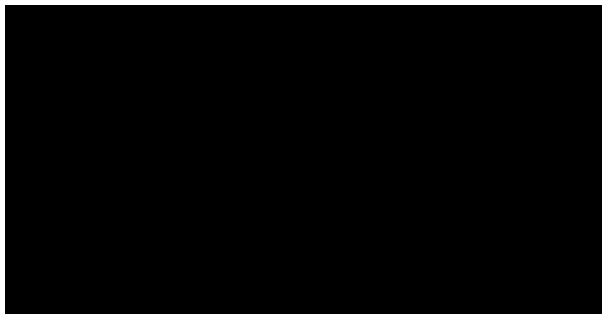
Comment

Agent

Email Address

Company / Organization

Address



Consultee

Redrow Homes (1357448)

Email Address



Company / Organization

Redrow Homes

Address

c/o Agent

GL7 1RQ

Event Name

Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation

Comment by

Redrow Homes (Redrow Homes - 1357448)

Comment ID

33

Response Date

6/1/24 9:29 AM

Status

Processed

Submission Type

Web

Version

0.2

To which part of the Salisbury Neighbourhood Development Plan does your comment relate?

Paragraph 214 and 215

Comment:

The housing requirement

Paragraph 214 of the SNDP identifies that the LPA have advised that there is a requirement for 410 homes in the designated area over the plan period. Paragraph 202 of the Regulation 14 draft SNDP identified that this requirement was based on the brownfield target for Salisbury City as identified in the Local Plan Review Emerging Strategy Paper published in 2021.

However, these brownfield targets have not been included in the latest Regulation 19 Wiltshire Local Plan Review (LPR). Instead, Policy 22 of the LPR proposes a number of large allocations, including Land north of Downton Road (which is partially within the designated SNDP area), a windfall allowance for 350 homes on small sites across the City and an additional requirement for 60 homes within the designated area.

In this context, it is unclear where the proposed requirement for 410 homes proposed in the SNDP comes from. It could arise from a previous proposal for 410 homes on brownfield sites that is no longer being advanced in the LPR, or it could be the combination of the windfall allowance of 350 homes and the additional requirement for 60 homes in the designated area now proposed in the LPR. This will need to be explained to ensure that the SNDP responds appropriately.

The supply of housing

Paragraph 214 of the SNDP states that the estimated number of “windfall sites per annum is likely to be 150-190 based on past trends. Paragraph 215 then extrapolates this figure to assume that over the SNDP period of 15 years, it is likely that 2,250-2,850 new homes will be delivered through windfall development. It then goes on to say; “This far exceeds the amount of development that will be required according to advice from the LPA”.

The windfall allowance of the SNDP is however demonstrably incorrect by a significant margin as is evident from the fact that Policy 22 of the LPR proposes an allowance for 350 homes from windfall development at Salisbury, parts of which are outside of the designated area. Accordingly, it is clear that at most 350 homes will arise from windfall development within the designated area rather than the 2,250-2,850 suggested in the SNDP. Indeed, the allowance of 2,250-2,850 homes from windfall development in the designated area would be circa twice as great as that which will arise across the entire HMA according to the Housing Land Supply Statement of Wiltshire Council (May 2023).

Furthermore, as explained in the latest Housing Land Supply Statement, the windfall allowances of Wiltshire Council make allowances for both brownfield and greenfield development.

Therefore, in the event that the proposed requirement for 410 arises from the now abandoned brownfield targets in a previous paper, not only would the SNDP being prepared on a basis that does not accord with emerging policy, but the SNDP’s reliance upon windfall development alone and part of the greenfield allocation at Land north of Downton Road would provide less than the 350 homes on brownfield sites, as only 350 homes would arise from both greenfield and brownfield windfall developments across the entire City. The SNDP would therefore fall short of proposing policies and allocations to meet its requirement.

In the alternative, namely that the proposed requirement arises from and accords with Policy 22 of the emerging LPR as it should, then the allocation at Land north of Downton Road would not meet this requirement as this is additional to the requirement according to Policy 22, there would only be justification for a windfall allowance of at most 350 homes across the City some of which will be within the designated area, and there would remain a requirement for an additional 60 homes within the designated area. Therefore, similarly on this basis, the SNDP would fall short of proposing policies and allocations to meet its requirement.

On either basis, it is clear that as a result of the SNDP significantly overstating the potential contribution of brownfield windfall sites, there will remain a need for additional sites within the designated area in addition to the allocations proposed outside of the designated area by the emerging LPR. Paragraphs 214 and 215 should therefore be amended to reflect the latest evidence and acknowledge the need for additional supply within the designated area alongside the wider need and continued support for strategic greenfield sites at Salisbury.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Comment

Consultee

Email Address

Address

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

[REDACTED] (1357453)

Comment ID

34

Response Date

6/1/24 1:14 PM

Status

Processed

Submission Type

Web

Version

0.2

Comment:

The inclusion of green field sites in the development plan, especially sites 8&9 in Harnham. To me this is folly. Viable brownfield sites around the city have been overlooked, although they would allow the council to meet its target without concreting over more countryside. Also, windfall sites have been excluded. I think it is important to fit more houses into the central areas of the city where walking and cycling are realistic modes of transport all year, it just on a summer day. There is no hope of sites 8&9 being anything other than car magnets, adding more traffic to already stretched Harnham Gyratory, with all the attendant pollution. It is also a shame to build more light polluting streets so close to the edge of AONB dark skies area to the South of sites 8&9. Greenfield sites should be a last resort after all other options have been explored, not first choice due to the ease of development and profit for developers.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Comment

Consultee

Email Address

Address

Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

(1339048)

Comment ID

35

Response Date

6/3/24 7:00 AM

Status

Processed

Submission Type

Web

Version

0.2

**To which part of the Salisbury Neighbourhood
Development Plan does your comment relate?**

Policy 11 Biodiversity Net Gain

Comment:

This policy for swift bricks is welcome but is not effective due to wording inconsistent with other policies, please amend as per local swift group advice.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?**

Yes

Comment

Agent

Email Address

Company / Organization

Address

Consultee

Email Address

Company / Organization

Address

Event Name

Comment by

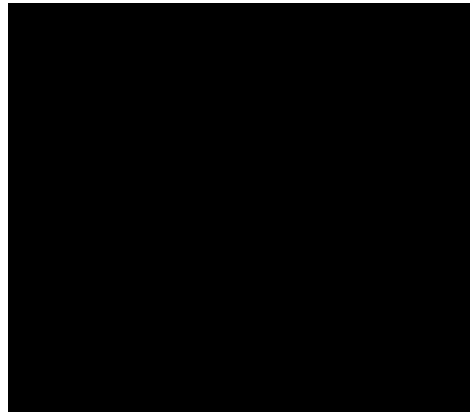
Comment ID

Response Date

Status

Submission Type

Version



Persimmon Homes

4th Floor
1 Newhall Street
Birmingham
B3 3NH

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Persimmon Homes ([REDACTED] - 1357521)

36

5/31/24 1:10 PM

Processed

Email

0.5

Comment:

Please find attached the submission on behalf of Persimmon Homes to the above consultation.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal?

Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

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Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address	
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Policy 14 Local green spaces
The policy wording as drafted simply states:

“The sites identified in Figure 18 and Appendix 3 Figure 66 are designated as Local Green Spaces.”

Figure 18 of the SNDP proposes 131 new Local Green Spaces (LGS) in the neighbourhood plan area. The areas of land proposed as LGS are derived from the areas of open space illustrated in Figure 17 of the SNDP. Paragraph 187 of the SNDP says that all the open spaces identified and described in Figure 17 and Figure 53 ‘meet the criteria for local green space designation’ and are therefore thus designated, as illustrated in Figure 18.

In terms of regard to national policy, planning practice guidance¹ advises that the identification of land for LGS is rarely appropriate where that land has planning permission for development. Figure 18 identifies a number of proposed LGS (not numbered) to the west of parcels 116 and 117 adjacent to the A360. However, these land parcels comprise green spaces within land that benefits from planning permission for 1,250 homes on land north west of Fugglestone Red and Bemerton Heath, Salisbury (S/2012/0814), approved in April 2015. The site is currently under construction. The SNDP is therefore seeking to define land as LGS that is contrary to national guidance. The identification of these parcels as LGS **fails criteria (a) of the basic conditions**. Accordingly, references to these parcels as LGS in Figure 18 should be deleted.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan: YES: NO:

Signature: Date:

Thank you for completing this form.

Data Protection

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¹ PPG Paragraph: 008 Reference ID: 37-008-20140306

prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk .”

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

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Part A – Personal details

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Persimmon Homes	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

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

This policy says that:

“Riparian development will ensure protection of the River Avon SAC in accordance with Core Policy 69 or other relevant local plan policy and paragraph 201”

In terms of general conformity with strategic policies of the development plan, we contend that Core Policy 69 provides sufficient protection for the River Avon SAC, alongside the relevant national planning policy and international legislation¹. It is also unclear what is meant by ‘riparian development’ in the context of development in the SNDP area as this is not defined in the SNDP. We contend that Policy 15 is unnecessary as it does not add anything of substance to the existing protection afforded to the River Avon SAC.

We note that paragraph 201 of the SNDP provides a list of be interpreted as policy criteria that could be applicable to riparian development. However, it is not clear whether this criteria is intended to be applied at the planning application stage in respect to new development proposals. For the wording to have effect in determining planning applications it must be set out in a (non-strategic) policy. We note that paragraph 201 relates to the ‘Salisbury River Park Masterplan’, which does not cover the whole of the SNDP area. If these criteria are to be incorporated into the policy, then the policy needs to clarify that the criteria relates to the land within the River Park and River Park Interface Zone only and not to land outside it.

Furthermore, certain criteria in paragraph 201 are not correct. Notably, the second criteria says that ‘*Landscape schemes should achieve a minimum 10% biodiversity net gain*’. However, practice guidance says that the statutory framework for biodiversity net gain has been designed as a post-permission matter to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission². This means that the 10% minimum BNG is measured across the development as a whole. The criteria included in the policy should reflect this guidance.

At present, the policy is vague, unnecessary, and does not reflect national guidance. It **fails criteria (a) of the basic conditions**.

¹ Special Areas of Conservation (SACs) are protected areas in the UK, designated under the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales

² Paragraph: 002 Reference ID: 74-002-20240214

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[Redacted Signature]

Date:

3/6/2024

Thank you for completing this form.

Data Protection

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Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Part A – Personal details

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	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Persimmon Homes	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Policy 16: Housing mix and affordable housing

Under this draft policy, developments of 10 or more dwellings would be required to achieve a maximum of 60% market housing, including rent and private ownership. Also, except where a different model of affordable housing is agreed, a minimum of 40% affordable housing, to comprise a minimum: - 60% affordable units to be delivered in accordance with current demonstrable needs at planning application stage. In addition, the policy would expect ‘as a rule’ First Homes should be 30% discounted from market rate. And finally, the policy expects 30-40% of affordable housing units Salisbury should be one bedroom.

The relevant strategic policy concerning affordable housing is WCS Core Policy 43. This policy expects at least 40% on sites within the 40% affordable housing zone (which includes Salisbury). Whilst expressed as a requirement, the policy nonetheless acknowledges that provision may vary from site-to-site, both in terms of the mix of affordable homes and the viability of development. National policy says that plans should set out the contributions expected from development; this should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Most importantly, such policies should not undermine the deliverability of the plan¹.

We acknowledge there is a need for additional affordable housing in the Salisbury NDP area. However, Policy 16 has been written as an absolute requirement without any consideration to the caveats providers for in the strategic policies or national policy, notably the need to ensure policies do not undermine deliverability of development. This premise is acknowledged in the Council’s own evidence (Housing Needs Assessment) which says that the evidence (on housing need) presented in the HNA ‘*should be interpreted and used in balance with other factors*’ (para 23).

Notably, no specific viability assessment has been carried out to demonstrate this policy is deliverable alongside all the other policy requirements in the strategic policies and the other SNDP policies. Furthermore, the policy seeks to place a ‘cap’ on the provision of market housing on major sites. This goes significantly beyond the scope of the strategic policies, which do not seek to apply a ‘private market tenure cap’ and is completely unjustified. Seeking to apply such a cap would also undermine the achievement of sustainable development and the need to plan for housing needs including an appropriate mix of housing types for the local community. We note that Basic Conditions Statement (Appendix 3) does not mention this ‘cap’ under the entry for this policy, but nonetheless SCC argue this stipulation is appropriate. We recommend that the 60% cap is deleted from the policy.

The policy also specifies a requirement for 30-40% of affordable homes to be one-bedroomed (flatted) properties. However, the HNA says (para 24) that the 2020 household survey found a much greater emphasis on demand for detached homes compared with the existing tenure mix in Salisbury, and was the most popular choice (with the options broadly descending in popularity as they ascend in density from

¹ NPPF 2023, para 34

detached to flats). A requirement for one-bed homes does not align with the evidence on housing demand from people living locally and also contradicts the purpose of neighbourhood plans, which is to give communities the power to develop a 'shared vision' for their area². This requirement should be deleted from the policy.

We also contend that the reference to First Homes in the policy should be deleted as this merely replicates national policy set out in the NPPF (para 6) and the Written Ministerial Statement on Affordable Homes Update dated 24 May 2021.

Taken together, the policy on tenure mix and affordable housing ignores the aspiration of the local community, is not adequately evidenced, is not in general conformity with the development plan, and has not had regard to national policy. **The policy fails criteria (a), (d) and (e) of the basic conditions.**

Future notification

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Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



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² NPPF 2023, para 29

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Page:

105

Paragraph:

Other:

Comment:

Policy 19: Community infrastructure

Under this draft policy, (second sentence) all planning applications for larger major residential development will be required to demonstrate that there is sufficient community infrastructure within walking distance of the development to meet its needs. Where this cannot be demonstrated, the scheme will be required to make provision for new on-site community infrastructure where possible, or offsite through a developer contribution.

Strategic policies for the provision of community infrastructure are principally set out in WCS Core Policy 3 (Infrastructure Requirements). Under this policy, all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. This approach is proposed to be rolled forward under the WLP review (Policy 5). The first sentence of Policy 19, as drafted, seeks to introduce a further requirement on applicants which would not relate directly to infrastructure associated with the application site. This, in our view, goes beyond the remit of national policy on planning obligations, which must only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development¹. There is also no clear or proportionate evidence provided to justify such a requirement.

Furthermore, national policy says that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. However, the policy does not define what is meant by 'sufficient' in terms of existing community infrastructure available in the wider locality.

Taken together, the draft policy is not in general conformity with the development (Core Policy 3) and has not had regard to national policy in this case. It does not reflect the emerging policy approach on infrastructure provision in the WLP review (Policy 5). In addition, the draft criteria is vague and imprecise, which could lead to confusion for applicants and decision-makers at the planning application stage. **It fails criteria (a) and (e) of the basic conditions**. We recommend the first sentence is deleted from the policy.

Future notification

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Salisbury Neighbourhood Development Plan:

YES:

NO:

¹ NPPF 2023, para

3/6/2024

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Page: Paragraph: Other:

Comment:

Policy 20 Allotments

Under this policy, major residential developments will be expected to make provision for allotments wherever feasible.

In regards to national policy, the Basic Conditions Statement (Appendix 3, page 28) refers to advice in the NPPF (the reference is incorrect – it actually relates para 96c) which says that planning policies should ‘aim’ to enable and support healthy lifestyles for example through the provision of allotments. However, national policy does not prescribe or require the provision of allotments on new development sites. The wording as expressed in Policy 20 goes beyond national policy. The wording **fails criteria (a) of the basic conditions**.

In terms of general conformity, the Basic Conditions Statements merely says that ‘*Core Policy 52 Green Infrastructure does not mention allotments*’. However, the Glossary to the WCS (Chapter 8) defines allotments as one example of ‘Green Infrastructure’ in the district. Core Policy 52 therefore does include allotments. The BCS is incorrect. No other explanation has been provided in the BCS to show how Policy 20 is in general conformity with Core Policy 52. Furthermore, Core Policy 52 does not require the provision of new allotments on new development sites. Such a requirement in Policy 20 is not in general conformity with the strategic policies of the development plan; **Policy 20 fails criteria (e) of the basic conditions**.

In addition, Policy 52 will be replaced by Policy 93 of the WLP (Green and Blue Infrastructure) which will cover allotment provision. Again, this new policy does not require the provision of new allotments in new developments. We would suggest that, in addition to the basic condition failings highlighted above, the approach to planning for allotment as it relates to the SNDP area is a strategic policy matter that is addressed in the WCS (and in future in the WLP). Consequently, there is no need for a separate non-strategic policy on allotments to cover such provision in respect of planning proposals brought forward on sites in the SNDP area.

Taken together, the second sentence of the first paragraph under this policy should be deleted or significantly revised.

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Page: Paragraph: Other:

Comment:

Policy 22 Sustainable Transport

The aspiration to increase the uptake of sustainable modes of transport through development is supported; however, we have concerns as to the subjective nature of the policy wording that may cause confusion and delays at planning and implementation project stages.

Under this policy, developments will set appropriate, challenging targets for modal shift in a travel plan. The policy also refers to strategic Core Policy 60 (Sustainable Transport). The use of the term ‘challenging’ is imprecise and so does not accord with national policy¹ where plans need to be ‘*clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*’. We recommend the term ‘challenging’ is deleted from the policy.

The policy says that developments will support transport schemes and mitigation measures identified in the Salisbury Transport Strategy and the Local Walking and Cycling Infrastructure Plan. This appears to be a blanket requirement on all development and assumes that mitigation measures will be required in all cases. However, national policy says that mitigation measures should be identified where the effects of development are ‘adverse’² or the impacts ‘significant’³. Each individual proposal will have their own potential impacts (both in nature and severity) but the policy does not recognise this. Similarly, the policy does explain how is this criteria is intended to be delivered in practice.

The policy includes a reference to ‘modal’ shift to more sustainable transport modes. However, such a requirement lack any precision and does not add anything in terms of detail to that already set out in the strategic policies (Core Policy 60ii, iv, and v). The wording is unnecessary.

National policy requires policies in plans should ‘serve a clear purpose’⁴. We therefore question how relevant ‘Blue Infrastructure’ is to promoting sustainable transport in an urban context. We would recommend that the focus should be more logically and reasonably on Green Infrastructure and how development can suitably connect to existing green infrastructure network (in accordance with Core Policy 52).

Taken together, the lack of clarity and imprecision in the policy as explained here means the policy fails criteria (a) of the basic conditions. We recommend the policy is deleted or substantially reworded.

Future notification

I wish to be notified of the decision on the draft

¹ NPPF 2023, para 16

² NPPF 2023, para 108d

³ NPPF 2023, para 114d

⁴ NPPF 2023, para 16f

Salisbury Neighbourhood Development Plan:

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Page:

126

Paragraph:

Other:

Comment:

Policy 23 Cycling and Walking Infrastructure

Under this policy, development will be supported where it makes contributions towards sustainable transport provision including for the mobility impaired according to Core Policy 61, and after making provision for the Local Walking and Cycling Infrastructure Plan and provision made for improvements to wider walking and cycling connectivity, as shown in Figures 32 and 33 of the SNDP.

However, connecting to identified routes, as shown in Figure 32 and 33, may not act as the primary desire line to facilities and amenities from a given location or site. The policy does not allow for suitable alternative solutions can achieve this objective, notably the potential whereby development is linked to local trip attractors to facilitate convenient active travel for future site occupants. The policy is overly restrictive and too narrowly focused, which could undermine the achievement of sustainable development by preventing the provision of appropriate measures that can otherwise support the delivery of the policy. This is contrary to national policy and the need for plans to contribute towards the achievement of sustainable development¹ and is not positively prepared². The policy **fails criteria (a) and (d) of the basic conditions.**

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¹ NPPF 2023, para 16a

² NPPF 2023, para 16b

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Policy 24 Cycle Parking
Under this policy, cycle parking and storage will be required for new developments, or residential conversions, as required by Wiltshire Council’s cycle parking policy.

In terms of regard to national policy, the Basic Conditions Statement says that this policy is in support of NPPF para. 106d (this is wrong - the correct reference is para 110d) which requires planning policies to provide for attractive and well-designed cycling networks with supporting facilities such as secure cycle parking. However, the SNDP misapplies national policy, which actually says ‘*Planning policies should... provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans) ...*’. Under national policy, there is no such requirement for any development to include provision for cycle storage. Policy 24 goes beyond the scope of national policy, and so **fails criteria (a) of the basic conditions**.

Furthermore, in respect of general conformity to the strategic policies, the Basic Conditions Statement refers to Core Policy 61 and says this policy “*...prioritises cycling over all other modes of transport except that for the visually impaired/disabled and pedestrians. This NDP policy provides a “sustainable transport improvement” as set out in the policy.*” Core Policy 61 encourages the use of sustainable transport alternatives and the consideration of cycling alongside other forms of transport when preparing transport assessments. Policy 61 does not ‘prioritise’ cycling over other forms of transport or ‘require’ cycle storage as part of new development. This is a misrepresentation of a strategic policy, which seeks to elevate cycling above other transport modes. Policy 24 is clearly not in general conformity with the strategic policies of the development’ it **fails criteria (e) of the basic conditions**.

Taken together, the aspects of Policy 24 highlighted above fails the basic conditions. We recommend the wording in the first paragraph of the policy ‘*will be required for*’ is deleted, and replaced with ‘*should be provided on*’.

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Paragraph:

Other:

Comment:

Policy 1 Tree planting for carbon capture

Under this policy, major development will aim to provide a minimum of 30% of the total site area of tree canopy cover after the first 15 years from completion of the development. Where this is not possible, provision may be made offsite according to (SNDP) Policy 12. In addition, all planning proposals that have more than 10 metres of road frontage will be required to provide at least one roadside tree where there are no overriding reasons why this will not be possible. One tree will be required for every additional 10 metre length of roadside. Where it is not possible to provide a roadside tree planted in soil, it will be necessary to make a contribution towards off site provision within Salisbury.

We do not object to the provision of new tree planting on new development sites in principle; tree planting clearly has a role to play not just in tackling climate change, but also in terms of enhancing the overall quality and character of new development.

However, national policy¹ says that “Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.”

The direction of national policy is based on encouraging and supporting the provision of trees on sites where opportunities allow; it does not advocate prescribing minimum standards in plans (in this case a minimum of 30% tree coverage) for tree coverage on major sites. It also the case that strategic Core Policy 52 of the WCS does not advocate setting minimum site areas or areas set aside along the roadside dedicated to trees on new developments and does not prescribe one tree for every ten metres of road frontage. The requirement for a roadside tree every 10 metres also has implications for street design including parking and location of services, along with long term maintenance. Accommodating such trees can lead to contrived layout solutions and the loss of net developable area (particularly where planted verges are provided). This undermines the pursuit of well-designed development required under national policy².

Policy 1 also ignores other national policy which says that plans should set out developer contributions expected from development; this should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Most importantly, such policies should

¹ NPPF 2023, para 136

² NPPF 2023, para 139

not undermine the deliverability of the plan³. Insisting on 30% tree coverage on development sites and provision of roadside trees will inevitably reduce the developable area and thus introducing a significant cost burden on development. However, the SNDP presents no evidence on the potential impact of this policy is likely to have on the viability, and thus the deliverability, of development sites in Salisbury.

These aspects of national policy and strategic policy have not been taken into account in the Basic Conditions Statement under Policy 1 (Appendix 3, page 17). Similarly, the approach is not supported by an appropriate evidence base. Taken together, the **first paragraph of Policy 1 fails criteria (a) and (e) of the basic conditions** and should be deleted or significantly revised.

Furthermore, there are a number of potential conflicts between this policy and other policies of the SNDP. Firstly, the requirement for minimum 30% tree cover on sites under this policy and the requirement to protect views of Salisbury Cathedral and spire under Policy 9. This includes protecting the Strategic Approach View of the cathedral and spire along Downton Road (A338). Any planting of trees or woodland areas within this corridor to the south will have to be carefully considered in terms of making sure these view are not obscured. Similarly, the requirement to safeguard land for trees on sites could also undermine delivery of public open space under Policy 13 (which can also perform the due role of keeping land open in order to safeguard views of the cathedral).

These are clearly conflicts that are very likely to arise when considering proposals for development, given the importance of the cathedral and spire in terms of its architectural and historic significance. However, the SNDP is silent on how these potential conflicts should be resolved. This creates uncertainty for both applicants and the decision-maker, which could cause undue delays when determining individual planning applications in the area. This contravenes national policy which says that plans contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals and should have serve a clear purpose⁴. For this reason, the **first paragraph of Policy 1 fails criteria (a) of the basic conditions** and should be deleted or significantly revised.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

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³ NPPF 2023, para 34

⁴ NPPF 2023, para 16

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Page:

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Paragraph:

Other:

Comment:

Policy 2 Air Quality

Under this policy, the first paragraph says that when fulfilling the requirements of Core Policy 55 in Salisbury, particular regard will be had to how the scheme design avoids the creation of NO₂ and PM₁₀ in Air Quality Management Areas. The second paragraph of the policy says that when fulfilling the requirements of Core Policy 55, transport assessments should address how the transport impacts of the development will result in acceptable air quality locally and will not lead to the breaching of air quality objectives within an existing Air Quality Management Areas or elsewhere.

In terms of regard to national policy and guidance, the Basic Conditions Statement (SNDP, Appendix 3) refers to national policy which says that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. National policy also says that planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan¹. Furthermore, national policy says that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be 'severe'². This means that impacts from emissions are permissible (and inevitable) as part of any new development, provided the likely impacts of those emissions are not significant and can be cost effectively mitigated, in line with national policy³.

However, as drafted, the first paragraph points to an avoidance of NO₂ or PM₁₀ emissions within the Salisbury AQMA altogether. The word 'avoid' within this context could lead to a number of interpretations. More clarity is required to determine whether absolutely no increase in pollutants is allowed, or whether a minor change would be acceptable. Should the former be applicable, this would lead to complications with the majority of development as any additional vehicle movements within an AQMA would cause an increase in pollutant concentrations. Furthermore, avoiding emissions within the AQMA is arguably undeliverable as any additional vehicle movements within an AQMA from new development are likely to cause an increase in pollutant concentrations.

The first paragraph of the policy clearly goes beyond the scope required in national policy regarding air quality and new development, and could also lead to confusion in how the wording show be interpreted and applied at the planning application stage, contrary to national policy and the need for clearly written and unambiguous policies in plans that serve a clear purpose⁴.

¹ NPPF 2023, para 192

² NPPF 2023, para 115

³ NPPF 2023, para 114d

⁴ NPPF 2023, para 16

The second paragraph of the policy covers the requirements in regards to transport assessments should show how developments will not lead to the breaching of air quality objectives within an existing Air Quality Management Area. This statement does not appear to be logical. As outlined in the Department for Environment Food and Rural Affairs (DEFRA) guidance '*Local Air Quality Management Technical Guidance (TG22)*'⁵, an AQMA is declared due to an 'exceedance' of an air quality objective. As such, pollutant concentrations would be expected to already be breaching the relevant criteria within the designation irrespective of any proposed development. Within the second paragraph reference is also made to encouragement towards the reduction in traffic impacts on Salisbury's AQMAs. This is contradictory to paragraph one which states a requirement for the avoidance of pollutants within these areas. The reduction of traffic does not infer that absolutely no traffic can travel within this area. In which case, any traffic that routes through the designation will subsequently increase pollutant levels in an area where it is expected this will be avoided. This is another example of how the policy lead to confusion in how the wording show be interpreted and applied at the planning application stage, contrary to national policy.

Taken together, the wording in the first and second paragraphs of the policy **fail criteria (a) of the basic conditions**.

In respect of general conformity with the strategic policies, Core Policy 55 (Air Quality) makes provision for mitigation measures that can have a positive contribution to the AQMA and Wiltshire Air Quality Actin Plan. This policy aligns with the national policy highlighted above. However, no reference is made in Policy 2 to those potential mitigation measures identified in Core Policy 55 that can help alleviate the potential impacts from emissions, or any cross-reference to them. The lack of any consideration of the potential for limiting the level of emissions in the policy, as opposed to avoidance, is not in general conformity with the strategic policies. **The policy fails criteria (e) of the basic conditions**.

The policy as drafted is confusing and unhelpful for applicants and decision-makers on maters relating to air quality. Furthermore, given that air quality issues in the SNDP area are already adequately covered by the strategic policies and national policy, the policy is also unnecessary. We recommend that Policy 2 should be deleted.

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⁵ Local Air Quality Management Technical Guidance (TG22), DEFRA, 2022.

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Page: Paragraph: Other:

Comment:

Policy 3 Carbon Neutral Development

According to the Basic Conditions Statement (Appendix 3, page 18) this policy is intended to provide ‘interim guidance’, which will replace the current strategic WCS policy (Core Policy 41) prior to adoption of the Wiltshire Local Plan and a new policy dealing with sustainable construction and low-carbon energy (Policy 83). However, neighbourhood plans can only include non-strategic policies¹. It is therefore not the role of neighbourhood plans, including the SNDP, to propose new strategic policies even if they are intended to be ‘interim’ or if the adopted strategic policies are deemed out of date (as SCC suggest).

In addition, Policy 3 would require the provision of two Electric Vehicle Charging Points (EVCPs) on all new residential development plots where parking is provided. EVCP infrastructure falls into the category of ‘demand management measures’ defined in the WLP (Policy 73). The WLP (paragraph 5.44) clarifies that along with parking, traffic management measures are a key component of any integrated approach to transport planning. This is further evidence that transport-related infrastructure, including provision of EVCPs, is a matter for the strategic policies to address.

In addition, the policy says that a Sustainable Energy Strategy will be required to address climate change adaptation and sustainable construction in new development proposals. This includes a requirement to show how development will provide an improvement on Part L (2013) or subsequent replacement document of the Building Regulations through energy efficiency measures. These would, if made, establish local energy standards specific only to the SNDP area. However, RPS points the Examiner to the recent Written Ministerial Statement (WMS) dated 13 December 2023², which clarifies that local standards that go beyond standard set at national level are not supported as a matter of principle at the local level. The WMS says:

“...the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- *The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).”* (RPS emphasis)

¹ NPPF 2023 para 18

² <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

Consequently, with respect to Policy 3, net zero carbon homes cannot be demanded. The SNDP has effectively ignored the WMS and the which is equivalent to national policy in the NPPF. Furthermore, no local evidence has been provided in the SNDP which has addressed these matters in order to justify this requirement. Similarly, the introduction of the Future Homes Standard, expected in 2025, sets out that FHS homes will need to be 'Zero Carbon Ready', which will render any local standards set out in the SNDP as out of date.

In terms of its implementation at the planning application stage, Policy 3 also provides very limited practical guidance, if any, as to how an applicant is to address low-carbon development in the SNDP area that is not available in national policy, other guidance on climate change³, or the relevant building regulations (under Part L).

For these reasons, we suggest that Policy 3 is unnecessary, unjustified, and runs counter to the purpose and role of the neighbourhood planning process, which is to shape and direct development outside the strategic policies⁴. **The policy fails criteria (a) of the basic conditions.** We request that the Examiner deletes this policy.

Future notification

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Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[Redacted Signature]

Date:

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³ [Climate change - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁴ NPPF 2023, para 29

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Page:

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Paragraph:

Other:

Comment:

Policy 5 Habitats Regulations

Under this policy, development that is not allocated in the Wiltshire Core Strategy must demonstrate phosphorus neutrality.

This criteria appears to be a 'bolt-on' to the policy which has nothing to do with the habitat regulations or development that might affect an international protected site. Furthermore, any decision to preclude development on non-allocated sites in the WCS was a matter for consideration as part of the adoption of the WCS at the time. It is not appropriate to seek to insert a modification to the WCS via the SNDP now. No evidence has been provided to justify this approach, in any event. It is also unclear what purpose this particular criteria would serve¹, given that any development (allocated or non-allocated) could have an impact on a protected site in terms of impact from phosphates.

The inclusion of this criteria in the policy is unjustified and unnecessary and would not serve clear purpose. It **fails criteria (a) of the basic conditions**. The wording relating to phosphorus neutrality should be deleted.

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¹ NPPF 2023, para 16f

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Policy 6 Design in the built environment

Under this policy, 'generic design approaches will not be tolerated'.

In terms of regard to national policy, plans should at the most appropriate level set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable¹. Furthermore, it makes clear that development that is 'not well designed' should be refused especially where it fails to reflect local design policies and government guidance on design². We note that 'generic' design (whatever this may be) is not precluded in principle in national policy or guidance. This aspect of national policy is not reflected in the Basic Conditions Statement.

National policy also requires that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and should have a clear purpose³. The use of the term 'generic design will not be tolerated', however, is imprecise and open to significant interpretation in regards to the design merits of individual development proposals. Furthermore, seeking to apply an outright, blanket restriction on a certain design concept will not, in itself, promote well-designed development.

In respect of general conformity with the strategic policies, the Basic Conditions Statement rightly refers to Core Policy 57 (Ensuring High Quality Design and Place Shaping). This strategic policy promotes high quality design, but does not preclude any particular style or design approach. Similarly, the emerging policy in the WLP (Policy 98) also promotes high standards of design but does make any reference to what is 'generic' or otherwise. Policy 6 goes beyond the strategic policies of the development plan, but in doing so creates more uncertainty than clarity for applicants and decision-makers. The approach is not positive in nature and so in not in general conformity, and so **fails criteria (e) of the basic conditions**.

We also note that the SNDP is supported by the *Salisbury Design and Advertising Guide (submission draft September 2023)*. Paragraph 98 of the SNDP says that the guide has been prepared to accompany this SNDP which sets out detailed design considerations for all development and must be read in conjunction with the policies in this SNDP. The guide includes some references (para 104) to 'off the peg' (generic) design which, the SCC's opinion, has characterised recent developments that has reduced the distinctiveness of different neighbourhoods throughout the city. However, the guide provides no further explanation on this. Similarly, the 'recent developments' SCC refers to were presumably deemed to be acceptable in design terms in accordance with the development plan and consistent with national policy, otherwise they would not have been approved.

¹ NPPF 2023, para 132

² NPPF 2023, para 139

³ NPPF 2023, para 16

Paragraph 57 of the guide includes a footnote which makes reference to biodiversity net gain metric 4.0. This is incorrect. The metric 4.0 has since been superseded by a statutory BNG metric, titled *Statutory biodiversity metric - published 29 Nov 2023 (updated 12 Feb 2024)*⁴. The guide should include the correct reference source.

Taken together, the policy, as drafted, is unhelpful and potentially confusing for applicants and decision-makers. Inclusion of the term 'generic' does not reflect national policy and so **fails criteria (a) of the basic conditions**. Furthermore, Policy 6 goes beyond the strategic policies of the development plan, but in doing so creates more uncertainty than clarity for applicants and decision-makers. The approach is not positively drafted in support of design solutions and is not in general conformity, and so **fails criteria (e) of the basic conditions**. Furthermore, sufficient policy coverage on design matters is provided in the development plan (both adopted and emerging) and national policy and guidance and is therefore unnecessary. The sentence to 'generic design will not tolerated' should be deleted.

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⁴ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

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Policy 9 Protecting key views in Salisbury

Under this policy, planning permission will only be granted for development that does not exceed 12.2 metres (40 feet) in height.

In terms of general conformity with the strategic policies, the Basic Conditions Statement (Appendix 3, page 21) refers to Core Policy 9 (Salisbury Skyline). Core Policy 22 makes very clear that the 12.2m height restriction (above sea level) is applicable to sites within the ‘Salisbury Central Area’ and does not relate to any other parts of the district. The Salisbury Central Area is focused on an area that envelopes the City centre and the cathedral broadly defined by the A36, and which does not extend any further south than the junction with New Bridge Road and River Avon. However, the BCS says that Core Policy 22 has been ‘updated’ and by doing so Policy 9 now seeks to establish a blanket restriction on all development within the SNDP area limited to that which does not exceed 12.2 metres in height. Such a blanket restriction on building heights literally goes significantly beyond the scope of the strategic policies of the development plan, is unduly onerous, and is not supported by an appropriate evidence base.

National policy says that neighbourhood plans should only include non-strategic policies¹ and that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine the strategic policies². It is not the role or purpose of neighbourhood plans to seek to ‘update’ strategic policies of the development plan; this can only be done through a review of the development plan. SCC argue that Core Policy 22 is not a strategic policy. In our opinion, issues relating to Salisbury Cathedral is very likely to be of considerable interest to not only the local community in Salisbury and other interest groups, but also the wider community of Wiltshire and national stakeholders, including Historic England. SCC’s suggestion that the cathedral is not a ‘genuinely strategic matter’ is spurious and unjustified.

Such a blanket restriction on building heights is unduly onerous and is not supported by an appropriate evidence base, and is also dis-proportionate in nature.

For these reasons, the proposal to extend the height restriction on development across the whole of the SNDP **fails criteria (a) and (e) of the basic conditions.**

Future notification

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Salisbury Neighbourhood Development Plan:

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¹ NPPF 2023, para 18

² NPPF 2023, para 28

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Persimmon Homes	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Policy 10 Safeguarding and enhancing green and blue infrastructure

Under this policy, major development will meet the ‘National Urban Greening Factor’ of at least 0.3 for commercial development, 0.4 for residential development, and where appropriate, 0.5 for residential greenfield development, and developments should have no net detrimental impact on the green and blue infrastructure network. The SNDP also includes a map (Figure 14) showing new proposals for Green and Blue Infrastructure (GBI) in and around the SNDP area linked to this policy.

In terms of regard to national policy, the Basic Conditions Statement highlights that green infrastructure is to be addressed in strategic policies¹. This is because strategic policies address the overall strategy for the pattern, scale and design quality of places. The whole basis underpinning Policy 10 is the Wiltshire Council’s Green and Blue Infrastructure (GBI) Strategy (February 2022). Section 1.3 of the GBI strategy states:

“The GBI Strategy as a whole is a material planning consideration as it supports GBI policy in the Wiltshire Local Plan. Settlement GBI Frameworks will be prepared to provide more detailed planning guidance on local priorities and opportunities for GBI provision in and around key settlements.”

Emerging strategic Policy 93 of the WLP explains that green and blue infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green and blue infrastructure network in accordance with the Wiltshire Green and Blue Infrastructure Strategy and GBI Settlement Frameworks will be supported. Developer contributions to support such initiatives will be required where appropriate.

Any new or revised approach to green (and blue) infrastructure across Wiltshire and Salisbury NDP area is plainly a strategic policy consideration to be addressed through the WLP process. Whilst at an advanced stage, the WLP and the GBI Strategy has yet to be tested at examination and does not form part of the development plan. Given the strategic nature of GBI, it is inappropriate for the SNDP (which must only include non-strategic policies²) to seek to designate specific areas of land within the SNDP for GBI purposes before the WLP and its supporting evidence have been suitably tested at examination. The SNDP has not had regard to national policy in this case, and **so fails criteria (a) of the basic conditions**.

In respect of general conformity with the strategic policies, Core Policy 52 (Green Infrastructure) does not define any requirement relating to ‘urban greening factors’ for new residential development. The Urban Greening Factor concept is set out in *Urban Greening Factor for England User Guide* issued by Natural England in 2023³ and so do not form part of the development plan or national policy; their use is also

¹ NPPF 2023, para 20

² NPPF 2023, para 18

³ Urban Greening Factor for England User Guide Green Infrastructure Standards Framework – Principles and Standards for England Date: January 2023 Urban Greening Factor Report 3.3 Version: 1.1

intended to be voluntary. Simply because the strategic policies may pre-date this advice does not justify the arbitrary insertion of elements from this guide into the SNDP. Any potential to include 'Urban Greening Factors' in Wiltshire is another strategic issue that is most appropriately addressed through the WLP. Policy 10 seeks to go beyond the strategic policies and so **fails criteria (e) of the basic conditions**.

Furthermore, there is no reference or recognition in Policy 10 of the emerging site allocations proposed in the WLP. This includes Land north of Downton Road (identified under WLP Policy 26). Policy 26 includes proposals for a significant amount of new and enhanced green infrastructure to support the residential element to be brought forward through the allocation. Accordingly, the policy should be revised to acknowledge the role new site allocations will have in addressing GBI in the SNDP area. In addition, figure 14 map should be amended to exclude any designations that cover sites that are proposed for allocation in the WLP.

We also note that figure 14 also highlights land areas outside the SNDP designated area and which falls within neighbourhood parishes, in particular land leading south eastwards along Downton Road. The map should be revised to ensure it relates solely to within the SNDP area.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

3/6/2024

Thank you for completing this form.

Data Protection

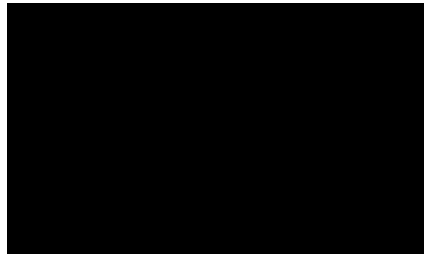
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346721)

Comment ID

37

Response Date

5/31/24 3:51 PM

Status

Processed

Submission Type

Email

Version

0.4

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

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Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		

Address Line 4	
Postcode	
Telephone Number	
Email Address	

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

*Brownfield Sites.
Why are Brownfield sites at Quidhampton Quarry, Brown Street and Churchfields totalling 480 homes not included in the current version of the SNDP? They appeared in the earlier Regulation 14 version. A further 200 homes in the Maltings and Central Car Park are not reflected in the housing allocation. The Basics Conditions Statement makes the point that "the Local Plan Review has made an incorrect assumption that there is insufficient brownfield land available and that Greenfield site allocations are necessary."*

Taking these numbers of brownfield site homes it would mean that sites 8&9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & 28) envisages the building of 300+ homes would not be necessary. These sites are on much needed agricultural land which also provides open space for recreation as well as feeding the nation. Road access to these sites are already overloaded and there is no mitigation for the traffic.

It should be recommended that these brownfield sites are included in both the SNDP and Local plan which would make the requirement of development on sites 8&9 unnecessary and help make the Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

31/05/24

Thank you for completing this form.

Data Protection

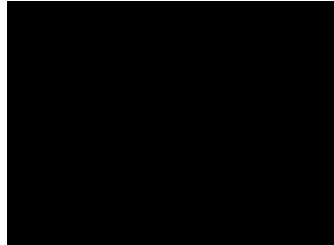
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346693)

Comment ID

38

Response Date

5/31/24 4:00 PM

Status

Processed

Submission Type

Email

Version

0.6

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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First name	
Last name	
Job title <small>(where relevant)</small>	
Organisation <small>(where relevant)</small>	
Address Line 1	
Address Line 2	
Address Line 3	

Address Line 4	
Postcode	
Telephone Number	
Email Address	

Part B – Please use a separate sheet for each draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

I believe it is vital that Brownfield sites be used as a priority for new housing, thereby reducing the necessity for the use of Greenfield sites. I understand that sites at Quodhampton Quarry, Brown St and Churchfields, which were included in the earlier version of the SNDP, have since been omitted without explanation. This has implications for the inclusion of Sites 8&9 in the Local Plan which will not only result in the loss of prime agricultural land much enjoyed as a recreational space, but will also exacerbate the already fraught traffic volumes feeding into the Hamham gyratory.

I understand there has been a significant underestimate of properties that could be built on windfall sites and would like to request that this be remedied in order to maximise the scale of new builds without requiring the loss of much valued green spaces.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

 Y

NO:

Signature:

[Redacted Signature]

Date:

31/5/24

Thank you for completing this form.

Data Protection

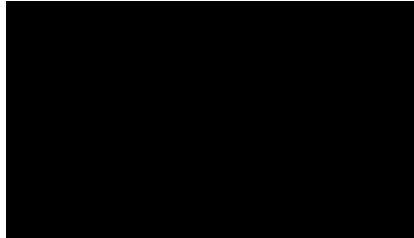
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1348349)

Comment ID

39

Response Date

5/31/24 6:48 PM

Status

Processed

Submission Type

Email

Version

0.7

Comment:

Dear Sir / Madam,

please find attached my comments regarding the Draft Salisbury Neighbourhood Development Plan (2020 – 2038).

Regards,

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield and windfall sites

On the issue of safeguarding green spaces, which I take to include spaces currently used for farming and as near-natural habitat by wildlife, the draft plan does not give a clear explanation as to why three recognized brownfield sites in Salisbury, which have been assessed to be suitable for 480 homes, and a substantial number of so-called windfall sites, have not been included in the draft plan. As a consequence, greenfield sites have been unnecessarily included in the Local Plan, with the potential for a concomitant loss of habitat for wildlife, loss of land currently used for food production, and excessive traffic pressure in systems such as the Harnham gyratory.

It seems logical, sounder, and more sustainable to include brownfield sites and windfall sites in the draft Wiltshire Council Local Plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[REDACTED]

Date:

Thank you for completing this form.

Data Protection

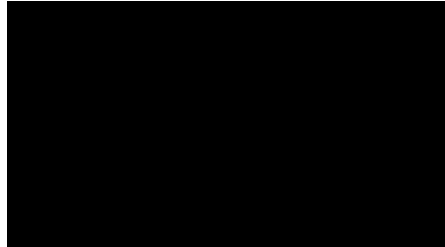
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Comment

Consultee

Email Address


Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346700)

Comment ID

40

Response Date

5/31/24 8:18 PM

Status

Processed

Submission Type

Email

Version

0.5

Comment:

Dear Sir/Madam

I have attached the form with my comments on the draft Salisbury Housing Development Plan.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

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Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

x

Comment:

I am writing in response to the draft plan as there is a failure to address the fact that brownfield sites could be used in Salisbury, to provide a substantial number of houses. There are highly significant reasons why brownfield sites, and windfall sites, should be developed for housing, rather than using greenfield sites. In particular, it would be more appropriate to use sites identified as brownfield so that the sites referred to as 8 and 9 continue to be used as farmland/green spaces. Developing sites 8 and 9 would cause major problems for residents in new houses and in older housing stock. The very busy high-speed Coombe Bissett Road does not have pavements on either side. Any residents walking to the city centre would necessarily have to use Old Blandford Road, also without pavements. This very narrow road already presents a danger to walkers as two cars cannot pass without mounting the verges along much of the road. The brown field sites identified in Salisbury are closer to usable infrastructure so that adults, and particularly children, can move around with greater freedom and safety without the use of the car for all journeys. This has health and social implications for our young people as they grow up.

In addition to these considerations there are further environmental and food security reasons why brownfield and windfall sites should be developed for housing instead of the constant erosion of the countryside.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signatur



Date:

Thank you for completing this form.

Data Protection

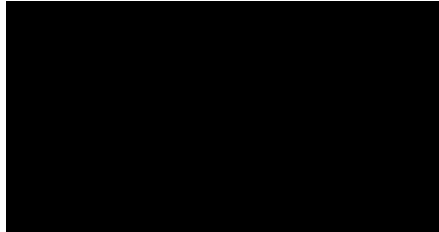
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by

 (1357604)

Comment ID

41

Response Date

5/31/24 8:24 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Hi,

I enclose comments on the subject Development Plan as my contribution to the consultation.

A submission date of 3 June was indicated.

Thankyou

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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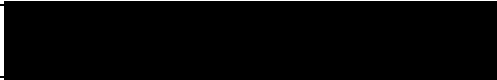
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Title		NA
First name		
Last name		
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Organisation (where relevant)		
Address Line 1		
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Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

Brownfield sites

- There is not a clear explanation about why three brownfield sites, which could accommodate 480 homes, have been dropped from this plan.
- This means that plans for greenfield sites are unnecessarily included in the Local Plan.
- Brownfield sites should be included in the draft Wiltshire Council Local Plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan

‘Windfall’ sites

- It is not clear why the housing allocation for ‘windfall’ sites in this plan and the Council’s own Housing Land Supply Statement [dated March 2023] have not been reflected in the draft Wiltshire Council Local Plan. These documents show 2 to 3 times the number of ‘windfall’ sites compared with the Local Plan.
- This means that plans for greenfield sites are unnecessarily included in the Local Plan.
- Higher ‘windfall’ numbers should be included in the Local plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

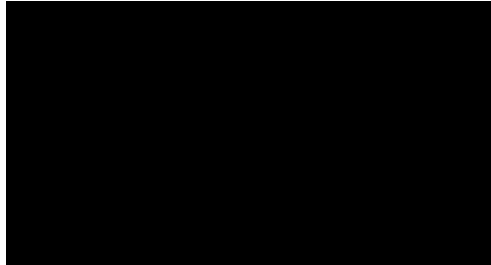
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by



(1346522)

Comment ID

42

Response Date

6/1/24 11:56 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached two separate responses to the SNDP consultation.

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Whilst recognising the requirement for the SNDP to align with the Regulation 19 draft of the Wiltshire Local Plan, I would like to make the following observations in relation to the revised neighbourhood area housing requirement of 60 dwellings [para 204].

Comparison to SNDP Regulation 14 Draft

The Regulation 14 draft SNDP quoted written advice from the Wiltshire Council Head of Spatial Planning that:

“the indicative figure for the Salisbury neighbourhood area for the purpose of neighbourhood planning would be 410 homes, which the neighbourhood plan should aim to meet through new sites. As you appreciate, this is based on the brownfield target proposed in the recent consultation on the Local Plan Review which set a figure for the 10-year period 2021 to 2031 on the basis that plans would be reviewed and new sites could be introduced if necessary.”

This is referenced in the SNDP as a requirement for neighbourhood planning, to 2036 [para 204] or “over the SNDP period” [para 218].

The apparent source of this figure is the analysis in Wiltshire Council’s Emerging Spatial Strategy, published January 2021. This clearly establishes that 410 dwellings is the brownfield completion target for Salisbury Principal Settlement in a 10 year period (2021-2031); based on a 10-year (2009-2019) average of brownfield permissions of 57.1 dwellings per year, calculated for sites of up to 100 dwellings, and then incorporating a suitable downscaling for the proportion of permissions which are actually delivered.

The written advice from WC to SCC quoted above is similarly clear that this target applies for a 10-year period; and so **an equivalent target for the full 18-year SNDP / LP period would in fact be 738 dwellings.**

Basis for Regulation 19 LP Requirement

The revised Salisbury neighbourhood area housing requirement of 60 dwellings is stated, without justification, in the Regulation 19 Local Plan, Policy 22, and the Wiltshire Council Revised Spatial Strategy, published September 2023. The RSS remarks that justification is provided in “separate papers” but no specific reference is provided. It is impossible to accept such a massive reduction (only 15% of the 410-dwelling figure) without clear reasoning on the part of WC.

Given the introduction of a separate 350-dwelling “small sites” allocation in the Regulation 19 Local Plan, Policy 22, it is assumed that 60 dwellings simply represents the balance of the previous 410-dwelling allocation – noting as set out above, that this should apply to a 10-year period only.

Continued overleaf

This effectively equates the neighbourhood requirement with “large” (i.e. 10 or more dwelling) brownfield sites only, although there is no basis in the NPPF or Government guidance on neighbourhood planning that constrains a neighbourhood area housing requirement to brownfield sites, let alone sites of any particular size.

It is not clear (the LP and its supporting documents provide no justification) why WC now believes a specific “small sites” allocation to be within the remit of strategic allocation, when this was not so in previous drafts of the Local Plan. As SNDP [para 218] states:

“NPPF para 22 states that LPAs are responsible for strategic policies and that these should be limited to those necessary to address strategic priorities for their areas to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are appropriately dealt with through neighbourhood plans or other non-strategic policies.”

It is entirely unnecessary for the LP to distinguish between unidentifiable “small sites”, and a residual neighbourhood area requirement. **All non-specific housing allocations should be included in the neighbourhood requirement, and the final versions of both the LP and SNDP should reflect this.**

Historic Completion Data

SNDP [para 206 and 207] quote data supplied by WC, stating that 778 new dwellings were completed in Salisbury parish in a 5-year period between 2016 and 2021; an average of 156 dwellings per year. It is assumed that this refers to all completions in this period, notwithstanding the later reference to “windfall” completions in [para 218]. The Basic Conditions statement supporting the SNDP asserts a total of 579 completions on brownfield land (116 dwellings per year) in the same period.

The most recent Housing Land Supply Statement (HLSS) published by Wiltshire Council in September 2023 provides longer term completion data. HLSS Appendix 6 states that for a 16-year period from 2006 to 2022, there were:

- 4058 completions in Salisbury [Principal Settlement]
- 8197 completions in the South Housing Market Area

This implies a long-term average of 254 completions per year in Salisbury; and that Salisbury constitutes approximately 50% of the South HMA.

This provides context for the historic data on windfall completions within Wiltshire and each HMA in Appendix 5 of the HLSS – where windfall is defined as unallocated development, in line with the NPPF definition of “sites not specifically identified in the development plan”.

From HLSS Chart 2, Chart 3 and Chart 4, for the 16-year period in the South HMA, there were approximately:

- 910 windfall completions on brownfield small sites ⇒ average 56.9 per year
- 890 windfall completions on brownfield large sites ⇒ average 55.7 per year
- 425 windfall completions on greenfield small sites ⇒ average 26.6 per year

While the HMA is not homogenous, it is reasonable to suggest that pro-rata historic windfall completions in Salisbury could therefore be of the order:

- 28 dwellings per year on brownfield small sites
- 28 dwellings per year on brownfield large sites
- 13 dwellings per year on greenfield small sites

Continued overleaf

The HLSS argues that, whereas completions on small sites have remained relatively stable, completions on brownfield large sites have declined in recent years, and future allowances for large sites should be based on permissions since April 2019 only.

Extrapolating a long-term trend, applicable to an 18-year plan period, from only 3 years of historic data, is extremely questionable. Factoring in the impact of COVID-19 lockdowns within these 3 years only increases the likelihood of this being a poor predictor of future long-term delivery.

Moreover, Chart 3 shows any such short-term trend is driven largely by a decline in the North & West HMA, and any trend for the South HMA is far less clear (indeed, there were more large-site brownfield completions in 2020 than any other year shown!)

Assuming long-term future delivery in the South HMA and Salisbury to be broadly similar to long-term historic completions, it is therefore possible that in the full 18-year plan period, 2020 to 2038, there could be of the order:

- 500 dwellings on brownfield small sites
- 500 dwellings on brownfield large sites
- 230 dwellings on greenfield small sites

This suggests **a total of around 1200 windfall completions is plausible for Salisbury over the 18 year plan period**. This is still less than half the total potential delivery of 2250 to 2850 dwellings in 15 years, which the SNDP asserts is possible in [para 215]; and less than 60% of the quoted 579 brownfield completions for Salisbury parish between 2016 and 2021, on a per annum basis.

Summary

- Strategic allocations in the Local Plan should be constrained to specific sites only. All remaining housing requirement is non-specific and thus, by NPPF definition, to be delivered as “windfall” development. This should be included in the neighbourhood area requirement, without any qualification as to how this should be delivered (i.e. on “small sites”).
- The neighbourhood allocation of 410 dwellings – now apparently divided between a 350-dwelling LP allocation for non-specific small sites, and a residual 60-dwelling neighbourhood area designation – applies to a 10-year period only. The neighbourhood allocation for the full 18-year LP and SNDP period should thus be at least 738 dwellings.
- Historic windfall completion data for the South HMA suggests that around 1200 dwellings could be delivered in Salisbury (as 50% of the HMA) in the 18-year plan period, if past delivery rates are sustained. This includes around 1000 dwellings on brownfield sites.
- A revised neighbourhood area designation of 738 dwellings would therefore still allow significant margin for any decline in windfall delivery rates compared to past completions; noting that there is no clear evidence of sustained decline for windfall completions on either large or small sites, for the South HMA.
- A revised neighbourhood area designation of 738 dwellings would still be extremely conservative (less than 60%) compared to other projections of potential windfall delivery given in the SNDP.
- **The LP and SNDP should be updated before adoption, to include a revised neighbourhood area designation for Salisbury of at least 738 dwellings. This incorporates the non-specific “small sites” LP allocation, which should be deleted. Sites identified in the Regulation 19 LP which are then not required to meet the residual requirement of 1530 homes between April 2022 and March 2038 (e.g. Sites 8 and 9, totalling 310 homes on the periphery of the city) should be removed from the LP.**

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

Thank you for completing this form.

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Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

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Postcode		
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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

236

Other:

Comment:

The Regulation 19 Wiltshire Local Plan made a clear and unambiguous commitment to promoting development of brownfield sites in preference to greenfield sites.

In light of the subsequent failure of the Regulation 19 LP to adopt any brownfield sites as strategic allocations for Salisbury, it is extremely disappointing that the brownfield sites identified in previous drafts of the SNDP have been excluded from this draft.

Specifically, the Regulation 14 draft of the SNDP provided compelling evidence of the potential for development at:

- Quidhampton Quarry – a large site with potential to support 300 to 400 new dwellings;
- Coldharbour Lane – a centrally located site with potential to support 60 purpose built dwelling for older people, plus 60 refurbished affordable homes;
- Brown Street – a small but centrally located site, with potential to support up to 50 new dwellings.

The exclusion of the Coldharbour Lane site (also known as the “former gasworks”) is completely unjustified, given that this was the top-ranked site in Wiltshire Council’s own Sustainability Appraisal (SA) supporting the Regulation 19 LP; and was specifically excluded from strategic allocation in the LP on the basis that “the site is being pursued through the neighbourhood planning process” [Planning For Salisbury, September 2023]. This site should be reinstated.

The Quidhampton Quarry site, meanwhile, scored only 1 point less in the SA than other strategically adopted sites, due in large part to “major adverse” assessments against Biodiversity and Transport objectives. Both of these findings are strongly contested, not least by evidence generated in preparation of the SNDP. A positive and proactive approach to brownfield development requires that every effort be made to overcome these challenges, particularly on a site with potential to make such a significant contribution to meeting overall housing requirements.

If these large brownfield sites are not included as strategic allocations in the Local Plan, they should be reinstated in the SNDP with a corresponding increase in the neighbourhood area designation for Salisbury (LP Policy 22). Peripheral greenfield sites which are then no longer needed to meet the residual housing requirement (e.g. Sites 8, 9 and 10, totalling 370 dwellings) should then be removed from the LP.

In addition to the above, the LP and SNDP should positively and proactively revisit mixed-use redevelopment of the Churchfields and Maltings/Central Car Park sites, in line with Policy 20 of the Wiltshire Core Strategy (WCS). The Basic Conditions document supporting the current draft of the SNDP identifies Churchfields as having potential to support up to 1100 new dwellings, in a location immediately adjacent to the railway station. The WCS has proposed at least 200 dwellings on the Maltings/Central site. Both sites are within 15 minutes’ walk of the city centre; thus perfectly aligned with other goals of the LP to promote alternatives to private car usage, and evolution of the Salisbury city centre economy. Adopting just a fraction of these as strategic allocations would demonstrate genuine commitment to the goal of brownfield development, and there is no clear reason why these could not then be deliverable within the remaining 14 years of the plan period.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

Thank you for completing this form.

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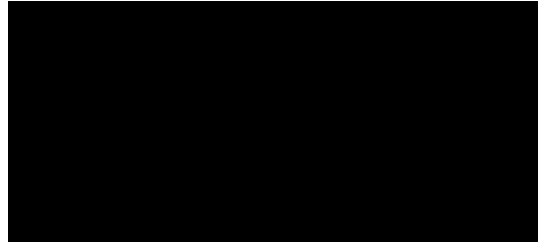
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Comment

Consultee

Email Address

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Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346818)

Comment ID

43

Response Date

6/1/24 12:33 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find attached my representation form with regards to Salisbury Neighbourhood Development Plan (SNDP).

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield sites

Three brownfield sites with the potential to accommodate 480 homes have been removed from this plan without any explanation. Consequently greenfield sites are now included in the Local Plan, which is totally unnecessary and highly controversial since alternative solutions to build house elsewhere are clearly available. Brownfield sites should be utilised and greenfield sites like Sites 8 & 9 South of Harnham should be preserved for prime agricultural and recreational use and therefore should be removed from the Local Plan.

Windfall sites

What is the reason for windfall sites housing allocations not being included in this plan? The Housing Land Supply Statement of the Council (from March 2023) have not been taken into account in the draft Wiltshire Council Local Plan. These documents indicate 2 to 3 times the number of windfall sites compared with the Local Plan. The Local Plan should include the increased number of windfall allocations so that greenfield sites like Sites 8 & 9 can be removed from the plan.

I would also like to comment that moving back to Salisbury from London and looking for a property to purchase, it was extremely challenging to find a suitable home within walking distance of the station as I still need to frequently travel to the office in London. There are brownfield sites available that would make it easier for people like me to source a home in the right location. I would also like to point out that building on greenfield sites would have a negative impact on the already stressed road system and infrastructure in our city since there are no employment opportunities, schools or shops certainly around those Sites 8 & 9 I mentioned earlier.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

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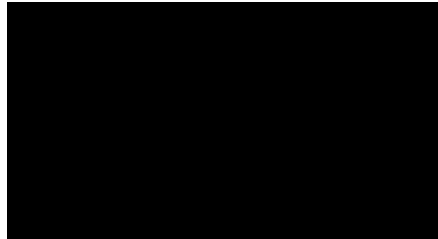
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347210)

Comment ID

44

Response Date

6/1/24 12:44 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached.

Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal? Yes

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Page:

Paragraph:

Other:

Comment:

Brownfield sites

I do not see why brownfield sites (Quidhampton Quarry, Brown Street and Churchfields) that were included in the previous version of SNDP have not been included in the plan with no explanation for their removal. These would have supported 480 new dwellings and meant that greenfield sites such as sites such as 8 and 9 could be removed from the plan.

Also development of up to 200 dwellings in the Maltings and central car park have not been included. Therefore the assumption that there is insufficient brownfield sites is incorrect and inclusion of sites 8 and 9 currently greenfield sites – agricultural land is unnecessary and should be dropped if the local plan is to be made sound.

Windfall Sites

The SNDP identifies the potential for significantly greater numbers of ‘windfall’ sites compared to the draft Wiltshire Council Local Plan. Your own documentation suggests that over a five-year period (2016-2021), 579 ‘windfall’ dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 ‘windfall’ dwellings over the remaining 15-year period of the Local Plan. This is three times the total number of ‘windfall’ allocations currently reflected in the Local Plan (410 homes).

The Housing Land Supply Statement dated March 2023 suggests over 400 homes would be built on large brownfield windfall sites over the 15 year local plan compared with just 60 homes in the draft local plan. This totally negates the requirement to build 300 plus homes on sites 8 and 9 in Harnham.

I recommend, therefore, that the correct large ‘windfall’ allocation is reflected in both the SNDP and Local Plan.

Transport/Pedestrians

I am very concerned about the impact of so many more people living in Harnham on the traffic flows at the Harnham Gyratory. This is already very congested and causes issues for ambulances trying to get to and from the hospital. The pavements around the gyratory can also get very congested and dangerous when people walking dogs/pushing prams with children meet.

Access to nature/walking routes

The agricultural land around the Odstock road is heavily used for leisure – generally people walking. If the only area left for people was the Lime Kiln Down area this would be over used and ruined. Planning needs to take on board people’s need to go outside their homes and walk places if the traffic situation is not going to get even worse.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: Y NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

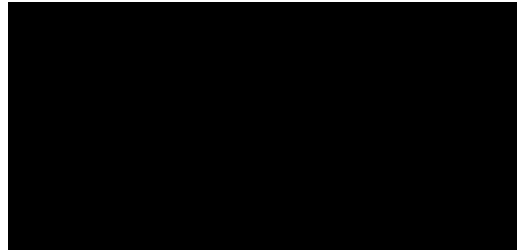
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Comment

Consultee

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Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1346982)

Comment ID

45

Response Date

6/1/24 1:11 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my completed consultation response form.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Why have the 3 brownfield sites (Quidhampton Quarry, Brown Street and Churchfields) been removed from the latest version of the SNDP? They would have provided 480 homes. Has Wiltshire Council explained why these important brownfield sites have been removed from the SNDP?

The SNDP includes the provision of 200 homes in the Central Car Park and the Maltings. These do not appear in the housing allocations in the draft Wiltshire Council Local Plan.

The result of these missing brownfield sites creates the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (Policy 27 & 28) leading to the building of more than 300 homes in south Harnham on prime agricultural greenfield land.

The inclusion of these brownfield sites in the SNDP and local Plan would make the local Plan sound.

The SNDP identifies the potential for far greater numbers of 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. If the draft Local Plan recognised this discrepancy, it would not be necessary to build more than 300 homes on Sites 8 & 9 (Policy 28 & 29 in the Local Plan).

Therefore, I suggest that the correct windfall allocation is reflected in both the SNDP and the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

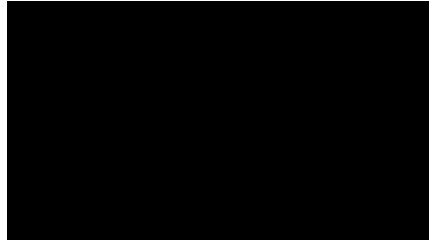
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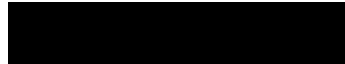
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Event Name

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(2020-2038) Regulation 16 Consultation

Comment by



Comment ID

46

Response Date

6/1/24 3:27 PM

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Comment:

Please find attached two representations regarding the SNDP.

**Do you wish to be notified of the decision on the
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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

I write to express my concern that Wiltshire Council is not allowing the inclusion of three Brownfield sites on the SNDP. These 3 sites (Quidhampton Quarry, Brown Street and Churchfields) could provide 480 homes as they were included in the earlier Regulation 14 version of the SNDP, No explanation of why these sites have been dropped is given.

In addition to this, the SNDP includes the provision of 200 homes in the Maltings and Central Car Park but again, these do not appear to be included in the draft Wiltshire Council Local Plan without an explanation. This total of 680 homes seems to contradict the statement in the Local Plan review that "there is insufficient Brownfield land available and that Greenfield site allocations are necessary".

Brownfield site should be the first choice for development even if costs are increased if it prevents building on prime agricultural, Greenfield land.

Including these sites in both the SNDP and the Local Plan would negate the need for development on Sites 8 and 9 (referred to as Policy 28 and Policy 29) where it is proposed to build 300+ houses.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

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Signature:

Date:

01/06/24

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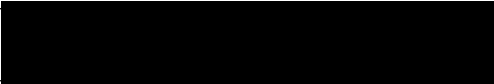
Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

I am concerned that the housing allocation on 'Windfall' sites in this plan and the Council's own Housing Land Supply Statement (March 2023) have not been reflected in the draft Wiltshire Council Local Plan. Accompanying information with the SNDP reflects that 579 'Windfall' dwellings were delivered on Brownfield sites in Salisbury over a period of 5 years (2016-2021). Over the remaining 15 year period of the local plan this extrapolates to 1700 'Windfall' dwellings which is considerably greater than the 410 currently reflected in the Local Plan.

The Council's own Housing Land Supply Statement (March 2023) implies 400 homes could be built on LARGE Brownfield 'Windfall' sites over the 15 year Local Plan compared to just 60 in the Draft Local Plan. If these 400 homes are developed it would eliminate the need to build 300+houses on Sites 8 and 9 in South Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

I therefore propose that the correct, LARGE 'Windfall' allocation is reflected n both the SNDP and in the draft Wiltshire Council Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

01-06-24

Thank you for completing this form.

Data Protection

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Comment

Consultee

Email Address


Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347552)

Comment ID

47

Response Date

6/1/24 3:33 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached completed form.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

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Postcode		
Telephone Number		
Email Address		

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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Brownfield Sites

Whilst I support the aims of the SNDP, I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes - that were included in the earlier Regulation 14 version of the SNDP - have been dropped from this version of the SNDP. Wiltshire Council has not explained why these important brownfield sites have been removed from the SNDP.

Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham.

It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

‘Windfall Sites’

I also note that the SNDP identifies the potential for significantly greater numbers of ‘windfall’ completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 ‘windfall’ dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 ‘windfall’ dwellings over the remaining 15-year period of the Local Plan and is three times the total number of ‘windfall’ allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council’s own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield ‘windfall’ sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

I recommend, therefore, that the correct large ‘windfall’ allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft.

Salisbury Neighbourhood Development Plan:

YES: X

NO:

Signature:

Date:

██████████

1st June 2024

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Data Protection

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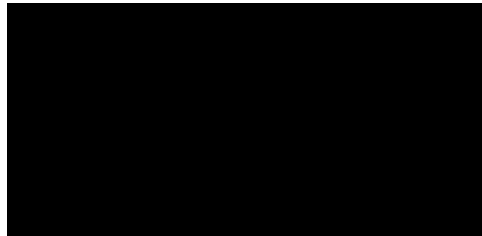
Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk .”

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1347739)

Comment ID

48

Response Date

6/1/24 4:31 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached completed form.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Page: Paragraph: Other:

Comment:

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Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

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Moreover, analysis of the Council’s own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield ‘windfall’ sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

I recommend, therefore, that the correct large ‘windfall’ allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft.

Salisbury Neighbourhood Development Plan:

YES: X

NO:

Signature:

Date:



1st June 2024

Thank you for completing this form.

Data Protection

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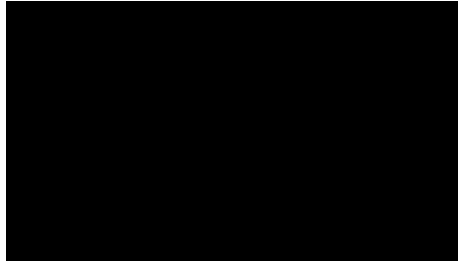
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Comment

Consultee

Email Address

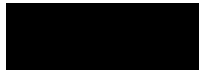
Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1347848)

Comment ID

49

Response Date

6/1/24 4:47 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

I the Neighbourhood Development Plan 2020-2038 (consultation Response Form)

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Job title (where relevant)		
Organisation (where relevant)		
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Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Yes

Comment:

I wish to object to the Wiltshire Council Local Plan on several grounds: -

- The plan does not explain clearly why three of the three brownfield sites, which could accommodate 500 ish homes, have been dropped from the plan. By doing this that means greenfield sites are being included in the local plan quite unnecessarily.
- The sites which have been marked as brownfield sites should be included in the draft WCLP, so that greenfield sites – for example the two listed above – can be removed.
- The already chaotic and overcrowded road system, particularly the Harnham Gyratory just will not cope with the extra traffic any new houses will add. The council has already, and quite unbelievably given permission for two estates to be built on the Harnham Road. That alone will bring in approx. 1000 cars each day using the infrastructure. Another 500 houses will add a potential further 750-1000 cars.
- Where is any plan for a GP surgery to look after the health needs of the residents of these houses?
- What about education – I'm told the Local Authority claim "it's OK as Harnham School isn't full". It's probably only a handful short of full quota so what about the rest of the children?

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: Y NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

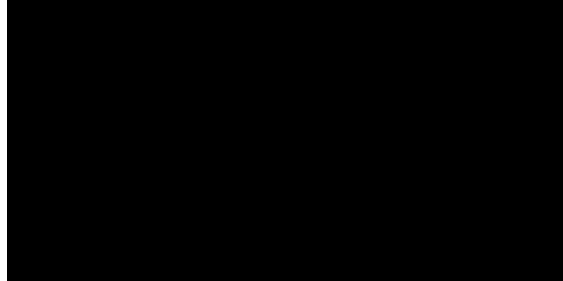
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347219)

Comment ID

50

Response Date

6/1/24 9:04 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

I attach two representations under the Regulation 19 SNDP Consultation.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

10

Paragraph:

8

Other:

Comment:

While the SNDP seeks to prioritise the use of 'brownfield' sites in preference to 'greenfield' sites, how this will be operationalised and quantified in the plan is unclear. I note from the Basic Conditions Statement (Page 45, Paragraphs 10-11) that a combination of 'brownfield' site development at Churchfields, Brown Street Carpark and Quidhampton Quarry could have provided an additional 480 homes and that these options were dropped from the Regulation 14 draft by the LPA without any explanation. The provision of homes on these sites would avoid the unnecessary and environmentally damaging inclusion in the SNDP of 'greenfield' Sites 8 and 9 under Policy 27 (Land South of Harnham) and Policy 28 (Land West of Coombe Road).

In order to make the SNDP and the Local Plan sound, I would ask that these three sites be re-included in both plans.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

91

Paragraph:

215

Other:

Comment:

Thank you for the opportunity to comment on the SNDP.

I note that the SNDP states that it 'shows that windfall development with the City's development boundary will be sufficient to meet the City's identified housing requirement and that no greenfield development at the edges of the city will be required in the plan period'. Page 20. It justifies this statement by saying that 'Over the SNDP period of 15 years and using past trends as an approximation of what could be delivered by windfall development over the plan period, it is likely that 2,250-2,850 new homes will be delivered through windfall development. This far exceeds the amount of development that will be required according to advice from the LPA'. Page 91, Para 215

The Wiltshire Local Plan identifies a residual need for 1,530 new homes from 1 Apr 22 to the end of the plan period (2038) but appears to make no allowance for a 'windfall' offset which would reduce the need to build on greenfield sites. Even if only 50% of the lower windfall estimate of 2,250 were to become available, the residual need would be only for 355 dwellings which could be easily accommodated within other planned development. There seems, therefore, to be no justification for development on greenfield Sites 8 and 9 under Policy 27 (Land South of Harnham) and Policy 28 (Land West of Coombe Road).

There is clearly a lack of coherence across the hierarchy of planning documents and I would recommend that appropriate, justified and consistent windfall assumptions are built into, and made clear in, both the SNDP and Wiltshire Local Plans in order to make both plans sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

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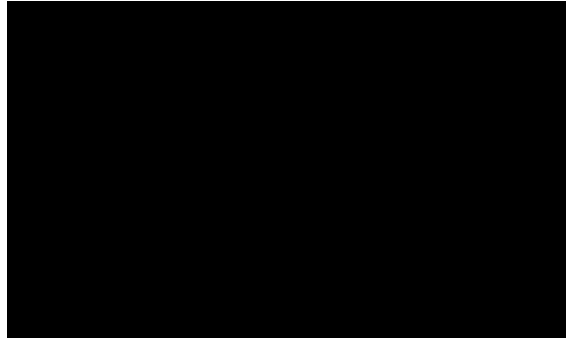
Comment

Consultee

Email Address

Company / Organization

Address



Event Name

Salisbury Neighbourhood Development Plan (2020-2038)
Regulation 16 Consultation

Comment by

Historic England ([REDACTED] - 1067771)

Comment ID

51

Response Date

6/2/24 10:35 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Dear Neighbourhood Planning team

Thank you for your Regulation 16 consultation on the Submitted version of the Salisbury Neighbourhood Development Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Our Regulation 14 consultation response is attached for information.

Kind regards

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:

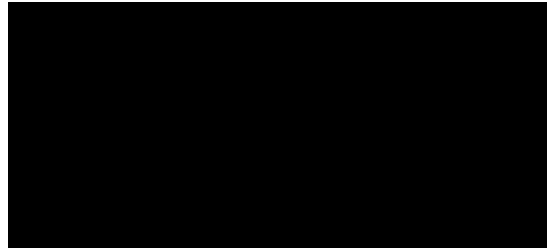
1. Our congratulations to your community on its Plan. Much time, consideration and resources have obviously been expended in identifying and understanding those local issues which would most benefit from inclusion in the Plan. There is an impressive scope and depth to the policies which have been promoted, 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.

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1356740)

Comment ID

52

Response Date

6/2/24 10:59 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find my Response Form to the above Consultation.

**Do you wish to be notified of the decision on the
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Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites

I support the goals of the SNDP; however, I'm disappointed by the exclusion of three brownfield sites (Quidhampton Quarry, Brown Street, & Churchfields) from the current version of the SNDP, totaling 480 homes. Wiltshire Council has not provided reasoning for removing these significant brownfield areas from the plan.

Additionally, the SNDP earmarks space for 200 homes in the Maltings and Central Car Park, but these allocations are missing from the housing plans outlined in the Wiltshire Council Local Plan draft. The Basic Conditions Statement notes that the assumption of insufficient brownfield land led to the necessity of greenfield sites in the Local Plan review.

The removal of these brownfield sites has necessitated the incorporation of Sites 8 & 9 in the Wiltshire Council Local Plan draft (referred to as Policy 27 & Policy 28), proposing the construction of over 300 homes on valuable agricultural greenfield land south of Harnham.

Including these brownfield sites in both the SNDP and the Local Plan is therefore advised. This step would eliminate the need for development on Sites 8 & 9 and contribute to the soundness of the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[REDACTED]

Date:

Thank you for completing this form.

Data Protection

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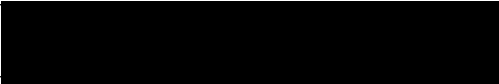
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Page:

Paragraph:

Other:

X

Comment:

‘Windfall Sites’

I also observe that the SNDP highlights the potential for a significantly higher number of unexpected 'bonus' completions on brownfield sites in comparison to the draft Wiltshire Council Local Plan. Information provided with the SNDP shows that, between 2016 and 2021, 579 'windfall' homes were constructed on brownfield land (both large and small sites) in Salisbury. This translates to more than 1,700 'windfall' homes over the remaining 15-year period of the Local Plan, which is three times the total number of 'windfall' allocations currently outlined in the Local Plan (410 homes).

Furthermore, an examination of the Council's Housing Land Supply Statement from March 2023 indicates that more than 400 homes could potentially be developed on significant brownfield 'windfall' sites over the 15-year duration of the Local Plan, as opposed to just 60 homes in the initial draft Local Plan. This, in itself, would eliminate the necessity to construct over 300 houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Therefore, I suggest that the appropriate allocation for significant 'windfall' opportunities is accurately represented in both the SNDP and the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

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Page:

Paragraph:

Other:

X

Comment:

Harnham Gyratory

In my opinion, the minor (and unfunded) improvements that are proposed to the Harnham gyratory will not address the projected traffic increase from the development along the Netherthampton Road, which will see the Gyratory reaching 97% capacity, resulting in further traffic gridlock around Salisbury.

This is all before any more proposed developments add more traffic into the system.

Including the now planned development of 86 homes between Rowbarrow and Odstock Road and along with sites 8 and 9 in Harnham which will further increase the pressure on the Gyratory.

In any case, I believe that the costs for any proposed scheme will make any new developments in Harnham unviable!

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

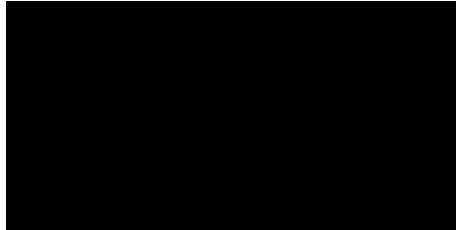
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347483)

Comment ID

53

Response Date

6/2/24 12:35 PM

Status

Processed

Submission Type

Email

Version

0.5

Comment:

Attached is my response to the above Plan.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** No

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Postcode		
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Email Address		
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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

****Brownfield & Windfall Sites – Response to Consultation Document on the Salisbury Neighbourhood Development Plan (SNDP)**

The documentation was rather overwhelming so I have had assistance in seeking clarification on the above two issues. My comments are as follows:

Brownfield sites

I feel strongly as a Harnham resident that the Brownfield sites should be included in the draft Wiltshire Council Local Plan. This would allow the greenfield sites, such as the land south of Harnham (sites 8 & 9) to be removed from the local plan and prevent further new housing expansion.(An example of this is the the Netherhampton Road house building scheme which, as resident I was given no formal official opportunity on which to voice my opposition to such a building development on flood- prone land and insufficient infrastructure to accommodate such a large development.)

Additionally there is a lack of clarity around the explanation as to why three brownfield sites which could accommodate 480 homes have been dropped by this plan. As a consequence it means that greenfield sites are unnecessarily included. These must be removed from the draft plan.

Windfall Sites

The documents do not make it clear why the housing allocation for ‘windfall’ sites in this plan and the Council’s own Housing Land Supply Statement (dated March 2023) have not been reflected in the draft Wiltshire Council Plan. These documents show 2 to 3 times the number of ‘windfall’ sites in comparison to what the Council’s own Housing Land Supply Local Plan states.

As a result of this omission it means Greenfield sites are unnecessarily included in the Local Plan.

In conclusion higher Windfall numbers should be included in the Local Plan so that Greenfield sites such as the land South of Harnham (sites 8 & 9) may be removed from the local plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

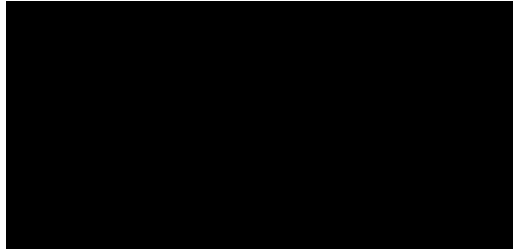
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1348180)

Comment ID

54

Response Date

6/2/24 4:13 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached a Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

'Windfall Sites'

The SNDP has identified significantly greater numbers of 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. **Therefore, I recommend, that the 'windfall' allocation is increased in the Local Plan so that it is consistent with the correct data in the SNDP.**

Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan and is three times the total number of 'windfall' allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council's own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Brownfield Sites

Why have the brownfield sites at Quidhampton Quarry, Brown Street & Churchfields been excluded from the SNDP without any explanation. These were included in the earlier Regulation 14 version of the SNDP and would provide a significant total allocation of 480 homes.

Provision for a further 200 homes in the Maltings and Central Car Park has not been reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that "the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary."

The consequence of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan. **Therefore, I recommended that these brownfield sites are included in both the SNDP and Local Plan.** This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

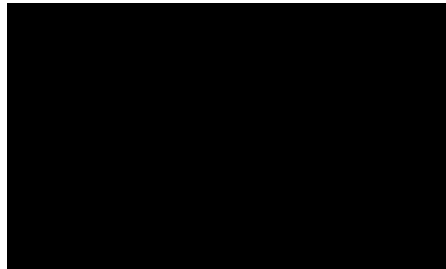
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347294)

Comment ID

55

Response Date

6/2/24 5:37 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please see response form attached

Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal? Yes

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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Sites
8/9

Comment:

Brownfield Sites

Following concerns raised regarding Sites 8 & 9 and proposed building on land used for agriculture with no regard for traffic congestion, environmental and wild life issues. I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes - that were included in the earlier Regulation 14 version of the SNDP - have been dropped from this version of the SNDP and Wiltshire Council has not explained why these important brownfield sites have been removed.

Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available .

The impact of these brownfield sites being dropped and the worrying proposal to include Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham. This comes after a large current expansion of housing in Harnham along the Netherhampton Road already under construction!

It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement on Sites 8 & 9 and help make the Local Plan sound and therefore remove Sites 8 & 9 from development.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



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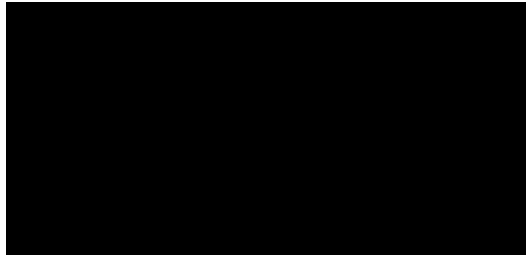
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Comment

Consultee

Email Address

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Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1346705)

Comment ID

56

Response Date

6/2/24 5:39 PM

Status

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Comment:

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Page: Paragraph: Other:

Comment:

Windfall Sites'

I also note that the SNDP identifies the potential for significantly greater numbers of 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan and is three times the total number of 'windfall' allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council's own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

I recommend, therefore, that the correct large 'windfall' allocation is reflected in both the SNDP and Local Plan.

Future notification

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Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

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Comment

Consultee

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Event Name

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(2020-2038) Regulation 16 Consultation

Comment by

 1357648)

Comment ID

57

Response Date

6/2/24 9:17 PM

Status

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Submission Type

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Comment:

Please find attached objection

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Page:

Paragraph:

Other:

x

Comment:

Brownfield Sites

Whilst I support the aims of the SNDP, I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes - that were included in the earlier Regulation 14 version of the SNDP - have been dropped from this version of the SNDP. Wiltshire Council has not explained why these important brownfield sites have been removed from the SNDP.

Also, the SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham.

It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

‘Windfall Sites’

I also note that the SNDP identifies the potential for significantly greater numbers of ‘windfall’ completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 ‘windfall’ dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 ‘windfall’ dwellings over the remaining 15-year period of the Local Plan and is three times the total number of ‘windfall’ allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council’s own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield ‘windfall’ sites over the 15-year Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES:

NO:

Signature:

Date:

2 June 24

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1347276)

Comment ID

58

Response Date

6/2/24 9:41 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

I've attached my representation forms for the SNDP regulation 16 consultation,
Best wishes,

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
------	-------------------------

Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

While I support the aims of the SNDP, I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street, and Churchfields) with a total allocation of 480 homes, previously included in the earlier Regulation 14 version of the SNDP, have been dropped from the current version. The Regulation 14 version contained clear explanations about how these brownfield sites could be utilised. There is no clear explanation for the removal of these important brownfield sites and they seem to have been removed without justification.

Furthermore, the SNDP includes provisions for 200 homes in the Maltings and Central Car Park, which are not reflected in the housing allocations of the draft Wiltshire Council Local Plan. The Basic Conditions Statement points out that “the Local Plan review has incorrectly assumed there is insufficient brownfield land available, necessitating greenfield site allocations.”

The exclusion of these brownfield sites has led to the unnecessary inclusion of Sites 8 and 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 and Policy 28), proposing the construction of over 300 homes on prime agricultural, greenfield land south of Harnham.

I believe these brownfield sites should be included in both the SNDP and the Wiltshire Local Plan to eliminate the need for development on greenfield Sites 8 and 9 and to ensure the Local Plan is sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

I agree with the section on safeguarding the Salisbury’s green blue infrastructure. To protect important greenfield land on the periphery of the city from unnecessary development – as represented in Figure 14.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

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Postcode		
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Email Address	<div style="background-color: black; width: 200px; height: 15px;"></div>	
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

The evidence base within the Wiltshire Local Plan and the SNDP regarding windfall sites is unclear and seems contradictory.

The SNDP identifies the potential for significantly more 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Data accompanying the SNDP shows that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (both large and small sites) in Salisbury. This translates to over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan, which is three times the current 'windfall' allocations in the Local Plan (410 homes).

Additionally, an analysis of the Council's own Housing Land Supply Statement (dated March 2023) indicates that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan period, compared to just 60 homes in the draft Local Plan. This would eliminate the need to build over 300 houses on Sites 8 and 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Therefore, I believe that the correct large 'windfall' allocation should be reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

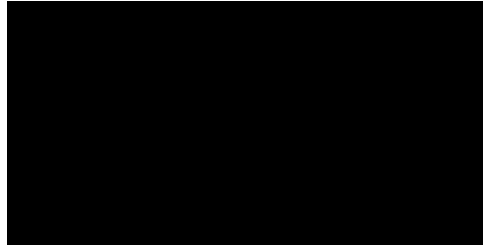
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Comment

Consultee

Email Address

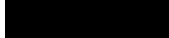
Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1348245)

Comment ID

59

Response Date

6/2/24 9:43 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my completed Response for the Consultation regarding the Salisbury Neighbourhood Development Plan.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Postcode		
Telephone Number		

Email Address	<div style="background-color: black; width: 100%; height: 15px;"></div>	
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

With reference to Brownfield Sites

I endorse the goals of the SNDP, but I am concerned about the exclusion of three brownfield locations (Quidhampton Quarry, Brown Street, and Churchfields) earmarked for a total of 480 homes in the previous Regulation 14 iteration of the SNDP. This current version of the SNDP has omitted these significant brownfield sites, and Wiltshire Council has not provided a rationale for their removal.

Furthermore, the SNDP accounts for 200 homes in the Maltings and Central Car Park areas, yet these figures are absent from the housing allotments outlined in the preliminary Wiltshire Council Local Plan. Referencing the Basic Conditions Statement, it highlights that the Local Plan review operates on a mistaken premise that there is inadequate brownfield land accessible, thus necessitating greenfield site designations.

The consequence of removing these brownfield sites is the introduction of Sites 8 and 9 in the preliminary Wiltshire Council Local Plan (known as Policy 27 and Policy 28), which proposes constructing 300+ homes on valuable agricultural greenfield land located to the south of Harnham.

Therefore, it is advised to incorporate these brownfield sites into both the SNDP and Local Plan. This action would eliminate the necessity for development on Sites 8 and 9, contributing to the coherence and robustness of the Local Plan.

With reference to Windfall Sites

Additionally, I observe that the SNDP highlights the potential for a significantly higher number of 'windfall' completions on brownfield sites compared to the initial Wiltshire Council Local Plan. Data accompanying the SNDP reveals that from 2016 to 2021, 579 'windfall' residences were completed on brownfield areas, both extensive and compact, in Salisbury. This translates to more than 1,700 'windfall' homes in the remaining 15 years of the Local Plan, a figure three times greater than the combined 'windfall' allocations currently outlined in the Local Plan, which total 410 residences.

Furthermore, an examination of the Council's Housing Land Supply Statement from March 2023 indicates the potential for constructing over 400 residences on significant brownfield 'windfall' sites throughout the 15-year Local Plan, in contrast to a mere 60 homes in the preliminary Local Plan. This adjustment alone would eliminate the need to erect over 300 houses on Sites 8 and 9 in Harnham, identified as Policy 28 and Policy 29 in the Local Plan.

Hence, I suggest that the appropriate allocation for significant 'windfall' developments be accurately represented in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

[REDACTED]

Date: 2nd June 2024

Thank you for completing this form.

Data Protection

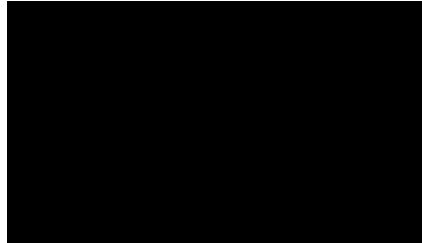
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347228)

Comment ID

60

Response Date

6/3/24 6:26 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my consultation response form

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Email Address		
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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Re page 69-70 – Safeguarding and enhancing local green blue infrastructure and page 78 Local Wildlife Recovery plan both refer to The Lime Kiln Down County Wildlife Site.
The Lime Kiln Down County Wildlife Site is included in the proposed Habitat improvement and restoration scheme p154
This site at its wildlife is at risk of serious, irreversible harm if the proposed development at site 8 is allowed. As this is in addition to the development of 86 homes to the east of Odstock road adjacent to the existing Persimmon development (owned by Bellway homes).

Brownfield Sites

It is concerning that four brownfield sites (Quidhampton Quarry, Coldharbour Lane, Brown Street & Churchfields) with a total allocation of 480 homes - that were included in the earlier Regulation 14 - have been dropped from this version of the SNDP.
The provision for 200 homes in the Maltings and Central Car Park, are not reflected in the housing allocations in the draft Wiltshire Council Local Plan.
The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham.
It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

'Windfall Sites'

Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan and is three times the total number of 'windfall' allocations currently reflected in the Local Plan (410 homes).
Moreover, analysis of the Council's own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

3/06/24

Thank you for completing this form.

Data Protection

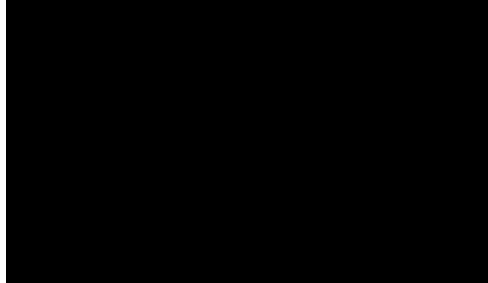
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1347048)

Comment ID

61

Response Date

6/3/24 10:33 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my Representation Form filled out with my points for your consideration.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
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Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

The use of 'Brownfield' sites and why this is not contained within the plan. Three brownfield site which could accommodate 480 homes have been dropped from this plan and as a consequence greenfield sites are unnecessarily included in the Local Plan. It is my contention that if brownfield sites were included in the draft Wiltshire Council Local Plan then greenfield sites such as the land South of Harnham (sites 8&9) could be removed from the Local Plan.

Windfall sites – Why has the housing allocation for 'windfall' sites in this plan and the Council's own Housing Land Supply Statement (dated March 2023) not been reflected in the draft Wiltshire Council Local Plan?

These documents show 2 to 3 times the number of 'windfall' sites compared with the Local Plan.

As a consequence, plans for greenfield sites are unnecessarily included in the Local Plan.

Higher 'windfall' numbers should be included in the Local plan so that greenfield sites, such as the land South of Harnham (sites 8&9) can be removed from the Local Plan.

Whilst I support the aims of the SNDP, I am disappointed that Quidhampton Quarry,, Brown Street and Churchfields with a total allocation of 480 homes – that were included in the earlier Regulation 14 version of the SNDP – have been dropped from this version. Wiltshire Council has not explained why these important brownfield sites have been removed from the SNDP.

Also, the SNDP included the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that "the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary."

The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham.

It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

I also note that the SNDP identifies the potential for significantly greater numbers of windfall completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that over a five year period (2016-2021) 579 windfall dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 windfall dwellings over the remaining 15 year period of the Local Plan and is three times the total number of windfall allocations currently reflected in the Local Plan (410 homes).

Analysis of the Council's own Housing Land Supply Statement (dated March 2023) suggests that over 400 homes could be built on large brownfield windfall sites over the 15 year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan. I recommend therefore that the correct large windfall allocation is reflected in both the SNDP and Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

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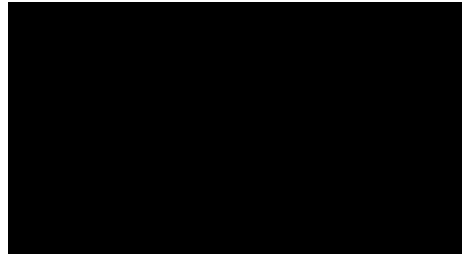
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1346552)

Comment ID

62

Response Date

6/3/24 11:22 AM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

I attach Consultation Response Form in respect of the above.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

89

Paragraph:

205

Other:

Comment:

The Plan does not give a clear explanation as to why three brownfield sites have been dropped from the Plan when they could enable 480 homes to be constructed.

The knock on effect of this is that greenfield sites are included in the Local Plan when they do not need to be. Brownfield sites should be included in the Wiltshire Council Local Plan which would enable the greenfield sites like the land south of Harnham (sites 8 & 9) to be removed from the Local Plan

The Draft Wiltshire Local Plan does not reflect the ‘windfall’ sites in this Plan and Salisbury Council’s own Housing Land Supply Statement of March 2023.

This again means that plans for greenfield sites are included in the local plan when this is not necessary and inclusion of higher windfall site numbers would again mean that greenfield sites such as Sites 8 & 9 South of Harnham could be removed from the Local Plan

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

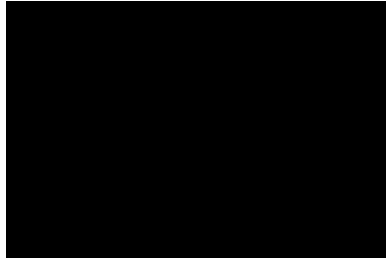
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Comment

Consultee

Email Address


Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1347488)

Comment ID

63

Response Date

6/3/24 11:28 AM

Status

Processed

Submission Type

Email

Version

0.4

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal?

Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council's website at: <http://consult.wiltshire.gov.uk/portal>

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First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

I do not understand why 3 Brownfield sites have been dropped from the earlier Regulation 14 version of the SNDP? These could have accommodated 480 homes and made it unnecessary to include the Greenfield sites 8&9 which are important agricultural land and an important nature habitat.

I also would question why housing allocation for Windfall Sites (and the Council's own Housing Land Supply Statement) are not included in the draft Wiltshire Council Local Plan? These documents show approximately 3 times the number of Windfall Sites? So, yet again, plans for Greenfield Sites are being unnecessarily included in the Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

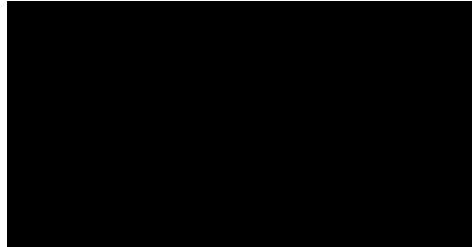
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1357739)

Comment ID

64

Response Date

6/4/24 12:14 PM

Status

Processed

Submission Type

Email

Version

0.3

Comment:

Please find attached two separate comments concerning the Salisbury Neighbourhood Development Plan (SNDP).

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Postcode		
Telephone Number		

Email Address		
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Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Brownfield sites

- There is not a clear explanation as to why three brownfield sites, which could accommodate 480 homes, have been dropped from this plan.
- As a result of the omission of the brownfield sites, plans for developing on greenfield sites are unnecessarily included in the Local Plan.
- Brownfield sites should be included in the draft Local Plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan

Whilst I support the aims of the SNDP, I am disappointed that three brownfield sites (Quidhampton Quarry, Brown Street & Churchfields) with a total allocation of 480 homes, that were included in the earlier Regulation 14 version of the SNDP, have been dropped from this version of the SNDP. Wiltshire Council has not explained why these important brownfield sites have been removed from the SNDP.

The SNDP includes the provision for 200 homes in the Maltings and Central Car Park, but these are not reflected in the housing allocations in the draft Wiltshire Council Local Plan. The Basic Conditions Statement makes the point that “the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary.”

The impact of these brownfield sites being dropped is the unnecessary inclusion of Sites 8 & 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28) that envisages the building of 300+ homes on prime agricultural, greenfield land south of Harnham, adjacent to an AONB.

It is therefore recommended that these brownfield sites are included in both the SNDP and Local Plan. This would negate the requirement for development on Sites 8 & 9 and help make the Local Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

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Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Address Line 2		
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Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

'Windfall' sites

- Why has the housing allocation for 'windfall' sites in this plan and the Council's own Housing Land Supply Statement [dated March 2023] not been reflected in the draft Wiltshire Council Local Plan? There were 2 to 3 times the number of 'windfall' sites compared with the Local Plan.
- As a result of reinstating this allocation of windfall sites, plans for greenfield sites would not unnecessarily included in the Local Plan.
- Higher 'windfall' numbers should be included in the Local plan so that greenfield sites, such as the land South of Harnham (Sites 8 & 9), can be removed from the Local Plan

I also note that the SNDP identifies the potential for significantly greater numbers of 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Information accompanying the SNDP reflects that, over a five-year period (2016-2021), 579 'windfall' dwellings were delivered on brownfield land (large and small sites) in Salisbury. This equates to over 1,700 'windfall' dwellings over the remaining 15-year period of the Local Plan and is three times the total number of 'windfall' allocations currently reflected in the Local Plan (410 homes).

Moreover, analysis of the Council's own Housing Land Supply Statement [dated March 2023] suggests that over 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan compared with just 60 homes in the draft Local Plan. This alone would negate the requirement to build 300+ houses on Sites 8 & 9 in Harnham (referred to as Policy 28 and Policy 29 in the Local Plan).

Therefore, it is recommended that the correct large 'windfall' allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: X NO:

Signature:

Date:

Thank you for completing this form.

Data Protection

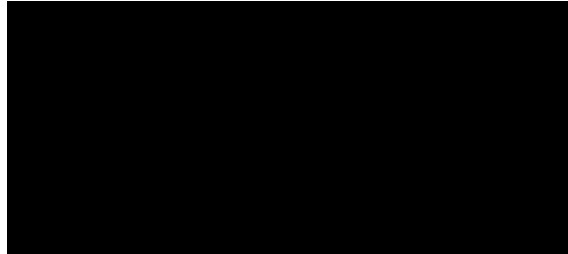
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Comment

Consultee

Email Address

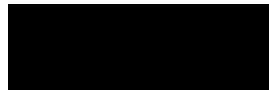
Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by



(1357763)

Comment ID

Response Date

6/3/24 12:48 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my completed Response Form for the *Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation*.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

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Part A – Personal details

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Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

Brownfield Sites:

Although I am supportive of the SNDP's aims, I am both disappointed and concerned that three brownfield sites, which were included in the earlier Regulation 14 version, have been removed from this version of the SNDP. Given that 480 homes could be built upon the sites at Quidhampton Quarry, Brown Street and Churchfields, it is deeply worrying that Wiltshire Council has not provided any explanation as to why these important brownfield sites no longer appear in the SNDP.

An additional concern is the removal of the brownfield sites at the Maltings and Central Car Park from the draft Wiltshire Council Local Plan, which would provide 200 homes. The Basic Conditions Statement makes the point that "the Local Plan review has made an incorrect assumption that there is insufficient brownfield land available and that greenfield site allocations are necessary."

Together, the aforementioned brownfield sites that have been removed from the draft Wiltshire Council Local Plan and SNDP would provide 680 homes. The impact of removing these is the unnecessary inclusion of the sites referred to as 8 and 9 in the draft Wiltshire Council Local Plan (referred to as Policy 27 & Policy 28), which would destroy productive agricultural, greenfield land to the south of Harnham to provide only c.300 houses.

To mitigate the destruction of productive agricultural land, the aforementioned brownfield sites are recommended for inclusion in the SNDP and Wiltshire Council Local Plan documents. Further, by adopting this recommendation, it would remove the need to develop sites 8 and 9.

Windfall Sites:

I am also concerned that there is no clear explanation as to why the housing allocation for 'windfall' sites in the SNDP differs to that of the draft Wiltshire Council Local Plan. It appears to me, based on accompanying information to the SNDP, that 579 'windfall' homes were delivered on brownfield land in Salisbury during the period 2016 to 2021. Looking forward to the remaining 15-year period of the Local Plan, this would equate to 1,700 'windfall' homes. As the current number of 'windfall' sites in the Local Plan is 410 homes, it is notable that 1,700 is three times greater.

Based on the Council's *Housing Land Supply Statement* from March 2023, it appears that more than 400 homes could be built on large brownfield 'windfall' sites over the 15-year Local Plan, as compared to only 60 in the draft Local Plan. Subsequently, there is no need to build over 300 homes on sites 8 and 9 (referred to as Policy 27 & Policy 28) in Harnham as 'windfall' brownfield sites would provide more than enough homes.

To that end, my recommendation is that the correct *large* 'windfall' allocation is reflected in both the SNDP and Local Plan.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

02/06/2024

Thank you for completing this form.

Data Protection

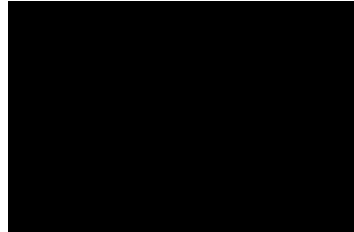
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Comment

Consultee

Email Address


Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1357771)

Comment ID

66

Response Date

6/4/24 2:43 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my response to the Salisbury Neighbourhood Plan.

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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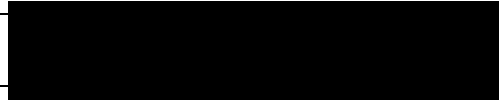
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Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

Comment:

Brownfield Sites

While I support the SNDP's goals, I'm disappointed that three brownfield sites (Quidhampton Quarry, Brown Street, and Churchfields) for 480 homes were omitted from the current version. Wiltshire Council hasn't explained why.

The SNDP allocates 200 homes in the Maltings and Central Car Park, which aren't reflected in the draft Wiltshire Council Local Plan. The Basic Conditions Statement notes that the Local Plan incorrectly assumes there's insufficient brownfield land, necessitating greenfield site allocations.

This exclusion has led to unnecessary inclusion of Sites 8 and 9 in the draft Local Plan, proposing over 300 homes on greenfield land in Harnham. Including these brownfield sites in both the SNDP and Local Plan would avoid this and ensure the plan's soundness.

Windfall Sites

The SNDP identifies significantly more potential for 'windfall' completions on brownfield sites compared to the draft Wiltshire Council Local Plan. Data shows that from 2016-2021, 579 'windfall' dwellings were built on brownfield sites in Salisbury, suggesting over 1,700 could be delivered in the remaining 15 years—three times the 410 homes reflected in the Local Plan.

Additionally, the Council's March 2023 Housing Land Supply Statement indicates over 400 homes could be built on large brownfield 'windfall' sites over the 15-year period, compared to just 60 in the draft Local Plan. This discrepancy negates the need to build over 300 houses on Sites 8 and 9 in Harnham (Policies 28 and 29).

Thus, the correct large 'windfall' allocation should be reflected in both the SNDP and the Local Plan.

Traffic

Wiltshire Council has not developed a strategy to address the projected traffic increase at the Harnham Gyratory due to the planned developments on Sites 8 & 9 in Harnham, Britford, and Netherhampton Road. These developments will increase Harnham's size by one-third.

The Council's Transport Evidence base shows that the Gyratory will reach 97% capacity, leading to gridlock. The Council's recent plans for minor improvements to the Gyratory, which seem unfunded and impractical, won't adequately address the projected traffic.

Therefore, it is recommended that Sites 8 & 9 (Policies 27 & 28) be removed from both the SNDP and the Local Plan.

Lime Kiln Nature Reserve

If Sites 8 & 9 building plans go ahead, the beautiful Lime Kiln Nature Reserve will be ruined. There will be 100s more people in that area trampling, cycling, playing which will kill the 100s species of fauna that is in that area as well as putting 100s species of insects, the ones we need to protect, at huge risk. We also have bats, badgers, swifts, all protected. How will they all survive, and what plans are in place to protect this stunning area of beauty? I see no evidence of any plans in either the SNDP or Wiltshire Council Local Plan. This needs to be addressed urgently.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

03/06/2024

Thank you for completing this form.

Data Protection

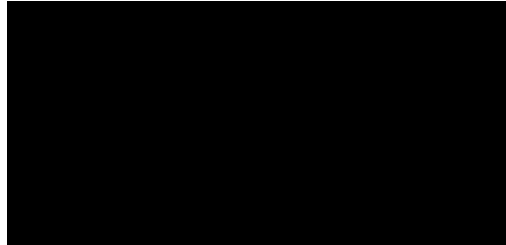
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1354104)

Comment ID

67

Response Date

6/3/24 2:57 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please find attached my response to the subject plan

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?** Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:(For official use only)

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Email Address

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page:

Paragraph:

Other:

X

Comment:

In their Local Plan, at Policy No 28 & 29, Wiltshire Council envisage the construction of 300+ dwellings at Sites 8 & 9 to the south of Harnham. This would entail building on one of the principle "green lungs" of Salisbury, overlooking the beautiful Ebble Valley. Such destruction would be unnecessary if the Salisbury Neighbourhood Development Plan (SNDP) fully took into account the availability of both brownfield sites and windfall sites.

Brownfield Sites

It is disappointing that three brownfield sites; namely Churchfields, Quidhampton Quarry and Brown Street have been dropped from the current version of the SNDP despite appearing in an earlier edition. These had the potential to accommodate 480 homes. Wiltshire Council have yet to explain why these important sites have been removed from the SNDP.

In addition the draft Wiltshire Council Local Plan fails to take into account the 200 homes in the Maltings and Central Car Park which are included in the SNDP.

Windfall Sites

The SNDP and associated documents identify the scope for 2 to 3 times more completions on windfall sites than is currently reflected in Wiltshire Council's draft plan.

The Salisbury Neighbourhood Development Plan and Wiltshire Local plan should both acknowledge the figures projected for the Brownfield and Windfall sites. This would make the Plan sound and do away with the need to develop land to the south of Harnham at sites 8 & 9.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:

Date:

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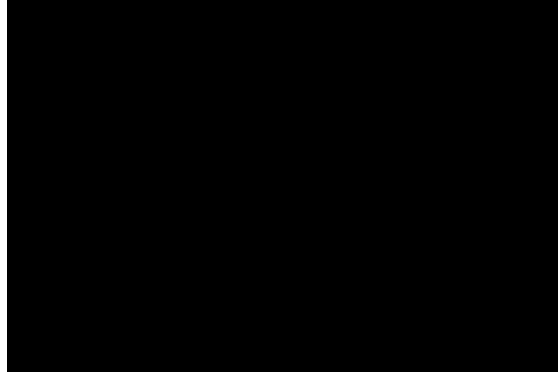
Comment

Consultee

Email Address

Company / Organization

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

Environment Agency ([REDACTED] - 1357789)

Comment ID

68

Response Date

6/3/24 3:26 PM

Status

Processed

Submission Type

Email

Version

0.4

Comment:

Please see attached.

**Do you wish to be notified of the decision on
the Salisbury Neighbourhood Development Plan
proposal?**

No

Neighbourhood Planning
Planning and Economic Development
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our ref: WX/2022/136266/OR-
36/PO1-L01
Your ref: Salisbury NP

Date: 03 June 2024

Dear Sir/Madam

Salisbury Neighbourhood Development Plan (2020 – 2038) Regulation 16 Consultation

Thank you for consultation the Environment Agency on the above Neighbourhood plan.

We have the following comments to make:

Chapter 4. Green and Blue Infrastructure

Multifunctional green and blue infrastructure section

We support that the plan refers to enhancing the water environment as well as the associated riparian corridors. The importance of the rare chalk stream is also acknowledged within the plan.

As the main river Avon, Bourne and Nadder all flow through the city area we would highlight that works to restore or enhance them may require permissions from other organisations such as Environment Agency and Natural England.

Biodiversity net gain Section

We recognise that since this plan was drafted, guidance has updated regarding BNG and that as of 2 April 2024 it will be required for development not defined as non-major development. For more information see the [Draft biodiversity net gain planning practice guidance](#) (draft BNG PPG) Paragraph: 003 Reference ID: 74-003-2023.

The Pre-Submission Draft 2020-2038 (Regulation 19) which was out for consultation in Autumn 2023 stated 'Development must achieve a minimum of 20% biodiversity net gain' however this Neighbourhood plan states 'All new development proposals should manage impacts on biodiversity and will provide a minimum of 10% biodiversity net gain as part of the scheme design'.

Chapter 8. Appendices for Policies and Explanatory Text

Figure 39: Flooding related to Salisbury's rivers.

This figure uses current Flood Zone Maps from the Environment Agency. However, we would highlight that the Planning Policy Guidance (PPG) confirms that all sources of flood risk need to be considered not just rivers. Therefore, the maps should be driven /

linked to the Strategic Flood Risk Assessment. We would also recommend the incorporation of the Long-Term flood Risk surface water maps, and Wiltshire Councils Groundwater risk maps. This would help advise on potential risk locations, there may be also other flood risk issues that need to be considered.

If you have any questions about our response, please get in touch.

Yours faithfully


Sustainable Places - Planning Advisor

Comment

Agent

Email Address

Company / Organization

Address

Consultee

Email Address

Company / Organization

Address

Event Name

Comment by

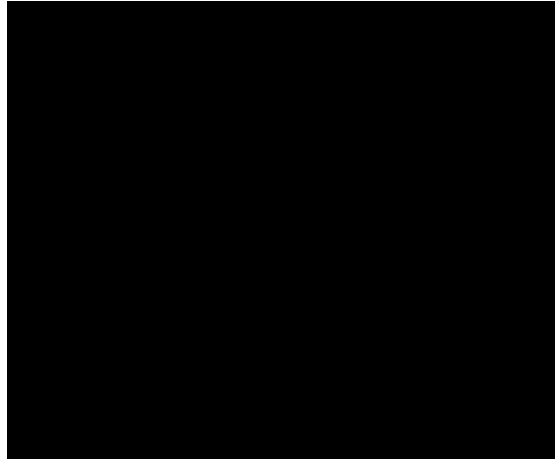
Comment ID

Response Date

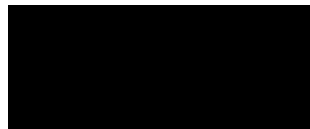
Status

Submission Type

Version



Wyatt Homes



Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Wyatt Homes ([REDACTED] - 1357832)

69

6/3/24 3:48 PM

Processed

Email

0.4

Comment:

Please find attached representations on behalf of Wyatt Homes, comprising:

- . Representation form
- . Covering letter
- . Appendix 1 (an overall vision document for Wyatt's proposed development under the Wiltshire Local Plan)
- . Appendix 2 (draft proposals for an area of SANG associated with the above development).

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

Documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		
Email Address		

Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph: Other:

Comment:

Please refer to accompanying letter however in brief our comment is as follows.

There is a conflict between Figure 14 of the draft NDP and the emerging Local Plan, and the NDP also strays beyond the Civil Parish Boundary of Salisbury. Neighbourhood Development Plans must follow a strict process as set out in:

- the Town & Country Planning Act 1990 (as amended);
- the Planning and Compulsory Purchase Act 2004 (as amended);
- the Neighbourhood Planning (General) Regulations 2012 (as amended).

Section 61G of the Town & Country Planning Act 1990¹ sets out the process for designating 'Neighbourhood Areas', which then become the geographic extent of NDPs. If made, the Salisbury NDP would have Development Plan status only within the red line area above and is procedurally incapable of having formal status beyond that boundary. This therefore requires the following amendment:

Proposed Amendment 1:

Remove all proposals from the draft NDP that lie outside of the Civil Parish of Salisbury

Reason:

To ensure compliance with relevant legislation and procedures for Neighbourhood Planning as noted above.

It is also inappropriate for the draft Salisbury NDP to show extensive areas of land as a 'Downland / Country Park Reserve'. Whilst they are understood to be aspirational and indicative, they run counter to key components of the Development Plan as articulated in the draft Wiltshire Local Plan. This has potential implications for the achievement of sustainable development in relation to housing, SANG and public open space, as articulated in draft policies 27, 28 and 29 of the draft Local Plan. This therefore requires the following amendment:

Proposed Amendment 2:

Amend Figure 14 of the draft NDP to remove the 'Downland /Country Park Reserve' annotation from the land that is encompassed by Wiltshire Core Strategy policies 27, 28 and 29, and replace it with a cross reference to these emerging policies.

Reason:

To meet the following Basic Conditions under paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990:

- (d)the making of the order contributes to the achievement of sustainable development,
- (e)the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

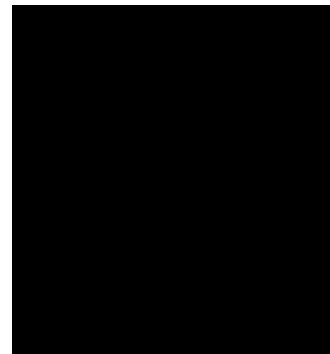
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3 June 2024



Neighbourhood Planning,
Planning,
Wiltshire Council,
County Hall,
Bythesea Road,
Trowbridge,
Wiltshire,
BA14 8JN

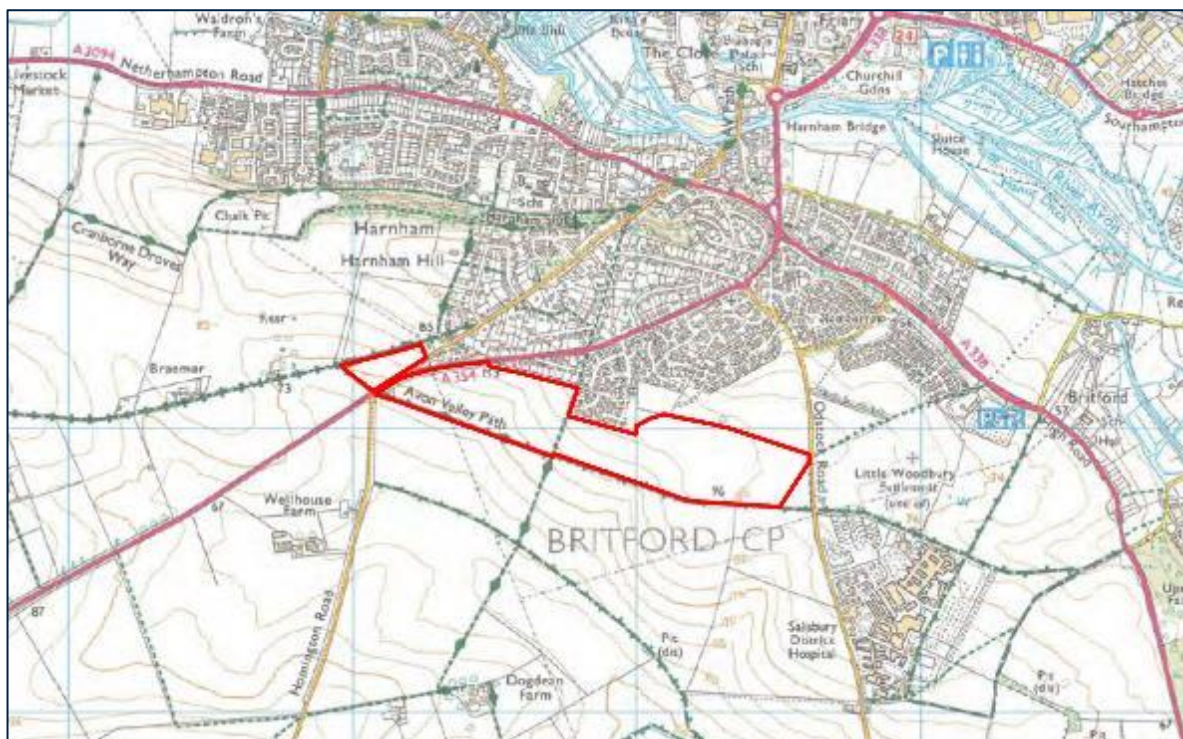


Dear Sir/Madam

**Draft Salisbury Neighbourhood Development Plan ('NDP'), 2020 – 2038:
Representation on behalf of Wyatt Homes Ltd**

This submission is on behalf of our client Lewis Wyatt (Construction) Ltd, hereafter referred to as 'Wyatt Homes', which has land interests to the south of Salisbury, as shown in the figure below.

Figure 1: Extent of Wyatt Homes interest to the south of Salisbury



Wyatt Homes has promoted this site for several years, in conjunction with the landowners, and has made representations at the previous (Regulation 14) stage of the NDP in 2022.

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

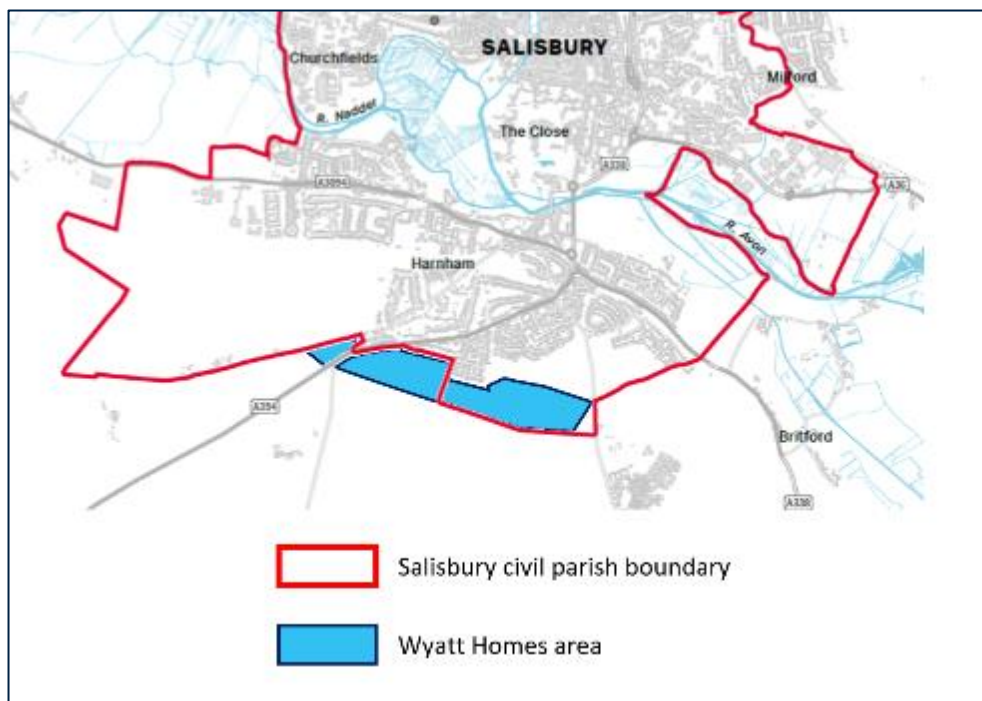
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For clarity, the area of land being promoted by Wyatt Homes is shown in Figure 2 below in relation to the formal boundaries of the NDP.

Figure 2: Relationship between Wyatt Homes site and the boundary of Salisbury NDP



As can be seen, approximately the eastern half of the site lies within the formal boundary of Salisbury City, with the remainder outside of the boundary (in the parish of Britford).

Overall stance on Salisbury Neighbourhood Development Plan (NDP)

In general Wyatt Homes **welcomes** the progress made on the NDP for Salisbury, and is supportive of key principles and aims that it sets out (on page 17). These include:

- sustainable development principles including appropriate climate change adaptation and mitigation, and biodiversity enhancement;
- providing green infrastructure networks to link jobs, schools, leisure, transport, and the countryside;
- protecting the landscape setting of Salisbury, particularly views to the Cathedral spire and Old Sarum;
- respecting the character and amenity of different neighbourhoods and areas of Salisbury;
- providing affordable and market housing in accessible locations to meet diverse needs;
- managing water, through minimising flood risk and run-off, improving water quality and enhancing rivers and wetlands.

However, Wyatt Homes maintain their **objection** (previously made at the Regulation 14) to aspects of the draft NDP that extent beyond the designated boundary, and thus request **focussed amendments** to specific parts of the draft NDP as outlined below.

Emerging Wiltshire Local Plan and proposed allocation of the site for development

Since the previous consultation on the Salisbury NDP, significant progress has been made by Wiltshire Council (WC) in relation to the Local Plan 2020-2038, particularly through undertaking consultation on a 'Regulation 19' pre-submission draft of the plan from September-November 2023. This make provision for land across Wiltshire towards meeting housing and employment needs up to 2038, including approximately 4,500 homes and 12.3ha of employment land at Salisbury.

Supporting this strategy, the draft Local Plan includes a series of new proposed housing site allocations and other measures, the most relevant of which are the following:

- **Policy 27 (Land South of Harnham, Salisbury)** development of approximately 265 dwellings;
- **Policy 28 (Land West of Coombe Road, Salisbury)** development of approximately 45 dwellings;
- **Policy 29 (Suitable Alternative Natural Greenspace, South Salisbury)** allocating a SANG on land immediately adjoining the above sites, to mitigate recreational impacts on the New Forest both from these and other new developments in the surrounding area.

Wyatt Homes is proposing to deliver the residential development set out in policies 27 and 28 (i.e. 310 dwellings in total), and to do so as part of a comprehensive masterplan that will also deliver SANG in accordance with Policy 29. Wyatt Homes has an interest in the majority of the land proposed as SANG, with Wiltshire Council and Salisbury City Council owning most of the remainder.

The figure below is included in the pre-submission draft Local Plan, and outlines broad principles that WC anticipate being followed by any future development. It should be noted that the proposed area for physical built development lies primarily within Britford parish, with the eastern part of the site (within the Salisbury City area) primarily consisting of open space.

Figure 3: Land South of Harnham and Land West of Coombe Road, Harnham Concept Plan (Wiltshire Council, September 2023)



The boundaries of the SANG proposed by Wiltshire Council are shown in the figure below for clarity.

Figure 4: Extent of proposed South Salisbury SANG in draft Local Plan (Wiltshire Council, September 2023)



Emerging masterplan proposals

Following the inclusion of this site within the draft Wiltshire Local Plan, Wyatt Homes have progressed with additional design, technical and environmental studies in order to achieve a successful and sustainable development. Details of this are set out in **Appendix 1**, which comprises a Vision Document for the site and outlines how we envisage the development could come forward. This was submitted to Wiltshire Council during the Regulation 19 consultation in November 2023. For ease, an excerpt of this is shown in the figure below.

Figure 5: Emerging masterplan for the site (Wyatt Homes)



Emerging SANG proposals

During 2024, Wyatt Homes have engaged further with Wiltshire Council and Natural England in order to devise a more detailed strategy for the SANG proposals in the eastern part of the site. An illustrative strategy for this is included as **Appendix 2** to this letter, giving a framework for:

- the physical extent of the SANG
- a broad layout of accesses, footpaths, and land uses;
- proposals for key features including parking, benches, and interpretation boards;
- key principles for planting and management;
- measures to protect the Scheduled Monument;
- consideration of views to the Salisbury Cathedral spire

An excerpt of this strategy is shown in Figure 6 below. Based on this framework, Wyatt consider that adequate SANG can be delivered on land controlled by Wyatt Homes, to mitigate the impacts of residential development arising from both Policies 27 and 28 (approximately 310 dwellings).

Figure 6: Draft proposals for the South Salisbury SANG (Wyatt Homes / Pegasus Group, May 2024)



Wyatt believe that there is a direct and potentially beneficial connection between the above proposals for the SANG, and emerging provisions in the NDP. However, for this to be achieved **it is vital that modifications are made to the latter.**

Formal objection

We note Policy 10: Safeguarding and enhancing green and blue infrastructure in the draft NDP which includes the following provisions:

‘Development proposals that contribute to the greening of Salisbury and deliver elements of the Salisbury green and blue infrastructure vision shown in Figure 14 will be supported.’

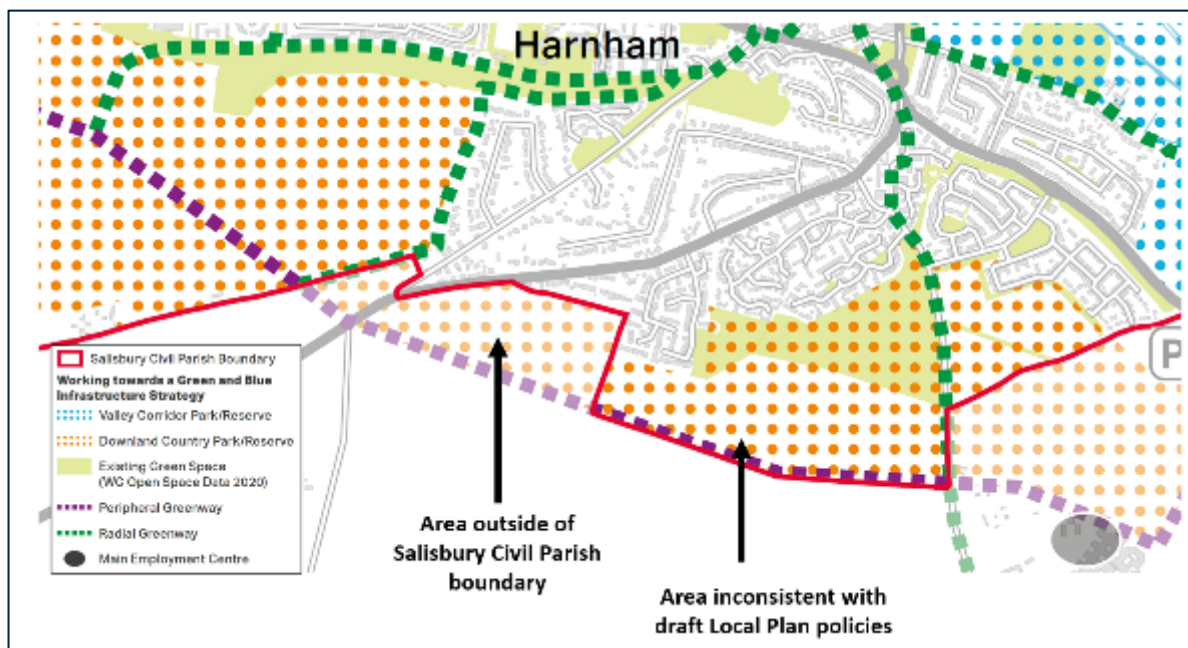
‘Developments should avoid loss of visual amenity or visual access to blue and green infrastructure and loss of quality of routes due to development.’

Relating to this, the NDP includes a Green and Blue Infrastructure (GBI) strategy described in paragraph 156 and illustrated in Figure 14, reproduced below:

156 Figure 14 illustrates the potential for safeguarding the green and blue spaces in the river valley corridors and on the high ground within and around the city. Working with landowners, this could be achieved by creating a series of country parks and/ or reserves and there is also potential to establish a network of dedicated mainly off-road routes or greenways. These would be for people on foot and for cyclists to encourage safer, sustainable active travel and less car dependency which is becoming increasingly important in the face of the climate emergency and the public health issues around local air quality and traffic congestion. There are also opportunities to improve access to local open countryside and neighbouring communities.

In general, Wyatt Homes support these broad principles and is aiming to contribute substantially to them via the proposed approach to SANG and public open space outlined above. However, there is a **conflict** between Figure 14 of the draft NDP and the emerging Local Plan, and the NDP also strays beyond the Civil Parish Boundary of Salisbury.

Figure 6: Excerpt from Figure 14 from the draft Salisbury NDP



Neighbourhood Development Plans must follow a strict process as set out in:

- the Town & Country Planning Act 1990 (as amended);
- the Planning and Compulsory Purchase Act 2004 (as amended);

- the Neighbourhood Planning (General) Regulations 2012 (as amended).

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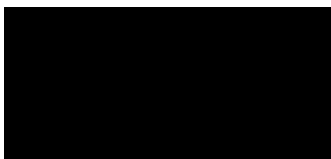
- (d)the making of the order contributes to the achievement of sustainable development,
- (e)the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Next steps

Notwithstanding these objections Wyatt Homes believes that there is general consistency between the aims of the emerging NDP for Salisbury and the emerging Wiltshire Local Plan, and that by working together, the aim of securing a large area of protected public open space can be achieved to the east of the Wyatt development.

We therefore intend to engage positively with the Local Plan and NDP processes as these progress through further stages including examination, and would welcome further dialogue with SCC, Wiltshire Council and others to ensure a successful and deliverable approach.

Yours sincerely

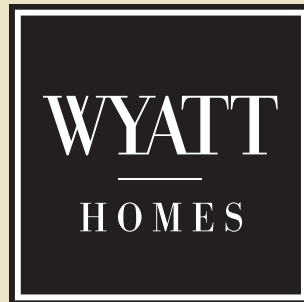


¹ <https://www.legislation.gov.uk/ukpga/1990/8/section/61G>

South Harnham

Vision Statement

November 2023



Contents

- 1 → Vision & Objectives
- 2 → The Opportunity
- 3 → Site & Context
- 4 → Illustrative Masterplan
- 5 → Delivery

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Doc Ref: 158_BI_231117_SouthHarnhamVision

List of accompanying technical documents:

- Written representations (Savills)
- Highways and Transport Appraisal (PFA)
- Heritage Appraisal (Wessex Archaeology)
- Landscape and Visual technical note (Pegasus)
- Arboricultural Constraints Assessment (Barrell Arboriculture)
- Flood risk and drainage appraisal (PFA)
- Updated ecology phase 1 report (HDA)
- Phase 1 Noise Assessment report (Clarke Saunders)

Document designed and produced by:

NEW masterplanning



Pegasus
Group

Landscape Architecture
Masterplanning
Ecology



wessex
archaeology



S clarke saunders
acoustics

Wider technical consultant team:

Vision

This section introduces our vision for South Harnham (Policy 27: Land south of Harnham and Policy 28: Land west of Coombe Road) and the core underpinning objectives for people, place, purpose, and process.

South Harnham:

A welcoming new neighbourhood extension to Salisbury.



‘Connected to the city, shaped by the countryside, and integrated with the community’

Vision Objectives

PLACE



Distinctive

A memorable place, with a distinctive physical identity and a character rooted in the area's history, built form, people and landscape.



Connected

An integrated place, with strong walking, cycling and public transport connections to jobs, facilities, and neighbouring communities.



Welcoming

An inviting place, accessible and used by as many people as possible, who feel relaxed, safe, and encouraged to spend time there.

PEOPLE



Healthy

A community where residents have good physical and mental well-being, where they feel socially and physically connected to their surroundings and their neighbours.



Sociable

Prioritising people in the design of streets and spaces to encourage daily community interactions, events, and activities.



Diverse

Meeting local housing needs through a balanced mix of dwellings to create a place people want to live and can afford to live.



PURPOSE



Active

Incorporating physical activity into everyday life by encouraging recreation, play and active travel.



Sustainable

Resilient and responsive to the challenge of climate change, by encouraging walking and cycling, efficient use of resources and energy, and reducing CO2 emissions.



Biodiverse

Creating connected green infrastructure networks to provide stronger routes and habitats for wildlife, and to deliver a biodiversity net gain.



PROCESS



Empowered through engagement

Wyatt Homes are committed to working collaboratively to ensure that South Harnham is a balanced and inclusive community.

Community spirit and identity cannot be imposed, nor can it be bolted on once the development is completed. It needs to be nurtured through long-term working with local people. The local authorities, residents, businesses, and key agencies will therefore need to be involved throughout the 'place-making', delivery and management process.

The next steps will involve more detailed technical investigations, review, and engagement to evolve the initial concepts and framework masterplan response presented in this submission document. Led by Wyatt Homes, a range of consultants have already been appointed to address technical matters related to heritage, landscape, highways, ecology, arboriculture, noise, and drainage.

NEW masterplanning Ltd, a specialist masterplanning team based in Dorset, have been appointed to bring their expertise to develop a vision and coordinate the masterplanning process.

Opportunity

South Harnham will deliver a planned expansion of Salisbury through a sustainable and co-ordinated approach. This section introduces the opportunity to continue the historic pattern of city growth and create a place for the 21st century with a locally distinctive character and identity.

A strategy for growth

Salisbury is an attractive historic Cathedral city with a distinctive market town feel. It is the principal settlement for south Wiltshire, benefiting from its rural surroundings and good strategic connections.

The emerging Local Plan sets out a clear vision for the town to 2038. It aims to protect and enhance the existing historic, cultural, and natural qualities and establish a better balance of housing and jobs in the city, with improved accessibility to public transport. Reinforcing the historic and distinctive character and identity of Salisbury is a key priority.

The plan sets out a longer-term strategy for growth for the city, delivered through focused development areas around the periphery, and through regeneration opportunities within the city centre. This creates the opportunity to work collaboratively with the local community and key stakeholders to design, shape and manage a truly sustainable and integrated neighbourhood extension; to form South Harnham at Site Policy 27 and 28 and deliver long term benefits for Salisbury.

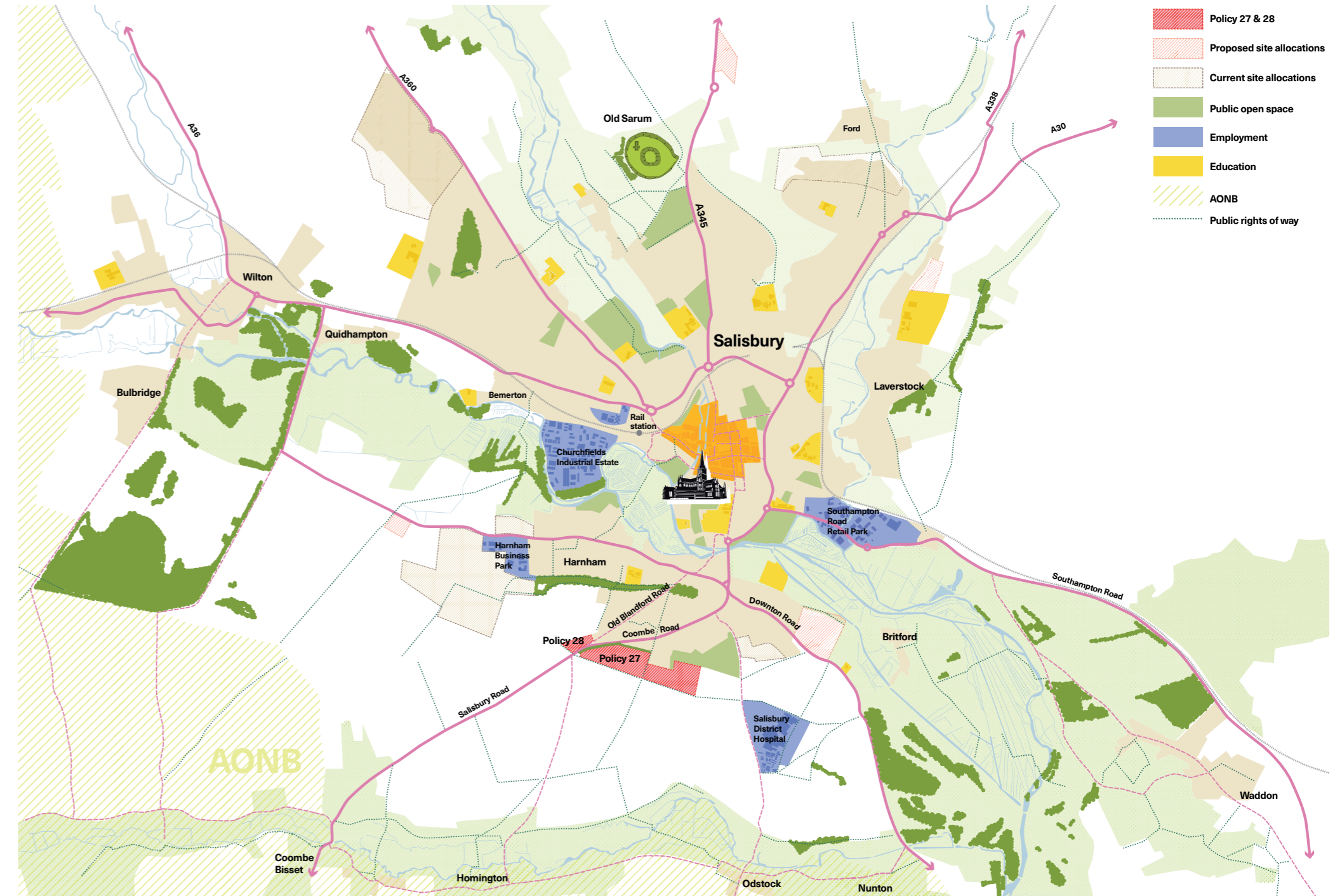
This will include the creation of an improved gateway arrival to the city, accessible green space, inviting pedestrian and cycle routes, housing to meet local needs, and new community facilities.



Salisbury is a historic city with a distinctive character defined by the Cathedral and river meadows

“The city of Salisbury is a Principal Settlement and a main focus for future growth. The city’s setting and its heritage significance need to be protected. The Plan proposes a limited amount of further development on the city’s periphery.

Wiltshire Local Plan Regulation 19 consultation



Salisbury is a principal settlement for growth in Wiltshire with planned growth around the city periphery

A pattern for growth

Understanding how a place has evolved is an important starting point in developing a strategy for growth.

Both sites lie on the edge of Harnham, a suburb of the city of Salisbury south of the Cathedral and across the River Avon.

Harnham is an attractive and popular residential area, broadly split into the areas of West and East Harnham.

The area has had human habitation since the Iron Age, with Salisbury Road / Coombe Road route forming a strategic arrival route into the city that was improved in 1244 by the building of Ayleswade bridge.

The route has been and remains an important growth and movement corridor for the city. The proposed extension at South Harnham can continue an historic growth pattern for the city.

“An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region is necessary when making decisions on the siting and design and identity of new developments”

Draft Wiltshire Design Guide 2023

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape”

National Design Guide 2019



1770

- East Harnham is key gateway to Salisbury.
- Important Mill at West Harnham



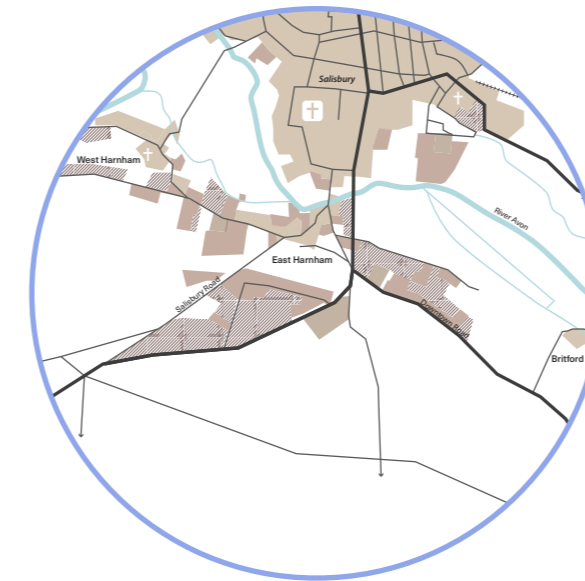
1902

- East and West Harnham act as 'garden' for Salisbury with many allotments and orchards.
- Rail connection to Salisbury established, canal network improved.



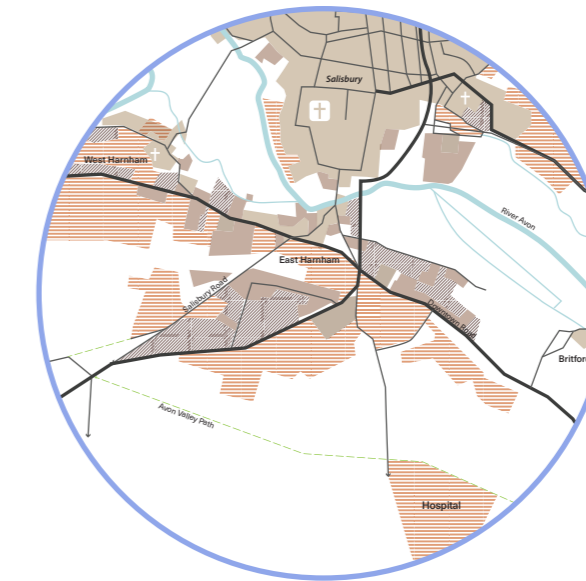
1926

- Growth along arterial roads in East and West Harnham.



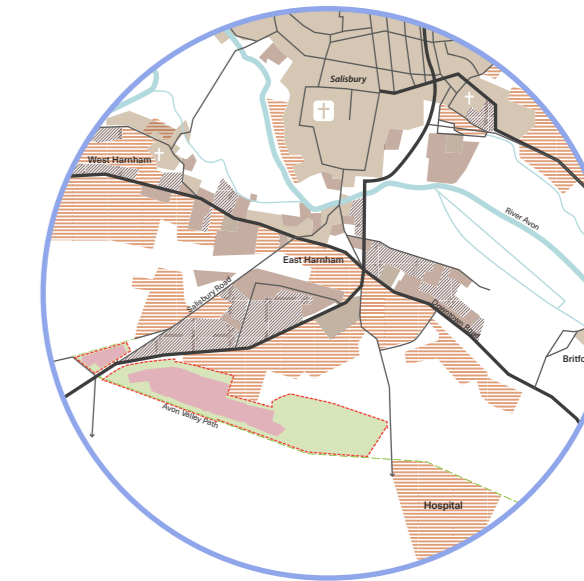
1946

- New bridge connection between East Harnham and Salisbury, resulting in re-routing of main road away from East Harnham local centre further east.
- Coombe Road the priority approach route.
- Significant growth around East Harnham.



1950's to present day

- Further significant growth in and around East and West Harnham, and edges of Salisbury.



Potential future growth

- Growth to follow primary corridors of movement and trade.
- The centre will continue as the trade and socialising focus.
- Opportunity to create a new gateway to Salisbury.
- Opportunity to plan future development in creating an integrated new neighbourhood.

A distinctive character and identity

The built character qualities of the local area provide references for a distinctive form and identity to create a strong sense of place for South Harnham.

This includes:

- Green and leafy avenue streets where more spacious plots and villa dwellings front grassed verges and tree lined edges.
- Terrace groupings, with rhythmic gables and smaller front gardens closer to the street.
- Rural and informal cottages, barn buildings, courtyard spaces and lanes found within the villages surrounding the city.

This context can also inform the selected architectural materials and details to ensure a coherent and cohesive character response.



Terrace groups with distinctive gables (Bemerton)



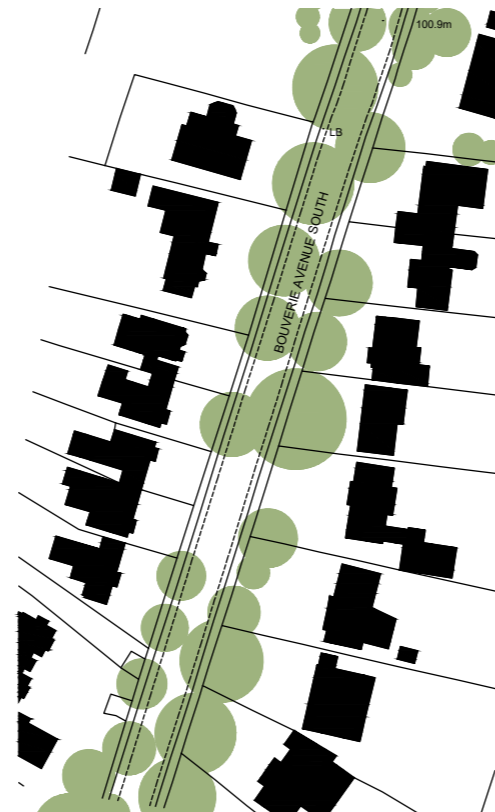
Brick cottages and enclosed gardens (Britford)



Barns define a rural edge character (Laverton edge)



Leafy avenue streets with verges and trees (Harnham)



Bouverie Ave. South (Harnham)

“Well-designed places contribute to local distinctiveness. This may include adopting typical building forms, composition, articulation, proportions, features, materials, details, patterns and colours of an area”

National Design Guide 2019

“The identity of a place is not just about how it looks or its geographic location. It stems from the way that its buildings, streets and spaces, landscape and infrastructure combine to create a whole”

Draft Wiltshire Design Guide 2023

Materials



Wall finishes - predominantly red/ orange brick



Variations in wall finish, painted brick, painted render, hung clay tiles, stained timber cladding and knapped flint courses



Other notable features: chimneys, recessed porches, deep hood moulds to windows

Boundaries



Walls with hedging

Hedges

- Predominately red/orange brick
- Some painted brick, render, hung tiles, stained timber and knapped flint
- Notable feature include chimneys, recessed porches and deep hood moulds to windows
- Boundaries include brick walls, and wall/ hedge combinations



18 Feature greens and trees mark village arrival points (Homington)

A sustainable approach

Wyatt Homes are committed to delivering zero carbon ready homes at South Harnham and helping to address the challenges of climate change through delivering the objectives of Policy 4 in the emerging Local Plan:

Minimising carbon emissions:

- Development located to enable sustainable and active modes of transport to jobs and services.
- Density of development that makes the most efficient use of accessible sites.
- Energy efficient buildings and developments that are fit for purpose and adaptable.
- Maximising the potential of the south facing slopes for solar gain opportunities.

Maximising carbon storage and sequestration:

- Providing, conserving, enhancing, and restoring habitats.
- Incorporating green infrastructure, such as trees and woodland planting.
- Incorporating blue infrastructure, such as Sustainable urban Drainage (SuDS) systems.

Mitigating and adapting to the impacts of climate change:

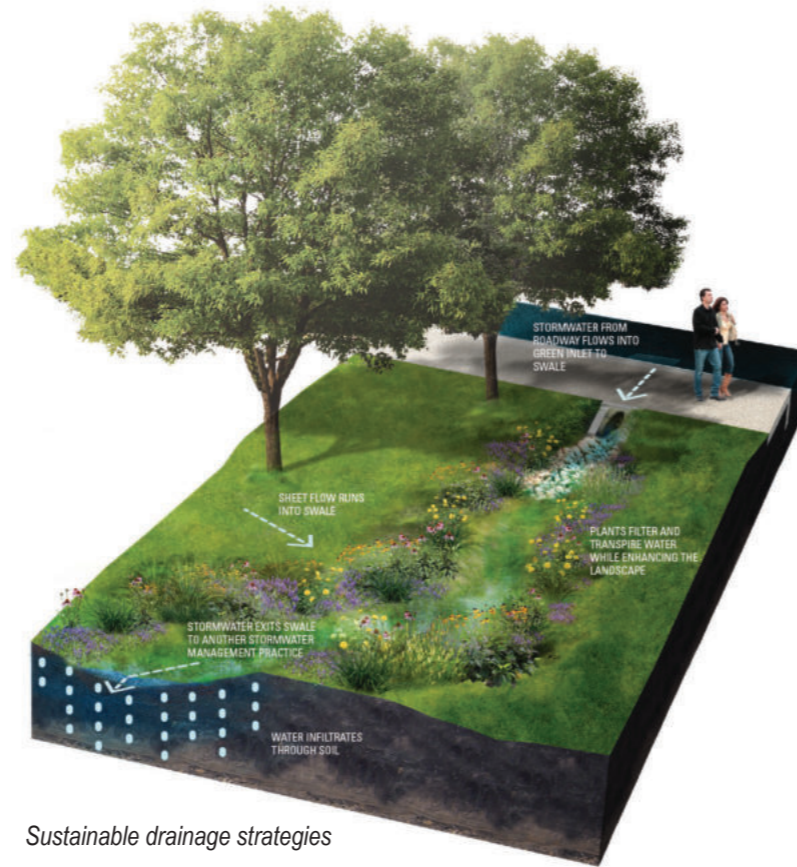
- Development located outside of known flood zones.
- Providing shade and green and blue infrastructure to reduce overheating.
- Creating places that positively promote social inclusion, interaction and well-being.
- Delivering biodiversity net gain.

“Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero by 2050”

National Design Guide 2019



Active travel connections, biodiversity gains and energy efficient technologies supporting zero carbon ready homes



A co-ordinated approach

South Harnham will be delivered through a co-ordinated approach, working in partnership with Wiltshire Council, local stakeholders, and the community.

The land at Site Policy 27 and 28 can be brought forward as a comprehensive opportunity to meet the Local Plan delivery timescales and make a significant contribution to the local housing supply.

Place making will be central to the development approach for South Harnham and is at the core of Wyatt Homes ethos. Wyatt Homes are a regional developer and traditional housebuilder, where the main focus is to design places and buildings of superior quality. They collaborate with local communities and landowners to deliver essential new facilities and homes; previous developments have successfully provided community halls, schools, sports clubs, allotments and parkland spaces integrated within developments.

Alongside Wyatt Homes, a technical team of consultants will provide expert support to progress the design and implementation of the proposals for South Harnham.

A range of technical investigations have already been undertaken by the team to inform the concept masterplan in this document and demonstrate delivery potential. The reports listed in the contents page of this document are submitted alongside this statement.

“Well-designed places, buildings and spaces are designed and planned for long-term stewardship by landowners, communities and local authorities from the earliest stages”

National Design Guide 2019



Delivery of community infrastructure:



New football club ground and facilities for Wimborne



Welcoming arrival with existing landscape features in Poole

“The aim should be for residents to feel a sense of ownership and pride and live in places that are well-managed and maintained”

Draft Wiltshire Design Guide 2023



Community hall at Charminster Farm, Dorset



New allotments and growing space at Wimborne

Site & Context

Land at South Harnham is proposed as a neighbourhood extension to Salisbury in the draft Wiltshire Local Plan. This section sets out the context to the site, the draft policy objectives, setting considerations, and the key site features informing the design response.

Site allocation

Land at South Harnham is allocated in the draft Wiltshire Local Plan Regulation 19 Consultation (September 2023) to provide approximately 265 dwellings and supporting infrastructure including allotments, play areas and a nursery at Site Policy 27. A further 45 dwellings are also proposed as an allocation on land west of Coombe Road (Site Policy 28) adjacent to Site Policy 27.

The new neighbourhood will create an extension to the Harnham area of Salisbury, on the city's south-western approaches. The draft Plan identifies that the site is reasonably well connected to the city centre and on a bus route. Additional public transport connectivity can be achieved through ensuring a pedestrian link through to Andrews Way, to the north.

The Plan notes that the proposals will support the city centre, regeneration and the economy since residents would be able to work in and visit the city centre using sustainable transport modes, including cycling, which would help to increase footfall and boost local trade. The site is also close to local employment opportunities at Salisbury District Hospital.

A Concept Plan has also been prepared by Wiltshire Council in support of the draft Policy (as shown overleaf).

Policy 29 of the draft Plan identifies land within the eastern section as a potential Suitable Alternative Natural Greenspace (SANG) to mitigate the adverse effects of recreation on New Forest designated sites.



“The new housing creates an extension to the Harnham area of Salisbury, on the city's south-western approaches”.

Policy 27

Land South of Harnham, Salisbury

- Land South of Harnham, as identified on the Policies Map, is allocated for the development of approximately 265 dwellings and 0.3ha of land for the provision of an early years nursery.
- A single comprehensive masterplan, phasing and delivery strategy for the development, must be prepared and approved by the local planning authority in advance of any planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this Policy and the principles shown within the concept plan and be prepared in consultation with the local community and local planning authority. Subsequent planning applications must be in accordance with the approved masterplan.
- Infrastructure and mitigation requirements include:
- vehicular access from A354 Coombe Road;
 - improvements to cycling and walking routes through and around the site, including to Salisbury District Hospital and into the city centre;
 - an eastern section of the site to remain undeveloped to conserve and where possible enhance the heritage setting of the Woodbury Ancient Villages complex;
 - an improved urban edge and countryside transition on the approach into Salisbury from the south-west, conserving and enhancing the setting and interpretation of Woodbury Ancient Villages scheduled monument;
 - children's play areas;
 - allotments;
 - provision of Suitable Alternative Natural Greenspace on adjacent land to the east in accordance with Policy 29 (Suitable alternative natural greenspace, South Salisbury), connected with walking routes through the site;
 - Funding contributions toward measures that improve air quality. An assessment will be needed to understand cumulative effects of development on relevant receptors in the Air Quality Management Area, and to identify appropriate mitigation measures;
 - measures aimed at neutralising the levels of phosphates flowing into the River Avon Special area of Conservation (SAC) to improve water quality;
 - offsite infrastructure reinforcement for water supply and foul drainage where required;
 - assessment of potential noise impacts from the A345, to inform an appropriate layout and necessary mitigation measures; and
 - funding contributions towards early years, primary and secondary education.

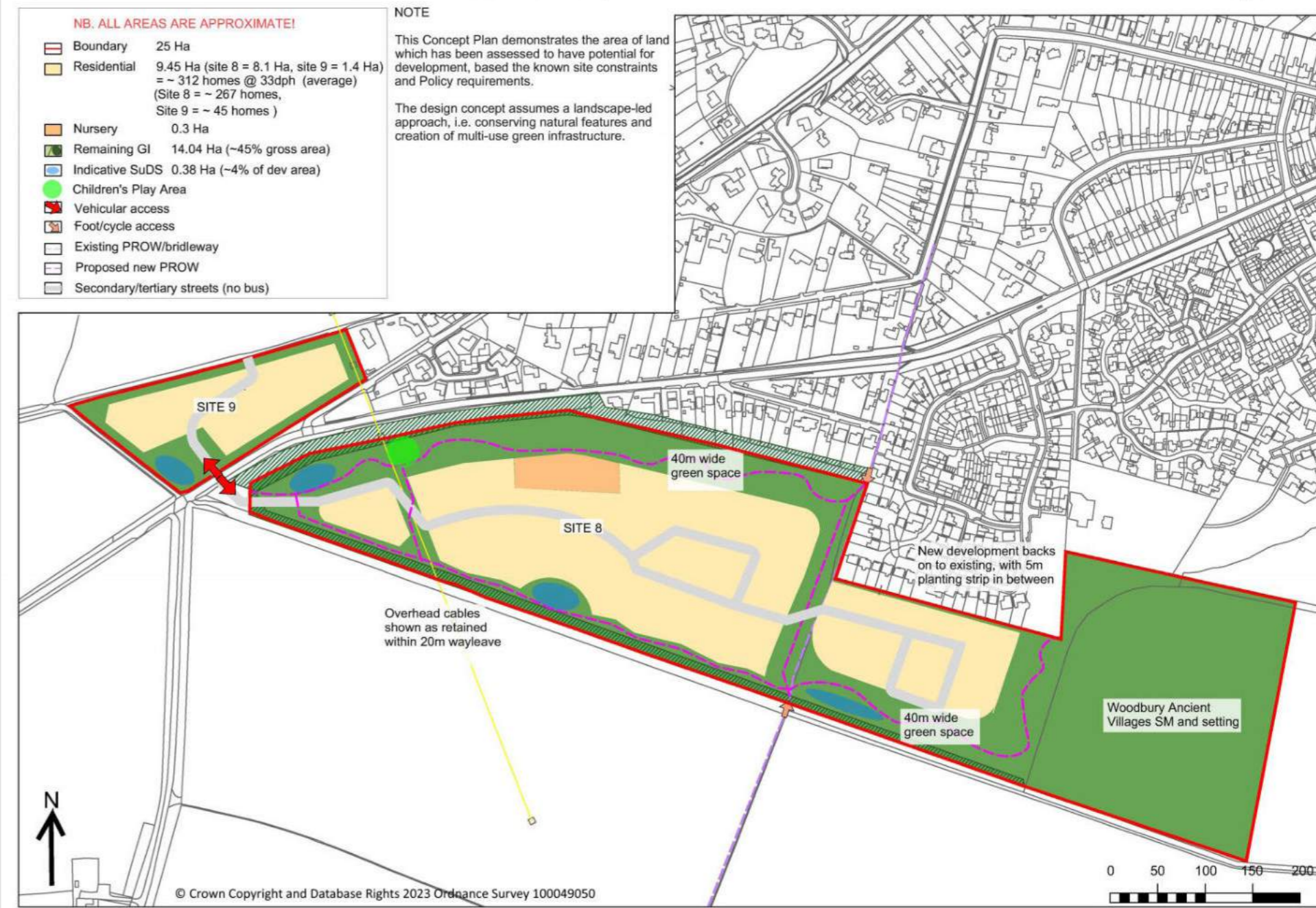
Policy 28

Land West of Coombe Road, Salisbury

- Land West of Coombe Road, Salisbury, as identified on the Policies Map, is allocated for the development of approximately 45 dwellings. Development should come forward in accordance with the principles in the concept plan.
- Infrastructure and mitigation requirements include:
- vehicular access from A354 Coombe Road;
 - improvements to cycling and walking routes through and around the site, including to Salisbury District Hospital and into the city centre, and to connect with the nearby Suitable Alternative Natural Greenspace allocation;
 - children's play areas;
 - provision of Suitable Alternative Greenspace on nearby land to the east of the site in accordance with Policy 29 Suitable Alternative Natural Greenspace, South Salisbury, connected with walking routes through the site;
 - funding contributions toward measures that improve air quality. An assessment will be needed to understand cumulative effects of development on relevant receptors in the Air Quality Management Area, and to identify appropriate mitigation measures;
 - a noise impact assessment to address the potential impacts associated with the A345;
 - measures aimed at neutralising the levels of phosphates flowing into the River Avon Special area of Conservation (SAC) to improve water quality;
 - offsite infrastructure reinforcement for water supply and foul drainage where required; and
 - funding contributions towards early years, primary and secondary education.

Land South of Harnham and Land West of Coombe Road, Harnham

Concept Plan



Site integration

The opportunity for South Harnham is for an integrated and connected neighbourhood extension to Harnham and south Salisbury – a key part of the proposed sustainable approach.

Both Site Policy 27 and 28 are well positioned to connect with an established network of pedestrian and cycle routes and is within easy walking distance of bus stops providing a regular service to the city.

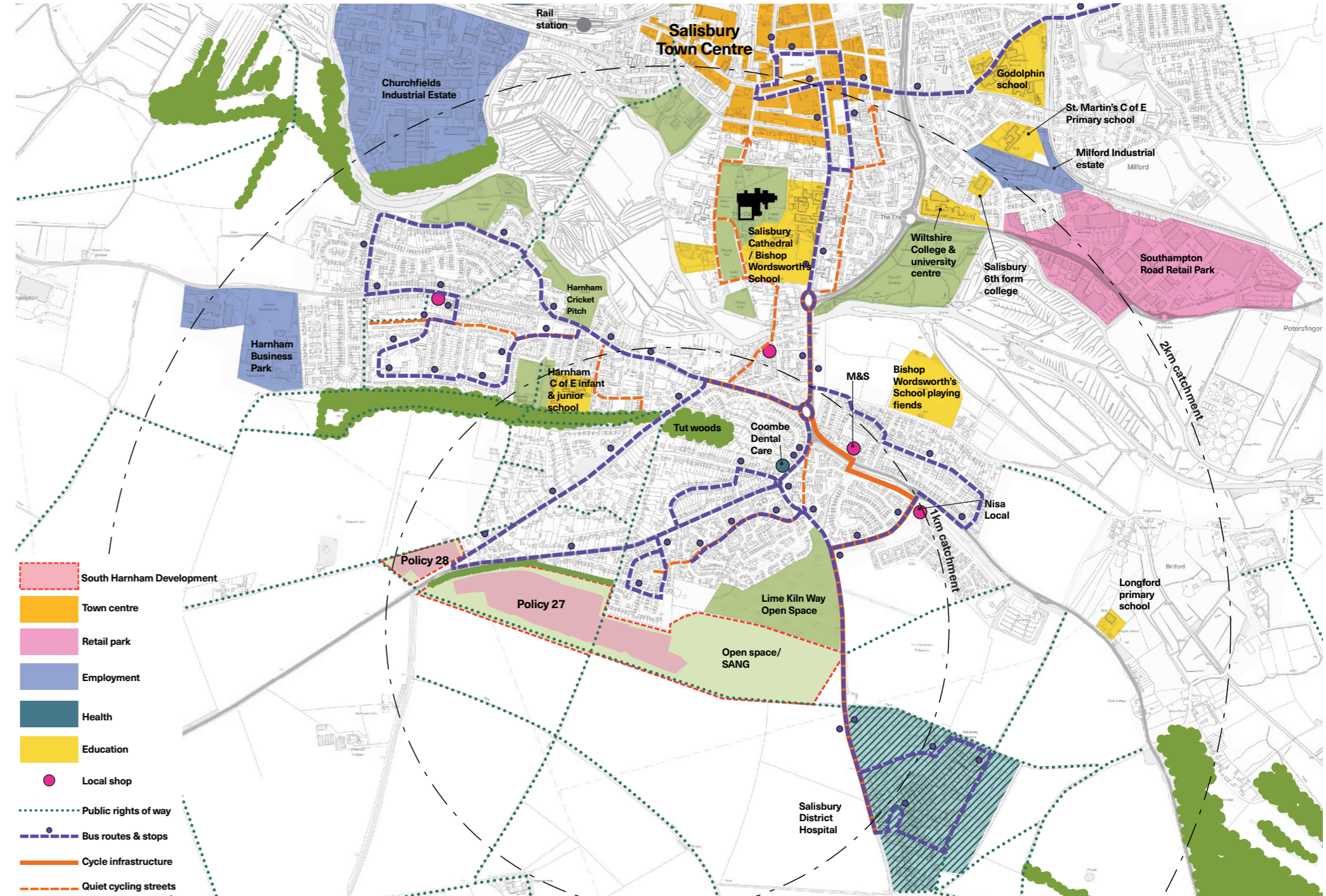
They are also within walking and cycling distance of schools, shops, community facilities, green spaces and key employment destinations such as Salisbury District Hospital and planned employment growth areas.

Walking and cycling connections to Salisbury District Hospital will form a key element of the integration strategy for South Harnham. It is the largest employer in the city, with over 4,000 employees and has future plans (HEAT Project Salisbury) to integrate the existing main hospital, with the environment and community at the core, offering new facilities for health, well-being, education, training, and research. This creates opportunities for key worker living to be provided near to the hospital at South Harnham with active travel route connections between the two supporting sustainable movement patterns.



HEAT Project Salisbury
- Health, Education and Technology (HEAT) Project Salisbury -

Salisbury District Hospital is the largest employer in the city, with future plans to grow through project HEAT. This will create even further job opportunities on the doorstep of South Harnham.



Accessibility plan

Landscape context

Site Policy 27 is located on a south-west facing dip slope of Harnham Hill, between the summit to the north, and a dry valley to the south. The hill is surrounded by the valleys of the River Nadder to the north, the Avon to the east and the Ebbles to the south. The British Geological Society (2023) maps the underlying geology as chalk.

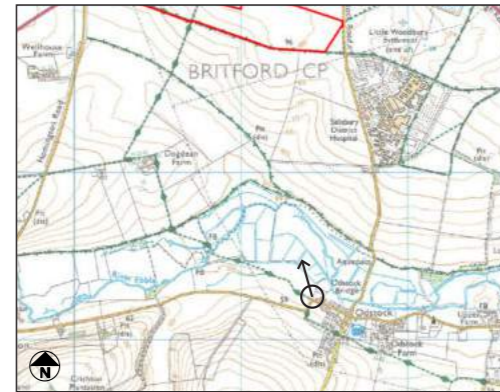
Salisbury District Landscape Character Assessment, February 2008 summarises the Visual Character' as "strongly influenced by the settlement edges which impart a human influence over the landscape and introduce a source of noise and visual intrusion".

Beyond the site to the south, the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB) covers land to the south and west of the site, bordered by the River Ebbles. Land between the AONB and the site is designated as a 'Special Landscape Area', a non-statutory landscape designation, meaning it is considered locally important.

The site is visible from the south, particularly the eastern half of the site which has a steeper gradient. The AONB designation on rising ground further south has inter-visibility with the site; however, there are not many public receptors (footpaths) of high sensitivity from which the site can be viewed.

Although visible from the south, the site is viewed in context with the existing Harnham settlement which is a harsh edge due to lack of screening around Andrews Way and Thompson Close, as well as the single species tree belt which is conspicuous in all views.

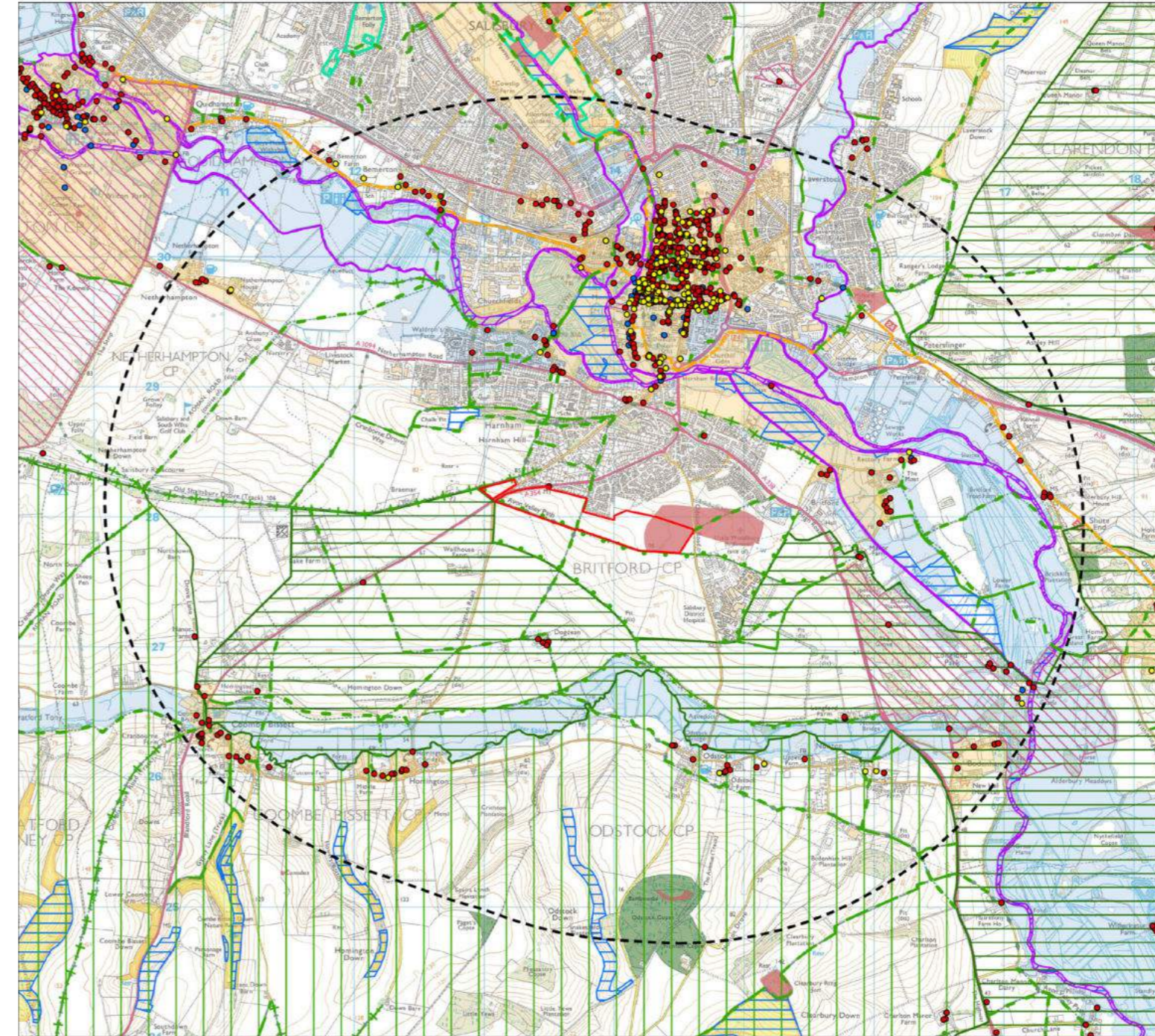
CONTEXT BASELINE VIEWPOINT 16
PRoW (footpath) ODST8/Avon Valley Path near Odstock (within AONB)



Camera make & model - Canon EOS 6D Mark II
Date & time of photograph - 05/10/2023 @ 14:46
OS grid reference - 414424, 126251
Viewpoint height (AOD) - 50m
Distance from site - 1475m



Preliminary viewpoint assessments have been undertaken, including important reference points within the AONB designation to the south, where the site is viewed in context with the existing Harnham settlement edge.

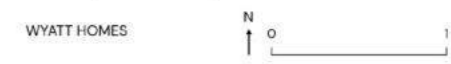


- KEY**
- Site Boundary
 - 3km Buffer
 - Listed Building Grade
 - I
 - II*
 - II
 - Public Footpaths
 - Public Bridleways
 - Restricted Byway
 - Public Byway open to all traffic
 - National Cycle Network
 - CRoW Access Land
 - Special Landscape Area (Wiltshire Council)
 - Areas of Outstanding Natural Beauty
 - Registered Parks and Gardens
 - Scheduled Monuments
 - Conservation Area
 - Local Nature Reserves
 - Special Areas of Conservation
 - Sites of Special Scientific Interest
 - Ancient Woodland
 - EA Flood Zone 3
 - EA Flood Zone 2

NOTES:
REVISIONS:

ENVIRONMENTAL DESIGNATIONS PLAN

HARNHAM, COOMBE ROAD, SALISBURY



DATE	SCALE	TEAM	APPROVED
26/09/2023	1:30,000@A3	MW	LS

SHEET	REVISION
-	-

DRAWING NUMBER
P23-2024_EN_02



Heritage context

Designated heritage assets located within the context of Policy Site 27 and 28 are depicted in the plan overleaf.

The south western part of the Woodbury Ancient Villages Scheduled Monument lies within Site 27. The Scheduled Monument covers the Iron Age enclosed settlement of Great Woodbury, in the western part of the monument and Little Woodbury in the eastern part. The Monument is currently under private agricultural management and is therefore affected by farming activities including ploughing.

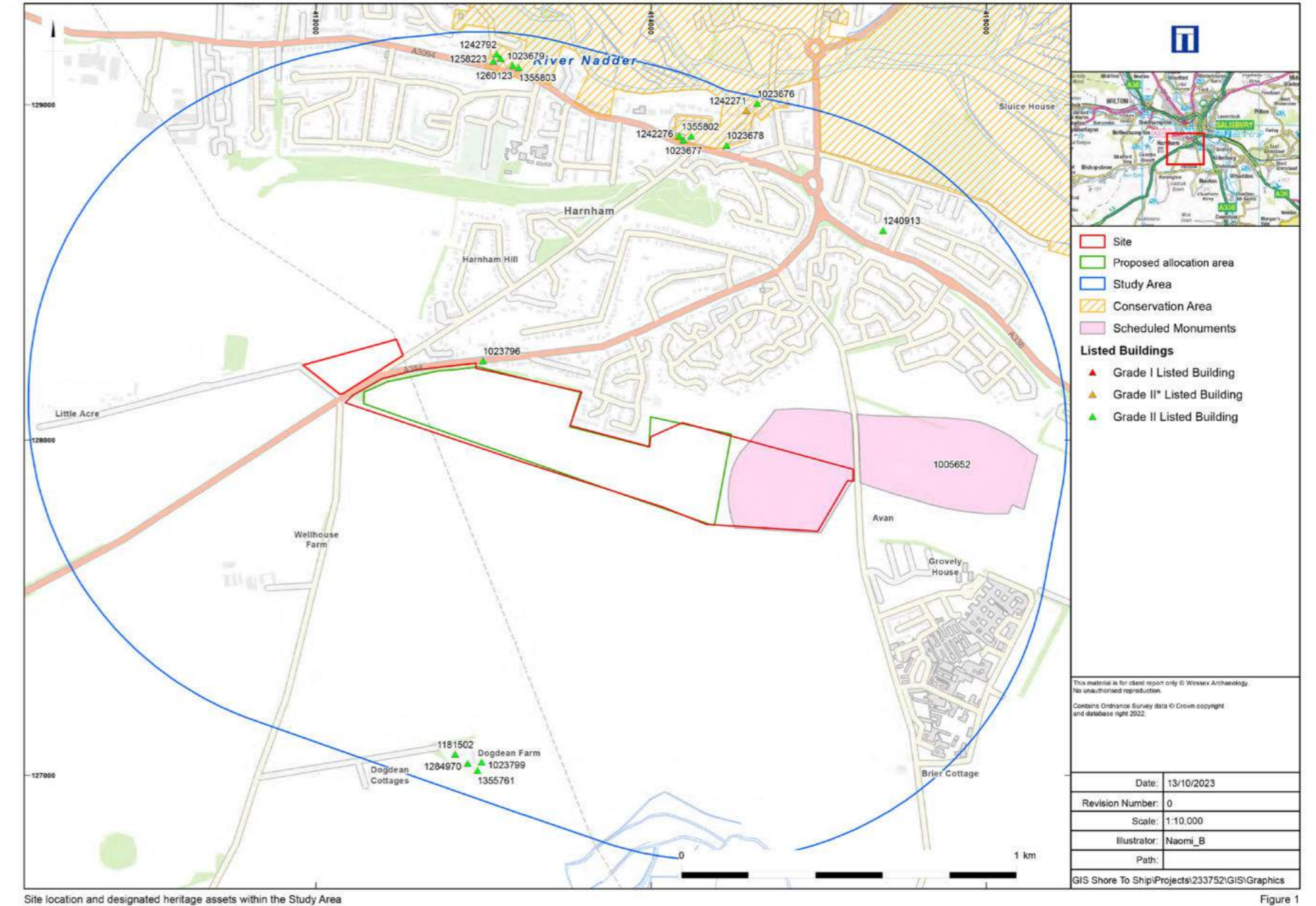
In consultation with Historic England and Wiltshire Council, Wyatt Homes have identified the potential to remove the Greater Woodbury section of the Scheduled monument from ploughing, which is a gradual but continual source of damage to the buried archaeological remains.

The opportunity is also identified to allow greater access to the monument as part of SANG proposals, thereby allowing visitors to appreciate its landscape context more easily and enhancing the ability to appreciate its archaeological significance. Development proposals to the west of this asset will respond sensitively to the monument's designation and its setting.

Other contextual heritage assets in the area include Salisbury Conservation Area, 800m north of the site and a number of listed buildings and structures. A listed milestone on Coombe Road is the only listed structure within the immediate vicinity.



View from the Great Woodbury SAM looking across the designation towards the settlement edge of Harnham. The Monument is current under private agricultural management.



Site features

Site Policy 27 at South Harnham comprises approximately 30 hectares of land covering most of a single arable field at the southern edge of Harnham.

The site is bordered to the north by the residential development of the former Harvard Hospital Site, to the north-west and west by the A354 (Coombe Road) and by a double hedgerow lined byway to the south.

Beyond this, the site is surrounded by further agricultural land to the west, south and east, with Odstock Road and Salisbury District Hospital beyond the remainder of the field to the east. Mature trees covered by Tree Preservation Orders (TPOs) line Coombe Road and form a distinctive and dense wooded boundary to the north west.

The heads of two shallow coombes run north-east/south-west through the centre-west and eastern part of the site. These form part of the natural drainage systems of Harnham Hill into the River Ebble.

The site is also crossed by an overhead power line, running south-east/north-west over the north-west corner of the site. No pylons are present within the site.

Site Policy 28 forms approximately 2.5 hectares of land west of Coombe Road allocated in the draft plan to provide 45 dwellings and supporting infrastructure.

The land rises gently from Coombe Road to higher ground on the northern edge where it adjoins Shaftesbury Drove.



South Harnham Site: Photograph locations (approximate position)



Coombe Road approach with Site Policy 27 and 28 frontages creating a new city gateway opportunity.



The distinctive row of mature Beech trees bind the western and north western edge of the site.



Shallow 'coombes' cross through the site forming a dip and natural drainage corridor.



Public Right of Way north-south crosses through the site and links through to Coombe Road.



Rear garden fences of properties on Andrews Way / Thompson Close back on the northern edge.



Views from the northern edge out to the River Ebble valley slopes and AONB designation.



Doubled hedgerow enclosing a byway route along the southern edge of the site.



Connection route and view over the Scheduled Monument towards Odstock Road and Hospital.

Key considerations

Site investigations have informed the following key considerations and objectives. It is important to note that technical work is ongoing and will continue to inform the masterplanning process:

Access and movement

- Access connection to be created from Coombe Road with potential to announce a gateway arrival to Salisbury.
- Seek to reduce vehicular speeds along Coombe Road approach and exit route to the city.
- Improve crossing safety for pedestrians and cyclists.
- Strengthen pedestrian and cycle connections between the site, city, hospital, and adjoining neighbourhoods.
- Enable the potential for future bus route connections and retain existing public right of way routes.

Landscape and ecology

- Create public focal areas along the northern edge at higher ground with channelled views towards the countryside.
- Introduce planting buffers along the southern edge to enable large trees to mature and soften views in from the AONB.
- Provide setting space for mature Beech tree group and settlement edge along Coombe Road.
- Ensure space within streets and space for tree planting 'layers' to soften views of built form.
- Enhance dark corridors along the southern boundary with tree and hedgerow planting to improve species connectivity.

Heritage

- Respect the setting and significance of the Great Woodbury Scheduled Monument.
- Create the opportunity for public access and interpretation of the asset.
- Allow for the physical linking of all the elements of Woodbury Ancient Villages together.

Drainage and utilities

- Respect existing topography and drainage patterns by incorporating the 'coombes' into the overall drainage strategy.
- Adopt a 'natural' SuDS scheme throughout the site including swales, rain gardens and attenuation ponds.
- Respect easements for existing underground sewers and water mains, and wayleaves for overhead power-lines.
- Maximise the potential of south facing slopes for solar gain and energy production.

Community

- Provide new facilities in accessible locations to support new and existing communities.
- Maintain public access and parkland walks around and through the site.
- Expand the network of community green spaces with linkages to Lime Kiln Way and Andrews Way.

Key:

	The site
	Main vehicular route
	Secondary vehicular route
	Public rights of way
	Proposed vehicular access
	Proposed pedestrian & cycle crossing improvements
	Improved connectivity with existing community
	2m contours
	Key views
	Scheduled monument
	Listed milestone
	Category B tree with root protection zone
	Other existing trees
	Hedges
	Existing coombe features
	Watermain and 6m easement
	Overhead cable and easement
	Existing back of properties
	Setting for TPO trees (northern boundary)
	Planting & ecology buffer
	Potential location for community facilities



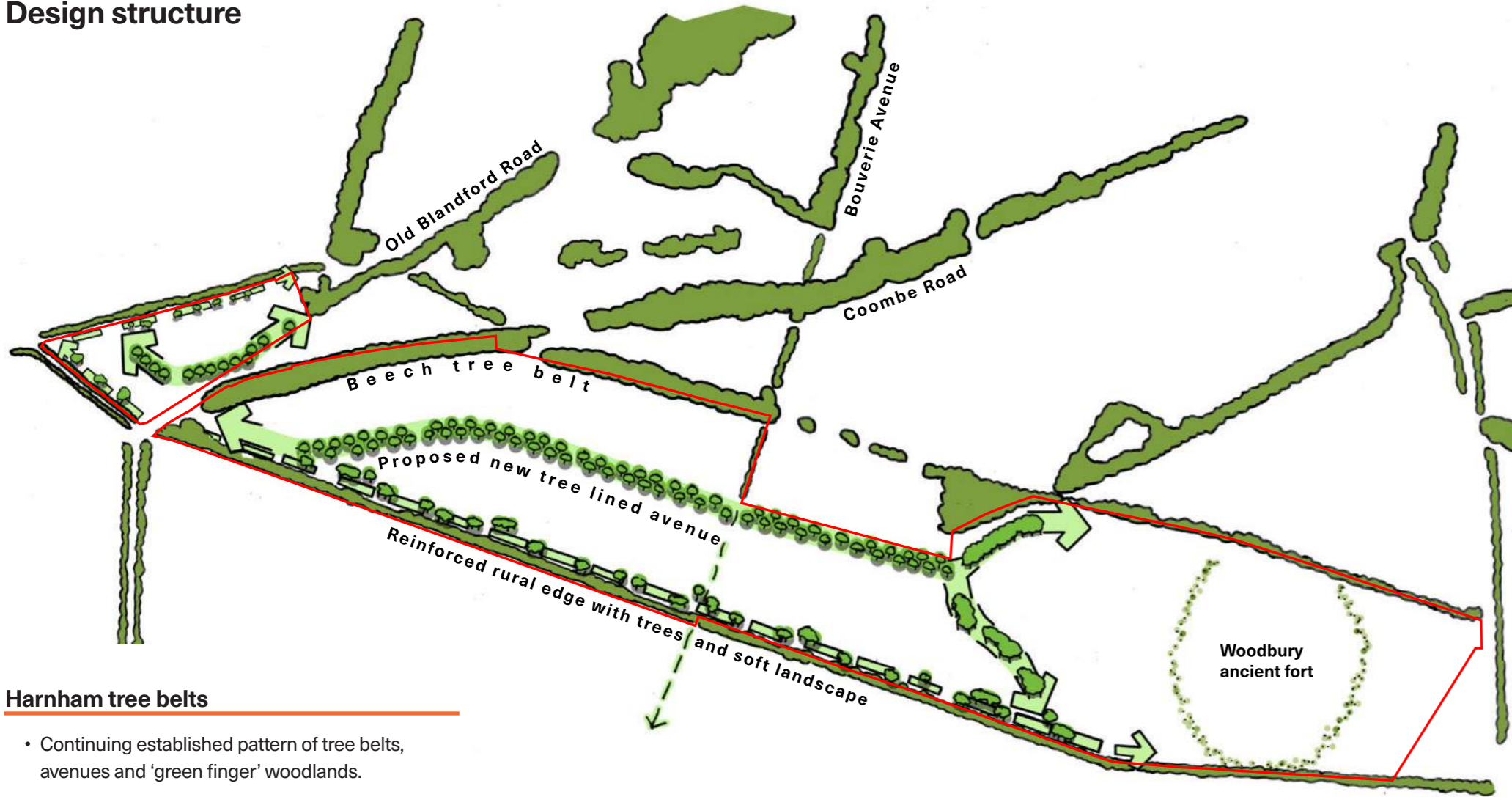
Site considerations plan

Illustrative Masterplan

An illustrative masterplan has been prepared in response to the vision principles, opportunity objectives, and site considerations.

This section sets out the structuring components of the masterplan and illustrates the potential neighbourhood character that can be created for South Harnham.

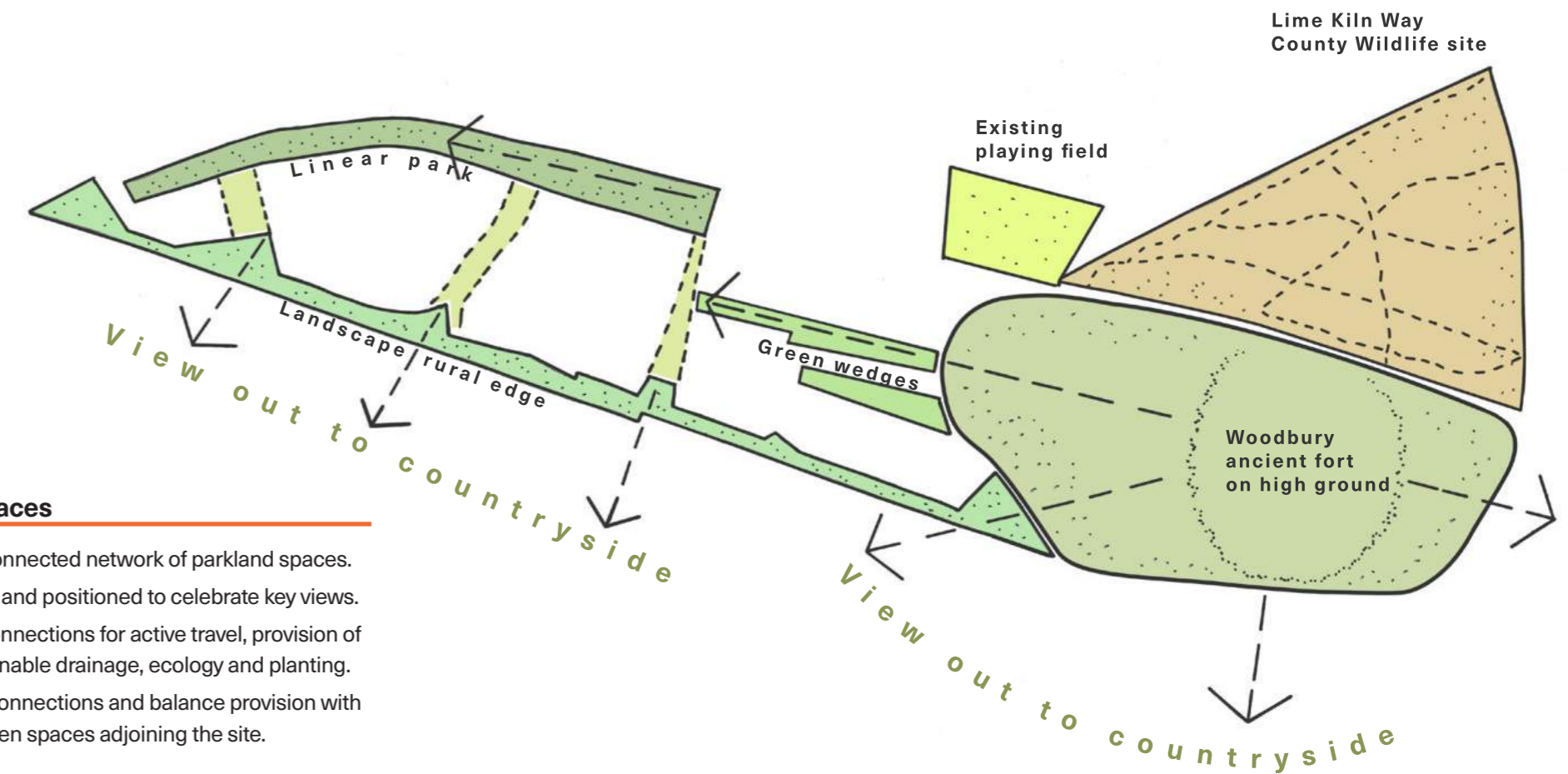
Design structure



Harnham tree belts

- Continuing established pattern of tree belts, avenues and 'green finger' woodlands.
- Introduce central avenue connecting corridor.
- Reinforce southern edge with new mature tree planting to filter inward views.
- Planting belts to extend across the contour and protect the Monument setting.

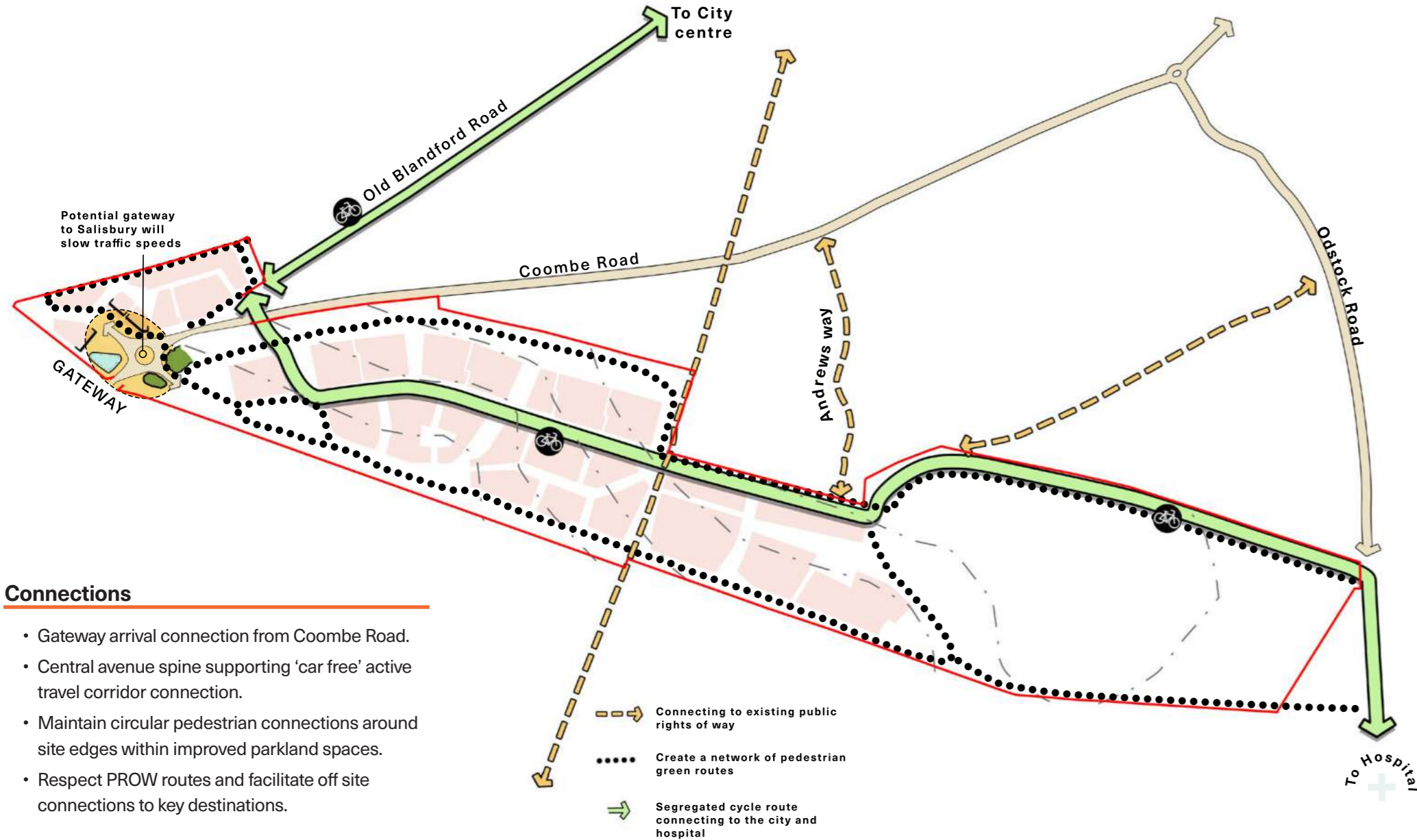
Design structure



Parkland spaces

- Create a connected network of parkland spaces.
- Structured and positioned to celebrate key views.
- Support connections for active travel, provision of play, sustainable drainage, ecology and planting.
- Facilitate connections and balance provision with existing open spaces adjoining the site.

Design structure



Connections

- Gateway arrival connection from Coombe Road.
- Central avenue spine supporting 'car free' active travel corridor connection.
- Maintain circular pedestrian connections around site edges within improved parkland spaces.
- Respect PROW routes and facilitate off site connections to key destinations.

Design structure



Masterplan Framework

The design structuring components combine to provide a framework for the illustrative masterplan response set out in this vision statement for South Harnham.

Illustrative masterplan



- 1 Gateway arrival with new roundabout access from Coombe Road
- 2 Terrace grouping to frame the entrance street and announce arrival
- 3 Feature entrance building addressing arrival space and pond
- 4 Central avenue street with parallel active travel route
- 5 Villa dwellings with cars contained within courtyards
- 6 Rural edge with cottages, informal greens, and village lanes
- 7 Linear parkland setting to tree belt with a car free frontage
- 8 Green wedge parkland corridors supporting drainage and views
- 9 Southern parkland corridor with mature planting belts
- 10 Community hub area with nursery, facilities, and food growing
- 11 Sensitive edge to monument with low scale barn courtyards
- 12 SANG parkland with public access to the historic monument

Gateway arrival

A welcoming new gateway arrival to Salisbury will be announced by a new roundabout junction at the start of Coombe Road, providing access to both Site Policy 27 and 28 and onward connections to the city centre.

A pond and grassland landscape setting to a new barn building will define an appropriate transition from the rural approach character of Salisbury Road.

The approach vista is marked by a distinctive terrace, reflecting the built qualities of Salisbury and its locality, and grouped to frame the entrance street and space and positively announce an arrival to the city from the country.

New tree planting and a development frontage along the north side of Coombe Road will complement the retained mature Beech tree boundary to Site Policy 27 and reinforce the established wooded avenue street character approach towards the city centre.



Illustrative masterplan extract: Policy Site 28 and 27 arrival



The Avenue

Through the spine of Site Policy 27, an avenue corridor will continue the established character of tree lined streets and planting belts extending through Harnham.

A central connecting street with generous landscaped verges will support substantial new tree planting to create a green and leafy character. Front garden space and hedgerow boundaries will further reinforce the distinctive parkland street character.

A segregated active travel corridor will provide a car free community connection spine through the heart of the development. Seating and public realm features can be designed into the route to encourage community interaction and instil local identity.

Dwellings are positioned to overlook the route with car access contained to a limited number of shared driveways and courtyards to prioritise pedestrian and cycle movements.



Illustrative masterplan extract: Site Policy 27 Avenue



46 Precedent character references



Illustrative sketch view: The Avenue through Site Policy 27

Linear park

The linear parkland will extend along the northern edge of Site Policy 27, incorporating the setting of the mature Beech trees to create a locally distinctive community green space corridor.

Routes will weave through the space, maintaining established perimeter and edge trails, and deliver connections through to Coombe Road and the adjacent neighbourhoods.

Opportunities for play, informal recreation, biodiversity, and edible landscape planting will help to deliver the vision objectives for a healthy and active new community.

New homes will be set back to overlook the parkland with cars concealed within internal courtyard spaces and pedestrian and cycle only routes along the parkland frontage.



Illustrative masterplan extract: Site Policy 27 linear parkland edge



Illustrative sketch view: Linear park and play space on Site Policy 27

Community edge

A 'community hub' will create a focal point for the new neighbourhood along the eastern edge of Site Policy 27, positioned in an easily accessible location for integration with the adjoining neighbourhood at Andrews Way.

The area has potential to provide an early years nursery building alongside space for community food production, vending facilities and a cycle mobility hub.

The uses can be arranged around a square space which also creates opportunities for small scale events and community meeting / interaction.

Low scale barn typology buildings arranged around courtyard spaces will draw reference from the locality to form a sensitive edge response and transition to the parkland SANG and historic Woodbury Monument.



Illustrative masterplan extract: Community edge Site Policy 27



Illustrative sketch view: Community square Site Policy 27



Village edge

Lane streets, informal green spaces and a linear greenway route will form an appropriate transition to the adjoining countryside along the southern edge of Site Policy 27.

Rural character typology buildings, with groups of low scale cottages, barn courtyards and more irregular building lines, will reflect the village characteristics found in settlements surrounding Salisbury.

Development will be set back from the southern edge to create an attractive linear greenway running parallel to boundary hedgerow and existing bridle way. The greenway will provide space to allow new tree planting belts to mature alongside opportunities for sustainable drainage, ecology and play.



Illustrative masterplan extract: Village edge Site Policy 27



Illustrative sketch view: Village edge and sustainable drainage Site Policy 27

‘Connected to the city,
shaped by the countryside,
and integrated with the
community’



Delivery

The proposals for South Harnham will deliver the key objectives for the area set out in the emerging Local Plan. This section summarises the outputs and outlines how proposals will integrate to deliver a comprehensive response and enhanced city gateway.

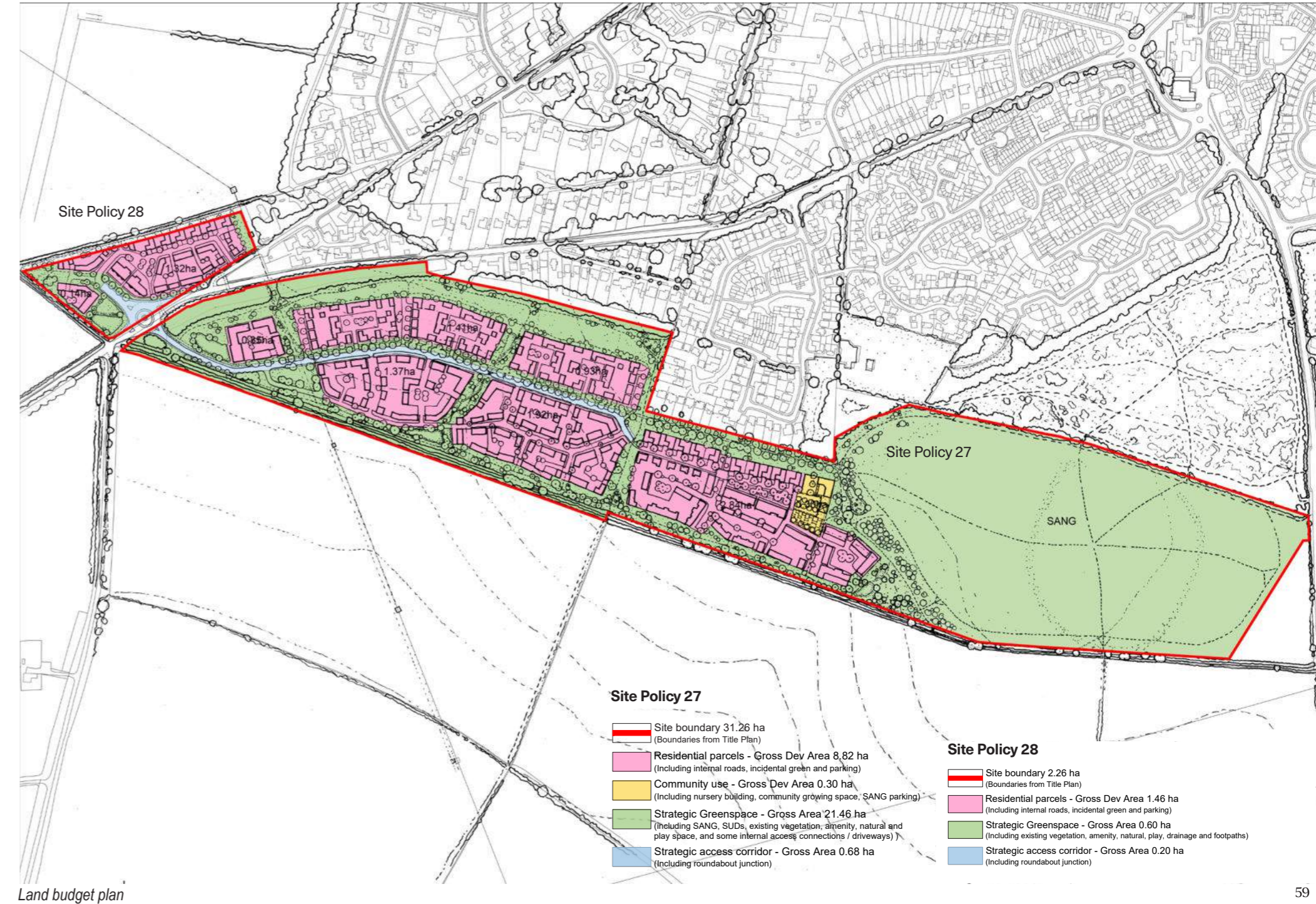
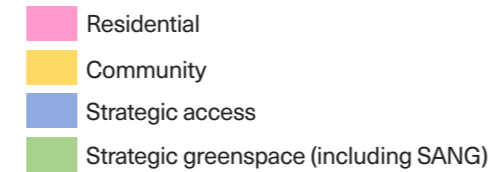
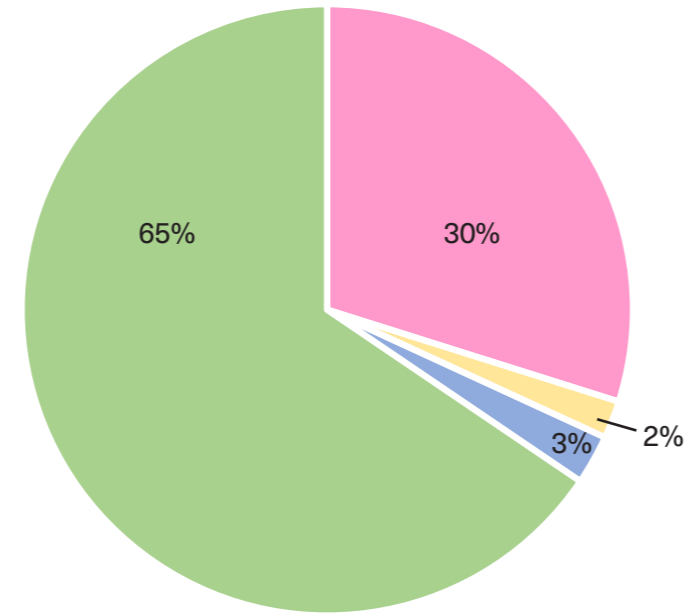
Uses and amount

The land budget plan for the illustrative masterplan sets out approximate gross area outputs. This demonstrates a policy compliant approach, with approximately 10 hectares of residential land overall, enabling at least 310 dwellings from Site Policy 27 and 28 combined at an average density of 30 dwellings per hectare. Approximately, over 60% of the site area is proposed as strategic greenspace and SANG.

Land use	Site 27 Area (ha) *	Site 28 Area (ha) *
Residential (including internal roads, courtyards and incidental green)	8.82	1.46
Community (Nursery building, community growing space)	0.30	
Strategic access (including roundabout junction)	0.68	0.20
Strategic greenspace (including SANG, SUDs, existing vegetation, amenity, natural and play space, and some internal access connections / driveways)	21.46	0.60
Area totals	31.26	2.26

58 * Approximate gross area measurements

The parklands of South Harnham will provide a significant resource for communities and nature. Over 60% of the site area will be dedicated to strategic greenspace, including SANG.



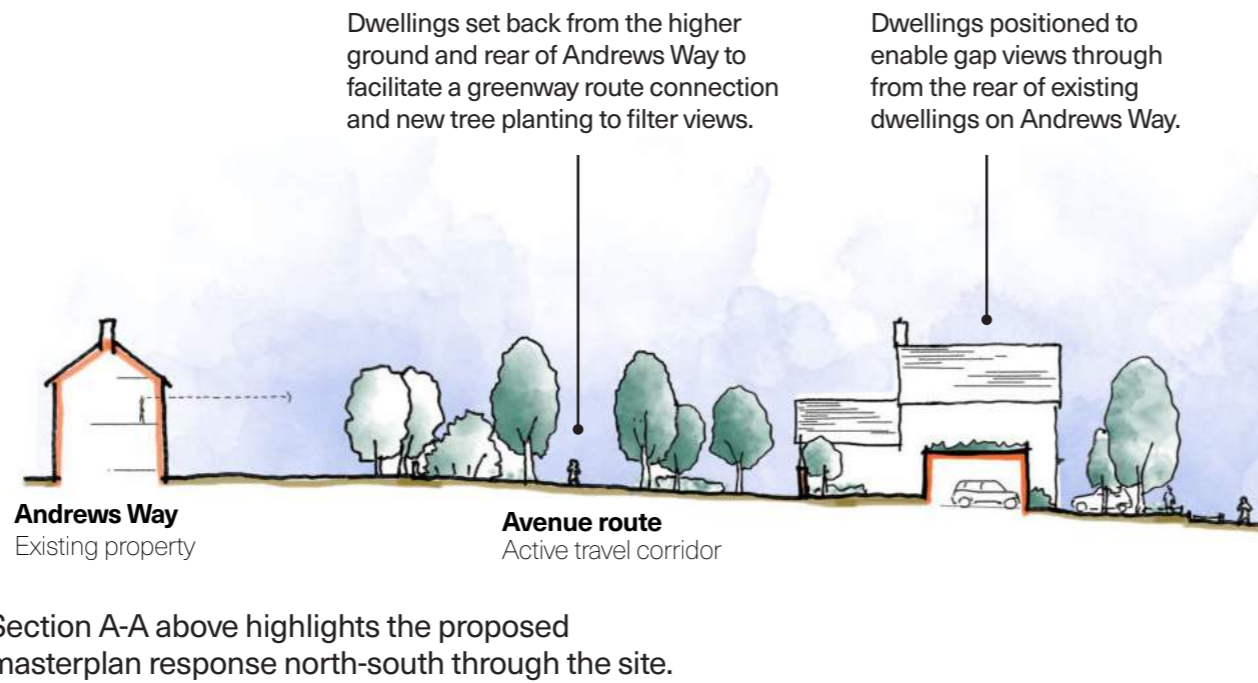
59

Illustrative site sections

The illustrative masterplan response seeks to deliver the local plan objectives for Site Policy 27 to successfully transition to the countryside, and to conserve and enhance the setting of Woodbury.



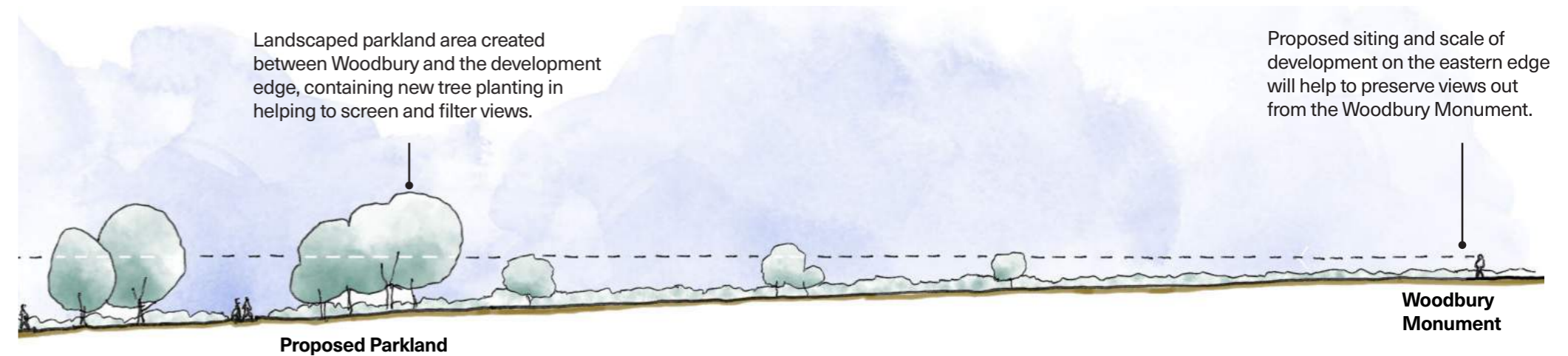
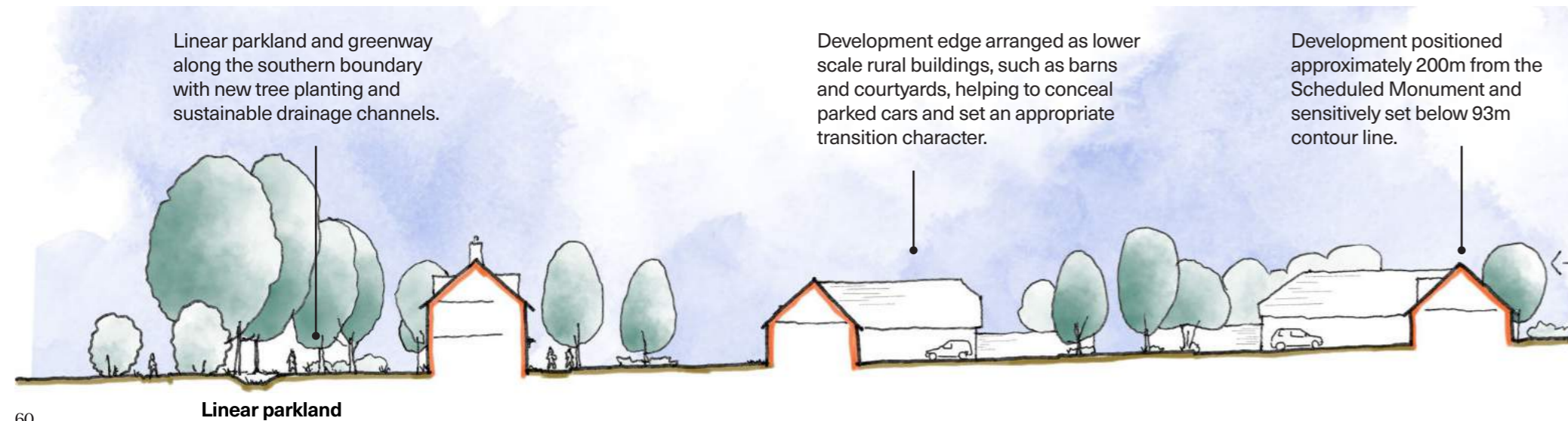
Section location plan



Section A-A above highlights the proposed masterplan response north-south through the site.



Section B-B above highlights the proposed masterplan response east-west from Woodbury Monument.



Section B-B above highlights the proposed masterplan response east-west from Woodbury Monument.

Policy compliance

The illustrative masterplan set out in this vision statement responds positively to the masterplanning principles and design requirements set out in draft Policies 27 & 28 of the Local Plan. The funding contributions and offsite mitigation requirements set out in the policy will also be addressed, with a commitment to respond in detail once the specific requirements become clear through the next stages.



Policy objective	Framework masterplan response
Allocated for approximately 265 & 45 dwellings	The concept masterplan identifies approximately 10 hectares of land for residential development at Site Policy 27 and 28 combined. This will enable the delivery of at least 310 dwellings at an overall average density of 30 dwellings per hectare. There is also flexibility for variances with the density approach to reflect different character responses across the sites.
0.3ha of land for the provision of an early years nursery	The concept masterplan identifies 0.3 hectares for community uses at Site Policy 27. This could include the provision of an early years nursery building as well as potential for other community related uses and activity space such as communal food growing, events space and hub facilities (food vending, bike hire / interchange). The masterplan locates these facilities to ensure easy access for both new and existing communities.
Vehicular access from A354 Coombe Road	A new roundabout access is proposed from the A354 Coombe Road. The junction acts as both a 'gateway' feature for drivers entering Salisbury from the south, and as an indirect speed restraint to mitigate speeds across the site frontage. The junction also make provision for improvements to accommodate pedestrians and cyclists
Improvements to cycling and walking routes through and around the site, including to Salisbury District Hospital and into the city centre	Encouraging active travel through walking and cycling routes is a key element of the site vision and concept masterplan. A connected network of routes is proposed, including a continuous 'car free' avenue corridor through Site Policy 27 and out to Odstock Road to connect with onward linkages to the hospital and city. Improved crossing arrangements to Coombe Road are proposed to ensure safe connections through to Harnham and established routes along Old Blandford Road.

Eastern section of the site to remain undeveloped to conserve and where possible enhance the heritage setting of the Woodbury Ancient Villages complex	A sensitive edge response is created to the heritage setting of Woodbury at Site Policy 27. Development is positioned approximately 200m from the Scheduled Monument, with a landscaped parkland area between containing new tree planting in helping to screen and filter views. The proposed development along the eastern edge is also sensitively arranged through lower scale rural building typologies set below 93m contour line. See illustrative site sections in this report to demonstrate the proposed response.
Improved urban edge and countryside transition on the approach into Salisbury from the south-west, conserving and enhancing the setting and interpretation of Woodbury Ancient Villages scheduled monument	The gateway arrival to Salisbury will continue to be characterised by the tree line avenue appearance of Coombe Road, with the new junction helping to slow approaching traffic. The avenue street characteristic, common to the local area, will flow through the developments with tree lined routes forming bands of new planting to help assimilate development within the landscape. A transition towards the countryside can be achieved through a rural built character of village type streets, spaces and buildings more informally arranged along the southern edge. Lower scale development and appropriate edge landscaping will help conserve and enhance the setting of the monument.
Children's play areas and allotments	The extensive network of parkland spaces will provide a range of opportunities for children's play and community food production, particularly through interactive landscape design and planting. Planting spaces, allotments and edible landscape trails will be a central element of the vision for a healthy and active community. Play spaces for all ages will be provided and overlooked to feel accessible and safe.

Document designed and produced by:

NEW masterplanning 2023.



SANG (Suitable Alternative Natural Greenspace) Precedent images



1. Chalk Grassland to be managed to increase the habitat health and diversity. Mowing will be undertaken approximately 3 times per year, with cuttings removed to keep nutrient levels low. Scrub planting will be monitored to prevent encroaching.



2. Scrub planting to be maintained to encourage structural diversity. Limited intervention will be taken in the control of the scrub planting, allowing it to grow naturally. Action could be taken to maintain variation in height and structure, to create open areas forming a scrub mosaic, or discourage scrub species from spreading into the chalk grassland.



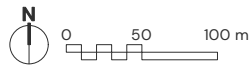
3. Scattered tree buffer, providing a filtered effect of views to the AONB. Management will be undertaken to ensure the health and longevity of the tree planting, along with any understorey. Any new tree planting will be undertaken outside of the Scheduled Monument area.



4. Interpretation boards/signage - the boards/signs will explain the purpose of the SANG space, including the ecological benefits, the importance of protecting the valuable heritage asset of the scheduled monument (Woodbury Ancient Village) and the crop marks.

KEY	
	Application Site Boundary
	Proposed SANG Boundary associated with the development (approx 13.4Ha)
	Avon Valley Path (long-distance path)
	Public Right of Way
	Approximate extent of Scheduled Monument ref: 1005652
	Approximate extent of South Salisbury SANG - as defined by Fig. 4.2 of the Wiltshire Local Plan (Pre-Submission draft 2020-2038) Sept 2023.
	Existing access into the site
	Key access points between the proposed SANG and the wider landscape
	Picnic benches
	Interpretation board/signage
	Chalk Grassland with mown footpath routes to provide 2.37km route
	Scrub planting
	Defined areas to have relaxed mowing regime to aid natural regeneration to support scrub
	Tree/tree group planting
	Car Park
	Location of proposed Local Equipped Area for Play
	Seating area with views of Salisbury Cathedral Spire
	Locations of existing bus-stops

General Management: Landscape management to be undertaken by a management body, LPA or public sector body, and is subject to a Landscape and Ecological Management Plan (LEMP) to be prepared at the detailed design stage.
Note: To be read in conjunction with the SOCG Table of SANG assessment in relation to Natural England's SANG creation guidelines.



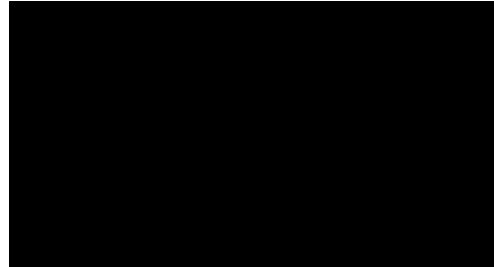
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Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 (1146165)

Comment ID

70

Response Date

6/3/24 3:50 PM

Status

Processed

Submission Type

Email

Version

0.4

**To which part of the Salisbury Neighbourhood
Development Plan does your comment relate?**

Other Comment

Comment:

Please find the attached Comment in response to the Consultation for the Salisbury Neighbourhood
Development Plan

**Do you wish to be notified of the decision on the
Salisbury Neighbourhood Development Plan
proposal?**

Yes

03/06/2024: Conserving and Enhancing Wiltshire's Special Landscape Areas for Existing and Future Generations

Concerns: Multiple, Large-scale Development Pressures on Special Landscape Areas. Questionable Planning Procedures and Cumulative Adverse Effects

The Special Landscape Area referred to is the strategically important rural gap that separates the cathedral city of Salisbury from Conservation Area village, Coombe Bissett, inside the Cranborne Chase and West Wiltshire Downs AON boundary. It is a just a few minutes' drive along the A354 Primary tourist route to link these exceptional heritage assets. The magnificent Beech Tree Avenue, enroute, a magnificent landscape asset, enhances a substantial section of the A354 within this special area.

Given that Wiltshire Council's Local Plan and the Salisbury Neighbourhood Development Plan are process-transitioning towards examination, confidence in transparent dialogue is essential to refine the best planning choices for highly sensitive areas. All too often, overwhelming development pressures are forcing small communities to breaking point – i.e. controversially located, over-scaled housing schemes; and solar farm clusters. Developers focused on site-specific yield without empathy for wider implications, are increasingly leveraging consistently productive farmland to maximise gain, before moving on to the next unsuspecting target. A few bird and bat boxes, carpet remnants, half a dozen young trees and a strip of wild flowers, cannot begin to compensate for the loss of evolved wildlife habitats that naturally increase protected species. The profound and irreplaceable loss of cherished Special Landscape Areas, ruination of heritage-asset settings, and eradication of a community's deep rooted sense-of-place should not be so carelessly trampled.

It would seem that Neighbourhood Plans, starting from a position of compliance under the guidance of Local Planning Authorities, are hooked-in to unreliable protection mechanisms. Reserve Sites and revised-up housing numbers quickly become testing issues. Perhaps it is safer to depend on the underlying foundations: National Planning Policy Framework; Policy detail in the emerging Local Plan; the overarching National Policy Statement for energy EN-1; 'LUC: Wiltshire Council Renewable Energy Study. Landscape Sensitivity Assessment, Final Report 2023' (Map 3.4); the Cranborne Chase and West Wiltshire Downs AONB Management Plan, CRoW Act, DLUHC/ gov.uk Planning Guidance; Planning Inspectorate (PINs) reference base, etc.

Housing numbers no longer dictate decision-making. Jessica Moriarty reported in the 09/03/2024 Wiltshire Times that 'three controversial planning applications that were previously approved have now been reversed as Wiltshire Council takes into account the new NPPF and relaxation of the need for a five-year housing land supply. Wiltshire Council is only now required to show a supply of deliverable sites for a minimum of four years. Wiltshire Council is presently demonstrating a 4.59 year supply, exceeding the threshold'.

However, planners continue to support greenfield as the short-cut solution for delivering housing numbers and large-scale solar arrays. Genuine evaluation is often discounted, i.e. whether proposals are justified as the most appropriate strategy - taking into account the reasonable alternatives and cumulative adverse effects based on proportionate evidence. Brownfield, previously developed or windfall sites; and many key National Planning Policy Framework principles are sidelined for economies of scale and uniform place-shaping.

The Local Plan fundamentally self-conflicts whilst striving to appear to be all things to all. This is evident for the Special Landscape Area that enhances the approaches to the cathedral city of Salisbury, and Conservation Area village, Coombe Bissett - the entry settlement to Cranborne Chase

and West Wiltshire Downs Area of Outstanding Natural Beauty, on the A354 primary tourist route. From Harnham, Salisbury's clear urban edge settlement - there follows an immediate change to rural landscape character, to open fields – beautiful, as consistently productive. Then suddenly, there is a powerful sense of woodland enclosure, dynamically pierced with contrasting long-views, framed between the trunks of the Beech Tree Avenue.

The magnificent, irreplaceable Beech Tree Avenue leads directly into Coombe Bissett, inside the AONB; with its Listed buildings and notable landmark, Grade I Listed, 12th century church of St. Michael – also serving to enhance the primary A354 tourist route. The proposed 30 MW, 40-hectare Beech Tree Solar Farm's northern boundary would merge with the Beech Tree Avenue along its length. The controversial 5 MW Bake Farm Solar Park, opposite the proposed Beech Tree Solar Farm, was stepped back from the A354 by Southern Area Planning Committee stipulation. The Bake Farm Solar Park planning application was subject to an EIA. This attractive approach route, as it exists, to the AONB, and Salisbury (within a few minutes of each other) is a significant asset to their respective settings. Custodial responsibilities should, therefore, produce enhancing results – sensitively protecting the integrity of all these remarkable assets, at all levels.

'Wiltshire Council Local Plan Pre-Submission Review (Cabinet version July 2023)

'5.166 There will also be a new Wiltshire Landscape Strategy which includes guidance based on the distinct character areas identified within the Wiltshire Landscape Character Assessment. The existing local 'Special Landscape Area' designations will no longer be saved, the council instead recognises the NPPFs landscape character approach to determining landscape value and will require applicants to assess the value of their sites at the local level through the use of the Landscape Institutes Technical Guidance Note TGN 02-21: 'Assessing landscape value outside national designations.'

High profile, large-scale planning proposals, that by their very nature, have potential to cause significant adverse effects on the setting of this cathedral city, should be painstakingly assessed. Routes leading into Salisbury add to or detract from its charismatic setting in the surrounding chalk landscape. Its fundamental relationships with Stonehenge, and the Cranborne Chase and West Wiltshire Downs Area of Outstanding Beauty are integral to historical context and the local economy, for existing and future generations. Both Plans focus on the need to sensitively enrich these assets. We live with planning decisions that have irreversibly damaged this unique city and its setting. It has often been down to councillors and residents to insist on common-sense. e.g. 'Save the Meadows' and 'Save the Market Square Trees.'

At the very least, this strategically significant landscape gap urgently requires a comprehensive, competent Environmental Impact Assessment, regulated by Wiltshire Council's 'Transformation Board' re: Planning Service Peer Review, as initiated by the Environment Select Committee; applying the disciplines of Precautionary and Prevention Principles; proof beyond reasonable scientific doubt; and worst-case-scenario. Residents and visitors are sensitively attuned to the particular qualities that make up this landscape narrative. Unfortunately, Wiltshire Council's future spatial vision for this area is being delivered in incomprehensible mixed-messaging.

While there is acute understanding that planning decisions are not a way of exercising local democracy, planning decisions should be made with regard to the national and local policy context and material planning considerations, in an open and transparent manner. Wiltshire Council has

committed to these principles in the Statement of Community Involvement, a legal requirement: '3.1) We are committed to open and honest dialogue with the community and try to include as many groups, organisations and individuals in the planning process as possible'.

The Local Plan 'New Policy' has identified housing development at two adjacent sites (8 & 9) south of Harnham, estimating a density of 310 dwellings on arable fields either side of the A354. This proposed swathe of housing would be little more than a field away from the LPA supported, highly controversial, Beech Tree Solar Farm Site - 40 hectares of PV panels in full view.

This scale of housing development would require a major re-configuration of the dangerous A354/Homington Road junction. It would increase traffic movements along the narrow Homington Road adding to Homington and Coombe Bissett's traffic pressures. It would also increase pressure on the Harnham Gyratory. How is the funding to be raised? These developments would bring aggressive urbanisation and industrialisation to overwhelm what is now a 'Special Landscape Area' where nature dominates, within the setting of the AONB, nurturing an abundance of improving wildlife – therefore, deeply deserving of that designation.

Coombe Bissett already has the operational Bake Farm Solar Park. 'Sensitive Receptors' and 'Cumulative adverse effects' are material to the current Beech Tree Solar Farm planning application: PL/2023/10394. Other proposals, affected by PL/2023/10394, and likely to surface soon, would amplify cumulative adverse effects.

There is a plethora of renewable energy innovations that negate the need for inefficient, large-scale solar array installations on land of any type. Do we need clusters of dated technology as a way forward? In light of this County's enviable solar energy record, and the issues relating to large-array clusters that are raging; we have the responsibility to weigh what we need – where we need it, to ascertain the most prudent option for existing and future generations. Also to consider in this nuanced argument is the Wiltshire Wildlife Community Energy project 'Petersfinger Solar Farm; and the 26 battery unit, 50MW project at Quidhampton Quarry – specifically, is its renewable energy to be sourced from community energy projects, or private developer driven projects, or other?

PL/2023/10394, Beech Tree Solar Farm, @ 30 MW, over 40 hectares, for a farcical projection of 40 years operational duration, has been Called-in to Committee by Councillor Richard Clewer, diligent Unitary Councillor for Downton and Ebble; and Leader of Wiltshire Council. Councillor Clewer is an ex-member of the SAPC – serving at the Bake Farm determination.

An article in the Salisbury Journal (28/12/2023) referred to the Beech Tree Solar Farm proposal as the *unidentifiable* 'Low Carbon Solar Park 24'. Given the confusing search titles for Beech Tree Solar Farm; 80+ Documents, and the public consultation period running over Christmas and New Year, (when many parishioners were preoccupied with another Covid outbreak and flooding issues); the high number of astute Comments objecting to PL/2023/10394 share a common rationale: i.e. the application is without essential evidence of the necessary Consents to achieve its operational purpose; large-scale Solar Arrays are outdated, inefficient first-wave technology, particularly without battery storage facilities on-site; and the 'Beech Tree Farm Solar Array Site' would likely cause significant adverse and irreversible effects, with reference to many NPPF principles. There are far-reaching cumulative implications for many designated sites across the local area; and it has, determinedly, not been subjected to the competent scrutiny of an Environmental Impact Assessment including Cumulative LVIA, EclA, HRAs, Hydrological Risk Assessment, Sulphur Hexafluoride (SF6) screening, and thorough Aviation Safety appraisal.

It is of pressing concern at this late hour, that the residents of Harnham and Salisbury likely to be adversely affected, should be quickly informed and allowed the time to study this voluminous planning application with opportunity to Comment, before it is determined through the Strategic Planning Committee.

There are alarming flaws in this proposal and procedural standards require an urgent re-set.

The NPPF acknowledges the concept of cumulative impact in relation to planning decisions. Specifically, it states that granting permission for a development may undermine the plan-making process if the proposed development is substantial or its cumulative effect would be significant. In such cases, granting permission could predetermine decisions about the scale, location, or phasing of new development, which are central to an emerging plan.

Essentially, if multiple developments together have a significant impact, it's essential to consider their cumulative effects on the overall planning process. Therefore, the planning officer's position "An EIA is not required" for Beech Tree Solar Farm, is baffling.

Cumulative Effects: Legislative Background

The need to take account of the potential adverse impacts of development proposals as well as the benefits of those developments has been at the heart of the modern planning system. The relevant UK legislation was the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999, (notably Schedule 3). Cumulative impacts describe the combined effects of a number of individual impacts which, in aggregate, are greater than the sum of those individual impacts. They are those which are caused by the combined effects of one action, or of several actions or developments at the same time or from a succession of actions or developments over time. These regulations aim to ensure that environmental considerations are taken into account during the planning process for certain types of development.

Schedule 3 within these regulations outlines specific criteria that should be considered when assessing the environmental impact of a proposed development. The three broad criteria identified in Schedule 3:

Characteristics of the Development:

This includes factors such as the size of the development, its use of natural resources, and the quantities of pollution and waste generated.

Environmental Sensitivity of the Location:

Consideration of the location's sensitivity to environmental changes is crucial. Some areas may be more ecologically fragile or have unique features that require special attention.

Characteristics of the Potential Impact:

The magnitude and duration of the potential impact should be evaluated. This involves assessing how significant the environmental effects of the development might be.

These regulations play an essential role in promoting sustainable development and ensuring that environmental impacts are carefully considered before granting planning permission for certain projects. Paragraphs 49 & 50 National Planning Policy Framework should also be considered.

There are concerns as to the level of Local Authority knowledge re: South of Harnham Sites 8 & 9, when PL/2023/10394, Beech Tree Solar Farm underwent pre-application consultations and validation. Were cumulative effects diligently considered, particularly in respect of precautionary and

prevention principles, before it was decided that: “An EIA is not required.” How will this ‘ruling-out’ decision affect future planning applications for this area?

Wiltshire Council Local Plan Pre-Submission Review (Cabinet version July 2023)

‘5.160 Development can present many pressures upon Wiltshire’s landscapes including on the periphery of towns and villages, where the erosion of the separate identity of settlements and their coalescence, character, visual and functional amenity can degrade their setting to the detriment of the character of the rural countryside. New developments must seek to conserve and where possible enhance the rural edge of settlements by protecting locally important views and landscape character, as well as ensuring appropriate landscape buffers are formed that can adequately manage the transition from the urban to rural landscape.’

Historic England Planning Guidance Advice 3, & PPG, paragraph: 013, reference ID: 18a-013-20140306

‘When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.’

There is pressing need to address the above cumulative issues as material to the planning process; to apply the necessary extent of competent appraisal now, and to include the many residents affected by these planning concepts in the consultation process.

The first planning proposal to surface for this Special Landscape Area is Beech Tree Solar Farm: PL/2023/10394, and in its questionable state, it is at the point of determination by the Strategic Planning Committee. With stacked agendas it is unlikely that all members would have the time to scrutinise the 80 plus documents, designed to overwhelm, with many ‘Superseded, Revised and Added’ documents outside of consultation deadlines. The applicant, ‘Low Carbon,’ - a privately owned investment management company of unlimited resources, has 35 other solar array projects in development across the UK. Its strategies are sharply honed. It is possible that Strategic Planning Committee members are likely to be heavily dependent on a synopsis.

Permitted development would set many unfortunate planning precedents that could adversely overwhelm other small communities and bring further pressures to this area, particularly in sensitive settings. At this point in time, in Salisbury Council’s Neighbourhood Plan and Wiltshire Council’s Local Plan, all of the large-scale planning pressures on this strategically important Special Landscape Area need to be clearly identified, and soundly evaluated for their enmeshed cumulative effects, before any are determined. Transparent dialogue is essential. Much is at stake.



Reference: Planning Application PL/2023/10394 Beech Tree Solar Farm

Comments: Richard Clewer WC-24-01-290357

John and Jan Jarvis WC-24-04-298592

Linda Buckley WC- 24-04- 298822

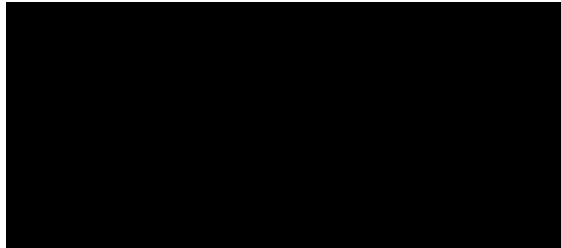
Richard Burden AONB WC- 24-03-297165 & WC- 24-02-292631

Comment

Consultee

Email Address

Address



Event Name

Salisbury Neighbourhood Development Plan
(2020-2038) Regulation 16 Consultation

Comment by

 1347524)

Comment ID

71

Response Date

6/3/24 3:53 PM

Status

Processed

Submission Type

Email

Version

0.4

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan (2020 – 2038) Consultation Response Form

Ref:	(For official use only)
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Please return to Wiltshire Council, by 5pm on Monday 3rd June 2023.

By post to: Neighbourhood Planning, Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: neighbourhoodplanning@wiltshire.gov.uk

Via the council’s website at: <http://consult.wiltshire.gov.uk/portal>

Documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

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

	1. Personal details	2. Agent’s details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		

Email Address



Part B – Please use a separate sheet for each part of the draft plan you wish to comment on

To which part of the draft Salisbury Neighbourhood Development Plan (2020 – 2038) do your comments relate?

Page: Paragraph Other:

Comment:

In their Local Plan, Policy 28 & 29, Wiltshire Council want to build 310 homes on Sites 8 & 9. In this Salisbury Neighbourhood Development Plan, Salisbury Council had plans for houses to be built on **brownfield sites** in lieu of the above, but Wiltshire Council vetoed them. Similarly, future **'windfall site'** numbers, statistically projected from the period 2016 – 2021 when 579 dwellings were built, adding up to 1,737 homes over the remaining 15 years of the Local Plan, were disputed by the WCC in their Local Plan.

The discarded **brownfield sites** are Quidhamptom Quarry, Brown Street & Churchfields. These, with an allocation of 480 homes, were in Reg 14 of the SNDP but not Reg 16. Why were these removed? The Maltings and the Central Car Park could also provide 200 homes according to the SNDP but this was also rejected by the WCLP. **680 homes – more than twice the amount of the 310 planned for sites 8 & 9!!** Would WCC really prefer to exploit the 'green lung' of Salisbury, rather than utilise, in **brownfield sites** and projected **'windfall' sites**, land which is ripe for development? I'll give you an example: Dunn House by the Ring Road opposite Waitrose. What an eyesore it was for so long, and then someone had the presence of mind to do something about it and now it is completely unrecognisable.

The Salisbury Neighbourhood Development Plan and the Wiltshire Council Local Plan should both include **brownfield site** figures and future **'windfall' site** projections. Development on Sites 8 & 9 should not be necessary if the above is acknowledged. Only that would help make the Local Plan sound.

Future notification

I wish to be notified of the decision on the draft

Salisbury Neighbourhood Development Plan:

YES: NO:

Signature:



Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comment

Consultee	Strategic Planning Wiltshire Council (975614)
Email Address	spatialplanningpolicy@wiltshire.gov.uk
Company / Organization	Wiltshire Council
Address	n/a n/a n/a
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Wiltshire Council (Strategic Planning Wiltshire Council - 975614)
Comment ID	72
Response Date	6/14/24 4:00 PM
Status	Processed
Submission Type	Email
Version	0.6

Comment:

Please see attached comments.

Do you wish to be notified of the decision on the Salisbury Neighbourhood Development Plan proposal? Yes

Draft Salisbury Neighbourhood Development Plan 2020–2038 (submission September 2023)

Wiltshire Council comments to the Regulation 16 consultation

This response sets out Wiltshire Council's comments on the draft Salisbury Neighbourhood Development Plan (SNDP), which has been formally submitted to Wiltshire Council.

Wiltshire Council is fully supportive of neighbourhood planning and has welcomed the opportunity to engage with Salisbury City Council and its planning agent about the neighbourhood planning process throughout preparation of their draft Plan. We recognise the significant work undertaken to produce the document and the extent of consultation and community engagement that has gone into the production of their draft Plan. Advice and comments have been offered by Wiltshire Council through ongoing dialogue throughout the process. The draft SNDP addresses a broad scope of issues that are of importance to the local community.

The Salisbury neighbourhood area was designated on 18th July 2019. A pre-submission consultation was undertaken by Salisbury City Council as the qualifying body (QB) in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) from 20th July 2022 to 30th September 2022. Wiltshire Council provided their formal comments to the QB.

This Regulation 16 consultation gives a further opportunity for Wiltshire Council to provide comments with the intention of ensuring that the draft SNDP is in generally conformity with strategic policies of Wiltshire's development plan, meets the Basic Conditions, and provides a user-friendly document that will assist decision takers in the making of planning decisions in the Salisbury neighbourhood area.

Submission of the draft SNDP

In March 2024 the draft SDNP was submitted to Wiltshire Council, the local planning authority who confirmed that the submission complied with all relevant statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The submitted draft SDNP was accompanied by a Basic Conditions Statement, a Consultation Statement and a map of the neighbourhood designated area. Wiltshire Council formally consulted (Regulation 16) on the submitted draft SDNP between 15th April 2024 and 3rd June 2024.

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

Wiltshire Council's SEA screening opinion in November 2023 (Appendix 1) concluded that the proposals within the draft SDNP were likely to have significant environmental effects and required an SEA for the following reasons:

'The draft SNDP, when screened under the Habitats Regulations, requires an appropriate assessment (AA) as a result of the potential for likely significant effects within the Zol (Zone of influence).'

Wiltshire Council's HRA screening opinion (Appendix 2) recommended that 12 planning policies out of the 30 planning policies of the draft SNDP were taken forward to appropriate assessment (AA) due to the potential likely significant effects on the River Avon SAC and the New Forest SPA/SAC.

The AA concluded on the basis that the recommended policy amendments were made to the draft SNDP it could be concluded beyond reasonable scientific doubt that the draft SNDP will have no adverse effects on the integrity of the River Avon SAC either alone or in-combination with other plans and projects.

Natural England concurred with Wiltshire Councils appropriate assessment conclusion (Appendix 3) .

Policy context

The policy context for the draft SNDP is as follows.

- *Wiltshire Council's development plan*
 - Wiltshire Core Strategy, 2006-2026 (WCS) - adopted January 2015.
 - Salisbury District Local Plan (SDLP) – saved policies as set out in Appendix D of the WCS.
 - Wiltshire Housing Site Allocations Plan (WHSAP) – adopted February 2020.
- *Wiltshire Council's emerging components of the development plan*
 - Wiltshire Local Plan, 2020-2038 (WLP)
 - Wiltshire Gypsies and Travellers DPD
- *Other relevant policy considerations*
 - National Planning Policy Framework (NPPF) – updated December 2023.
 - Planning Practice Guidance (PPG).

Status of the emerging Wiltshire Local Plan

The draft SNDP has been prepared alongside the review of the Wiltshire Core Strategy – the Wiltshire Local Plan (WLP) – which will cover a new plan period of 2020-2038. The draft WLP has reached pre-submission 'Regulation 19' stage which took place in late 2023 but has not been subject to public examination. It is anticipated that the draft WLP will be submitted for Examination in Public in Q4 2024. The draft WLP therefore holds limited weight but provides a picture of anticipated direction of travel for strategic planning in Wiltshire beyond the WCS plan period. The reasoning and evidence informing the emerging draft WLP is of relevance to the examination of the SNDP.

Comments on the draft SNDP

A number of comments that follow are repetitions of points that were raised by Wiltshire Council during the Regulation 14 consultation. The below comments represent a collective response from Wiltshire Council specialist officers and are presented in the order that topics appear in the draft SNDP for ease of reference.

General points

Wiltshire Council acknowledges that the draft SNDP plan period has been extended to reflect the plan period of the emerging Wiltshire Local Plan. The neighbourhood plan has been prepared to

reflect the policy context of the existing adopted WCS, with cross referencing to WCS policies throughout. While there is reference to the emerging WLP and its evidence base there are some elements of the draft SNDP which potentially conflict with the emerging evidence for the WLP, which we suggest would require amendment. This is set out in more detail later in this response.

As planning decisions must have regard to adopted WCS policies we feel there is no need to cross refer to specific WCS policies within neighbourhood plan policies, as the development plan should be read as a whole, and we would suggest amending the wording of such policies to avoid duplication.

Wiltshire Council would raise as a general comment that the draft SNDP makes several references to earlier versions of the National Planning Policy Framework that would benefit from updating to reflect the most recent published version of the NPPF from December 2023. References also to the Environment Bill should also be updated to the Environment Act.

The draft SNDP is very long and contains a large amount of background evidence and contextual commentary that may be better suited to background documents. The draft SNDP is likely to be made more user friendly for the reader and decision maker if reduced in length, with cross reference to background evidence where appropriate.

Section 1: Introduction

Paragraph 11 within the introductory section provides commentary on the relationship of the draft SNDP and the emerging WLP. The draft SNDP no longer proposes to allocate sites for housing development, which is a key difference from the Regulation 14 version of the document that was previously consulted on. The reasoning for this is explained in paragraph 11, being that the timescales for the WLP were pushed back thus creating misalignment with the timeframe for the draft SNDP which had been programmed to be produced in parallel with the WLP timescales. However, paragraph 11 refers to the potential for a prompt review of the neighbourhood plan (in 2025) to reflect the WLP once adopted, and which could reintroduce site allocations. An early review is supported given that the draft SNDP has been framed around the WCS which will be superseded. The draft WLP includes a neighbourhood plan housing target of 60 homes for Salisbury, which will need to be addressed alongside any other housing needs identified at that time, through a review of the plan.

With regard to the 'Vision and Objectives' set out in Figure 3, we would comment that the paragraph relating to Churchfields Industrial Estate presents a conflict with the evidence supporting the draft WLP, and would suggest requires amendment. This is explained in more detail below, in the discussion of Policy 17 Churchfields and the Engine Shed Site.

Wiltshire Council suggest that for completeness, paragraph 27 needs to be extended to set out a fuller articulation of 'excluded development', incorporating 'county matters' as set out in Schedule 1(1) of the 1990 (Town and Country Planning) Act.

Paragraph 28 may also benefit from setting out the quoted section from the PPG in full, including that neighbourhood plans must be general conformity with, and plan positively to support strategic policies.

It is considered that paragraph 30 should be amended to more accurately reflect paragraph 1.9 of the WCS which describes the complementary relationship between the WCS and neighbourhood

plans, with the WCS providing ‘a clear overall strategic direction for development in Wiltshire, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.’ The WCS was adopted prior to the requirement to delineate strategic / non-strategic policies, although it is clear from paragraph 1.9 that all policies contained in the WCS are considered to be of a strategic nature. We would, therefore, suggest an amendment to the last sentence of draft SNDP paragraph 30.

Policy 1 Tree planting for carbon capture

The premise of the policy is broadly supported, as tree planting is an important measure to mitigate for the impacts of climate change as well as providing biodiversity, health and wellbeing benefits. To this end Wiltshire Council have proposed a policy within the draft WLP – Policy 90: Woodland, hedgerows and trees – which encourages tree planting as part of development schemes. The neighbourhood plan requirement for 30% tree cover on major developments is drawn from recommendations from The Woodland Trust, and we would comment that it will be important for any such requirements to be flexible to respond to a range of site characteristics as 30% represents a significant proportion of land take. The policy introduces allowance for offsite contributions in accordance with draft SNDP Policy 12, and is discussed later in our response to Policy 12.

Policy 2 Air quality

With regard to paragraph 49 we would advise that the latest Annual Status Report was completed in August 2023, so the reference to July 2022 should be updated. In the interests of accuracy ‘NO²’ should be corrected to ‘NO₂’. Furthermore, we note that fine particulate matter (PM10) is not of concern in this area so we would recommend removing the final part of the paragraph, and an amendment to Policy 2 may also be required.

We would suggest removing paragraph 53, as this is not considered relevant. More recent data has shown that levels are below the objective for NO₂ with the exception of Wilton Road (A36 trunk road).

Reference in paragraph 57 to the draft Air Quality Action Plan (AQAP) also requires updating to reflect that the AQAP was formally adopted in April 2024.

Policy 3 Carbon neutral development

In the interests of accuracy we suggest that paragraph 59 is amended to reflect that Wiltshire Council’s commitment to achieve carbon neutrality applies to Wiltshire Council operations only. Instead of ‘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 draft neighbourhood plan, and consider an amendment is required to better reflect the meeting minutes of Wiltshire Council on 26 February 2019¹, when this matter was agreed by the council.

¹Wiltshire Council, Minutes of meeting held 26 Feb 2019:
<https://cms.wiltshire.gov.uk/documents/g11678/Public%20minutes%2026th-Feb-2019%2010.30%20Council.pdf?T=11>

Policy 3 cross refers to the requirements of WCS Core Policy 41 and adds a number of additional requirements, including for minor developments and conversions. While some elements of the policy are reflective of WCS Core Policy 41, we have some concerns that the specialist skillset required to assess developments against some of the more technical elements of the policy are not available to the local planning authority at this time and therefore, may lead to issues with implementation and enforcement.

Policy 4 Electric vehicle charging points

With regard to Policy 4, the final paragraph makes reference to the provision of in-street EV charging infrastructure, such as within lamp posts. An amendment may be required to reflect that highway infrastructure may be delivered under separate legislation by the highway authority.

Policy 5 Habitats regulations

It should be noted that the recommended amendments to Policy 5 that were provided within the Appropriate Assessment accompanying Wiltshire Council's Regulation 14 response have not been factored in, and this will require addressing. A further update to the HRA screening response and revised Appropriate Assessment are provided as part of this consultation response (Appendix 2), and its recommendations should be addressed within the draft SNDP.

Section 3: Built environment

Paragraph 81 would benefit from reference to the need to consider the Wiltshire Design Guide, which has now been adopted and forms a material consideration in the making of planning decisions in Wiltshire.

We consider paragraph 82, which refers to the draft SNDP taking forward policies from the former Salisbury District Council 'Creating Places' SPG, could be improved by clarifying that this is incorporated within the neighbourhood plan's Salisbury Design and Advertising Guide – which we would recommend is presented as an appendix or volume 2 to the neighbourhood plan rather than featuring as a separate document, to ensure it is read as part of the neighbourhood plan.

Within the fourth/fifth bullet points at paragraph 88, we consider this section should also refer to the Salisbury historic central area and the incidental appearance of buildings faced in the 'Fisherton Grey' brick (a pale buff brick once quarried off the Wilton Road) and the notable virtual absence of flint facings other than on ecclesiastical buildings – as key architectural characteristics of the area.

At paragraph 96 we would suggest a minor amendment reflecting that the Wiltshire Council Historic Environment Record is not fully comprehensive, and that the council's archaeology team should be consulted for completeness.

Policy 6 Design in the built environment

In relation to Policy 6 and paragraph 100, further clarification may be needed on the requirement for major schemes to undergo assessment through an independent design review. Assessment may not always be required. We would recommend some additional flexibility be built into the policy to address this.

Paragraph 100 may also benefit from further clarity given ambiguous wording such as what is to be categorised as ‘important developments’ and what is meant by ‘sensitive locations’. Clarification as to whether ‘major development’ refers to the definition given in the NPPF Glossary would also be helpful to the reader.

We consider that part of the first paragraph of Policy 6, ‘*particularly for schemes requiring a design and access statement*’ is superfluous and would suggest this be deleted, as all development should ‘have regard’ and it is up to developer and assessors to decide to what degree and which parts are relevant.

Regarding the second paragraph of Policy 6 we would raise that Wiltshire Council’s Conservation Area Management Plans – including the City of Salisbury Conservation Area Appraisal and Management Plan 2014 – are only available on request from the council. For ease of access to the document we would recommend including a footnote to <https://www.wiltshire.gov.uk/planning-conservation-areas> where information about how to obtain the document can be found.

Within the third paragraph we note that the text ‘*generic design approaches will not be tolerated*’, leaves ambiguity which could be improved.

In the fourth paragraph we would note that any development including signage (not just Class E) could find guidance on use and quality of signage useful.

In relation to the fifth paragraph, we note that the term ‘*overall enhancement*’ is subjective and would benefit from rewording. We have some concerns that the wording of this paragraph, particularly use of words ‘*may in some instances*’ may be read as favouring a ‘traditional’ stylistic appearance, when each planning application should be considered on its own merits. Our experience is that issues often arise with applications that purport a ‘traditional’ style, with problematic superficial detailing, poor quality proportions and materials not faithful to traditional practice, which we would caution against encouraging.

Policy 7 The Close and its Liberty

We would suggest a rewording of Policy 7 to reflect that each planning application in this area will be considered on its own merits; albeit with a requirement to have due regard to the important heritage setting of the Cathedral Close and a requirement to have regard to the Cathedral masterplan, where appropriate.

Policy 8 The Chequers

We would suggest that an amendment is made to Policy 8 to clarify that schemes that respect the traditional Chequers layout must also be acceptable in respect of other design matters.

Policy 9 Protecting key views in Salisbury

We question whether it is appropriate to include the element of Policy 9 that relates to the Salisbury skyline, as these matters are already covered within the adopted WCS Core Policy 22 and the draft SNDP policy does not appear to provide any further local detail. The draft WLP proposes a new policy – Policy 32: Salisbury Skyline – which will continue to set a height restriction (with some limited allowances) in order to preserve the dominance of the cathedral within the cityscape. We therefore consider this part of the policy to be duplicative of a strategic policy and unnecessary.

The second half of Policy 9 seeks to protect identified views from a range of locations within (around around) the neighbourhood area. There is some uncertainty around whether the views which are sought for protection are of Salisbury Cathedral (as suggested by Figure 12) or of Salisbury central area (as stated in the policy).

Section 4: Green and blue infrastructure / Policy 10 Safeguarding and enhancing green and blue infrastructure

Figure 14 illustrates the draft SNDP's proposed strategy for green and blue infrastructure (GBI). This figure shows part of the GBI network falling outside of the Salisbury neighbourhood area, and we would suggest an amendment to the map so that only GBI falling within the remit of the neighbourhood area is proposed.

We are concerned that the areas mapped as GBI includes site proposed for strategically important development within the draft WLP. This includes:

- Land North of Beehive Park and Ride (Policy 25 of the draft WLP)
- Land North of Downton Road (Policy 26 of the draft WLP)
- Land South of Harnham (Policy 27 of the draft WLP)
- Land West of Coombe Road (Policy 28 of the draft WLP)
- Suitable Alternative Natural Greenspace, South Salisbury (Policy 29 of the draft WLP)

In the interests of ensuring there is no conflict with evidence and strategic policies of the emerging WLP, an amendment to the map is needed to remove the GBI classification from these areas.

Figure 14 also maps a series of 'Peripheral Greenways' and 'Radial Greenways'. There is some uncertainty here as it is not clear which of these routes are existing and which are aspirational, which would benefit from clarification.

The later section relating to Greenways from paragraph 159-162 may require review in respect of requirements set out in in LTN 1/20 and Wiltshire Council's Local Cycling and Walking Infrastructure Plans (LCWIP). In particular:

- Paragraph 161 refers to a stated minimum width of 10m for greenways. It is assumed that this refers to land for planting as well as for the path, with the minimum width for any path being 4m (3m bound surface with a 0.5m low level verge either side). In locations with higher usage LTN 1/20 requires at least 6m (2m footway plus 3m cycleway bound surface with a 0.5m low level verge either side – and a green verge or kerb may segregate the walking from the cycling route). We would note that planting trees along any of the Local Cycling and Walking Infrastructure Plans (LCWIP) potential routes may be detrimental to Wiltshire Council's ability to deliver the Salisbury LCWIP. 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.
- Referring back to Figure 14, Wiltshire Council cannot assure that an LTN 1/20 route on the bridleway along Harnham Slope would be supported, for example.

- Some of the greenways are Rights of Way which require funding, but others are routes that Wiltshire Council have already ruled out – and it is recommended that this misalignment be addressed.
- Wiltshire Council are unable to 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. It will also not be possible to make this a route accessible for disabled people. We have no objection to an unsurfaced or semi-surfaced route being delivered here, but it will not be the main access route to St Peter's Place as alluded to in the draft SNDP paragraph 162. The route to St Peter's Place will be predominantly on existing highway – a route alignment has not yet been determined but it may utilise existing quieter roads through Bemerton Heath.

In the interests of accuracy, we recommend an amendment to Para 151 to reflect that the multiple rivers that pass through Salisbury are all part of the same SAC – the River Avon SAC – as opposed to each being separate SACs.

Policy 10 Safeguarding and enhancing green and blue infrastructure

The penultimate paragraph cross refers to Policies 11 and 12. It is unclear as to whether the requirement for 10% improvement refers to the provision of green infrastructure or to biodiversity net gain (BNG). All developments are required to provide at least 10% BNG not just those where harm is unavoidable, and the harm is outweighed by the need for the development. We recommend that, if this refers to BNG, this part of the policy should be removed as there is no need to repeat the requirements of Policies 11 and 12.

Policy 11 Biodiversity net gain / Policy 12 Habitat improvement and restoration schemes

With reference to the first part of Policy 11 and its supporting text, a minimum of 10% BNG became mandatory for large sites in February 2024 and for small sites in April 2024. It is recommended that this be reflected in the text. Wiltshire Council are proposing a higher threshold of 20% BNG in the draft WLP, which may supersede the neighbourhood plan requirement once adopted, subject to the outcome of the Local Plan EiP.

Policy 11 cross refers to Policy 12 which identifies six sites detailed in Appendix 2 for the delivery of 'Habitat improvement and restoration schemes' as options for offsite biodiversity net gain delivery. Some of these sites are owned by Wiltshire Council and it is understood that others are owned by Salisbury City Council. We would highlight that the Environment Act now requires that land to deliver offsite Biodiversity Units (not owned by the same developer) must be registered on the national register of biodiversity gain sites², which should be reflected with an update to paragraph 181. We are not aware that there has been any communication with Wiltshire Council's Estates team as landowner about the inclusion of Wiltshire Council owned sites and we are not aware that any of Wiltshire Council's land has been formally submitted to the biodiversity gain sites register. We would therefore request that Wiltshire Council owned land is removed from Policy 12 and Appendix 2 in the interests of accuracy:

- Wiltshire Council owned part of Site 1: Avon Valley Local Nature Reserve

² <https://www.gov.uk/guidance/register-a-biodiversity-gain-site>

- Wiltshire Council owned part of Site 2: Bemerton Folly and Bernards Folly Local Nature Reserve ('The Valley')
- Wiltshire Council owned part of Site 3: Harnham Slope, the Chalkpit, Harnham Folly, The Cliff and Old Blandford Road Open Space
- Wiltshire Council owned part of Site 5: Lime Kiln Down

We would advise that if not already done so, the remaining land parcels owned by Salisbury City Council should be formally submitted as biodiversity gains sites to the national register by the landowners in order for Policy 11, 12 and 1 to be effective.

In addition, we note that one of the sites identified for offsite biodiversity gain is Lime Kiln Chalk County Wildlife Site (part owned by Wiltshire Council and part by Salisbury City Council). This site forms part of a site proposed for allocation for Suitable Alternative Natural Greenspace (SANG) under draft WLP Policy 29, which is required to meet Habitats Regulations to provide alternative recreation space to reduce pressure on the New Forest SAC, in order to facilitate the delivery of four strategic housing site allocations in the WLP. To avoid any conflict with the emerging strategic policies of the WLP, we request the removal of this site – including parts outside of Wiltshire Council's ownership – from the proposed neighbourhood plan policy.

The second part of Policy 11 relates to the introduction of spaces for specific protected species, including bat boxes and specialist bird boxes. These are not covered by the biodiversity net gain metric so we would recommend this paragraph is moved to a new separate policy, which is alternatively titled for clarity.

Policy 13 Open space provision

We consider that Policy 13 may require amendment to reflect that a proportion of funds received by the Qualifying Body under Community Infrastructure Levy (CIL) can be allocated to improvement schemes for open spaces in the neighbourhood area.

Policy 14 Local green spaces

Policy 14 proposes to allocate 131 Local Green Spaces (LGSs) in the neighbourhood area, which are illustrated in Figure 18. We understand that a proportion of the sites proposed as LGSs are owned by Wiltshire Council, but unfortunately our Estates team (as landowner) have no record of having been consulted on the principle of this land being allocated for LGS.

In terms of Figure 18, the identified sites have been derived from Wiltshire Council's own register of open spaces that is replicated in Figure 17. In replicating this data, Figure 18 includes a large number of small unidentified and unnamed sites, which are presumably not proposed to be allocated for LGS. For clarity we would recommend that these sites be removed from the map to avoid any confusion over the status of this land. The extent of the numbered sites is also unclear with no defined boundaries. The clarity of Policy 14 would be improved with the introduction of a new appendix which shows each LGS site in more detail to better define its boundaries at closer scale.

While some of the proposed LGS sites that fall in Wiltshire Council ownership are supported, we have concerns with a number of them, as follows:

- We note that a number of sites proposed as LGS are playing pitches associated with schools owned by Wiltshire Council. Wiltshire Council do not support the inclusion of these sites, as this risks restricting the potential for school development/expansion should this be required in future to meet educational needs, and we would therefore request these are removed as proposed LGSs. Although Figure 18 is not clear as to the boundaries of each of these sites, this appears to be applicable to LGS sites 76, 77, 81, 82, 87, 93, 95, 110, 114, 116 and 122.
- Some of the proposed LGS sites are associated with formal sports and leisure operations, and we would be concerned with their allocation which could limit opportunities for sport/leisure related development. This appears to be applicable to LGS sites 92, 97 and 98.
- In addition, Wiltshire Council as landowner has concerns within the inclusion of LGS land at sites 127, 128 and 129 which may limit the opportunity to undertake estate regeneration for affordable housing purposes.
- We would also comment that proposed LGS numbers 23, 26, 32 and 84 appear to cover sites that are identified within the Salisbury River Park Masterplan that was endorsed by Wiltshire Council in July 2021. This document identified a scheme of improvements along the river corridor through central Salisbury, and we recommend removal of the LGS designation to avoid complicating the delivery of this project.
- In addition, several sites are listed as LGS that are also identified for delivery of BNG projects under draft SNDP Policy 12, and we would question the appropriateness of these sites being allocated for both purposes given that the designations serve different purposes. In particular one of the proposed LGS sites (LGS site 10) is Lime Kiln Chalk County Wildlife Site (partly owned by Wiltshire Council). As noted above this site forms part of a site proposed for allocation for Suitable Alternative Natural Greenspace (SANG) under draft WLP Policy 29, which is required to facilitate the delivery of three other strategic housing site allocations in the WLP. To avoid any conflict with the emerging strategic policies of the WLP, we request the removal of this site as a proposed LGS.

To address the above concerns we would suggest that the above sites are withdrawn from the proposed schedule of LGSs, with a view to the qualifying body carrying out further detailed consultation with Wiltshire Council as landowner through the review of their neighbourhood plan that is intended to take place in 2025.

We would also recommend that sites falling outside of the neighbourhood area boundary be removed from Figure 18 for consistency with the extent of the spatial area to which the policy applies.

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

Policy 15 appears to be a repetition of existing policy and therefore we would suggest it is removed to avoid duplication.

We would suggest that the final bullet point under paragraph 201 is amended to state that betterment of surface water runoff should be provided in line with Wiltshire Council's betterment policies to ensure consistency.

Section 5: Living

Paragraphs 204 and 205 make reference to the draft WLP Policy 22 neighbourhood plan requirement for Salisbury of 60 dwellings, to be delivered over the WLP plan period 2020-2038. This requirement should be considered alongside other sources of evidence gathered by the Qualifying Body, such as local housing needs assessment. With regard to paragraph 205, the draft WLP does not specify whether the neighbourhood plan requirement should be delivered on brownfield sites or not, albeit a brownfield first principle would be generally supported by the council. Site selection is a matter for the neighbourhood plan to address in its evidence base and could include both brownfield and greenfield site options. We would recommend paragraph 205 be reworded to reflect this.

We note that paragraph 214 includes out of date information referring to information that supported the previous WLP consultation in 2021. In particular, the WLP plan period is now proposed to be until 2038, not 2036; and the reference to a requirement for 410 homes is now superseded by the proposed neighbourhood plan requirement of 60 homes. For information, 410 relates to a 'brownfield target' that was previously consulted upon, that no longer forms part of the Local Plan proposals. Out of date references to the 410 brownfield target also appear in paragraphs 215 and 218, which should be corrected.

Wiltshire Council are unclear how the figures for windfall development, as set out in paragraph 215, have been reached and we remain of the view that it is unlikely that, across 15 years, 2,250-2,850 new dwellings will be realised at Salisbury from windfall development. It is noted that assumptions about windfall development form part of the justification for not including any housing allocations in the draft SNDP. However, the draft SNDP also states that an early review of the SNDP may take place which could include housing allocations, which is accepted.

Policy 16 Housing mix and affordable housing

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 53% 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, Wiltshire Council currently seeks to negotiate between 25% and 30% of the Affordable rented units as 1 bed units.

Policy 16 sets a requirement of 40% Affordable Housing, which while broadly corresponding with the Affordable Housing requirement in the WCS and draft WLP, does not provide any flexibility to accommodate for exceptional circumstances where this may not be possible to achieve. An amendment may be needed to address this, or it may be more appropriate to revert to the strategic policy.

Policy 16 states that 60% of the Affordable Units are to be delivered in accordance with demonstrable need. It is unclear if this means demonstrable need for affordable rented accommodation. It should be noted that WCS Core Policy 43 states that tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs, and the draft WLP proposes the following tenure mix: 65% affordable rented, 25% First Homes, 10% Shared Ownership. We would therefore caution against the draft SNDP specifying a tenure mix to ensure that there is no conflict with the WCS or evidence supporting the draft WLP.

Policy 16 also states that 30-40% of affordable housing units in Salisbury should be one bedroom. We are concerned that specifying the percentage of one bed units is too restrictive. It is not conducive to the creation of mixed and balanced communities and could restrict Wiltshire Council in negotiating a mix which reflects demonstrable need (which can change over time).

Policy 17 Churchfields and the Engine Shed site

Wiltshire Council have concerns with the scope of draft SNDP Policy 17 and the supporting Churchfields Masterplan which seeks to set a direction for the Churchfields Industrial Estate in Salisbury which conflicts with the emerging policy position for this site as set out in the draft WLP.

Churchfields is a complex and strategic scale site on which there were long standing ambitions for regeneration and decant of the existing heavier industrial uses which impact HVG traffic through the city. This ambition led to the allocation of the site for mixed use redevelopment within the WCS, which while forming the currently adopted policy position, should be read in the context of more recent evidence which identifies significant issues with the proposed regeneration of the site. Detailed work in the last few years has demonstrated that such a proposition would not be economically viable to be carried forward into the Local Plan. A major constraint is the existence of subsoil contaminants which have accumulated both from previous and current uses at Churchfields, affecting viability. Accordingly, the draft WLP has reframed proposals for the Churchfields Industrial Estate (excluding the Engine Sheds site) around the retention of the site for employment generating uses, which are recognised for their contribution to employment land needs in Salisbury/South Wiltshire. Draft WLP Policy 34 (Churchfields Employment Area) is caveated with policy requirements to ensure that proposals for development of employment uses on this site do not increase HGV traffic to and from the site, along with other criteria to improve the public realm and support sustainable travel; with the nature and scope for improvements to be set out in detail by an Estate Regeneration Plan and Accessibility Study. We therefore remain of the view that, as a strategic site, Policy 17 and the supported Churchfields Masterplan are beyond the scope of the draft SNDP and introduce conflict with the emerging WLP policy position. We therefore suggest that this element of the draft SNDP is removed.

Policy 18 Healthcare facilities

With regard to the final paragraph of Policy 18, the wording appears ambiguous and may benefit from clarification to ensure this can be implemented as intended.

At paragraph 257, reference is made to the potential for redevelopment of some of the car parks in Salisbury for alternative uses. It should be noted that any such proposed to redevelop city centre car parks will be subject to the outcome of a study on city centre car parking provision and needs by Wiltshire Council, which have not yet been undertaken.

Policy 19 Community infrastructure

We consider that there are elements of Policy 19 which lack clarity and may be problematic in the making of planning decisions. It is unclear how use of developer contributions would be managed to coordinate the delivery of equivalent community infrastructure and this part of the policy may need review. The requirement for developer contributions must be clearly evidenced with a demonstrable need, which is currently missing from the policy – and in an urban area may be difficult to demonstrate if alternative facilities are available. We may also caution against reference

to F Class within the use class order in case this should be changed with any future alternations to the use class order.

Policy 20 Allotments

We would query the necessity of the first paragraph of Policy 20, given that statutory allotment land is already afforded equivalent protection under the Allotments Act 1925. The second paragraph contains elements which are not land use matters and are otherwise design matters which may more logically sit within the Design chapter of the SNDP.

Paragraph 266 states that current demand for allotments will be exacerbated by new planned developments being delivered. In the interests of accuracy, we would note that the draft WLP housing allocations include a requirement for the provision of onsite allotments which will increase the supply of allotments in Salisbury.

Policy 21 Provision for play and sport

By way of update in relation to paragraph 287 the Wiltshire Playing Pitch Strategy (PPS) renewal will be completed in July 2024, and will provide a tool to assist in the planning process and to underpin the WLP as an evidence base to conform with the National Planning Policy Framework (NPPF). When the SNDP comes to be reviewed, this updated piece of evidence should be considered.

Paragraph 289 notes an SCC priority for the resurfacing on Multi Use Games Areas (MUGAs) at Bemerton Heath. Wiltshire Council are undertaking a feasibility study for upgrading the Gainsborough Close MUGA at Bemerton Heath with a bid to the Football Foundation. If this is confirmed during the examination of the draft SNDP, then it can be removed from the list.

With regard to draft SNDP Policy 21, we recommend that the 'Play' element of the policy/supporting text should reference the need for formal play to align to the Wiltshire Council Play Specification and/or Fields in Trust Guidance to ensure a standard of Play Value. The formal play, sport, pitch, youth and adult recreation S106 contributions for new developments are formulated using the calculators embedded within the Wiltshire Open Space Assessment (WOSA).

In addition, we suggest that additional wording be added to require that new housing developments consider a Health Impact Assessment (HIA).

Section 6: Transportation and movement

At paragraph 304 reference is made to documentation that supported the 2021 consultation on the WLP, which has now been superseded by material that was consulted on for the 2023 WLP 'Regulation 19' consultation. In the interests of accuracy, we would recommend this be updated.

Policy 22 Sustainable transport

We would observe that the wording in parts of Policy 22 are quite broad and ambiguous, such as 'appropriate, challenging targets for modal shift' and 'larger vehicles'. This would benefit from further explanation to provide clarity for the decision maker.

Policy 24 Cycle parking

We note that the first part of Policy 24 is a cross reference to Wiltshire Council's cycle parking policies, and therefore we would recommend its removal to avoid duplication. The second part of the policy may benefit from rewording as this may not be applicable to all developments.

Policy 25 Cycling for pleasure

We consider that draft SNDP paragraph 328 could be strengthened by stating that all major developments must deliver Travel Plans in accordance with Wiltshire Council's Travel Plan guidance, which includes purchasing and distributing relevant walking and cycling maps as set out in that guidance.

Policy 26 Residential parking

As a general note on parking standards, we would highlight that Wiltshire Council already sets requirements for parking standards within the adopted Local Transport Plan (LTP3), which is in the process of undergoing review for update.

With regard to draft SNDP Policy 26 and its supporting text we would clarify that historically Wiltshire Council have permitted car-free developments within the city centre. These have in the most part been conversions of existing buildings and not necessarily all new builds. We have concern that the wording of the first paragraph in the policy may be used as justification to provide no parking anywhere within the city, creating significant on-street parking problems and related congestion and safety issues. We would recommend that it be made clearer within the draft SNDP that car-free developments will only be accepted in the city centre and not the wider suburban areas.

The second paragraph of the policy would benefit from clarification, as it is not clear where this applies to. As noted above it would not be appropriate to support reduced levels of car parking across the whole city.

We note that the final paragraph of Policy 26 may be overly onerous for all developments. Additionally, we would request that reference to lay-by parking be removed, as it is generally not recommended for private car parking to be in lay-by form and would not be accepted within the adoptable area of a new road unless it was for unallocated visitor car parking.

With reference to paragraph 339, whilst the AQMA areas may extend up London Road and Wilton Road, Wiltshire Council do not class these roads as being within the city centre and therefore car free developments are not considered acceptable. We would comment that the fact that these locations are within an AQMA area should not be used as the overriding reason to allow car free developments when the quality issues in these locations are primarily caused by a high flows of through traffic, in particular, that of freight.

Paragraph 342 refers to the resident/permit controlled car parking schemes that exist within the city. It is Wiltshire Council's position that this should not be used as an alternative for private off-street car parking as suggested, especially outside of the city centre. This would conflict with Wiltshire Council's Car Parking Standards. It should also be noted that many of the parking permit zones are at capacity and residents of new developments are not able to apply for these permits.

Policy 27 Working from home and live-work units

We consider there to be a lack of clarity within the policy regarding the requirement for larger residential schemes to provide community work hubs where practicable. It is unclear what types of development would be permissible under this part of the policy, which may benefit from additional detail.

With regard to the second part of the policy we would note that conditions attached to planning decisions are applied on a case-by-case basis and it would be unacceptable to require conditions through policy.

Policy 28 Visitor accommodation

We note that Policy 28 is a cross reference to the WCS policy and therefore we would recommend its removal to avoid duplication.

Policy 29 Post offices

While the premise and intent behind Policy 29 is understood, we do not feel the policy as worded is implementable as the post offices fall within Class E of the Use Class Order.

Policy 30 Major food retail

Policy 28 cross references to the WCS policy and therefore we would recommend its removal to avoid what is largely duplication.

Comments on the draft SNDP Salisbury Design and Advertising Guide

For completeness, we would recommend paragraph 65 also references that Salisbury's historic environment is protected by provisions within the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.

We note that paragraph 66 contains an error in the number of listed buildings in Salisbury, which should be corrected. According to the National Heritage List for England, there are currently 641 listed buildings in the Salisbury neighbourhood area.

It is requested that in paragraph 69 the wording '*not lost*' is amended to '*not harmed*', to better reflect the protection afforded to heritage assets.

At paragraph reference to *Wiltshire County Council* should be corrected to *Wiltshire Council*.

We would question the inclusion of the curved frontage building on the bottom right of page 23, as this appears to illustrate an example which does not respect the historic unbroken terraced frontage.

We would comment in relation to paragraph 96 that there has been consistent and successful resistance to the introduction of balconies to buildings in Salisbury on design grounds and we would therefore question the appropriateness of this text.

At paragraph 161 we would recommend the removal of '*except on listed buildings and in Conservation Areas*' as extensions can be brought forward through Permitted Development rights on Listed Buildings and in Conservation Areas too.

It is stated at paragraph 162 that most conservatories can be constructed under Permitted Development rights, so the value of including design considerations such as timber window frames within paragraph 164 is questioned.

We would recommend an amendment to paragraph 174 changing '*listed buildings*' to '*historic buildings*' in order to serve as a catch all for all applicable heritage assets.

Paragraph 176 would benefit from clarification to reflect that there are some historic suburban houses where UPVC would not be acceptable.

There is a misunderstanding at paragraph 179 which requires correction. Listed Building Consent will be required for all replacement windows, and the line '*other than to replace windows with like-for-like replicas*' is incorrect and should be rectified.

At paragraph 223 and incorrect reference to the '*Property Portal*' should be corrected to the '*Planning Portal*'.

Paragraph 319 refers to the need for 'Conservation Area Consent'. This type of planning permission no longer exists so this section should be deleted.

APPENDICES:

- Appendix 1: SEA Strategic Environmental Assessment Screening Opinion (November 2023)
- Appendix 2: HRA Screening Opinion and Appropriate Assessment (May 2024)
- Appendix 3: Natural England response to AA (June 2024)

Appendix 1

SEA Strategic Environmental Assessment Screening Opinion
(November 2023)

Wiltshire Council

Strategic Environmental Assessment

**Screening determination for the Salisbury Neighbourhood
Development Plan 2020 - 2038**

November 2023

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1. Introduction

- 1.1 This document provides a screening determination of the need to carry out a Strategic Environmental Assessment (SEA) of the Salisbury Neighbourhood Development Plan (SNDP).
- 1.2 Wiltshire Council, as the 'Responsible Authority'¹ under the SEA Regulations², is responsible for undertaking this screening process. It will determine if the SNDP is likely to have significant environmental effects, and hence whether SEA is required.
- 1.3 This process has been carried out in accordance with the requirements of European Directive 2001/42/EC³, often known as the Strategic Environmental Assessment (SEA) Directive, which has been transposed into English law by the SEA Regulations. These Regulations require consultation on the screening decision with three 'consultation bodies' – Environment Agency, Historic England and Natural England.

2. Legislative requirements

- 2.1 The Localism Act 2011 requires neighbourhood plans to comply with EU legislation. The screening procedure outlined in this report meets the requirements of the SEA Directive and Regulations, as introduced in Section 1 of this document.
- 2.2 Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:
1. *are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), and which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Reg. 5, para. (2)(b)*
 2. *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) (Reg. 5, para. (3)*
 3. *set the framework for future development consent of projects⁴ (Reg. 5, para. (4)(b)*
 4. *are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Reg. 5, para. (4)(c)*
- 2.3 An environmental assessment need not be carried out for:
- a) *plans which determine the use of a small area⁵ at local level (Regulation 5, para. (6)(a); or b) plans which are a minor modification⁶ to a plan or programme (Regulation 5, para. (6)(b) unless it has been determined under regulation 9(1) that the plan is likely to have significant environmental effects.*
- 2.4 The diagram⁷ that follows shows the SEA Directive's requirements and its application to neighbourhood plans:

¹ The organisation which adopts the neighbourhood plan (this is described in Wiltshire Council's guide *Neighbourhood planning – a guide for Wiltshire's parish and town councils* (June 2012) as 'makes the plan').

² The Environmental Assessment of Plans and Programmes Regulations 2004

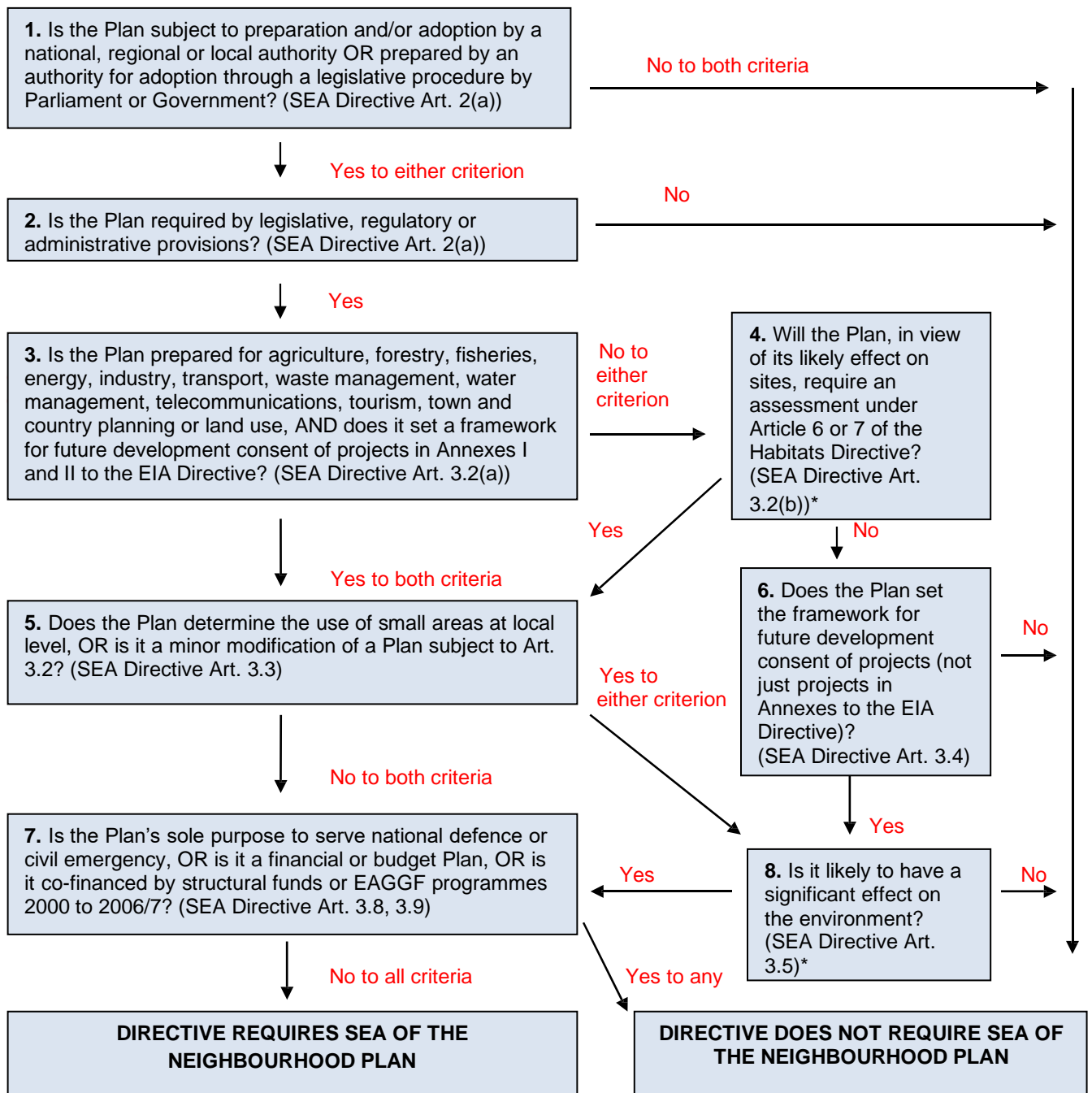
³ European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

⁴ European Commission guidance suggests that plans and programmes which set the framework for future development consent of projects would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. Development consent is defined in the EIA Directive as "the decision of the competent authority or authorities which entitled the developer to proceed with the project" (Article 1(2) of the EIA Directive).

⁵ European Commission guidance suggests that plans which determine the use of small areas at local level might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"

⁶ 'Minor modifications' should be considered in the context of the plan or programme which is being modified and of the likelihood of their having significant environmental effects. A modification may be of such small order that it is unlikely to have significant environmental effects.

⁷ Taken from *A Practical Guide to the Strategic Environmental Assessment Directive* ODPM, 2005)




* Plans falling in this category (No.8) will be screened by Wiltshire Council to determine if they are likely to have significant environmental effects. This determination will be made on a case by case basis for neighbourhood plans coming forward in Wiltshire.

NB This diagram is intended as a guide to the criteria for application of the Directive to neighbourhood plans. It has no legal status.

3. The Salisbury Neighbourhood Development Plan

- 3.1 Salisbury City Council is preparing a neighbourhood plan under the provisions of the Localism Act 2011.
- 3.2 The designation of the Salisbury Neighbourhood Area was made on 18th July 2019 (see map of area outlined in blue below). For the designation notice see <http://www.wiltshire.gov.uk/planning-neighbourhood-latest-news>

Salisbury Neighbourhood Area Designation Plan

 Neighbourhood Area Boundary



- 3.3 This screening decision is based on a draft of the neighbourhood plan dated September 2023.

4. SEA Screening assessment

- 4.1 Wiltshire Council, as the 'Responsible Authority', considers that the SNDP falls within the scope of the SEA Regulations on the basis that it is a plan that:

- a) is subject to preparation or adoption by an authority at national, regional or local level (Regulation 2);
- b) is prepared for town and country planning or land use and it is a plan that sets the framework for future development consent of projects generally (Regulation 5, para. 4); and
- c) will apply to a wider area other than a small area at local level and is not a minor modification to an existing plan or programme (Regulation 5, para. 6).

- 4.2 A determination under Regulation 9 is therefore required as to whether the SNDP is likely to have significant effects on the environment.

4.3 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations includes two sets of characteristics for determining the likely significance of effects on the environment. These relate to i) the characteristics of the SNDP and ii) the characteristics of the effects and of the area likely to be affected by the SNDP. In making a determination, Wiltshire Council will take into account the criteria specified in Schedule I of the Regulations which are follows:

1. The characteristics of the plans and programmes, having regard in particular to:

(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;

(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;

(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;

(d) environmental problems relevant to the plan or programme; and

(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

(a) the probability, duration, frequency and reversibility of the effects;

(b) the cumulative nature of the effects;

(c) the transboundary nature of the effects;

(d) the risks to human health or the environment (for example, due to accidents);

(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

(f) the value and vulnerability of the area likely to be affected due to—

(i) special natural characteristics or cultural heritage;

(ii) exceeded environmental quality standards or limit values; or

(iii) intensive land-use; and

(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

The screening assessment of the SNDP is set out below:

Criteria (Schedule 1 SEA Regs.)	Significant environmental effects likely?	Justification and evidence
1. The characteristics of plans, having regard, in particular, to:		
(a) the degree to which the plan sets a framework for projects and other activities, either with regards to the location, nature, size and operating conditions or by allocating resources	No	The neighbourhood plan covers the Salisbury City Council area only. Whilst the SNDP does set a framework for projects at the parish level, it does not set a framework for a significant degree of projects or other activities.
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	No	The SNDP is produced by the local community to influence development at the local level. The SNDP will not have a significant influence on other plans and programmes or those in a hierarchy. All neighbourhood plans must be in general conformity with the strategic policies contained in the development plan for the area, contribute to the achievement of sustainable development and have regard to national policies.
(c) the relevance of the plan for the integration of environmental considerations, in particular with a view to promoting sustainable development	No	The SNDP is a land-use plan that promotes sustainable development, in general conformity with the Local Plan and national planning guidance. It is not a Plan specifically relating to the integration of environmental considerations. However, environmental considerations are taken into account in the draft Plan.
(d) environmental problems relevant to the plan	Yes	The main environmental issues at Salisbury relate to sites protected under the Habitats Directive. All new development at Salisbury would lie within the River Avon SAC catchment. The Memorandum of Understanding (MoU) with EA / NE requires development to be phosphorus neutral. This will be difficult to achieve at this settlement depending on the quantum of new development proposed for the main sewage works. The river supports protected and priority species and development within 20m of the river can have a significant negative effect on these. Salisbury is also within the zones of recreational influence for the New Forest protected sites (SPA/SAC and Ramsar site).
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)	No	The neighbourhood plan is not relevant as a plan for implementing community legislation.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	Yes	The SNDP does not allocate sites for housing, however Policy 16 supports development within the NDP area. As the majority of Salisbury is located within the 13.8km Zol for the New Forest SPA/SAC there is potential for significant effects on the natural, built and historic environment. All new development at Salisbury would lie within the River Avon SAC catchment and must therefore demonstrate phosphorus neutrality.

		<p>Growth in/around Salisbury could notably impact upon heritage assets including Salisbury Cathedral / setting, Old Sarum scheduled monument and the city's conservation areas and settings. Outward development could also compromise the separate identities of surrounding historic settlements.</p> <p>The SNDP, when screened under the Habitats Regulations, requires an appropriate assessment (AA) meaning that an SEA will be required for the Plan as per Regulation 5 of the SEA Regulations.</p>
(b) the cumulative nature of the effects	No	No specific cumulative effects of the proposals are considered likely.
(c) the transboundary nature of the effects	No	No transboundary effects with other EU countries are considered likely to be significant.
(d) the risks to human health or the environment (for example, due to accidents)	No	There are no significant environmental effects considered likely to risk human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	Yes	<p>As per 2(a) above.</p> <p>Significant environmental effects due to the geographic size of the area and population size are not considered likely.</p>
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural Characteristics or Cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	Yes	<p>As per 2(a) above.</p> <p>The SNDP is considered unlikely to have significant environmental effects due to exceeded environmental quality standards or limit values or intensive land-use.</p>
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	Yes	As per 2(a) above.

5. SEA Screening decision

- 5.1 Regulation 9 of the SEA Regulations requires that the responsible authority (Wiltshire Council) shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall —
- (a) take into account the criteria specified in Schedule 1 to these Regulations; and
 - (b) consult the consultation bodies (Historic England, Natural England, Environment Agency).
- 5.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 5.3 Wiltshire Council considers that the SNDP **is likely to have significant environmental effects** and accordingly **a Strategic Environmental Assessment is required**. This decision is made for the following reasons:

Reason 1

The SNDP, when screened under the Habitats Regulations, requires an appropriate assessment (AA) as a result of the potential for likely significant effects within the Zol. This will also mean that a SEA will be required as per Regulation 5 of the SEA Regulations.

- 5.4 This SEA screening has been undertaken on a draft of the neighbourhood plan dated September 2023. It is possible that these proposals may change. If the SNDP is subsequently amended significantly from these proposals i.e. changes that substantially alter the draft plan and/or are likely to give rise to additional significant environmental effects, this SEA screening must be reviewed. In this instance, the Qualifying Body should request a revised SEA screening assessment from Wiltshire Council.

6. Consultation on SEA screening decision

- 6.1 This screening decision was sent to Natural England, Environment Agency and Historic England, requesting comments within a 5-week period from 19th October 2023 to 23rd November 2023.
- 6.2 Comments were received from Natural England, the Environment Agency and Historic England who agreed with the decision that that an SEA is required for the Plan. These comments are included in Appendix 1.

Appendix 1 – consultation comments received from the consultation bodies

Historic England

Dear [REDACTED]

Thank you for your consultation on the SEA Screening for the emerging Salisbury Neighbourhood Plan.

We have been consulted previously on both an SEA Screening and Scoping for this Plan and it is not clear why a further SEA Screening exercise is now required (see attached).

However, we note that policies which proposed to allocate sites for development appear to have been removed from the draft Submission version of the Plan shared with this consultation and on this basis we appreciate that there may be a need for a review of the original SEA Screening decision.

We also note that the reason now given for the need for a full SEA rests primarily in the fact that an AA has been triggered through the HRA process. That being the case, and on the assumption that no sites are now being proposed for development, we are happy that this need only be the main consideration which underpins such a decision and have no objection to the view that a full SEA is deemed necessary.

Kind regards

Environment Agency

Hi [REDACTED]

We concur with your screening decision that a SEA is required.

Kind regards, [REDACTED]

Natural England

Dear [REDACTED],

Draft Salisbury Neighbourhood Plan - SEA Screening Consultation

Thank you for your consultation on the above dated 19 October 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

We have considered the screening assessment of the Neighbourhood Plan against the requirements of the criteria set out in the SEA Directive. Based on the information provided, Natural England agrees the Neighbourhood Plan appears likely to give rise to significant environmental effects and your conclusion that a Strategic Environmental Assessment is required is reasonable.

We would be happy to comment further should the need arise but in the meantime if you have any queries relating to the above please contact me via email [REDACTED]
For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Appendix 2

HRA Screening Opinion and Appropriate Assessment (May 2024)

SALISBURY NEIGHBOURHOOD DEVELOPMENT PLAN HABITATS REGULATIONS ASSESSMENT

1. Introduction

- 1.1. This Habitats Regulations Assessment (HRA) relates to the Salisbury Neighbourhood Development Plan 2020 – 2038 Submission Draft September 2023, hereafter referred to as the NDP, submitted to Wiltshire Council in April 2024. This HRA has been undertaken to inform a Regulation 16 consultation response from Wiltshire Council to the NDP.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹, hereafter referred to as the Habitats Regulations. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites (formally also referred to as Natura 2000 sites and now known as the national site network²) before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures³, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening and any subsequent appropriate assessment must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:

*“Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.”*⁴

- 1.4. Where appropriate assessment is undertaken, the competent authority may go on to authorise the plan or project provided that it will not adversely affect the integrity of any European sites. Where an **adverse effect on the integrity (AEoI)** of any European sites cannot be ruled out, and where there are no alternative

¹ On 1st January 2021 the Conservation of Habitats and Species Regulations 2017 (as amended) were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change [Changes to the Habitats Regulations 2017 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/684427/changes-to-the-habitats-regulations-2017.pdf)

² Due to the Conservation of Habitats and Species Regulations 2017 (as amended) being amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 on 1st January 2021.

³ Court of Justice of the European Union, Case C 323/17 “People Over Wind”/P. Sweetman v Coillte Teoranta

⁴ Commission of the European Communities v UK and NI, opinion of Advocate General KoKott, 9 June 2005, Case C-6/04

solutions, the plan can only be authorised and proceed if there are **imperative reasons of over-riding public interest (IROPI)** and if the necessary compensatory measures can be secured.

- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Salisbury NDP. Where risks to European sites are identified, changes are recommended to remove or reduce the risks, and these should be incorporated into the NDP before it is made. Likewise, if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

- 2.1. Each element of the plan has been categorised against screening criteria developed by Natural England (NE) to provide a clear audit trail for the screening assessment.
- 2.2. The screening criteria used are as follows:
 - Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development.
 - Category A2: The policy is intended to protect the natural environment.
 - Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.
 - Category A4: The policy would positively steer development away from European sites and associated sensitive areas.
 - Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European sites and associated sensitive areas.
 - Category B: No significant effect.
 - Category C: Likely significant effect alone; and
 - Category D: Likely significant effects in combination.
- 2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see Table 1 below). Where potential for likely significant effects have been identified, an appropriate assessment has been undertaken in subsequent sections.

3. Higher Level HRAs

Wiltshire Core Strategy

- 3.1 The Wiltshire Core Strategy (WCS) HRA (October 2009, February 2012⁵, March 2013⁶, February 2014⁷ and April 2014⁸) identified general parameters to determine the likelihood of potential impacts on European sites. The following potential impact pathways and associated parameters were identified and assessed for the European sites stipulated below.
 - *Recreation – European sites within 5km of the plan area, or where the New Forest Special Protection Area (SPA)/Special Area of Conservation (SAC) is within 13.8km (extended to 15km where HRA indicates this is necessary) of the plan area or where Salisbury Plain SPA/SAC is within 15km of the plan area (it*

⁵ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁶ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁷ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

⁸ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

should be noted that the relevant parameter for the latter has since been revised on the basis of data obtained by means of visitor surveys and is now 6.4km):

- Salisbury Plain SAC / SPA
- River Avon SAC
- New Forest SAC / SPA
- Bath and Bradford on Avon Bats SAC (added post adoption of WCS)
- North Meadow and Clattinger Farm SAC (added post adoption of WCS)
- *Hydrology / Hydrogeology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – European sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Solent and Southampton Water SPA
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA
 - Chilmark Quarries SAC (added post adoption of WCS)
 - Mottisfont Bats SAC (added post adoption of WCS)

Wiltshire Housing Site Allocations Plan

- 3.2 Since the WCS was adopted, the Council published a pre-submission draft of the Wiltshire Housing Site Allocations Plan (WHSAP) together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A further schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. Subsequently, the WHSAP (Council Version, February 2020) was adopted by Full Council on 25th February 2020, and this was accompanied by the final WHSAP Assessment under the Habitats Regulations (Wiltshire Council, February 2020).

- 3.3 The screening criteria for the adopted WHSAP and final HRA were modified for some European sites from those used for the Core Strategy subsequent to the acquisition of results from new surveys, and in light of advice from NE. This includes the zone of influence around the Salisbury Plain SPA used to screen for likely significant effects as a result of recreational pressure being revised from 15km to 6.4km on the basis of data obtained by means of visitor surveys.
- 3.4 Furthermore, since the Core Strategy was adopted, NE has advised Wiltshire Council of its concerns regarding the growing number of visitors to the North Meadow and Clattinger Farm SAC in recent years which has led to an increase in trampling. NE has advised that this is particularly evident at North Meadow (which is also a National Nature Reserve (NNR)) during April and May when visitors come to see the Snake's-head fritillaries in flower. NE considers that the increase in recreational pressure upon the SAC is primarily as a result of increases in the local population, and that major new housing developments within a short travel distance of North Meadow are likely to add to the existing visitor pressure and trampling effects.
- 3.5 The North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy 2023 – 2028 (May 2023) sets out the mitigation strategy for the North Meadow element of the SAC with regards to new residential and tourism accommodation developments within the identified ZoI. The Clattinger Farm element of the SAC is not subject to the strategy. The strategy sets out two ZoI, an Inner Zone of 0km - 4.2km and an Outer Zone of 4.2km – 9.4km. The Inner Zone represents the area within which 75% of local year round users (e.g. dog walkers) originate. The Outer Zone represents the area within which 75% of those people who visit to view the Snake's-head fritillaries during the main flowering season originate⁹. Mitigation will be achieved through financial contributions to Strategic Access Management Monitoring (SAMM), Infrastructure Mitigation Projects (IMP) and/or Suitable Alternative Natural Greenspace (SANGs). Developments of over 50 units within the Inner Zone will be expected to provide their own SANG unless a financial contribution to the IMP/SANG project system can be robustly justified. The strategy is an interim approach and will be reviewed within 5 years following further monitoring and surveys.
- 3.6 Potential recreational impacts on the New Forest SPA/SAC were initially identified by the HRA to the South Wiltshire Core Strategy which was adopted in 2012. The HRA identified an 8km ZoI around the SPA/SAC. Core Policy 50 of the WCS addressed the New Forests mitigation requirements, identifying the need for a New Forest Mitigation Strategy. Since the WCS was adopted, the council has joined a partnership of local authorities seeking to develop a strategic approach to mitigation including the extent of the zone of influence and how to fairly reflect different visit rates within it. This evidence informed the preparation of an Interim Recreation Mitigation Strategy by Wiltshire Council.
- 3.7 The WCS adopted the 8km zone of influence, however, as discussed in the latest iteration of the council's strategy, from 1st September 2021, this was revised to 13.8km, and may be extended to include applications within 15km, where demonstrated to be necessary through a bespoke appropriate assessment.
- 3.8 At a Cabinet meeting on the 7th May 2024, a revised mitigation approach with regards to recreational impacts on the New Forest SPA/SAC was agreed for all new residential and tourism developments within the ZoIs around the SPA/SAC. This revised approach maintains the 13.8km and 15km ZoIs and came into effect immediately. The revised Recreation Mitigation Strategy document will be published on the Council's website shortly.
- 3.9 The revised approach requires developers to provide a contribution of £600 per dwelling/unit towards Strategic Access Management and Monitoring (SAMM) for all new residential and tourism developments within the ZoIs, including those coming forward under permitted development.

⁹ North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy 2023 – 2028. Cotswold District Council, Swindon Borough Council and Wiltshire Council in partnership with Natural England. May 2023

Residential developments of 50 or more dwellings on greenfield or brownfield sites would also be required to provide an area of Suitable Alternative Natural Greenspace (SANG).

3.10 The details of the revised approach are set out in the Cabinet paper dated 7th May and can be found here: [Cabinet paper 7th May - Revised New Forest Mitigation Strategy](#).

3.11 Since the WCS was adopted and on the advice of NE, any plan or project that will lead to development within the catchment of the River Avon SAC must be phosphorus neutral and be subject to appropriate assessment which concludes no adverse effect on the SAC alone or in-combination with other plans or projects in order to be authorised.

Emerging Evidence and Advice from Natural England Subsequent to Adoption of WHSAP

3.12 Similarly, it came to light in spring 2020 that any plan or project that will lead to development within the catchment of the River Test must be nitrogen neutral as the Test drains into the Solent and this region is protected by a number of European and international designations including the Solent Maritime SAC, Chichester and Langstone Harbours SPA, Portsmouth Harbour SPA and Solent and Southampton Water SPA and Ramsar site. In 2018 and 2019 NE undertook a number of condition assessments of the features of these designated sites around the Solent. These assessments identified that high levels of nitrogen and phosphorus are entering this water environment and that there is sound evidence that nitrogen in particular is causing eutrophication at the aforementioned designated sites and that the resulting excessive growth of green algae and plants, which reduces oxygen and light levels, is leading to negative effects on the special features for which the European sites are designated. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. These findings were published by NE in June 2020 in *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region*. This advice also stipulates that:

“There is uncertainty as to whether new growth will further deteriorate designated sites. This issue has been subject to detailed work commissioned by local planning authorities (LPAs) in association with Natural England, Environment Agency and water companies. This strategic work, which updates early studies, is ongoing. Until this work is complete, the uncertainty remains and the potential for future housing developments across the Solent region to exacerbate these impacts creates a risk to their potential future conservation status.

One way to address this uncertainty is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

This report sets out a practical methodology to calculating how nutrient neutrality can be achieved. This methodology is based on best available scientific knowledge, and will be subject to revision as further evidence is obtained. It is our advice to local planning authorities to take a precautionary approach in line with existing legislation and case-law when addressing uncertainty and calculating nutrient budgets.”

3.13 In accordance with NE’s advice, any plan or project which will lead to development within the catchment of the River Test cannot be approved unless nitrogen neutrality has been demonstrated via quantitative means, and an appropriate assessment conducted by the competent authority has concluded beyond reasonable scientific doubt that there would be no adverse effects on the integrity of any of the Solent region European sites.

3.14 In 2022 the River Lambourn SAC and the Somerset Levels and Moors Ramsar site were identified by NE as being in unfavourable condition due to excessive phosphorus inputs. A very small area of both of these sites are located within Wiltshire. Any overnight accommodation development within the catchment of the SAC or Ramsar site are now required to demonstrate phosphorous neutrality and be subject to an

appropriate assessment which concludes no adverse effect on the SAC or Ramsar site alone or in combination with other plans or projects in order to be authorised.

STAGE 1 SCREENING

Screening of Salisbury NDP Area

Recreation

- 3.15 The whole of the NDP area is located within the Hampshire Avon Catchment and the River Avon and its tributaries, which make up the River Avon SAC, flow through the NDP area. Recreational pressure on the River Avon SAC is recognised to occur in limited circumstances predominately where significant development lies immediately adjacent to or in close proximity to the river. Core Policy 69 (CP69) (Protection of the River Avon SAC) of the WCS states: *'In order to avoid and reduce potential environmental effects on the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures.'* The NDP does not allocate any sites for development however several policies support development which could lead to recreational impacts on the River Avon SAC therefore, the NDP must be subject to appropriate assessment due to the potential for recreational impacts on the River Avon SAC.
- 3.16 The current Zol around the New Forest SPA/SAC comprises 13.8km (further extended to 15km where HRA indicates this is necessary). A large portion of the NDP area lies within the 13.8km Zol and a smaller area lies within the 15km Zol. Although the NDP does not allocate sites for housing there are policies in the NDP that support residential development within these Zol's. The NDP must therefore be subject to appropriate assessment in terms of the potential for recreational effects on this European site.
- 3.17 In relation to Salisbury Plain, the SAC habitat features were screened out of appropriate assessment for the Core Strategy on the advice of NE. Recreational/visitor pressure is a known issue for the Salisbury Plain SPA, however the NDP area lies beyond the 6.4km zone around the SPA within which the majority (75%) of visitors to the Plain are expected to live. This is based on the data collated by means of a visitor survey commissioned by the Council in 2015. Therefore, appropriate assessment of the NDP is screened out with respect of the Salisbury Plain SPA.
- 3.18 Recreational impacts on the Porton Down SPA have been screened out as there is no public access to the site due to use by the Defence Science and Technology Laboratory (DSTL), the Health Protection Agency (HPA) and the Porton Down Science Park (PDSP).
- 3.19 Recreational impacts on the Great Yews SAC and Prescombe Down SAC have been screened out due to the distance to the European sites from the NDP area, approximately 5km and 13.5km respectively.
- 3.20 In terms of recreational pressures on other European sites, the NDP area is located well beyond the Zol for the various elements of the Bath and Bradford on Avon Bats SAC and the interim 9.4km outer recreational Zol to the North Meadow and Clattinger Farm SAC, and therefore appropriate assessment of the NDP is screened out with respect to these two SAC's.

Hydrology / Hydrogeology

- 3.21 Salisbury lies at the confluence of 5 rivers, the Hampshire Avon, the Nadder, the Bourne, the Wylde and the Ebbles. The Avon, Nadder, Bourne and Wylde are all components of the River Avon SAC. The Ebbles and the Wylde do not flow through the NDP area. The entirety of the Salisbury NDP area lies within the Hampshire Avon catchment and the Wessex Water Resource Zone.
- 3.22 The River Avon SAC and the groundwater sources are particularly vulnerable to the effects of diffuse and point source pollution which can cause ecological damage due to excessive algal growth. The potential for

significant effects on water quality and phosphate levels in the River Avon could be caused by increased housing and employment provision which would lead to discharges to the river and nutrient enrichment of the aquatic system. The Council has agreed through a Memorandum of Understanding with NE and others that measures will be put in place to ensure all developments permitted between March 2018 and March 2026 are phosphorus neutral in perpetuity. To this end it is currently implementing a phosphorus mitigation strategy to offset all planned residential development, both sewered and non sewered, permitted during this period.

- 3.23 In December 2023, the Government confirmed that a grant had been awarded through the Local Nutrient Mitigation Fund to help pump-prime nutrient neutrality interventions in the River Avon SAC catchment. The grant will help Wiltshire Council to continue to work proactively and strategically in the catchment to deliver mitigation projects that may be able to help some applicants. At a Cabinet meeting on 6th February 2024, it was agreed to revise the strategic mitigation strategy. This revised approach is led by the supply of mitigation projects in the catchment, funded by developer contributions via planning obligations. A council-led scheme has been approved and is one route that development can potentially use to achieve phosphorus neutrality. It will form part of the solution to achieving phosphorus neutral development in the catchment. A portfolio of projects will be progressed which includes council-owned sewage upgrades, householder sewage upgrades and first-time sewerage, wetlands, woodland planting and water efficiency measures. The council-led scheme will only be available for planned developments where there is a supply of mitigation credits within the sub-catchment.
- 3.24 Other routes such as securing mitigation through private providers, as well as delivery of bespoke solutions on-site, where possible, can also be progressed by developers.
- 3.25 The revised approach came into effect immediately and an updated strategy document will be published in due course.
- 3.26 With regards to the potential for likely significant effects on the River Avon SAC from water abstraction, the HRA (2020) for the Wiltshire Housing Site Allocations Plan states that existing levels of abstraction for Public Water Supplies (PWS) have the potential to exceed guideline levels on short stretches of the upper reaches of the River Avon SAC. Increased levels of abstraction in this part of the catchment could result in likely significant effects through low flows which would impact upon the qualifying features. Salisbury, however, was not listed as a settlement falling wholly or partly within sub catchments where abstraction for PWS could cause likely significant effects on the River Avon SAC.
- 3.27 Any application for development within close proximity to the SAC would need to incorporate appropriate and adequate avoidance and mitigation measures such as buffer zones along the river, and compliance with Core Policy 69 (Protection of the River Avon SAC) of the WCS. Core Policy 69 requires the use of Construction Management Plans for developments within 20m of the river bank as this will help to maintain water quality.
- 3.28 The NDP does not allocate sites for development however it does support development within the NDP area and as such, a pathway for likely significant effects on the River Avon SAC exists, therefore the NDP must be subject to an appropriate assessment in terms of potential for effects on this European site.

Air Pollution / Nitrogen Deposition

- 3.29 The WCS HRA identified that increased traffic would lead to potential effects through an increase in atmospheric pollution and nitrogen deposition upon a range of European sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level¹⁰. The Salisbury NDP does not allocate any sites for development therefore it is considered that the NDP will not result in significant effects on European sites as a result of nitrogen or particulate matter deposition.

¹⁰ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

Physical Damage / Interruption of Flight Lines / Disturbance

- 3.30 The Salisbury NDP area is located over 3km from the closest boundary of the Porton Down SPA, therefore, it is considered that the plan area is sufficiently distant from the SPA and known functionally linked habitat, for any development within the plan area to cause direct physical damage to, or fragmentation of, breeding and foraging habitat for the Annex I species stone-curlew. The plan area is also considered too remote for development within the plan area to result in anthropogenic disturbance or visual stimuli that could have an adverse effect on stone-curlew breeding at Porton Down.
- 3.31 Salisbury Plain SPA is located approximately 9.2km north of the NDP area at its closest point and is therefore deemed too distant for any development within the plan area to have implications for the Annex 1 species stone-curlew and quail that breed at the SPA, or to have effects on the Annex 1 species hen harrier, that winters at the SPA. Therefore, appropriate assessment in relation to this European site has been screened out.
- 3.32 It should be noted however, that a stone-curlew breeding plot exists approximately 1.08km from the northern boundary of the NDP area. Stone-curlew are susceptible to disturbance from visual stimuli within 1km. The NDP does not allocate any sites for development therefore appropriate assessment with respect to the Salisbury Plain SPA has been screened out with regards to physical damage, interruption of flight lines and disturbance. If a subsequent draft of the NDP were to allocate any sites for development in the north of the plan area, there could be a mechanism for a likely significant effect on stone-curlew which is a qualifying feature of the Salisbury Plain and Porton Down SPAs, and as such HRA of the plan could be necessary.
- 3.33 The NDP area is located approximately 40km from the nearest component of the Bath and Bradford on Avon Bats SAC and approximately 30km from the nearest core roost associated with the SAC. Appropriate assessment of the NDP can therefore be screened out with respect to this SAC.
- 3.34 The NDP area is also considered too remote from the Mottisfont Bats SAC and Chilmark Quarries SAC, being approximately 6.5km from both, for there to be physical damage or disturbance to bats and their habitats.

4. Screening of Policies in Salisbury Neighbourhood Development Plan 2020 – 2038 Submission Draft September 2023

- 4.1 The Salisbury NDP comprises 30 planning policies, 12 of which are recommended to be taken forward to appropriate assessment due to potential likely significant effects on the River Avon SAC and the New Forest SPA/SAC.
- 4.2 It is considered that none of the other policies within the NDP would lead directly to development or result in a likely significant effect on any European sites, either alone or in-combination with other plans or projects.

TABLE 1: Habitats Regulations Assessment Screening of the Salisbury NDP

A / B (Green) – Screened out
 C / D (Red) – Screened in

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
Policy 1: Tree Planting for Carbon Capture	A1	<p>This policy requires all major development to provide a minimum of 30% of the total site area as tree canopy cover after the first 15 years from completion. Provision may be made off-site where this is not possible in accordance with Policy 10. Tree management plans will accompany any proposals that include the removal of existing trees or the introduction of new trees to ensure like for like replacement of any trees lost in the 5 years following completion. This policy requires one tree to be planted for every 10m of road frontage, where there is no overriding reason not to. Development will be required to demonstrate how it has added trees and other types of planting for the purposes of carbon capture, improving air quality and biodiversity and helping residents, workers and visitors connect with nature. The policy supports schemes that seek to enhance natural features and connectivity with existing green infrastructure.</p> <p>This policy will not lead to development but seeks to increase tree cover to increase carbon capture, improve air quality and biodiversity and to connect local people and visitors with nature. This policy would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 2: Air Quality	A1	<p>This policy requires, that when fulfilling the requirements of Core Policy 55, developments should have particular regard to how the scheme design avoids the creation of NO₂ in Air Quality Management Areas (AQMA). Transport and Travel Plans should address how the transport impacts of the development will result in acceptable air quality locally and will not breach the objectives of existing AQMAs. Existing developments will be encouraged to reduce traffic impacts on Salisbury’s AQMAs. Proposals should include tree, hedgerow and shrub planting to support improved air quality.</p> <p>This policy will not lead to development, rather it encourages developments to reduce air quality impacts, especially in areas covered by AQMAs. This policy would not result in a likely significant</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.	
Policy 3: Carbon Neutral Development	A1	<p>This policy sets out that applications for new buildings or for significant modifications to existing buildings should be accompanied by an Energy Statement. The policy then goes on to list several criteria that the Energy Statement must address, including how the proposal will perform against the UK Green Building Council’s Net Zero Carbon Buildings Framework Definition meeting the zero carbon target wherever possible. Applications for modifications to existing buildings should be able to demonstrate that the proposal has improved the efficiency of the building. Proposals for modifications to Listed Buildings or buildings in the Conservation Area should consider advice from Historic England and demonstrate that the maximum level of energy efficiency, energy generation and reduction in CO₂ impacts have been achieved.</p> <p>This policy will not result in development; however, it does support the development of new energy efficient buildings and the improvement of energy efficiency in existing buildings. This policy would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 4: Electric Vehicle Charging Points	A1	<p>This policy requires all new residential developments, conversions and modifications where parking is provided to provide an appropriately located charging point, preferably with two sockets. In general parking areas an appropriate ratio of charging points for general use should be provided. All non-residential developments or major modifications to existing buildings are required to make proper provision for appropriate electric vehicle charging infrastructure to meet the developments needs and those of any visitors. This policy also supports the provision of vehicle charging points at public buildings with vehicular access, public parking and in street infrastructure.</p> <p>As this policy does not promote development but requires the ability to charge electric vehicles in residential and commercial settings, it would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 5: Habitats Regulations	A1 / A2	This policy states that all new development will be required to demonstrate compliance with the Habitats Regulations.	See Section 5 (paragraphs 5.22 - 5.35) below for recommended policy amendments.

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>It goes on to state that any development affecting the New Forest SPA/SAC must take account of increased recreational pressure on these European sites and must be in accordance with the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites.</p> <p>The policy sets out the need for any developments not allocated within the WCS to demonstrate phosphorus neutrality.</p> <p>This policy aims to ensure that all developments within the NDP area comply with the requirements of the Habitats Regulations and do not adversely affect the New Forest SPA/SAC or the River Avon SAC. This policy would not result in development and would not lead to a likely significant effect on any European sites. However, it is recommended that some amendments are made to the policy wording and supporting text to strengthen the policy.</p> <p>Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies. An appropriate assessment to ensure compliance with the Habitats Regulations will be required at the planning application stage.</p>	
Policy 6: Design in the Built Environment	A1	<p>This policy requires all developments to have regard to the Salisbury Design and Advertising Guide and those in the Conservation Area are required to have regard to the City of Salisbury Conservation Area Appraisal and Management Plan. All development for Class E uses, or from conversions from Class E to Class C3 are required to have regard to the Salisbury Design and Advertising Guide. High quality well designed non traditional buildings may be acceptable where they enhance the urban environment. Where provision is made for the following, a long-term management scheme (25 years) will be required: landscaping schemes other than individual residential properties, any form of flood management scheme, tree planting, and where appropriate, replacement of key building elements. Any developments with below ground impacts within the Conservation Areas, particularly within the Cathedral Close, should address the requirements in Core Policy 58 with regards to ecology.</p> <p>As this policy does not promote development but seeks to ensure good high quality design, it would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
Policy 7: The Close and its Liberty	A1/A3	<p>This policy sets out criteria for development proposals, including planning applications and listed building consent applications, within The Close and its Liberty, including to protect and enhance the biodiversity, ecology and landscape setting of the Close. Proposals for advertising will normally be deemed inappropriate. Development proposals within the scope of The Cathedral’s masterplan will be treated favourably.</p> <p>This policy will not itself lead to development as its aim is to protect the special character of The Close and its Liberty. It would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 8: The Chequers	A1/A3	<p>This policy sets out the types of proposals which will be supported or resisted within the Chequers:</p> <ul style="list-style-type: none"> • Those that avoid the erosion of the traditional back of pavement line, avoid causing a break in the street frontage or will not cause obstruction to the Chequers street pattern will be supported; • Proposals that seek to reintroduce the original street pattern in the Chequers where this has been eroded will be supported; • Loss or alteration of open space in the Chequers will only be supported where it is likely to enhance further provision or use of the space; • Loss of the open area of Marsh Chequer will be resisted; • The loss of traditional historic features such as kerbs and stable pavers should be avoided, or they should be reinstated to their original condition and location. <p>This policy will not result in development, rather it aims to restrict development which would be damaging to the historic character of the Chequers. It would not lead to a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 9: Protecting Key Views in Salisbury	A1	<p>This policy restricts the height of buildings to 12.2m (40ft) and states that only pitched roofs clad in traditional materials will be permitted. Decorative architectural features exceeding this height may be allowed provided they do not result in any increase in useable floorspace. A lesser height may be considered more appropriate for buildings that have to fit into the existing townscape. Where existing buildings are redeveloped planning permission will only be granted after careful consideration of whether rebuilding to the previous height will be acceptable. Developments within the Central Area or where they have a clear view of the Central Area should be</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>accompanied by a statement which sets out how views are preserved. A Landscape and Visual Impact Assessment should accompany major development applications. Major developments should consider and be sympathetic to potential impacts on the setting of the Scheduled monument of Old Sarum and protect views of the monument where they exist.</p> <p>This policy will not itself lead to development as its aim is to protect views of Salisbury Cathedral by restricting the height of buildings to maintain key views. It would not result in a likely significant effect on any European sites. Developments will be considered at the planning applications stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies, including WCS Policy 21.</p>	
<p>Policy 10: Safeguarding and Enhancing Blue and Green Infrastructure</p>	<p>A1, A2, A3</p>	<p>This policy supports proposals that contribute to the greening of Salisbury and deliver elements of the Salisbury green and blue infrastructure vision in the NDP.</p> <p>Major development will be required to:</p> <ul style="list-style-type: none"> • provide a green infrastructure plan setting out how the development will contribute to Salisbury’s green and blue infrastructure; • meet the national Urban Greening Factor for commercial and residential development, and where appropriate residential greenfield development; • obtain professional landscape and ecological design input. <p>Developments should have no net detrimental impact on the green and blue infrastructure network. Where harm is unavoidable and the harm is outweighed by the need for the development, the harm must be mitigated with at least a net 10% improvement.</p> <p>Developments should avoid loss of visual amenity or visual access to blue and green infrastructure and loss of quality of routes due to development.</p> <p>This policy would not result in development, rather it seeks to ensure that new developments contribute to the greening of Salisbury and deliver elements of the Salisbury green and blue infrastructure vision. It would not lead to a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	<p>All developments are required to provide a biodiversity net gain, or improvement, not just those where harm is unavoidable and the harm is outweighed by the need for the development. It is recommended that the wording of this policy is amended.</p>
<p>Policy 11: Biodiversity Net Gain</p>	<p>A1, A2, A3</p>	<p>This policy requires all new developments to provide a minimum of 10% biodiversity net gain as part of the scheme design. If this 10% is not included on site, a commuted sum will be required when development is started to be paid to Salisbury City Council or Wiltshire Council for the purposes of biodiversity improvement within Salisbury City. Developments should aim to safeguard and enhance habitats for protected species, e.g. by providing high quality green</p>	<p>This policy states that a sum of money will be required for any development where 10% BNG cannot be provided</p>

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>infrastructure within the development site and including specific features to support specific species, e.g. bat boxes. Swift bricks should be provided at a rate of one brick per residential unit.</p> <p>This policy would not result in development, rather it seeks to ensure that all new developments provide 10% biodiversity net gain and safeguard and enhance habitats for protected species. It would not lead to a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	<p>on site and this sum would be paid to Salisbury City Council or Wiltshire Council. This would not be the case as all planning applications are submitted to Wiltshire Council who will agree a sum of money and how/where that money is spent.</p> <p>The Environment Act makes provision for the Secretary of State to set up a national biodiversity credits scheme. This will allow developers to buy credits as a last resort at a higher than market price when onsite and local offsite provision of habitat cannot deliver the BNG required.</p> <p>It is recommended that the wording of this policy is amended to reflect these comments.</p>
Policy 12: Habitat Improvement and Restoration Schemes	C and D River Avon SAC	<p>This policy states that <i>offsite biodiversity net gain is encouraged to be delivered at the SNDP habitat improvement and restoration schemes listed in paragraph 182 and as detailed in Appendix 2, Figures 46-52</i>. The supporting text lists the habitat enhancement and restoration schemes as follows:</p> <ul style="list-style-type: none"> • Avon Valley Local Nature Reserve; 	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<ul style="list-style-type: none"> • Bemerton Folly and Barnards Folly Local Nature Reserve and the Valley; • Harnham Slope, West Harnham Chalkpit, Harnham Folly Woodland, Chiselbury Grove Woodland and old Blandford Road Open Space; • Middle Street Meadow; • Lime Kiln Down; • Hudson’s Field and Three Corner Field. <p>These schemes and projects are priority projects for off-site biodiversity net gain proposals and are preferred over other schemes that may be suggested. They relate to locally important wetland, woodland, valley bottom, grassland habitat and increasingly rare chalk downland habitat which require improvement in terms of management and access, and are located largely within the urban area.</p> <p>This policy supports the provision of offsite biodiversity net gain at the habitat improvement and restoration scheme sites listed above. The policy will not lead to development but seeks to enhance and restore important local habitats. However, as some of the schemes are located adjacent to the River Avon SAC there is the potential for the progression of such schemes to result in additional recreational pressure upon the habitats associated with the Avon which in turn could lead to likely significant effects on the SAC. Therefore, Policy 12 cannot be screened out and must be subject to appropriate assessment.</p>	
Policy 13: Open Space Provision	A2	<p>This policy requires all major development schemes located adjacent to the open spaces identified in the NDP, or that would give rise to additional usage of these spaces, to make provision to implement the improvements identified in Appendix 3. This can either be achieved by providing the specific infrastructure or maintenance required or by providing a commuted sum to Salisbury City Council to undertake the works. This policy requires very large scale housing schemes to ensure residents have access to a variety of greenspaces within 15 minutes’ walk from home.</p> <p>This policy will not lead to development but seeks to improve the important local greenspaces within Salisbury and therefore would not lead to a likely significant effect on any European sites. Developments will be considered at the planning application stage to ascertain whether HRA is required and to ensure compliance with this policy, the NPPF and other relevant Development Plan policies.</p>	Developments adjacent to open spaces within close proximity of the River Avon SAC may need to be subject to a HRA at the application stage to ensure there would be no recreational impacts on the SAC due to the improvements made to the open spaces leading to an increased level of public access/use.

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
Policy 14: Local Green Spaces	A3	<p>This policy states that the sites identified in the figure and relevant appendix are designated as Local Green Spaces, this is in accordance with paragraphs 101-103 in the NPPF (2021).</p> <p>This policy designates Local Green Spaces within Salisbury and therefore will not lead to development or a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 15: Construction and development management for projects affecting the River Avon SAC	C and D River Avon SAC	<p>This policy seeks to ensure that <i>'Riparian development will ensure protection of the River Avon SAC in accordance with Core Policy 69 or other relevant local plan policy and paragraph 201'</i>. The supporting text states that the Salisbury River Park Masterplan indicates that the following approach should be adopted to manage construction and development impacts near the River Avon and its tributaries:</p> <ul style="list-style-type: none"> • Development and redevelopment should aim to integrate the protection and restoration of the natural river habitat, riparian zone and floodplain. • Landscape schemes should achieve a minimum 10% biodiversity net gain. • Species used for new planting should be appropriate for the riverine environment, enhancing its character and respecting special features of the SAC. • Biosecurity measures and procedures should be employed to reduce the risk of introducing or spreading invasive non-native species (and other harmful organisms such as diseases) in the wild. • Measures should be employed to eradicate and manage invasive species such as Japanese knotweed, Himalayan balsam, Canadian waterweed, and Giant Hogweed. • It must be demonstrated that the development has been designed to avoid any temporary or permanent increases in artificial light levels near the river. • The development should not increase surface water or groundwater flood risk. • Development should incorporate Water Sensitive Urban Design (WSUD) and sustainable drainage principles taking account of the four pillars of sustainable drainage (SuDS) – water quantity, water quality, biodiversity and amenity. • Betterment of surface water run-off control should be achieved over pre-development run-off. <p>This policy is designed to protect the River Avon SAC from construction impacts by ensuring developments are in accordance with Core Policy 69 Protection of the River Avon SAC. This policy will not lead to development however, it does not recognise the need for development to comply</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>with the Habitats Regulations and the possibility that a HRA would be required. It is therefore necessary to take this policy forward to appropriate assessment. In addition, developments will be considered at the planning application stage to ascertain whether HRA is required and to ensure compliance with this policy, Policy 5, the NPPF, Core Policy 50 (CP50) (Biodiversity and Geodiversity) and Core Policy 69 (CP69) (Protection of the River Avon SAC) of the WCS and other relevant Development Plan policies.</p>	
<p>Policy 16: Housing Mix and Affordable Housing</p>	<p>C and D River Avon and New Forest SPA/SAC</p>	<p>This policy sets out the housing mix required for development proposals of 10 or more units or 0.5ha or more, including market rate housing and affordable housing. A minimum of 40% affordable housing should be provided. The provision of flats, either market rate or affordable, will be supported in sustainable locations. 30-40% of affordable housing units should be one bedroom.</p> <p>This policy will not lead to development however it supports development by identifying the housing mix required for 10 or more units or 0.5ha or more. Residential development supported through this policy could contribute to phosphorus pollution of the River Avon SAC through increased discharges from sewage treatment works and recreational pressures due to additional public use of habitats associated with the SAC. Developments may also be located within the New Forest SPA/SAC 13.8km Zol and could therefore lead to recreational pressures on these European sites. Therefore, it is necessary for this policy to be subject to appropriate assessment. Furthermore, developments will be considered at the planning application stage to ensure they comply with this policy, Policy 5, the NPPF and other relevant Development Plan policies.</p>	
<p>Policy 17: Churchfields and the Engine Shed Site</p>	<p>C and D River Avon SAC</p>	<p>This policy requires any developments within the area of Churchfields to take full account of the requirements and proposals in the Churchfields Masterplan and Salisbury Design and Advertising Guide. The guidelines and masterplan document were developed by AECOM to provide design support to Salisbury City Council with a focus on the Churchfields Area.</p> <p>Churchfields is surrounded to the west, south and east by the River Nadder which is a component of the River Avon SAC. The policy wording does not stipulate that there would be residential development on this site however the supporting text, design guide and masterplan do imply that there would be. If residential development came forward on this site as a result of this policy there would be the potential for likely significant effects on the River Avon SAC through increased phosphorus pollution, construction impacts and recreational pressure. Policy 17 cannot be screened out and must be subject to an appropriate assessment.</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>Furthermore, developments will be considered at the planning application stage to ascertain whether HRA is required and to ensure compliance with this policy, Policy 5, Policy 15, the NPPF, Core Policy 50 (CP50) (Biodiversity and Geodiversity) and Core Policy 69 (CP69) (Protection of the River Avon SAC) of the WCS and other relevant Development Plan policies.</p>	
	C and D New Forest SPA/SAC	<p>The policy wording does not stipulate that there would be residential development on this site however the supporting text, design guide and masterplan do imply that there would be. This site is located within the 13.8km Zol of the New Forest SPA/SAC and therefore if residential development came forward on this site as a result of this policy there would be the potential for likely significant effects on the SPA/SAC with regards to increased recreational pressure.</p> <p>Development will need to adhere to the Interim New Forest Mitigation Strategy¹¹ or subsequent iteration of the strategy, which requires developments on brownfield land within the 13.8km Zol to provide a Community Infrastructure Levy (CIL) contribution per dwelling. Policy 17 cannot be screened out and must be subject to an appropriate assessment. In addition, developments will be considered at the planning application stage to ascertain whether HRA is required and to ensure compliance with this policy, the NPPF, the Interim New Forest Mitigation Strategy (2022), Core Policy 50 (CP50) (Biodiversity and Geodiversity) of the WCS and other relevant Development Plan policies.</p>	
Policy 18: Healthcare Facilities	C and D River Avon SAC	<p>This policy sets out the NDPs support for the development of new primary and secondary healthcare facilities within the Central Area, particularly on previously developed land or in areas that are currently poorly served. The loss of existing healthcare facilities will not be supported unless a suitable alternative is provided. The policy supports the redevelopment of large buildings in whole or part for healthcare facilities before a change of use is considered. The following three sites have been suggested in the supporting text as potential sites as they are existing, accessible brownfield sites:</p> <ul style="list-style-type: none"> • The Maltings; • Central Car Park; • Brown Street Car Park. <p>This policy does not allocate land but it does support the location, relocation and/or development of healthcare services in the city centre. Of the three sites identified above, the Maltings and the Central Car Park are both located within 20m of the River Avon SAC. There is the potential for</p>	

¹¹ Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites, Wiltshire Council, January 2022 (Version 1.1 21/03/2023)

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>other sites to be adjacent to (within 20m of) the River Avon SAC. This policy cannot be screened out as there is the potential for likely significant effects on the SAC. This policy therefore needs to be taken forward to appropriate assessment.</p>	
<p>Policy 19: Community Infrastructure</p>	<p>C and D River Avon SAC</p>	<p>This policy seeks to ensure there is no loss of community infrastructure. Where the loss of infrastructure is unavoidable, acceptable equivalent replacement infrastructure will be required to be provided. All larger residential development will be required to provide new onsite community infrastructure, where possible, where it cannot be demonstrated that there is sufficient community infrastructure within walking distance. Where necessary offsite provision will be provided through developer contributions. Community infrastructure should be accessible to new residents and also benefit members of the community most affected by the development. Long term management plans will be required to accompany proposals for new or improved community infrastructure.</p> <p>This policy will not lead to development as it does not allocate sites, however it does support the development of new community infrastructure where appropriate. The River Avon and two of its tributaries flow through the Salisbury NDP area, therefore there is the potential for new or improved facilities to be located adjacent to or within 20m of the River Avon SAC. Therefore, the potential for likely significant effects with regards to construction impacts and recreational pressure on the SAC cannot be ruled out and Policy 19 must be subject to appropriate assessment.</p>	
<p>Policy 20: Allotments</p>	<p>A1</p>	<p>This policy seeks to ensure there is no loss of allotment land. Loss will be resisted unless an acceptable alternative is provided. All major residential development will be expected to make provision for allotments wherever feasible. Where the provision of allotments is not feasible provision will be required for residents to be able to participate in gardening for social and therapeutic purposes. This provision should enable wheelchair users and others to garden independently and in a sustainable manner.</p> <p>This policy will not lead to development but seeks to ensure that there will be no loss of allotment land and that all new developments make provision for allotments wherever feasible. This policy would not result in a likely significant effect on any European sites.</p>	
<p>Policy 21: Provision for Play and Sport</p>	<p>C and D River Avon SAC</p>	<p>The loss of play provision and sport infrastructure will be strongly resisted, including trading one for the other, through this policy. All major residential developments will make proportionate provision for play and sport to meet the demand the scheme gives rise to. Legacy planning will be required to ensure there is no future loss of provision and that schemes are maintained throughout their lifetime. New sports venues should be able to comply with climate change</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>policies. Play provision can be equipped play areas or informal adventure play opportunities but must meet the needs of a range of ages and abilities. Landscaping schemes should include opportunities for informal and creative play.</p> <p>This policy will not lead to development as it does not allocate sites; however, it does support the development of new play and sport facilities where appropriate. The River Avon and two of its tributaries flow through the Salisbury NDP area, therefore there is the potential for new play and sports facilities to be located adjacent to or within 20m of the River Avon SAC. Therefore, the potential for likely significant effects with regards to construction impacts and recreational pressure on the SAC cannot be ruled out and Policy 21 must be subject to appropriate assessment.</p>	
Policy 22: Sustainable Transport	C and D River Avon	<p>This policy aims to ensure a modal shift to more sustainable transport modes and to reduce the need to travel into and within the city centre, particularly for larger vehicles. Transport schemes and mitigation measures identified in the Salisbury Transport Strategy and the Local Walking and Cycling Infrastructure Plan will be supported by developments and wherever possible sustainable transport schemes should align with and enhance Salisbury’s Blue and Green Infrastructure networks.</p> <p>This policy will not lead to development but sets out the requirement for developments to support and promote sustainable transport including through the provision of new sustainable transport links. As the location of new transport links has not been identified, the potential for new links to be located adjacent to the River Avon SAC cannot be ruled out. Construction of new links in proximity to the SAC could result in construction impacts, for example damage or disturbance to the riverbank, and increased recreational pressure on the SAC. Therefore, likely significant effects on the River Avon SAC cannot be screened out and Policy 22 should be subject to an appropriate assessment.</p>	
Policy 23: Cycling and Walking Infrastructure	C and D River Avon SAC	<p>This policy supports developments that make provision for the Local Walking and Cycling Infrastructure Plan, make contributions towards sustainable transport provision, including for the mobility impaired, and make provision for improvements to wider walking and cycling connectivity. Safe walking and cycling routes to and from schools should be provided wherever possible.</p> <p>This policy supports the construction of new cycle/pedestrian routes throughout the Salisbury NDP area, some of which are adjacent to the River Avon SAC. As such, the development proposed in the policy has the potential to cause construction impacts, for example damage or disturbance</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		to the riverbank, and recreational pressure on the River Avon SAC by encouraging more people to walk and cycle along new routes constructed adjacent to the SAC. Therefore, likely significant effects on the River Avon SAC cannot be screened out and Policy 23 should be subject to an appropriate assessment.	
Policy 24: Cycle Parking	A1	<p>New developments and residential conversions will be required to provide cycle parking and storage, in accordance with Wiltshire Council cycle parking policy. Developments within the city centre will be required to either make provision for or contributions towards publicly available cycle parking, including covered cycle parking.</p> <p>This policy aims to increase the amount of cycle parking and storage provided within Salisbury and does not therefore lead to development itself. This policy would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 25: Cycling for Pleasure	C and D River Avon SAC	<p>This policy seeks to improve the provision of facilities for cycling for pleasure. This includes safe cycle storage at key points, repair stations and outdoor serving areas with seating. Safer crossing points for cyclists and provision of cycling maps and promotional material will also be supported.</p> <p>This policy will not lead to development but it does have the potential to cause likely significant effects on the River Avon SAC. The policy and supporting text do not identify where the ‘key points’ would be located and as such there is potential for these to be located adjacent to the SAC and to result in construction impacts, for example disturbance or damage to the riverbank, as well as increasing recreational pressure by encouraging more people to cycle on routes close to the SAC. Likely significant effects on the River Avon SAC cannot be screened out and Policy 25 should be subject to an appropriate assessment.</p>	
Policy 26: Residential Parking	A1	<p>This policy sets out the parking provisions that will be supported:</p> <ul style="list-style-type: none"> • Residential developments without allocated parking spaces, particularly in the Central Area; • Residential developments with reduced parking spaces and enhanced provision for car sharing and other sustainable travel modes; • Parking should be on plot where feasible and should never lead to on street parking unless in purpose-built parking bays. <p>This policy seeks to reduce the amount of parking and private car use within Salisbury and does not therefore lead to development itself. This policy would not result in a likely significant effect</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.	
Policy 27: Working from Home and Live-Work units	A1	<p>This policy aims to ensure that new residential developments are designed to facilitate home working. Larger schemes will be required to provide community work hubs where practicable. These schemes should also provide secure lock-up-and-leave storage. To ensure the community work hubs are not subsequently converted to residential uses, a planning conditions will be attached to any permission to remove permitted development rights for this conversion. Live work units are also supported through this policy.</p> <p>This policy does not allocate land for development but sets out criteria for residential schemes to provide facilities for working from home. This policy would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 28: Visitor Accommodation	C and D River Avon SAC	<p>This policy states: <i>Development for new visitor accommodation in Salisbury will be supported in accordance with Core Policy 40.</i></p> <p>This policy does not allocate land for development; however, it does support the development of new visitor accommodation which has the potential to be located within close proximity to the River Avon SAC. Therefore, due to the potential for likely significant effects on the SAC in terms of increased phosphorus pollution from additional discharges from sewage treatment works and construction impacts from the development of additional overnight accommodation, as well as an increase in recreational pressure, this policy cannot be screened out. Policy 28 should be subject to appropriate assessment.</p>	
	C and D New Forest SPA/SAC	<p>This policy does not allocate land for development; however, it does support the development of new visitor accommodation. The majority of the NDP area is located within the 13.8km Zol from the New Forest SPA/SAC. Likely significant effects on the New Forest SPA/SAC alone cannot be ruled out as the policy wording does not put a maximum threshold on the quantum of visitor accommodation supported by the policy. Therefore, the potential for likely significant effects on the New Forest SPA/SAC, alone and in combination, from recreational pressures caused by more people visiting and staying in Salisbury and potentially visiting the New Forest cannot be screened out and Policy 28 should be subject to appropriate assessment.</p>	
Policy 29: Post Offices	A1	<p>This policy states that post offices in Salisbury are deemed to be Class F2(a) where the essential service is as a post office. Post offices in Salisbury are not deemed to be Class E.</p>	

Policy	Initial screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>This policy will not lead to development and instead classifies post offices in Salisbury as Class F2. This policy would not result in a likely significant effect on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
<p>Policy 30: Major Food Retail</p>	<p>C and D River Avon SAC</p>	<p>This policy states that proposals for major food provision will be supported where there is poor provision. The policy goes on to state that local convenience goods shops that serve local catchments and can be accessed on foot by the majority of their customers will be supported.</p> <p>This policy does not allocate land for development; however, it does support the development of new major food retail units which have the potential to be located within close proximity to the River Avon SAC. Therefore, the potential for likely significant effects on the River Avon SAC due to construction related impacts and the contribution of additional phosphorus to the SAC cannot be screened out and Policy 30 should be subject to appropriate assessment.</p>	

STAGE 2 APPROPRIATE ASSESSMENT

5.0 Appropriate Assessment – River Avon SAC

Background to the River Avon SAC

- 5.1 The qualifying features of the River Avon SAC are the river habitat, categorised as a water course of plain to montane levels containing *Ranunculus* vegetation; Desmoulin's whorl snail which occurs on emergent vegetation in the floodplain, and; four species of fish, Atlantic salmon, sea lamprey, brook lamprey and bullhead. The conservation objectives are available at <http://publications.naturalengland.org.uk/publication/6048472272732160>, the current version (V3) is dated 27 November 2018.
- 5.2 In brief these require that the integrity of the site is maintained or restored as appropriate and that the site contributes to achieving the favourable conservation status of its qualifying features. Supplementary Advice on conserving and restoring site features was published by NE on 11 March 2019¹² (available through the weblink above). This discusses the need to restore the natural nutrient regime, by limiting anthropogenic enrichment to levels at which adverse effects on characteristic biodiversity are unlikely. In relation to planning, the main concern is the contribution that development makes to river phosphorus levels through inputs from sewage treatment works and package treatment plants. To this effect, specific targets have been identified for phosphorus for the individual waterbodies which make up the SAC.
- 5.3 Development may also affect the river directly, if works are undertaken on the banks or within the river channel and indirectly through non sewage related pollution, such as runoff during construction operations.

Plans and projects to be considered in combination

- 5.4 The HRA for the WCS considered the in-combination effect of all development proposed in the River Avon catchment, relying on the River Avon Nutrient Management Plan (NMP)¹³ to demonstrate there would be no adverse effect on the SAC.
- 5.5 The principle behind the NMP was that planned increases in development related sewage would be more than offset by the reductions in agricultural phosphate being secured by catchment sensitive farming. For the Core Strategy 2015-2026 this enabled the Council to conclude that, provided development was within the headroom of individual sewage treatment works, there would be no likely significant effects of housing allocations proposed within the River Avon catchment.
- 5.6 In March 2018, the EA and NE advised the Council that catchment sensitive farming targets were not being achieved and therefore the NMP could not be relied on for appropriate assessments, even for development within headroom. From that time onwards, all new development in the catchment would need to be "phosphate neutral" if it was to comply with the Habitats Regulations.
- 5.7 Subsequently Wiltshire Council and other Local Authorities in the Avon catchment have entered into a Memorandum of Understanding (MoU) with NE, Wessex Water and the EA¹⁴ agreeing to deploy a range of measures to ensure that development between March 2018 and March 2025 will be phosphate

¹² Supplementary Advice on Conserving and Restoring Site Features: River Avon Special Area of Conservation (SAC). Site Code UK0013016 Published by Natural England 11 March 2019

¹³ River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus (David Tyldesley Associates, 30 April 2015)

¹⁴ Memorandum of Understanding, River Avon Special Area of Conservation, Phosphate Neutral Development – Interim Mitigation, 29 May 2018

neutral. The MoU commits the parties to preparing an Interim Delivery Plan (IDP)¹⁵ in order to secure a trajectory of phosphorous reductions in line with the spatial and temporal pattern of development. The IDP focusses mainly on residential development down to single dwellings, as these combine to have the greatest negative effects across the catchment. In addition to residential and non-residential growth, the IDP considers the growth of unsewered development and takes account of land use change from agriculture to urban in order to arrive at a projection for net phosphorous increases up to 2025/26.

- 5.8 In Wiltshire, the Cabinet resolved on 5th January 2021 to adopt a strategic approach to secure in perpetuity measures to ensure development is phosphate neutral in the River Avon SAC catchment. It confirmed the strategic approach would include monitoring and annual reporting to ensure offsetting keeps pace with permissions granted and agreed to ring-fence an initial fund of £850,000 from the Community Infrastructure Levy (CIL) to fund the necessary offsetting measures and a project officer to oversee their delivery.
- 5.9 NE previously advised it intended to issue formal guidance in autumn/winter 2021 on when non-mains development can be excluded from appropriate assessment, however this guidance is still awaited. In the meantime, Wiltshire Council has some interim guidance about small scale thresholds for non-mains system development which can be applied to planning applications so that it can be determined when discharge to non-mains systems may be considered to be de-minimus; i.e. lead to impacts which are so minimal that they can be excluded from appropriate assessment and not require mitigation.
- 5.10 The strategic strategy agreed in 2021 was an interim approach to be reviewed by the Council and Natural England as evidence and legislation and policy changed. Following recent changes to guidance and legislation including; the Levelling Up and Regeneration Act 2023 and a statement from the Minister of State, Lee Rowley MP, on 19th December relating to nutrient neutrality, it is necessary for the Council's interim nutrient neutrality approach to be updated.
- 5.11 The Government announced in December 2023 that Wiltshire Council had been awarded a grant for capital projects via the Local Nutrient Mitigation Fund to help pump-prime nutrient neutrality interventions in the River Avon SAC catchment. The grant will help Wiltshire Council to continue to work proactively and strategically in the catchment to deliver mitigation projects that may be able to help some applicants.
- 5.12 At a cabinet meeting on the 6th February 2024, a revised strategic approach was agreed to securing phosphorus neutral development in the catchment of the River Avon SAC.
- 5.13 This revised approach comes into effect immediately and is led by the supply of mitigation projects in the catchment and funded by developer contributions, via planning obligations, of £38,500 per 1kg/TP/yr with a 5% administration charge (this fee is subject to review). It will apply to all housing and overnight tourism accommodation (and other qualifying development) in the River Avon SAC catchment seeking outline, full, reserved matters and discharge of condition approval. The council-led scheme will only be available in parts of the catchment where there is a sufficient supply of mitigation projects.
- 5.14 The council-led scheme is one route that development can potentially use to help achieve phosphorus neutrality. It will form part of the solution to achieving phosphorus neutral development in the catchment. The council is committed to enabling a delivery programme in all parts of the catchment. A portfolio of projects will be progressed which includes council-owned sewage upgrades, householder sewage upgrades and first-time sewerage, wetlands, woodland planting and water efficiency measures.

¹⁵ River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, Wood Environment and Infrastructure Solutions UK Limited, January 2019

- 5.15 All developments would still have the option to secure mitigation through delivery of bespoke solutions on-site where possible and purchasing credits from a third party (rather than purchasing from the council-led scheme or where credits in that locality are not available within the council-led scheme), facilitating a private market of mitigation solutions to help increase supply available to developers.
- 5.16 All developers are still expected to mitigate on site as far as possible using Sustainable Drainage Systems (SuDS) in line with the CIRIA Guidance¹⁶.
- 5.17 A policy document that details a clear approach for decision-making in the allocation of available capacity will be put in place. This will recognise the role of on-site and third party mitigation solutions in providing mitigation, alongside the council-led scheme. Under the revised strategy, the definition of planned development would remain the same and is as follows:
- Allocations within the development plan - Wiltshire Core Strategy (including saved policies), Wiltshire Housing Site Allocation Plan and Neighbourhood Plans (CP 2);
 - Proposals within settlement boundaries and infill at Small Villages (CP 2);
 - Rural exception sites (CP 44);
 - Outside settlement boundaries - only specialist accommodation, gypsy and travellers, rural workers dwellings, conversion and re-use of rural buildings consistent with policy (CP 46, 47 and 48).
- 5.18 Applications which are not considered to have significant effects on the SAC are as follows:
- Comparably sized replacement dwellings can be assumed to be phosphorous neutral in light of the condition restricting water use to 110 litres/person/day;
 - Any developments for annexes can also be regarded as phosphorous neutral if a condition is applied to limit use of the annex to that which is ancillary to the main dwelling;
 - Applications for replacement of a septic tank anywhere in the catchment are assumed to be phosphorous neutral provided there is no net increase in the number of connected dwellings.
- 5.19 Speculative greenfield applications outside of settlement boundaries that are contrary to the development plan (CP2) are not classified as planned development.
- 5.20 Non-residential development (excluding activities which contribute phosphorus as a result of their commercial processes or from people living beyond the catchment) and non-sewered development are also within the scope of the strategic appropriate assessment.
- 5.21 If development is not considered to be planned development, a bespoke mitigation strategy on site or via third parties is required to mitigate the potential impacts on the SAC. NE have developed a Nutrient Calculator which calculates a nutrient budget to be used to develop the mitigation strategy that will ultimately need to be agreed with NE and Wiltshire Council.

Analysis of Policy 5 Habitats Regulations and Recommendations

Policy 5 Habitats Regulations

- 5.22 Policy 5 seeks to ensure that all developments that come forward in the NDP area comply with the Habitats Regulations:

Policy 5: Habitats Regulations

¹⁶ Guidance on the Construction of SuDS, CIRIA, 2023.
<https://www.ciria.org/ItemDetail?iProductcode=C768&Category=BOOK>

All new development will need to demonstrate compliance with the Habitats Regulations.

Development affecting the New Forest SPA/ SAC must pay regard to the potential for increased recreational pressure on this site, taking account of the Interim Recreation Mitigation Strategy for the New Forest Internally Protected sites, January 2022, or subsequent iteration.

Development that is not allocated in the Wiltshire Core Strategy must demonstrate phosphorus neutrality.

- 5.23 The addition of this policy was agreed during discussions between Wiltshire Council ecologists and a representative of the NDP Steering Group prior to the submission of the Regulation 14 draft of the NDP. The actual text of the policy, however, was not agreed upon during these discussions. It was recommended that this policy would need to highlight the need for new developments to comply with the Council's strategic mitigation strategies and advise that new developments within the catchment of the River Avon SAC and the ZoI for the New Forest SPA/SAC may require a project level HRA.
- 5.24 While it is recognised that the policy does highlight the need to comply with the Habitats Regulations (which should be cited in full) and the Interim Recreation Mitigation Strategy for the New Forest and that developments would be required to demonstrate phosphorus neutrality, we recommended some amendments to the policy in the Regulation 14 appropriate assessment. We note that these recommendations have not been taken forward.
- 5.25 The supporting text to Policy 5 explains that Wiltshire Council undertook a HRA in November 2021 and that the document is appended to the NDP. The text goes on to explain that the policy draws on the findings of the HRA and that applicants are encouraged to consult the HRA and prepare proposals for appropriate mitigation where necessary.
- 5.26 The HRA undertaken by Wiltshire Council was issued in February 2022, not November 2021. The HRA was undertaken to assess an earlier draft version of the NDP and is therefore specific to that version of the NDP. We would not, therefore, expect it to be appended to this NDP or for developers to consult the document.
- 5.27 The supporting text should include a summary of the aims of the Habitats Regulations and should introduce the River Avon SAC and New Forest SPA/SAC. (It is noted that the River Avon SAC is introduced later in the document in the supporting text for Policy 15 and the New Forest SPA/SAC is not considered in the NDP.)
- 5.28 The policy should provide the full reference for the Habitats Regulations and should state that developments falling within the catchment of the River Avon SAC and within the ZoI for the New Forest SPA/SAC may be subject to a HRA.
- 5.29 Paragraph 2 of the policy sets out the potential for recreational impacts on the New Forest SPA/SAC and the need to take account of the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites. It is noted that there is a mistake in the policy and the word Internally is used instead of Internationally.
- 5.30 The paragraph starts by stating that '*Developments affecting the New Forest SPA/SAC must pay regard to the potential for increased recreational pressure on this site...*'. Developments should not be affecting the New Forest SPA/SAC, the objective of the policy should be to avoid or sufficiently mitigate the effects of new developments on European sites therefore it is recommended that this wording is amended.
- 5.31 The policy should set out the requirement for developers to provide a contribution to Wiltshire Council, or in some cases provide an on-site SANG, for residential or visitor accommodation developments located within the ZoI for the New Forest SPA/SAC in accordance with the revised mitigation approach and the revised Recreation Mitigation Strategy document (or latest iteration), which will be published on the Council's website shortly. The details of the revised approach are set out in the Cabinet paper dated 7th May, which can be found here: [Cabinet paper 7th May - Revised New Forest Mitigation Strategy](#).

This paper can be referred to in advance of the revised strategy document being published on the Council's website.

- 5.32 Paragraph 3 simply states that '*Development that is not allocated in the Wiltshire Core Strategy must demonstrate phosphorus neutrality.*' The supporting text does not explain the reason that developments are required to demonstrate phosphorus neutrality within the River Avon SAC catchment, and the policy does not refer to the Council's strategic mitigation strategy for the River Avon SAC¹⁷. The strategy sets out the Council's approach to achieving phosphorus neutrality within the SAC catchment and sets out that developments are considered to be within the scope of the strategic appropriate assessment if they are considered to be plan led development. Plan led developments are more than just those allocated within the WCS (see paragraphs 5.10-5.15), they are developments covered within the overall Development Plan, and this needs to be made clear within the policy wording and the supporting text.
- 5.33 Any developments that are not considered to be plan led development would be expected to demonstrate phosphorus neutrality through a bespoke mitigation strategy agreed with NE and Wiltshire Council.
- 5.34 It is therefore considered that amendments are still required to Policy 5 to strengthen the policy and ensure that developments coming forward within the NDP area avoid effects on these European sites or have sufficient mitigation measures in place.
- 5.35 On the basis that the recommended policy amendments above are made they would satisfy the need to comply with the Habitats Regulations for the following policies: (however these policies still need to be considered further in this appropriate assessment with regards to, for example, recreational and construction impacts)
- Policy 15 Construction and development management for projects affecting the River Avon SAC
 - Policy 16 Housing Mix and Affordable Housing
 - Policy 17 Churchfields and the Engine Shed site
 - Policy 21 Provision for Play and Sport
 - Policy 22 Sustainable Transport

Analysis of policies in the NDP screened into appropriate assessment

Recreational Impacts

- 5.36 As identified in Table 1 above, the following policies have the potential to have recreational impacts on the River Avon SAC:
- Policy 12 Habitat Improvement and Restoration Scheme
 - Policy 16 Housing Mix and Affordable Housing
 - Policy 17 Churchfields and the Engine Shed site
 - Policy 19 Community Infrastructure
 - Policy 21 Provision for Play and Sport
 - Policy 22 Sustainable Transport
 - Policy 23 Cycling and Walking Infrastructure
 - Policy 25 Cycling for Pleasure
 - Policy 28 Visitor Accommodation
- 5.37 As discussed previously in this HRA, recreational pressure on the River Avon SAC is recognised to occur in limited circumstances, predominately where significant development lies immediately adjacent to or in close proximity to the river.

¹⁷ The revised strategic mitigation strategy document will be published in due course.

- 5.38 Policies 16, 19 and 28 support the development of additional dwellings, community infrastructure and visitor accommodation within the NDP area, however as the policies do not allocate land it is not known at this stage where development may occur. Policies 12, 21, 22, 23 and 25 support the development of play and sport provision, sustainable transport and improved cycling and walking facilities. Again, as these policies do not allocate land for these purposes it is not known at this stage where development may occur. Policy 17 supports development at the Churchfields and the Engine Shed site which is allocated within the WCS.
- 5.39 There is the potential therefore for these policies to lead to an increase in pressure on the SAC by encouraging more people to access the river for recreational purposes. The potential for significant effects on the River Avon SAC from recreational pressure was considered in the HRA's undertaken for the WCS in 2012 and 2013 and it was concluded that an increase in population could result in an increase in demand for recreation which could affect the SAC, however CP69 is considered at the plan level to provide sufficient safeguards to avoid recreational pressure on the SAC.
- 5.40 Given that any proposals that may come forward as supported by the above policies would likely include small scale infrastructure improvements which would likely be primarily used by local residents, and would be unlikely to attract people from further afield, it is considered that the anticipated volume of additional visitors to the river as a result of the above policies would not result in a significant impact on the SAC provided that any development is in accordance with CP69 and Policies 5 and 15 of the NDP. In addition, any developments would be considered at the planning application stage to ensure compliance with these and other development plan policies and the NPPF, and would need to be subject to appropriate assessment which must reach a conclusion of no adverse effect on the SAC alone or in combination with other plans and projects in order to be granted planning permission.

Construction Impacts

- 5.41 The following policies have the potential to have construction impacts on the River Avon SAC:
- Policy 16 Housing Mix and Affordable Housing
 - Policy 17 Churchfields and the Engine Shed site
 - Policy 18 Healthcare Facilities
 - Policy 19 Community Infrastructure
 - Policy 21 Provision for Play and Sport
 - Policy 22 Sustainable Transport
 - Policy 23 Cycling and Walking Infrastructure
 - Policy 25 Cycling for Pleasure
 - Policy 28 Visitor Accommodation
 - Policy 30 Food Retail
- 5.42 Any development that comes forward which is supported by the above policies has the potential to have construction impacts on the River Avon SAC if it is located adjacent to or within close proximity of the river, for example through pollution incidents and river bank damage. Developments must therefore manage construction impacts in accordance with Core Policy 69, and Policies 5 and 15 of the NDP. Core Policy 69 states that *'development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory.'*
- 5.43 Policy 5 aims to ensure that all developments comply with the requirements of the Habitats Regulations and do not adversely affect the River Avon SAC.

- 5.44 Policy 15 supports CP69 in managing construction and development impacts on the River Avon SAC. The policy also requires developments to accord with paragraph 201 in the supporting text of the NDP which states that *‘the River Park Masterplan indicates that the following approach should be adopted to manage construction and development impacts near the Avon and its tributaries:*
- *Development and redevelopment should aim to integrate the protection and restoration of the natural river habitat, riparian zone and floodplain.*
 - *Landscape schemes should achieve a minimum 10% biodiversity net gain.*
 - *Species used for new planting should be appropriate for the riverine environment, enhancing its character and respecting special features of the SAC.*
 - *Biosecurity measures and procedures should be employed to reduce the risk of introducing or spreading invasive non-native species (and other harmful organisms such as diseases) in the wild.*
 - *Measures should be employed to eradicate and manage invasive species such as Japanese knotweed, Himalayan balsam, Canadian waterweed, and Giant Hogweed.*
 - *It must be demonstrated that the development has been designed to avoid any temporary or permanent increases in artificial light levels near the river.*
 - *The development should not increase surface water or groundwater flood risk.*
 - *Development should incorporate Water Sensitive Urban Design (WSUD) and sustainable drainage principles taking account of the four pillars of sustainable drainage (SuDS) – water quantity, water quality, biodiversity and amenity.*
 - *Betterment of surface water run-off control should be achieved over pre-development run-off.*
- 5.45 CP69, Policy 5 and Policy 15 are considered at the plan level to provide sufficient safeguards that any developments brought forward within the NDP area would not have adverse impacts on the River Avon SAC as a result of construction related activities. In addition, any developments would be considered at the planning application stage to ensure compliance with the aforementioned policies and other development plan policies and the NPPF, and would need to be subject to appropriate assessment which must reach a conclusion of no adverse effect on the SAC alone or in combination with other plans and projects in order to be granted planning permission.

Nutrient Neutrality

- 5.46 At this stage it is not known how developments that could come forward as supported by the policies listed below would dispose of foul waste however it is considered most likely to be via mains sewer to a sewage treatment works.
- 5.47 NE previously advised it intended to issue formal guidance in autumn/winter 2021 on when non-mains development can be excluded from appropriate assessment, however this guidance is still awaited. In the meantime, Wiltshire Council has some interim guidance about small scale thresholds for non-mains system development which can be applied to planning applications so that it can be determined when discharge to non-mains systems may be considered to be de-minimus; i.e. lead to impacts which are so minimal that they can be excluded from appropriate assessment and not require mitigation.
- 5.48 Under the MoU, all residential development in the catchment must be built to the highest water efficiency standards provided for by the building regulations which are currently a maximum water use of 110 litres per person per day (G2 of the Building Regulations 2010). This requirement would be secured by means of a planning condition at the planning application stage, unless subsequent formal guidance from NE indicates otherwise.

- 5.49 The provision of measures to control phosphorous in urban runoff through SuDs design, in line with the CIRIA Guidance¹⁶, and on-site offsetting measures will be the responsibility of developers.

Policy 16 Housing Mix and Affordable Housing

- 5.50 Any development supported by this policy that is located within the settlement boundary of Salisbury would be considered to be planned development and therefore the applicant can apply to the council-led scheme under the revised strategic appropriate assessment. If sufficient credits are not available under the council-led scheme, applicants can secure mitigation through bespoke solutions on site or via third parties.
- 5.51 If development comes forward that is not considered to be planned development it would not be covered by the revised strategic appropriate assessment and a bespoke mitigation strategy for the site, based on the results of the nutrient calculator developed by NE and agreed with NE, and a project level HRA would be required to demonstrate nutrient neutrality and therefore no significant impacts on the SAC.

Policy 17 Churchfields and the Engine Shed site

- 5.52 The Churchfields and the Engine Shed site is a major employment site to the west of Salisbury city centre and is allocated in CP20 of the WCS for a mixed use development of 1,100 dwellings and 5ha of employment land. It is bordered on 3 sides by the River Nadder which is a component of the River Avon SAC. Policy 17 states that development of the Churchfields and Engine Shed sites should take account of the proposals and requirements of the Churchfields Masterplan and Salisbury Design and Advertising Guide. The design guide presents various development scenarios which are in conformity with current and emerging local planning policy context.
- 5.53 As the site is allocated in the WCS and is located within the Salisbury settlement boundary it is considered to be planned development and would therefore fall within the scope of the revised strategic appropriate assessment and applicants can apply for the council-led scheme. If sufficient credits are not available under the council-led scheme, applicants can secure mitigation through bespoke solutions on site or via third parties.
- 5.54 Any application coming forward for the site would need to be in accordance with CP20, CP69 and Policies 5 and 15 in the NDP. In addition, any developments would be considered at the planning application stage to ensure compliance with these and other development plan policies and the NPPF, and would need to be subject to appropriate assessment which reaches a conclusion of no adverse effect on the SAC alone or in combination with other plans and projects in order to receive planning permission.

Policy 28 Visitor Accommodation

- 5.55 Any development supported by this policy that is located within the settlement boundary of Salisbury would be considered to be planned development and therefore the applicant can apply to the council-led scheme under the revised strategic appropriate assessment. If sufficient credits are not available under the council-led scheme, applicants can secure mitigation through bespoke solutions on site or via third parties.
- 5.56 If development comes forward that is not considered to be planned development it would not be covered by the revised strategic appropriate assessment and a bespoke mitigation strategy for the site, based on the results of the nutrient calculator developed by NE and agreed with NE, and a project level HRA would be required to demonstrate nutrient neutrality and therefore no significant impacts on the SAC.

Policy 30 Major Food Retail

- 5.57 The revised strategic appropriate assessment will not calculate phosphorus for non-residential development as guidance from NE regarding nutrient neutrality indicates that employment uses can be discounted on the assumption that there is no net migration into the catchment for employment

purposes. It also states that considering new employment applications separately would be potentially double counting phosphorus loads.

- 5.58 The same assumption can also be applied to food retail applications, as it is considered likely that those using toilets in supermarkets primarily also comprise residents and therefore their phosphorus load has already been accounted for.
- 5.59 Any application for development of a food retail outlet within the NDP area would require a project level HRA however it is considered likely that the development would be screened out at Stage 1 of the HRA with regards to phosphorus impacts.

Conclusion – River Avon SAC

- 5.60 The policies set out above have been considered in this appropriate assessment and have been assessed for their potential impacts on the River Avon SAC in terms of recreational, construction and phosphorus impacts. With regards to construction and recreational impacts, any development coming forward in the NDP area will be required to comply with CP69 and Policies 5 (updated as set out above) and 15 in the NDP which seek to avoid or reduce construction and disturbance impacts on the SAC.
- 5.61 With regards to phosphorus impacts, if developments come forward within the settlement boundary of Salisbury or are allocated within the Development Plan, they would be considered to be planned development and would therefore fall within the scope of Wiltshire Council's revised phosphorus strategic appropriate assessment. The council-led scheme is one route that development can potentially use to achieve phosphorus neutrality, other routes such as securing mitigation through private providers, as well as delivery of bespoke solutions on-site, where possible, can also be progressed by developers. A bespoke mitigation strategy will be required for any developments which are not considered to be planned development.
- 5.62 It is therefore concluded beyond reasonable scientific doubt that the NDP will have no adverse effects on the integrity of the River Avon SAC either alone or in-combination with other plans and projects.

6 Appropriate Assessment – New Forest SPA/SAC

Background to the New Forest SPA/SAC

- 6.1 The New Forest comprises the largest area of ‘unsown’ vegetation in lowland England and includes the representation on a large scale of habitats formerly common but now fragmented and rare in lowland western Europe. The mosaic of habitats owes much to the local geology and traditional commoning grazing system, a situation which is uncommon in lowland England.
- 6.2 The habitats include lowland heath, valley and seepage step mire, or fen, ancient pasture woodland, including riparian and bog woodland and a range of acid to neutral grasslands.
- 6.3 The SPA supports an exceptionally rich bird fauna including internationally important breeding populations and wintering populations of bird species associated with these habitats. The SAC supports outstanding examples of 13 habitats of European interest which are represented with two priority habitat types, bog woodland and riverine woodland. These habitats support an exceptionally rich diversity of fauna and flora which is largely dependent on traditional management practices of grazing and complemented by annual heathland burning and cutting programmes.
- 6.4 The SPA’s qualifying features are detailed below:
- Qualifying individual species listed in Annex I of the Wild Birds Directive
- During the breeding season the SPA regularly supports:
- A302 Dartford Warbler (*Sylvia undata*) - 538 pairs representing at least 33.6% of the breeding population in Great Britain at the time of SPA classification
 - A072 Honey Buzzard (*Pernis apivorus*), 2 pairs representing at least 10.0% of the breeding population in Great Britain at the time of SPA classification
 - A224 Nightjar (*Caprimulgus europaeus*), 300 pairs representing at least 8.8% of the breeding population in Great Britain at the time of SPA classification
 - A246 Woodlark (*Lullula arborea*), 177 pairs representing at least 12.3% of the breeding population in Great Britain at the time of SPA classification
- During the non-breeding season the SPA regularly supports:
- A082 Hen Harrier (*Circus cyaneus*) 15 individuals representing at least 2.0% of the wintering population in Great Britain at the time of SPA classification
- Qualifying individual species not listed in Annex I of the Wild Birds Directive
- During the breeding season the SPA regularly supports:
- A099 Hobby (*Falco Subbuteo*) – up to 25 pairs representing around 3% of the British breeding population at the time of SPA classification
 - A314 Wood Warbler (*Phylloscopus trochilus*) – in excess of 350 pairs representing at least 3% of the British breeding population at the time of SPA classification.
- 6.5 The conservation objectives are available at [European Site Conservation Objectives for New Forest SPA - UK9011031 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/conservation-objectives-for-new-forest-spa). The conservation objectives require that the integrity of the site is maintained or restored as appropriate and that the site contributes to achieving the aims of the World Birds Directive. NE published Supplementary Advice on the 19th March 2019¹⁸ (available through the weblink above) which sets out the need to reduce the frequency, duration and intensity of disturbance

¹⁸ Supplementary Advice on Conserving and Restoring Site Features: New Forest Special Protection Area (SPA). Site Code UK9011031 Published by Natural England 19 March 2019

on nesting, roosting, foraging, feeding, moulting and/or loafing birds so that the qualifying species are not significantly disturbed.

6.6 The qualifying features of the SAC are as follows:

- H3110. Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*); Nutrient-poor shallow waters with aquatic vegetation on sandy plains
- H3130. Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*; Clear-water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels
- H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
- H4030. European dry heaths
- H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows
- H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface
- H7150. Depressions on peat substrates of the *Rhynchosporion*
- H7230. Alkaline fens; Calcium-rich springwater-fed fens
- H9120. Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils
- H9130. *Asperulo-Fagetum* beech forests; Beech forests on neutral to rich soils
- H9190. Old acidophilous oak woods with *Quercus robur* on sandy plains
- H91D0. Bog woodland*
- H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*
- S1044. *Coenagrion mercuriale*; Southern damselfly
- S1083. *Lucanus cervus*; Stag beetle
- S1166. *Triturus cristatus*; Great crested newt

6.7 The conservation objectives are available at: [European Site Conservation Objectives for The New Forest SAC - UK0012557 \(naturalengland.org.uk\)](https://naturalengland.org.uk). The conservation objectives require that the integrity of the SAC is maintained or restored as appropriate and that the site contributes to achieving the favourable conservation status of its qualifying features. NE published Supplementary Advice on the 18th March 2019¹⁹ (available through the weblink above) which notes the following for several qualifying features:

Trampling from human activities can cause soil compaction, changes to soil hydrology and with heavy use, erosion and compacted bare ground. This leads to reductions in soil invertebrates and changes in plant communities. The effects are most acute near to car parks, access points from the urban fringe and in and around campsites.

6.8 Increased recreation is also noted to be a cause of:

- nutrient and sediment inputs to waterbodies;

¹⁹ Supplementary Advice on Conserving and Restoring Site Features: The New Forest Special Area of Conservation (SAC). Site Code UK0012557 Published by Natural England 18 March 2019

- bank erosion, excessive bare ground and impoverished vegetation; and
- a reduction in veteran trees, dead standing wood and a decline in the nature conservation value of woodland near to recreational facilities.

6.9 With regards to planning, the main concern is the increase in recreational pressure on the New Forest SPA/SAC caused by additional residential and tourism developments within south Wiltshire. The Interim Recreation Mitigation Strategy was developed, and reviewed in April 2023, to provide mitigation for residential and tourism developments coming forward in Wiltshire. The mitigation approach has been further revised as set out in paragraph 3.8 above.

Plans and projects to be considered in combination

6.10 The projects which need to be considered in combination with the Salisbury NDP are the WHSAP allocations listed in Table 4 of the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites, as follows:

- Netherhampton Road;
- Hilltop Way;
- North of Netherhampton Road;
- Rowbarrow;
- The Yard.

6.11 Applications for development at the WHSAP allocation sites, as well as any speculative applications within the 13.8km and 15km zones of influence, have been coming forward in accordance with the Interim Recreation Mitigation Strategy which has ensured that any in combination effects as a result of these developments have been addressed. Any residential or tourism developments supported by the policies in the NDP will be required to comply with the revised mitigation approach approved by Cabinet on 7th May 2024, and which will be fully detailed in the forthcoming revised Recreation Mitigation Strategy document. Therefore, these projects are not considered likely to have in combination impacts on the New Forest SPA/SAC as a result of development coming forward through the Salisbury NDP, as in combination impacts are addressed through the strategic mitigation strategy.

Analysis of Policy 5 Habitats Regulations and Recommendations

Policy 5 Habitats Regulations

6.12 Please see comments and recommended amendments to Policy 5 Habitats Regulations in Section 5 paragraphs 5.22 - 5.35.

Analysis of Policies in the NDP screened into appropriate assessment

Policy 16 Housing Mix and Affordable Housing

6.13 Policy 16 supports development within the NDP area by identifying the housing mix required for 10 or more units or 0.5ha or more. The policy does not allocate sites for development or suggest where these sites may be located. As the majority of Salisbury is located within the 13.8km Zol for the New Forest SPA/SAC, and a smaller area is located within the 15km Zol, it is likely new developments supported by this policy would be located within one of these Zol.

6.14 As indicated in Table 1 above, residential development supported through this policy would fall within the scope of the revised Recreation Mitigation Strategy and would be required to provide a contribution per dwelling of £600 for SAMM, and the provision of a SANG for developments of 50 or more dwellings. For greenfield and brownfield sites with 50 or more dwellings in the 15km Zol, mitigation will be

determined on a site by site basis for EIA scale development and / or where HRA demonstrates the potential for adverse effects.

- 6.15 Any development that comes forward would need to demonstrate compliance with the Habitats Regulations at the planning application stage and would need to adhere to the revised Recreation Mitigation Strategy.

Policy 17 Churchfields and the Engine Shed site

- 6.16 This policy relates to the Churchfields and Engine Shed site in Salisbury. The Churchfields Masterplan and Salisbury Design and Advertising Guide provide a high level vision and development scenarios for the site, including proposing houses on the site. Churchfields is located within the 13.8km Zol. If residential development were to come forward on this site it would fall within the scope of the revised Recreation Mitigation Strategy. A contribution of £600 per dwelling would be required and if the development is for 50 or more dwellings, a SANG would also be required.

Policy 28 Visitor Accommodation

- 6.17 Policy 28 does not allocate land for development, however it does support the development of new visitor accommodation. As with Policy 16, Policy 28 does not identify or suggest where these sites may be located, therefore it is likely any new visitor accommodation development supported by this policy would be located within one of the Zol.
- 6.18 As indicated in Table 1 above, visitor accommodation development supported through this policy within the 13.8km Zol would fall within the scope of the revised Recreation Mitigation Strategy and would be required to provide a contribution per dwelling of £600 for SAMM, and for developments of 50 or more dwellings, mitigation in the form of appropriate green infrastructure to be determined on a site by site basis and / or where HRA demonstrates potential for adverse effects. . For larger developments (i.e. EIA scale developments) between 13.8km and 15km, mitigation will be considered on a site by site basis for very large developments where HRA demonstrates potential for adverse effects.
- 6.19 Any development that comes forward would need to demonstrate compliance with the Habitats Regulations at the planning application stage and would need to adhere to the revised Recreation Mitigation Strategy.

Conclusion – New Forest SPA/SAC

- 6.20 The development supported by Policies 16, 17 and 28 would be covered by the revised Recreation Mitigation Strategy, providing a developer contribution of £600 per dwelling/unit and a SANG/GI for developments of 50 or more dwellings/units within the 13.8km Zol.
- 6.21 It is 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.

Prepared by Naomi Harvey, Ecologist, Wiltshire Council, 10 May 2024

V4.0 10/05/2024

Appendix 3

Natural England response to AA (June 2024)

Date: 14 June 2024
Our ref: 476146
Your ref: Salisbury Neighbourhood Plan



██████████
Ecologist
Wiltshire Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear ██████████,

Salisbury Neighbourhood Plan – Appropriate Assessment

Thank you for your consultation on the above dated 14 May 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Your appropriate assessment concludes that for the River Avon SAC the Salisbury Neighbourhood Plan will not result in adverse effects to the integrity of the site. We agree that planned development would be covered by Wiltshire Council's strategic phosphorus mitigation scheme. Development not considered to be planned development would be required to demonstrate nutrient neutrality by providing a bespoke phosphorus mitigation strategy to be agreed with Natural England. Having considered the measures proposed to mitigate for all identified adverse effects to the River Avon SAC that could potentially occur as a result of the Plan, Natural England advises that we concur with your conclusion.

Your appropriate assessment concludes that for the New Forest SPA/SAC the Salisbury Neighbourhood Plan will not result in adverse effects to the integrity of the site. We agree that any development coming forward would be subject to the Revised New Forest Recreational Mitigation Strategy. Having considered the measures proposed to mitigate for all identified adverse effects to the New Forest SPA/SAC that could potentially occur as a result of the Plan, Natural England advises that we concur with your conclusion.

We would be happy to comment further should the need arise but in the meantime if you have any queries relating to the above please contact me via email – ██████████.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully,

██████████
Lead Planning Advisor
Wessex Area Team

Comment

Consultee	[REDACTED] (1361676)
Company / Organization	Wiltshire Council - Estates
Address	1 1 1
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Wiltshire Council - Estates ([REDACTED] - 1361676)
Comment ID	73
Response Date	7/26/24 12:20 PM
Status	Processed
Submission Type	Email
Version	0.2

Salisbury Neighbourhood Plan
Reg 16 – Local Green Spaces.
Wiltshire Council Land

Response Summary:-

Sites not owned by WC:

Ref No.	NP Site Name
1	Bishopdown Open Space
5	Bemerton Folly LNR
5	Bemerton Folly LNR
49	St Edmund's Church Yard

Sites fully supported:

4	Westwood Road Open Space
10	Lime Kiln Down/Way Open Space

Sites supported, in so far as relate to WC ownership:

11	St Marks Open Space
14	Harnham Slope CWS
69	Millenium Close Open Space
70	Rowbarrow Green Open Space
71	Downton Road Commemorative Beech Tree Belt
84	Ashley Road/Maltings Footpath
108	Avon Valley LNR (where within Local Nature Reserve)
118	St Michael's Road Open Space
119	The Valley Open Space
120	The Valley Open Space
123	Wagstaff Way Open Space

Sites Objected to – as held for Education and opportunities for expansion:

Ref No.	NP Site Name
13	Barnard's Folly LNR - Education held
76	St Martins C of E Primary School
77	Harnham C of E Primary School
81	Exeter House Special School
82	St Mark's C of E Junior School
87	Stratford-Sub-Castle Primary School
93	Sarum St. Paul's Primary School
95	Manor Fields Primary School
110	Pembroke Park Primary School
114	Sarum Academy
116	St Peter's Primary School
122	Woodlands Primary School

Sites Objected to – as held for Housing and opportunities for regeneration :

15	Queen Elizabeth Gardens
54	Parsonage Green Open Space
127	Essex Square Open Space
128	Wiltshire Road Open Space
126	Montgomery Gardens Open Space
129	Woodbury Gardens/Senior Drive Open Space

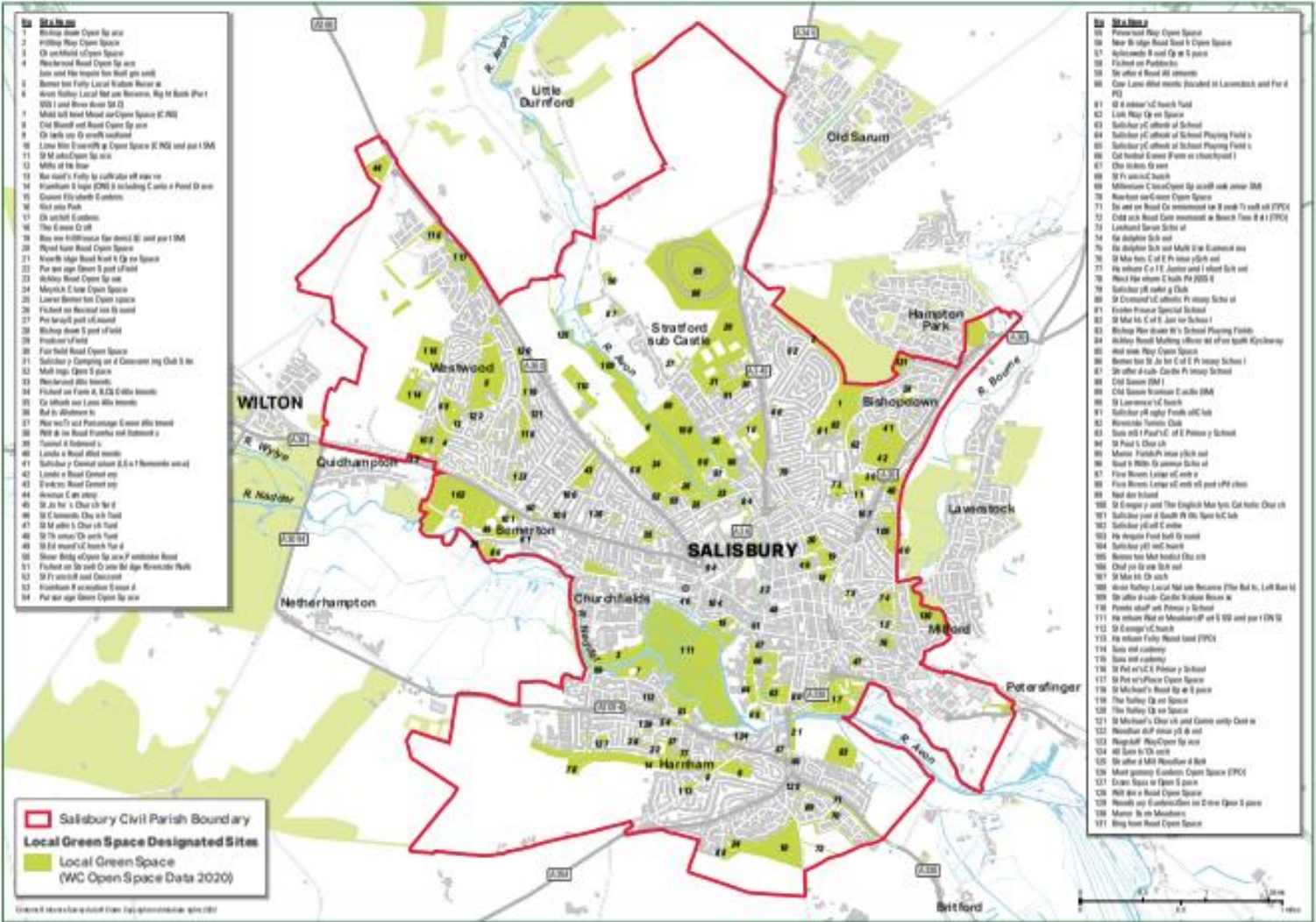
Sites Objected to – as held for Leisure and opportunities for wellbeing:

92	Riverside Tennis Club
97	Five Rivers Leisure Centre
98	Five Rivers Leisure Centre Sports Pitches

Sites Objected to – for other reason:

19	Bourne Hill House Gardens – part of operational office building
126	Montgomery Gardens Open Space – part site with OPCC ownership and may be suitable for 100% affordable housing

Plan provided by Salisbury City Council



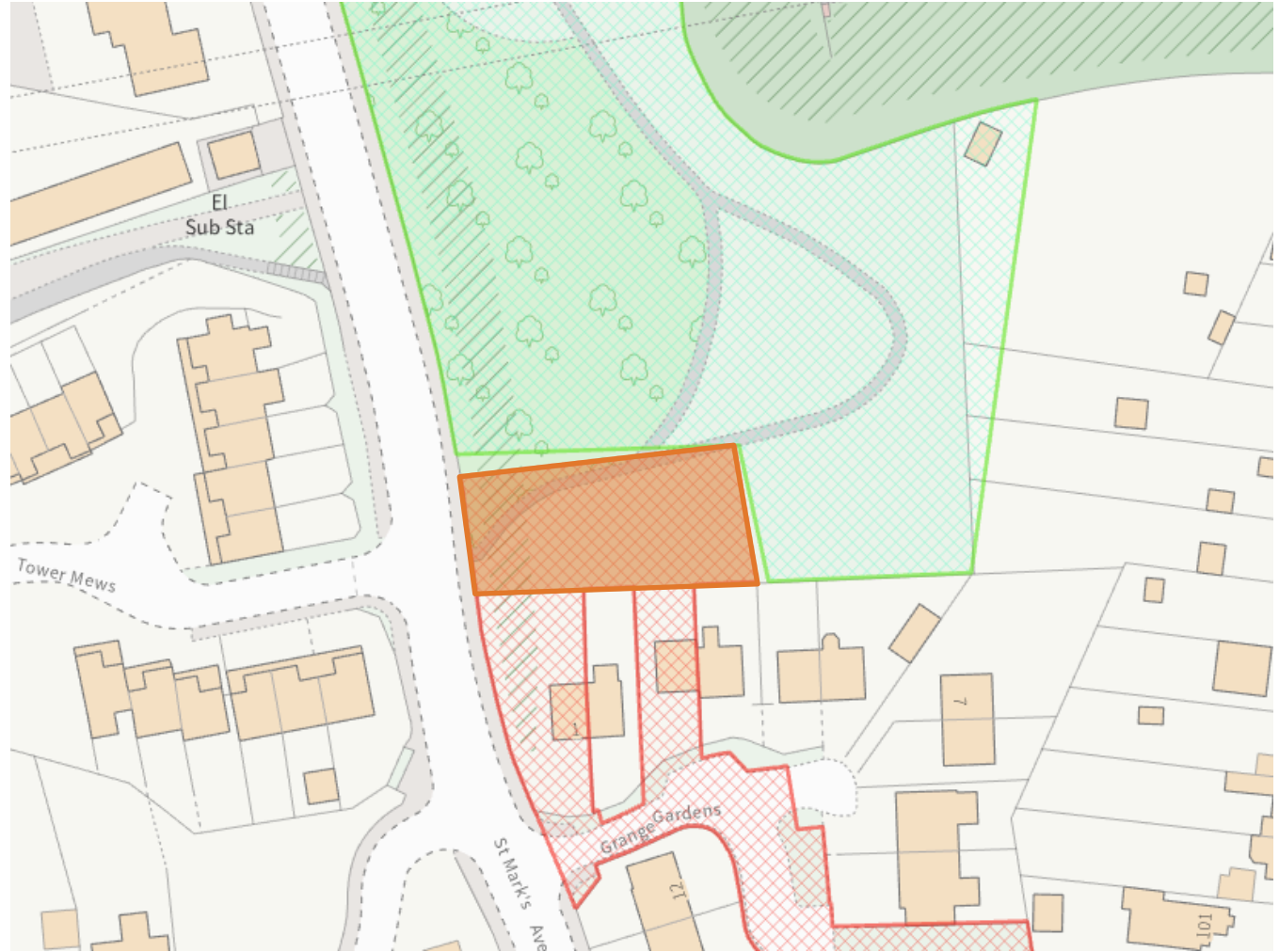
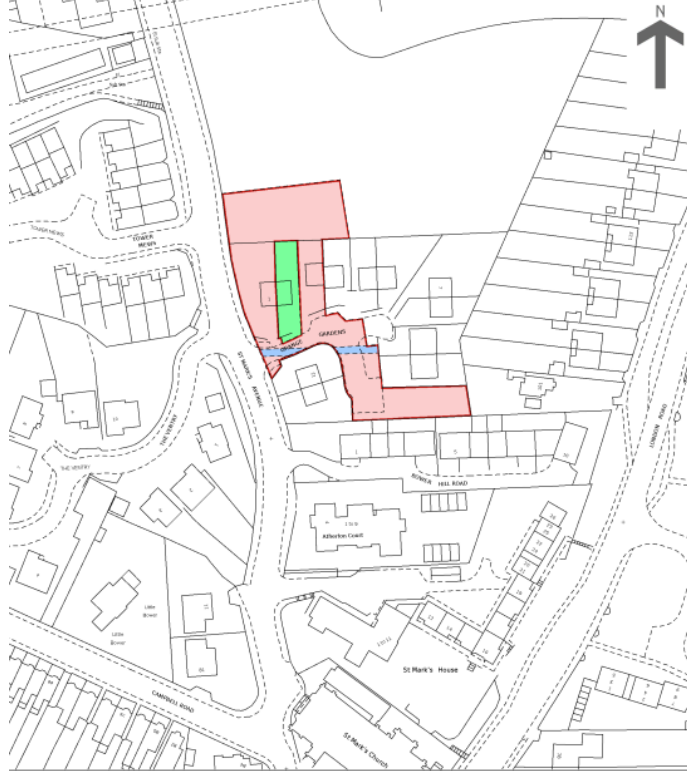
WC Response - Supportive - in so far as relates to WC ownership, orange on plan below

HM Land Registry
Official copy of
title plan

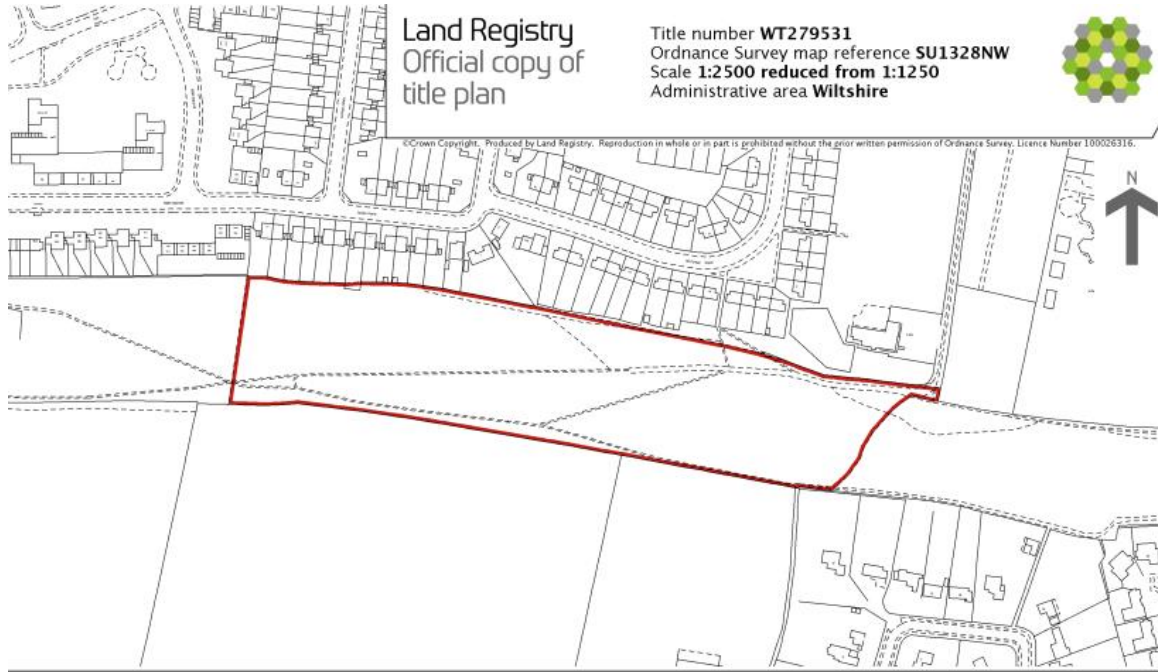
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Scale **1:1250**
Administrative area **Wiltshire**



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The land tinted green is not included in this title.



WC Response - Supportive - in so far as relates to WC ownership on plans shown

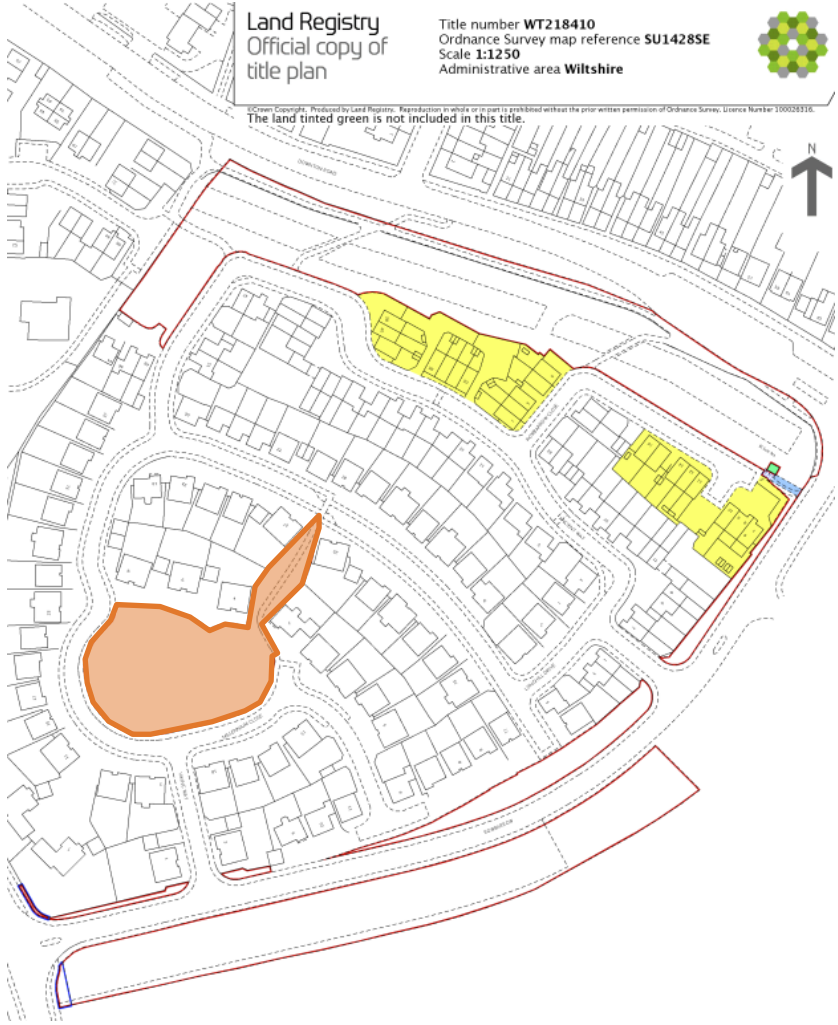


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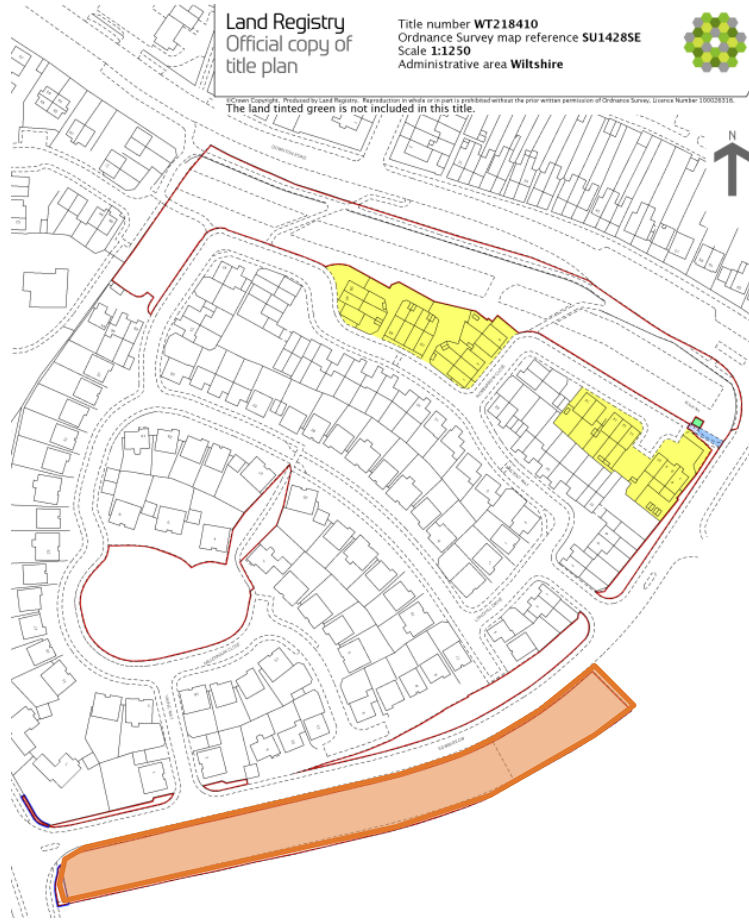


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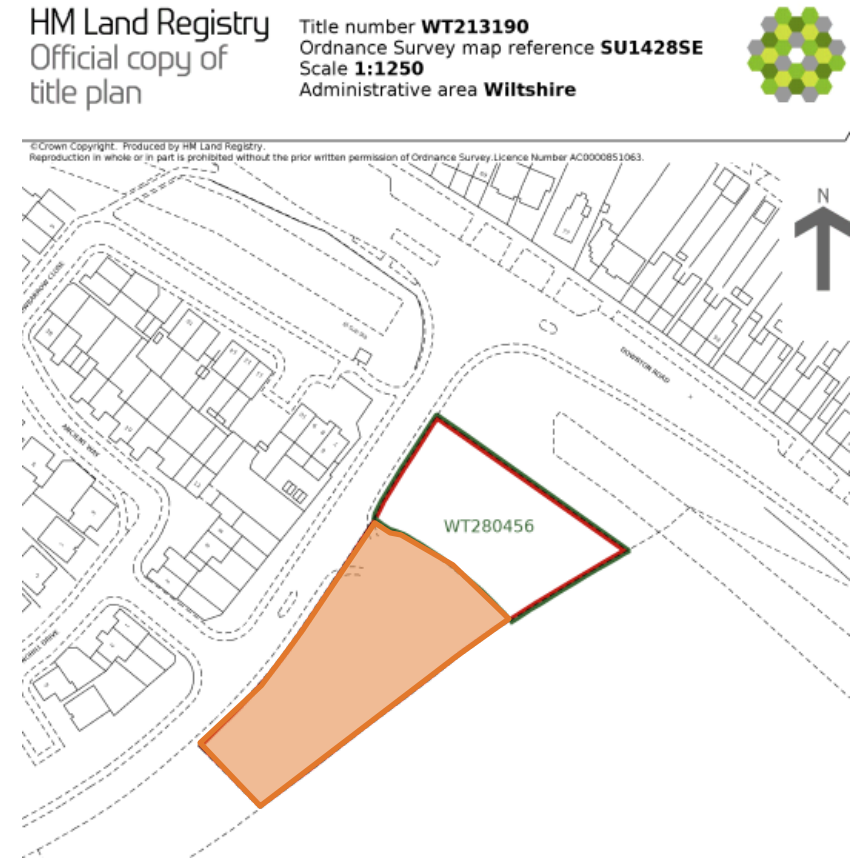
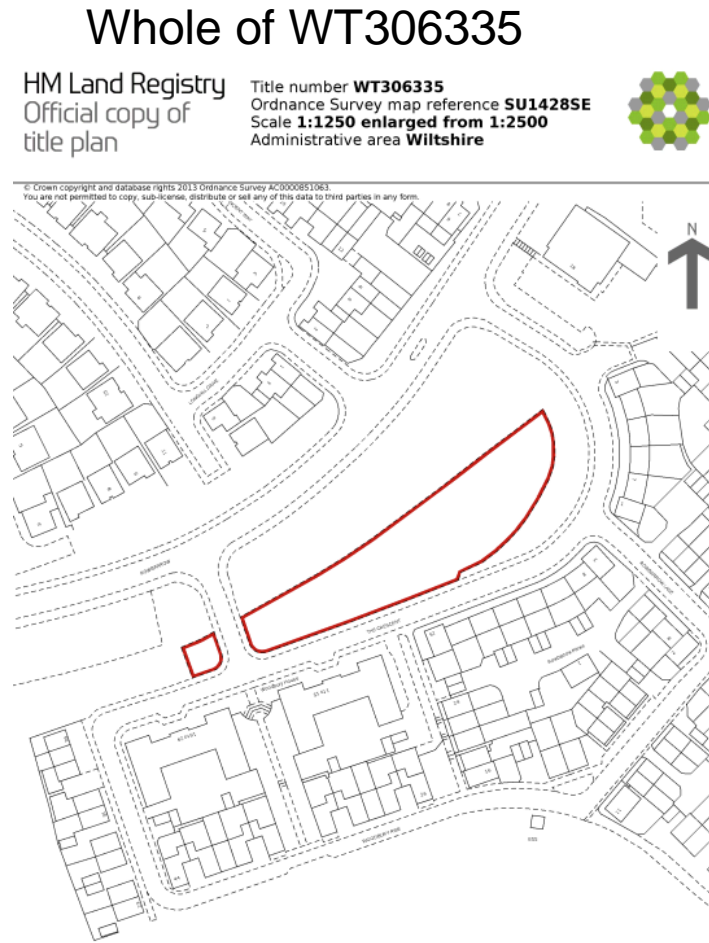
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WC Response - Supportive - in so far as relates to WC ownership on plans shown

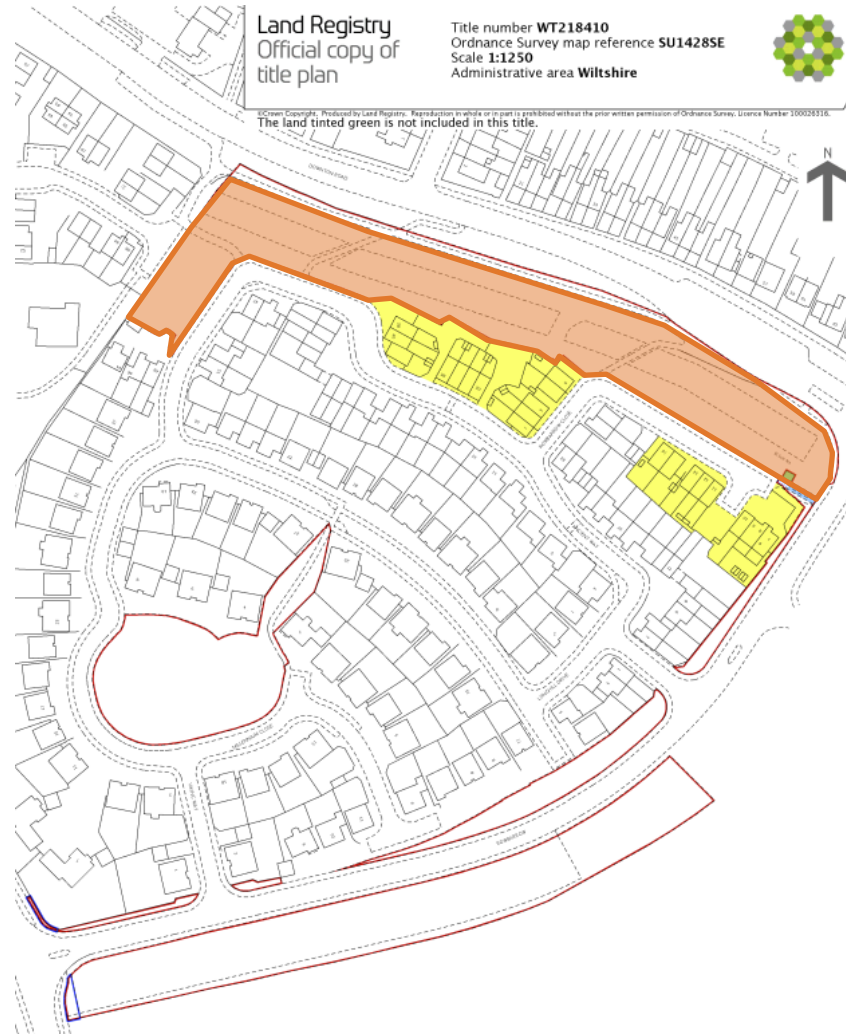


Part of WT218410, as shown orange



Whole of WT213190, as shown orange

WC Response - Supportive - in so far as relates to WC ownership, orange on plan below



WC Response - Supportive - in so far as relates to WC ownership on plan shown

HM Land Registry
Official copy of
title plan

Title number **WT279611**
Ordnance Survey map reference **SU1430NW**
Scale **1:1250**
Administrative area **Wiltshire**



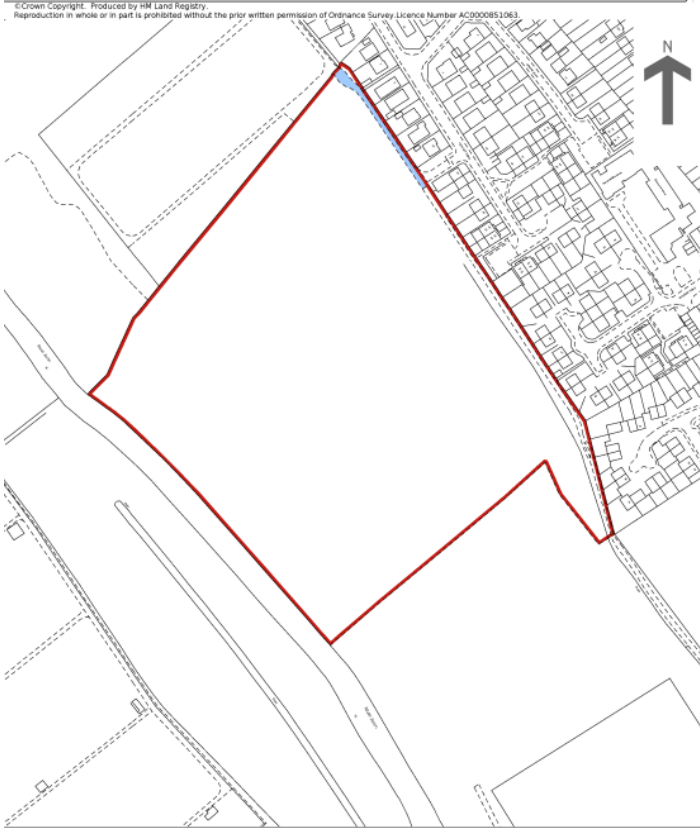
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WC Response - Supportive - in so far as relates to WC ownership and within Local Nature Reserve on plan shown

HM Land Registry
Official copy of
title plan

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Administrative area **Wiltshire**

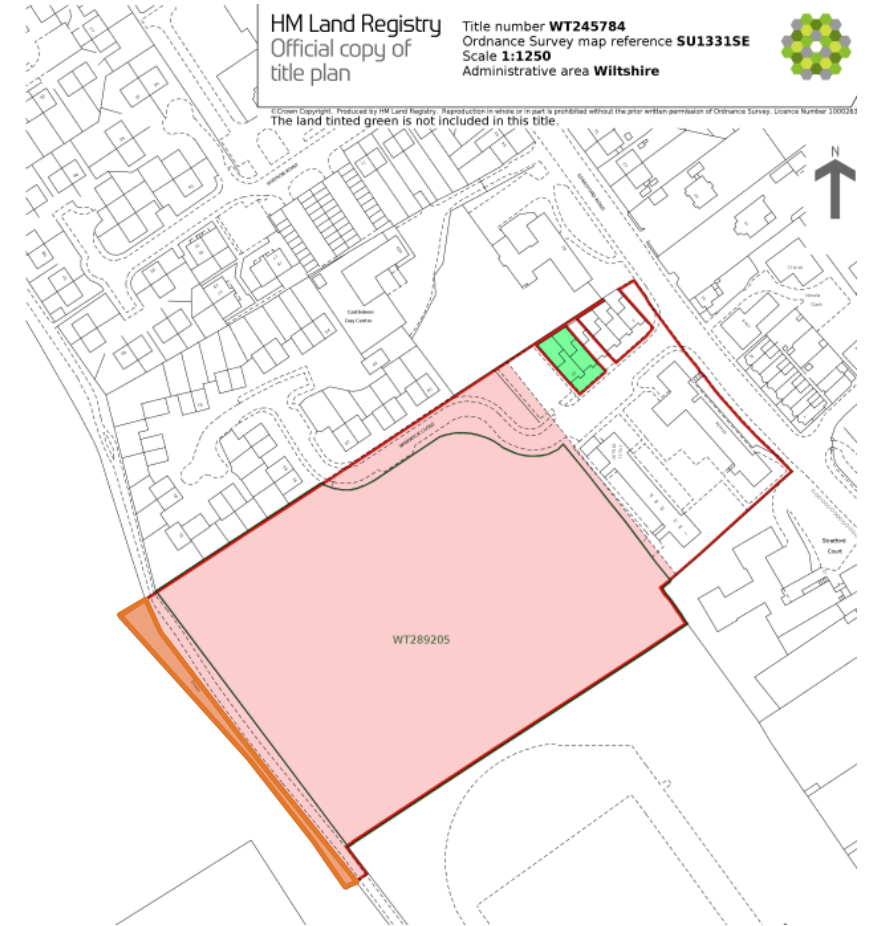
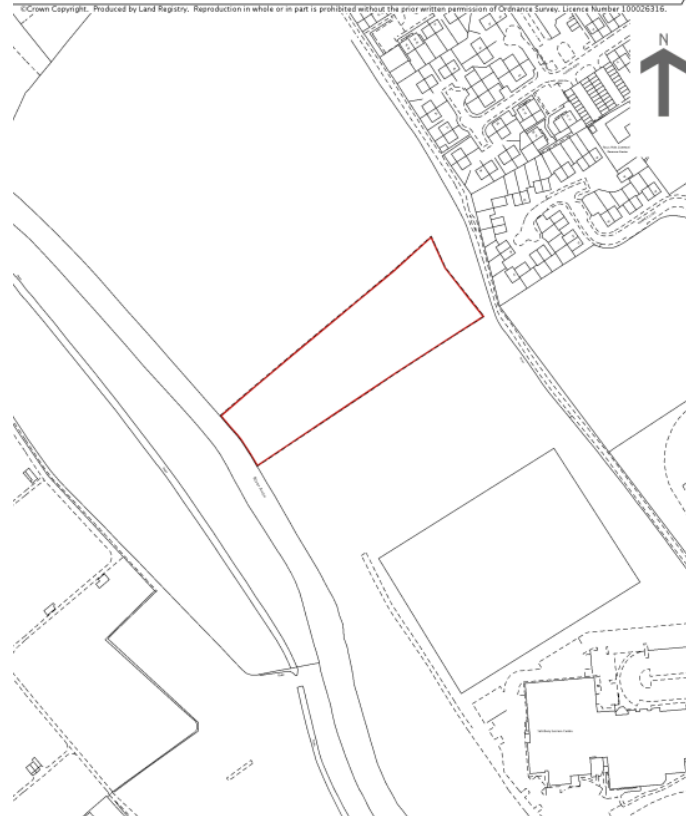


Whole of WT245780

Whole of WT275738

Land Registry
Official copy of
title plan

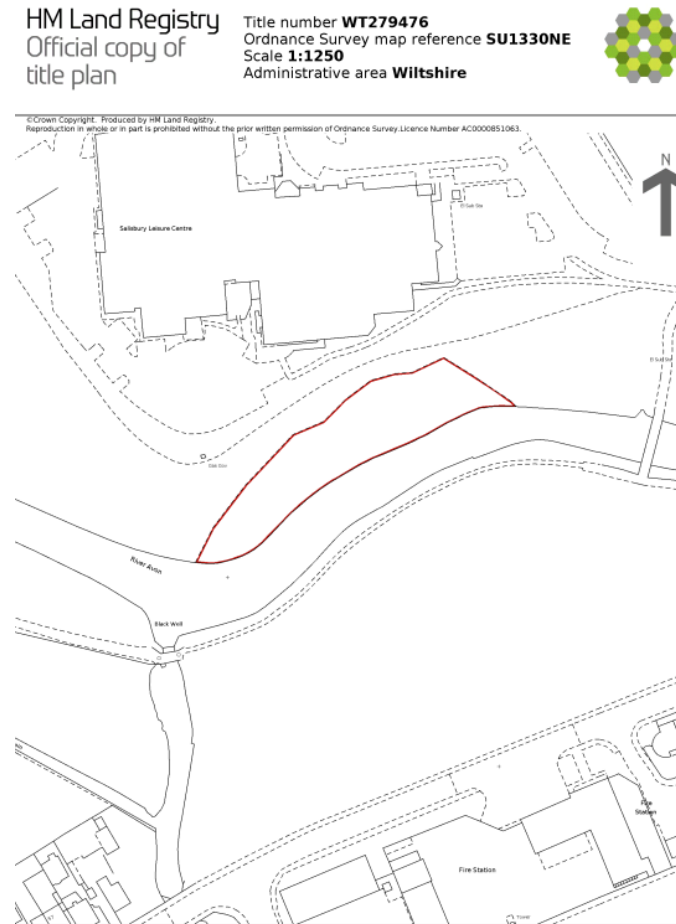
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Administrative area **Wiltshire**



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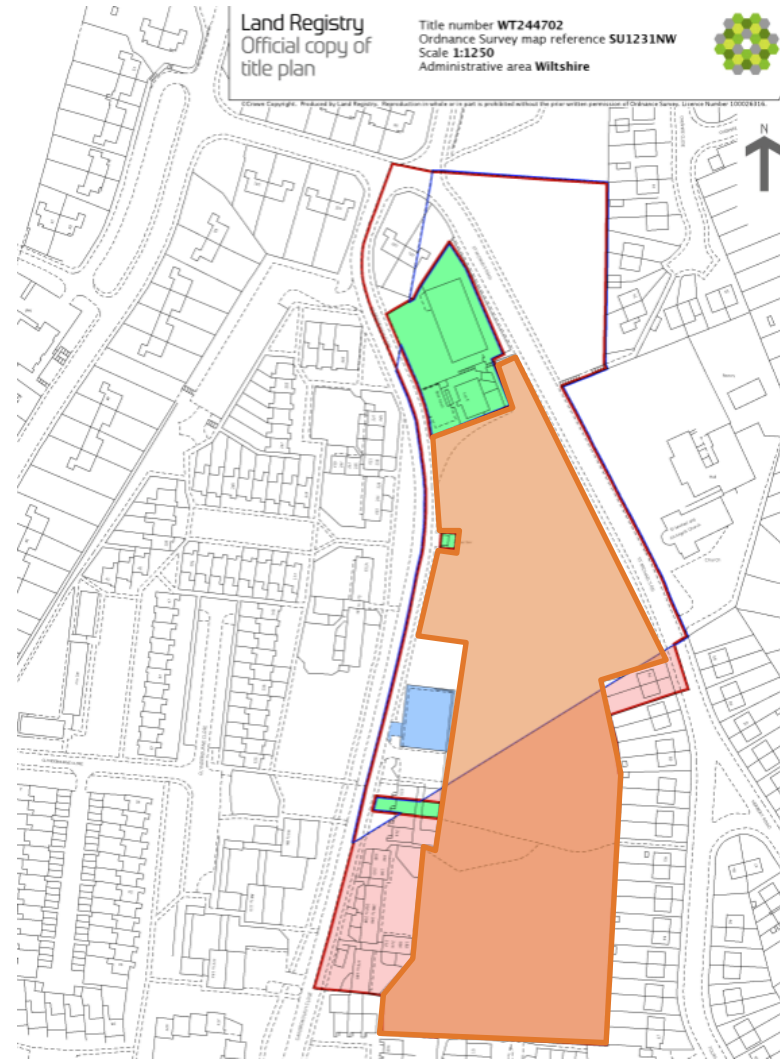
WC Response - Supportive - in so far as relates to WC ownership and within Local Nature Reserve on plan shown

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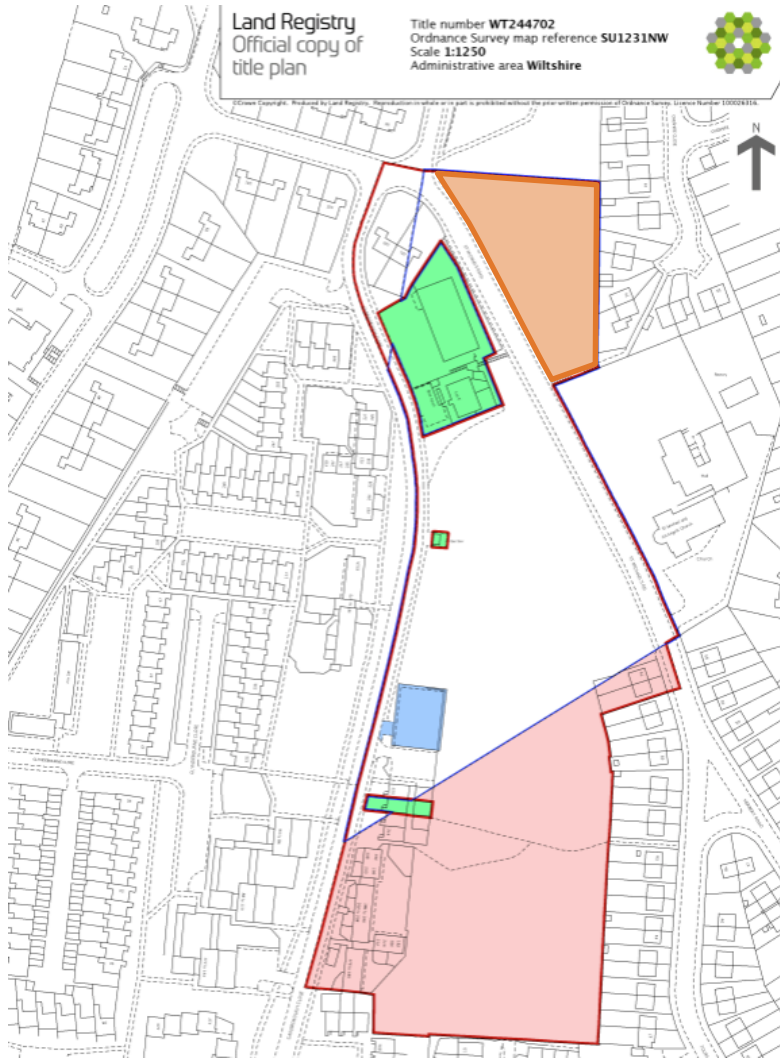
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WC Response - Supportive - in so far as relates to WC ownership, orange on plan below



Site 118 – St Michael's Road Open Space

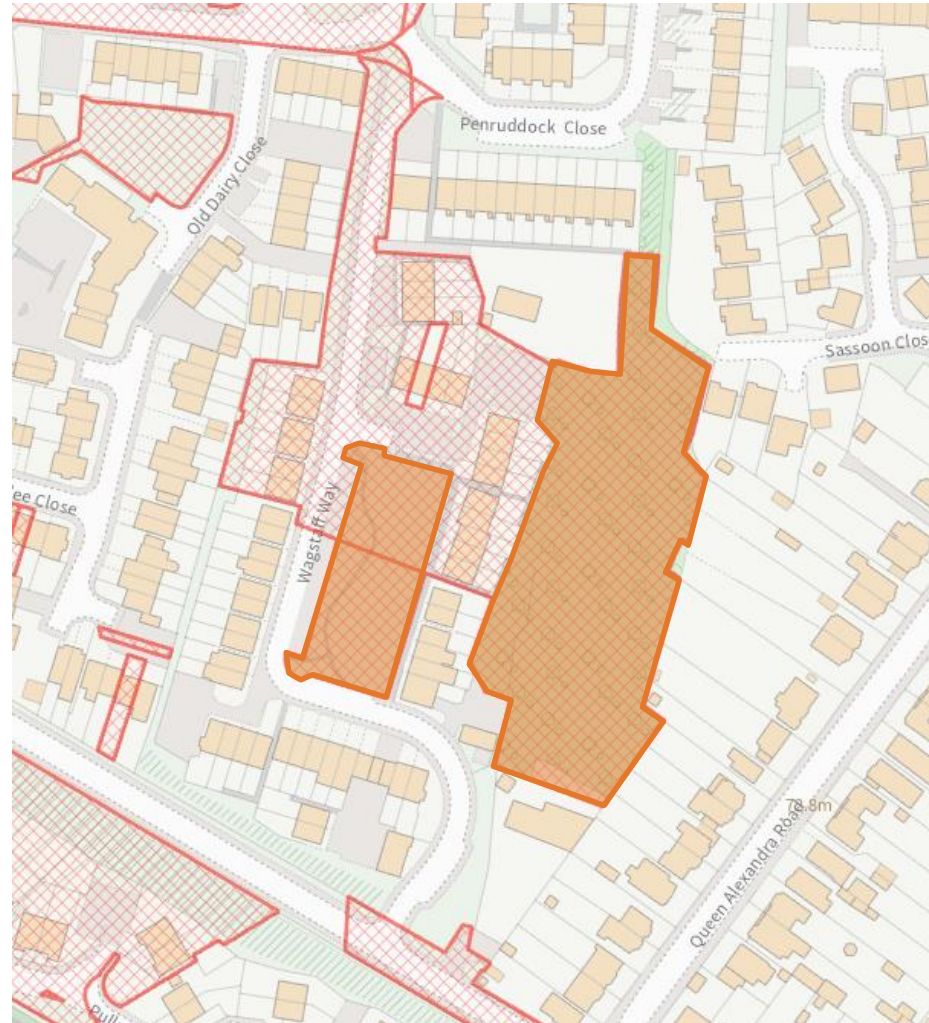
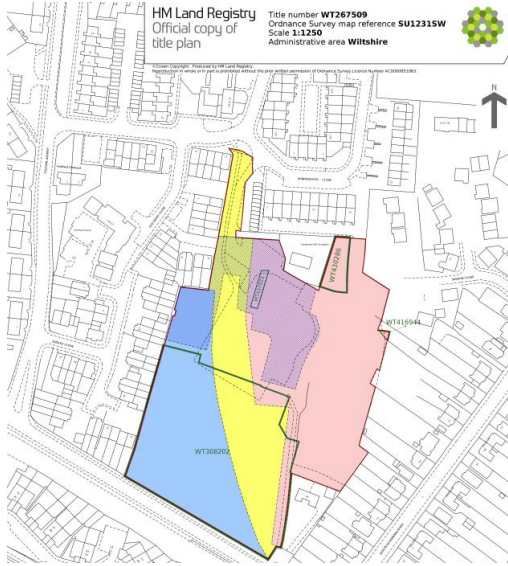
WC Response - Supportive - in so far as relates to WC ownership, orange on plans below



WC Response - Supportive - in so far as relates to WC ownership, orange on plan below



WC Response - Supportive - in so far as relates to WC ownership, orange on plan below



Comment

Consultee	(1361677)
Company / Organization	Network Rail
Address	1 1 1
Event Name	Salisbury Neighbourhood Development Plan (2020-2038) Regulation 16 Consultation
Comment by	Network Rail (- 1361677)
Comment ID	74
Response Date	7/26/24 12:33 PM
Status	Processed
Submission Type	Email
Version	0.3



Network Rail
1 Puddle Dock
London
EC4V 3DS

Via email only

03 June 2024

NETWORK RAIL RESPONSE TO SALISBURY NEIGHBOURHOOD PLAN CONSULTATION

Thank you for providing Network Rail the opportunity to make comment on the submission version of the Neighbourhood Plan. The Plan is thorough and we would like to commend those involved in bringing this together.

It is important that opportunities to promote the use of the railway as a more sustainable modes of transport are identified and taken forward. The rail network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail have comments to inform the development of the Neighbourhood Plan.

The Vision and Objectives, as set out in Figure 3, are generally supported. The promotion of use of public transport at Salisbury is supported and policies to encourage use of the railway should form a key part of the priorities for creating a climate resilient environment.

Policy 16

Network Rail note the reference to the Churchfields Masterplan and Salisbury Design Guide. The Masterplan and Design Guide set out that the Engine Shed site (site 1) should be developed for residential use within the context of the Churchfields area.

Network Rail are undertaking the Salisbury Area Strategic Study, which is examining requirements at Salisbury, aligning with several strategic considerations in the area. These include re-signalling works which are planned for delivery in Control Period 8 (2029-2034),

SWR's diesel fleet replacement, and ongoing strategic work on both Wessex and Western routes.

As part of this Strategic Study, Network Rail are reviewing land around the station and near the railway to identify suitable sites to provide options to meet railway needs. The Engine Shed site is one of several areas of land that are being considered to support the railway.

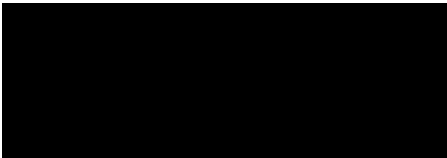
The emerging Wiltshire Local Plan proposes that flexibility be applied to the Churchfields area to allow for the future master planning of the site to identify various land uses that are suitable. As such, the promotion of residential use on the Engine Shed site conflicts with the emerging Local Plan as it does not retain flexibility and is too prescriptive about the type of land use considered suitable. The Neighbourhood Plan also fails to consider other suitable options.

Therefore, Network Rail object to draft Policy 16.

The Policy should acknowledge the flexibility and future master planning of the Churchfields site as within the emerging Local Plan and not have regard to the Churchfields Masterplan and Design Guide in its current form.

Network Rail are keen to work with the Council and Neighbourhood Plan group as the Strategic Study develops, which could allow for more detailed land uses to be identified over time and work constructively as the Neighbourhood Plan progresses.

Kind Regards



Comment

Consultee	██████████ (1361678)
Company / Organization	Salisbury City Council
Address	1 1 1
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The Qualifying Body's response to Wiltshire Council comments to the Regulation 16 Consultation of the Draft Salisbury NDP

Prepared by [REDACTED] on behalf of Salisbury City Council (the Qualifying Body)

July 2024

Introduction

This response has been prepared to provide to the Neighbourhood Plan Examiner with an understanding of the Qualifying Body's (QB's) views on the Wiltshire Council (WC) response to the Regulation 16 Salisbury Neighbourhood Development Plan (SNDP).

The SNDP has been very challenging to prepare and there have been significant obstructions and delays caused by the planning authority.

- WC failed to agree a statement of common ground early in the SNDP preparation process, though they instigated the process which would have enabled the LPA and the QB to work collaboratively. This could have clarified what was strategic and what was local in policy terms.
- WC proposed a site for the call for sites and then objected rigorously to it with the result that it was withdrawn from the SNDP after Regulation 14.
- The Local Green Spaces were evident in the Regulation 14 draft but no specific corrections were provided at the time that the draft SNDP could be amended, though they are included now when the QB can no longer make changes to the text.
- WC is the landowner of a number of key sites in the City such as significant amounts of land in Churchfields and many car parks. These sites could have been released for housing decades ago but inertia in WC has prevented this from progressing (for instance the promised parking study had not materialised, and the waste depot has been constrained and lacked an appropriate policy for decades). Yet, rather than work with the City Council, WC has chosen to object to any changes to the status quo. The SNDP could have gone far to release brownfield land for new homes but was stopped by WC.
- WC has briefed against the SNDP on numerous occasions in the local press through its press releases.

The Examiner is reminded that these difficulties and complications are set out in detail in the Consultation Statement.

The Qualifying Body took great pains to address all the comments raised by WC in their response to the Regulation 14 draft of the SNDP. The Examiner is reminded to consider in particular Part 2 of the Consultation Statement. In those comments from WC, there were numerous requests that the SNDP policies refer directly to WC Core Strategy policies.

For the Examiner's information, the following requests were made in WC's response to the Regulation 14 consultation to include reference to WC Core Strategy policies:

Page number in Consultation Statement Part 2	Reg. 14 policy referred to	Policy topic
63	Policy 2	Tree planting for carbon capture
65	Policy 3	Air quality
72	Policy 6	Design in the built environment
83	Policy 9	Protecting key views in Salisbury
108	Policy 14	Construction and development management for projects affecting the River Avon SAC
112	Policy 15	Housing mix
115	Policy 16	Churchfields and the Engine Shed site

117	Policy 17	Healthcare facilities
121	policy 20	Provision for play and sport
127	Policy 21	Sustainable transport
131	Policy 22	Cycling and walking infrastructure
137	Policy 25	Residential parking
142	Policy 27	Visitor accommodation
144	Policy 29	Post offices

The Examiner’s attention is drawn to the content and scope of the two responses (Regulation 14 and 16) and is asked to note that there is no read-through between them. One set of issues was raised at Regulation 14 and with very few exceptions, entirely new matters are raised at Regulation 16. However, it is pointed out, the text was not significantly different between the SNDP drafts (except where changes were made), so the differences between the responses cannot be explained other than that the respondents to Regulation 16 did not consider the previous response and did not consider that adding new requested changes and modifications at this stage would be impossible for the QB to respond to. Instead, these new matters have been left to the Examiner to address in his report. This is unhelpful.

With regard to the inclusion of references to Core Strategy policies, this was done in the submission version of the SNDP. As the Examiner will see below, these references are now being used as justification for deletion of entire policies (because there is already a core policy on this topic). WC fails to recognise that each of these policies referred to evidence and requirements specific to Salisbury.

This harkens back to a fundamental problem for the SNDP. The Core Strategy does not distinguish between what is a “strategic” policy and what is a “non-strategic” policy. NDPs are limited to non-strategic policies, but these must be in general conformity with the strategic policies. In the Regulation 14 draft, there was no mention of the Core Strategy policies because it was deemed that this would render the NDP out of date immediately upon adoption of the new local plan. However, because of the response received at Regulation 14 from WC, these policy reference were put into every policy.

This leaves the Examiner in a difficult position and it may be that every policy must be rewritten as a result. The QB has tried in all instances to meet the reasonable requests from WC. The Examiner is asked to refer to the original text which is obvious in the Consultation Statement Part 4, and either revert back to the original wording (which did not refer to Core Strategy policies) or to use other language such as “Core Strategy Policy XX or subsequent policy”. It is certainly not appropriate to delete every SNDP policy that refers to a Core Strategy policy when there are local concerns to be addressed in the delivery of those Core Strategy policies.

The review of the Local Plan is being rigorously challenged by the City Council. A summary of its main argument is included in the Consultation Statement and is copied here for ease of reference in Appendix A. The nub of that argument is that WC would rather do nothing, and take no action on the land it owns, than make decisions and investment to avoid the need to develop greenfield sites. Unfortunately, this strategy remains evident in this response to the SNDP.






The response from WC assumes that the Regulation 19 policies will be adopted. However, as WC admits, those policies have limited weight. The policies in the emerging local plan cannot be assumed to bear weight until they have gone through the local plan examination and are

adopted. The SNDP has been prepared against existing policies but has used new evidence from the emerging local plan where this was available.

Finally, the time since the text for the Regulation15 submission was prepared and the time it took to be graphic designed and then reassessed for SEA and HRA by the planning authority has resulted in a number of references becoming out of date or superseded. These should of course be corrected. Unfortunately, this adds to the burden for the Examiner, for which the City Council apologises. It was deemed better to continue with the “old” designed version than create additional delay and expense to update it before submission and then to update it again after examination.

In the next part of this document, the WC response has been copied into the left column of the table and the Qualifying Body’s response is offered in the right column.

<p>Wiltshire Council is fully supportive of neighbourhood planning and has welcomed the opportunity to engage with Salisbury City Council and its planning agent about the neighbourhood planning process throughout preparation of their draft Plan. We recognise the significant work undertaken to produce the document and the extent of consultation and community engagement that has gone into the production of their draft Plan. Advice and comments have been offered by Wiltshire Council through ongoing dialogue throughout the process. The draft SNDP addresses a broad range of issues that are of importance to the local community.</p>	<p>The City Council disputes that WC have been “fully supportive”.</p>
<p>This Regulation 16 consultation gives a further opportunity for Wiltshire Council to provide comments with the intention of ensuring that the draft SNDP is in generally conformity with strategic policies of Wiltshire’s development plan, meets the Basic Conditions, and provides a user-friendly document that will assist decision takers in the making of planning decisions in the Salisbury neighbourhood area.</p>	<p>Please note that the Core Strategy does not identify which policies are “strategic” and which are “local”. The SNDP only refers to local evidence and provides a local context for any strategic policies. The QB disputes that some policies such as views of the cathedral are strategic.</p>
<p>Status of the emerging Wiltshire Local Plan</p> <p>The draft SNDP has been prepared alongside the review of the Wiltshire Core Strategy – the Wiltshire Local Plan (WLP) – which will cover a new plan period of 2020-2038. The draft WLP has reached pre-submission ‘Regulation 19’ stage which took place in late 2023 but has not been subject to public examination. It is anticipated that the draft WLP will be submitted for Examination in Public in Q4 2024. The draft WLP therefore holds limited weight but provides a picture of anticipated direction of travel for strategic planning in Wiltshire beyond the WCS plan period. The reasoning and evidence informing the emerging draft WLP is of relevance to the examination of the SNDP.</p>	<p>The emerging plan has limited weight.</p>
<p>throughout. While there is reference to the emerging WLP and its evidence base there are some elements of the draft SNDP which potentially conflict with the emerging evidence for the WLP, which we suggest would require amendment. This is set out in more detail later in this response.</p>	<p>There is no conflict with the evidence. Potential conflicts arise from WC intended emerging polices which have limited weight.</p>
<p>superseded. The draft WLP includes a neighbourhood plan housing target of 60 homes for Salisbury, which will need to be addressed alongside any other housing needs identified at that time, through a review of the plan.</p>	<p>The evidence in the SNDP indicates that this number of homes would be delivered naturally through windfall development. The Regulation 14 NDP contained policies for the allocation of a significant number of homes (which were withdrawn in part due to objections from WC) and the Churchfields Masterplan also anticipates further residential development. Therefore, it is likely that the requirement for 60 homes will have been met by the time the new local plan is adopted.</p>

<p>With regard to the 'Vision and Objectives' set out in Figure 3, we would comment that the paragraph relating to Churchfields Industrial Estate presents a conflict with the evidence supporting the draft WLP, and would suggest requires amendment. This is explained in more detail below, in the discussion of Policy 17 Churchfields and the Engine Shed Site.</p>	<p>Churchfields is a major concern for residents and the City Council strongly objects to its removal from the Vision. There is no conflict with the "evidence" but with WC's intended change in <u>policy direction</u> which bears limited weight.</p>
<p>Wiltshire Council suggest that for completeness, paragraph 27 needs to be extended to set out a fuller articulation of 'excluded development', incorporating 'county matters' as set out in Schedule 1(1) of the 1990 (Town and Country Planning) Act.</p>	<p>This is not necessary in a neighbourhood plan because it is set out clearly in the regulations and planning practice guidance. Its inclusion would serve no purpose and would unnecessarily add to the length of the document (which WC considered to be too long already).</p>
<p>Paragraph 28 may also benefit from setting out the quoted section from the PPG in full, including that neighbourhood plans must be general conformity with, and plan positively to support strategic policies.</p>	<p>This is not necessary because it is set out clearly in the NPPF. Its inclusion would serve no purpose and would unnecessarily add to the length of the document (which WC considered to be too long already).</p>
<p>It is considered that paragraph 30 should be amended to more accurately reflect paragraph 1.9 of the WCS which describes the complementary relationship between the WCS and neighbourhood ³</p>  <p>0300 456 0100  wiltshire.gov.uk  @WiltshireCouncil  @wiltscoun</p>  <p>plans, with the WCS providing 'a clear overall strategic direction for development in Wiltshire, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.' The WCS was adopted prior to the requirement to delineate strategic / non-strategic policies, although it is clear from paragraph 1.9 that all policies contained in the WCS are considered to be of a strategic nature. We would, therefore, suggest an amendment to the last sentence of draft SNDP paragraph 30.</p>	<p>The City Council as QA disputes that every policy in the core strategy is strategic. The policies around views of the cathedral and the design considerations of The Chequers for instance are both limited to Salisbury and are local policies (though not identified as such). They were originally included in the Core Strategy because there was no neighbourhood plan for Salisbury and those important policies from the Salisbury District Local Plan needed a policy locus. That locus should now shift to the neighbourhood plan. This will be argued at the local plan inquiry.</p>

<p>The draft SNDP is very long and contains a large amount of background evidence and contextual commentary that may be better suited to background documents. The draft SNDP is likely to be made more user friendly for the reader and decision maker if reduced in length, with cross reference to background evidence where appropriate.</p>	<p>The plan is written as simply and briefly as possible considering the breadth of issues covered. Each policy is supported by as much evidence as is necessary to justify it.</p>
<p>Policy 1 Tree planting for carbon capture</p> <p>The premise of the policy is broadly supported, as tree planting is an important measure to mitigate for the impacts of climate change as well as providing biodiversity, health and wellbeing benefits. To this end Wiltshire Council have proposed a policy within the draft WLP – Policy 90: Woodland, hedgerows and trees – which encourages tree planting as part of development schemes. The neighbourhood plan requirement for 30% tree cover on major developments is drawn from recommendations from The Woodland Trust, and we would comment that it will be important for any such requirements to be flexible to respond to a range of site characteristics as 30% represents a significant proportion of land take. The policy introduces allowance for offsite contributions in accordance with draft SNDP Policy 12, and is discussed later in our response to Policy 12.</p>	<p>The policy is written to provide flexibility. Disagree.</p>
<p>Policy 2 Air quality</p> <p>With regard to paragraph 49 we would advise that the latest Annual Status Report was completed in August 2023, so the reference to July 2022 should be updated. In the interests of accuracy 'NO²' should be corrected to 'NO₂'. Furthermore, we note that fine particulate matter (PM10) is not of concern in this area so we would recommend removing the final part of the paragraph, and an amendment to Policy 2 may also be required.</p> <p>We would suggest removing paragraph 53, as this is not considered relevant. More recent data has shown that levels are below the objective for NO₂ with the exception of Wilton Road (A36 trunk road).</p> <p>Reference in paragraph 57 to the draft Air Quality Action Plan (AQAP) also requires updating to reflect that the AQAP was formally adopted in April 2024.</p>	<p>Agree to update reference to newest evidence.</p> <p>Disagree that para. 53 is deleted – it provide evidence.</p> <p>Agree.</p>
<p>Policy 3 Carbon neutral development</p> <p>In the interests of accuracy we suggest that paragraph 59 is amended to reflect that Wiltshire Council's commitment to achieve carbon neutrality applies to Wiltshire Council operations only. Instead of '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 draft neighbourhood plan, and consider an amendment is required to better reflect the meeting minutes of Wiltshire Council on 26 February 2019¹, when this matter was agreed by the council.</p>	<p>Agree.</p>
<p>Policy 3 cross refers to the requirements of WCS Core Policy 41 and adds a number of additional requirements, including for minor developments and conversions. While some elements of the policy are reflective of WCS Core Policy 41, we have some concerns that the specialist skillset required to assess developments against some of the more technical elements of the policy are not available to the local planning authority at this time and therefore, may lead to issues with implementation and enforcement.</p>	<p>This policy wording is based upon the (then emerging) Chippenham NDP policies which were made very recently. It would be acceptable to revert to the Chippenham policy in lieu of Core Policy 41. wiltshire.gov.uk/media/13108/Chippenham-NP-Made-May-</p>

	2024/pdf/Chippenham_Neighbourhood_Plan_1wt6yto577afd.pdf?m=1717070231263
<p>Policy 4 Electric vehicle charging points</p> <p>With regard to Policy 4, the final paragraph makes reference to the provision of in-street EV charging infrastructure, such as within lamp posts. An amendment may be required to reflect that highways infrastructure may be delivered under separate legislation by the highway authority.</p>	<p>Planning policies do not need to list potential applicants and agents. It is not necessary to add this information in the interest of brevity.</p>
<p>Policy 5 Habitats regulations</p> <p>It should be noted that the recommended amendments to Policy 5 that were provided within the Appropriate Assessment accompanying Wiltshire Council's Regulation 14 response have not been factored in, and this will require addressing. A further update to the HRA screening response and revised Appropriate Assessment are provided as part of this consultation response (Appendix 2), and its recommendations should be addressed within the draft SNDP.</p>	<p>The Basic Conditions and Consultation Statement explain that the QB considers that the suggested changes are too much detail for a NDP and that the HRA stands alone as a separate document. Disagree.</p>
<p>We consider paragraph 82, which refers to the draft SNDP taking forward policies from the former Salisbury District Council 'Creating Places' SPG, could be improved by clarifying that this is incorporated within the neighbourhood plan's Salisbury Design and Advertising Guide – which we would recommend is presented as an appendix or volume 2 to the neighbourhood plan rather than featuring as a separate document, to ensure it is read as part of the neighbourhood plan.</p>	<p>The WC response complains that the NDP is too long and then suggests that a substantial document is added as an integral appendix. The policy wording makes it clear that it should be considered. Disagree.</p>
<p>Within the fourth/fifth bullet points at paragraph 88, we consider this section should also refer to the Salisbury historic central area and the incidental appearance of buildings faced in the 'Fisherton Grey' brick (a pale buff brick once quarried off the Wilton Road) and the notable virtual absence of flint facings other than on ecclesiastical buildings – as key architectural characteristics of the area.</p>	<p>Agree.</p>
<p>At paragraph 96 we would suggest a minor amendment reflecting that the Wiltshire Council Historic Environment Record is not fully comprehensive, and that the council's archaeology team should be consulted for completeness.</p>	<p>Agree.</p>
<p>Policy 6 Design in the built environment</p> <p>In relation to Policy 6 and paragraph 100, further clarification may be needed on the requirement for major schemes to undergo assessment through an independent design review. Assessment may not always be required. We would recommend some additional flexibility be built into the policy to address this.</p>	<p>The policy wording is flexible because it requires the applicant to identify a suitable methodology. Disagree.</p>
<p>Paragraph 100 may also benefit from further clarity given ambiguous wording such as what is to be categorised as 'important developments' and what is meant by 'sensitive locations'. Clarification as to whether 'major development' refers to the definition given in the NPPF Glossary would also be helpful to the reader.</p>	<p>The wording is not prescriptive to provide flexibility. Whether a development is “important” is evident due to size, public interest, impacts, constraints, benefits, etc. It is up to an applicant to decide how to characterise a proposal and it up to the decision-maker to determine the level of scrutiny any proposal warrants. If, in that process, a scheme is deemed to be “important” then</p>

	this paragraph will apply. In addition, para. 100 is supporting text and not policy. Disagree.
We consider that part of the first paragraph of Policy 6, ' <i>particularly for schemes requiring a design and access statement</i> ' is superfluous and would suggest this be deleted, as all development should 'have regard' and it is up to developer and assessors to decide to what degree and which parts are relevant.	Do not disagree.
Within the third paragraph we note that the text ' <i>generic design approaches will not be tolerated</i> ', leaves ambiguity which could be improved.	Since no alternative wording is proposed, it is suggested that the phrase should be retained. Generic design approaches should not be tolerated in a place such as Salisbury. Disagree.
In the fourth paragraph we would note that any development including signage (not just Class E) could find guidance on use and quality of signage useful.	This is included because there is a separate section in the design guide specifically relating to this eventuality. Disagree.
Policy 7 The Close and its Liberty We would suggest a rewording of Policy 7 to reflect that each planning application in this area will be considered on its own merits; albeit with a requirement to have due regard to the important heritage setting of the Cathedral Close and a requirement to have regard to the Cathedral masterplan, where appropriate.	All planning applications are always determined on their own merits so this does not require repeating. Disagree.
Policy 8 The Chequers We would suggest that an amendment is made to Policy 8 to clarify that schemes that respect the traditional Chequers layout must also be acceptable in respect of other design matters.	Agree.
Policy 9 Protecting key views in Salisbury We question whether it is appropriate to include the element of Policy 9 that relates to the Salisbury skyline, as these matters are already covered within the adopted WCS Core Policy 22 and the draft SNDP policy does not appear to provide any further local detail. The draft WLP proposes a new policy – Policy 32: Salisbury Skyline – which will continue to set a height restriction (with some limited allowances) in order to preserve the dominance of the cathedral within the cityscape. We therefore consider this part of the policy to be duplicative of a strategic policy and unnecessary.	This is a key policy dispute between WC and the QB. Salisbury's skyline (views) can in almost every circumstance only be controlled within the city limits and this should therefore be considered a local policy. In the very rare circumstances where a development outside the city boundary might obstruct a view, the decision-maker can take this into account in the knowledge that it is important in Salisbury. It should sit within the SNDP and not the emerging local plan. This will be argued at the local plan inquiry. The policy should be removed from the LP and not the NDP. Disagree.
The second half of Policy 9 seeks to protect identified views from a range of locations within (around around) the neighbourhood area. There is some uncertainty around whether the views which are sought for protection are of Salisbury Cathedral (as suggested by Figure 12) or of Salisbury central area (as stated in the policy).	The inclusion of other views (Old Sarum) were added at the suggestion of WC in response to the Regulation 14 draft. Policy 9 refers only to "key views". The policy on Old Sarum does not refer to Figure 12. There is no ambiguity. Disagree.

<p>Section 4: Green and blue infrastructure / Policy 10 Safeguarding and enhancing green and blue infrastructure</p> <p>Figure 14 illustrates the draft SNDP's proposed strategy for green and blue infrastructure (GBI). This figure shows part of the GBI network falling outside of the Salisbury neighbourhood area, and we would suggest an amendment to the map so that only GBI falling within the remit of the neighbourhood area is proposed.</p>	<p>This objection was not raised at Regulation 14. It is an overstatement to call Figure 14 a “proposed strategy”. The title makes this clear: “what the future for GBI might look like” is not a strategy but a vision, and a potential one at that. Figure 14 is only mentioned in Policy 10 to indicate that proposals that helped to deliver this would be supported. It goes beyond the limits of Salisbury because it is showing how GBI in Salisbury links to the surrounding area – if this were removed, the context would be unclear. Disagree.</p>
<p>We are concerned that the areas mapped as GBI includes site proposed for strategically important development within the draft WLP. This includes:</p> <ul style="list-style-type: none"> • Land North of Beehive Park and Ride (Policy 25 of the draft WLP) • Land North of Downton Road (Policy 26 of the draft WLP) • Land South of Harnham (Policy 27 of the draft WLP) • Land West of Coombe Road (Policy 28 of the draft WLP) • Suitable Alternative Natural Greenspace, South Salisbury (Policy 29 of the draft WLP) 	<p>These objections were not raised at Regulation 14. Again, this is only a vision of what might happen. If any of the local plan allocations were to be adopted (and there are many objections to them so this cannot be certain) it is hoped that the schemes would be designed to promote connectivity between the GBI on that site with the surrounding area. This is supported by the Wiltshire GBI strategy. The request to exclude the sites is petty and seeks to avoid delivery of WC’s own policies which is illogical. Disagree.</p>
<p>Figure 14 also maps a series of 'Peripheral Greenways' and 'Radial Greenways'. There is some uncertainty here as it is not clear which of these routes are existing and which are aspirational, which would benefit from clarification.</p>	<p>These objections were not raised at Regulation 14. Clarification is not needed. Even where it already exists, green infrastructure should be improved and joined through delivery of new opportunities. The objective of Figure 14 is clearly to create a series of connected green and blue infrastructure routes/networks along the very imprecise and general areas indicated. Disagree.</p>

<p>The later section relating to Greenways from paragraph 159-162 may require review in respect of requirements set out in LTN 1/20 and Wiltshire Council's Local Cycling and Walking Infrastructure Plans (LCWIP). In particular:</p> <ul style="list-style-type: none"> Paragraph 161 refers to a stated minimum width of 10m for greenways. It is assumed that this refers to land for planting as well as for the path, with the minimum width for any path being 4m (3m bound surface with a 0.5m low level verge either side). In locations with higher usage LTN 1/20 requires at least 6m (2m footway plus 3m cycleway bound surface with a 0.5m low level verge either side – and a green verge or kerb may segregate the walking from the cycling route). We would note that planting trees along any of the Local Cycling and Walking Infrastructure Plans (LCWIP) potential routes may be detrimental to Wiltshire Council's ability to deliver the Salisbury LCWIP. 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. 	<p>These objections were not raised at Regulation 14. Where LTN 1/20 is difficult to deliver, it will be a requirement of individual planning applications to determine mitigation, find alternative routes, or provide inferior quality routes. LTN 1/20 is not an either/or policy that MUST be delivered in every instance, it is advice. It would be wrong to try to map out every route in the NDP – this is a matter for the LCWIP and for the determination of individual proposals. Finally, para. 161 is clearly setting out a possible future and uses language such as “would” and “where possible” to indicate that it is not prescriptive but advisory and visionary. Disagree.</p>
<ul style="list-style-type: none"> Referring back to Figure 14, Wiltshire Council cannot assure that an LTN 1/20 route on the bridleway along Harnham Slope would be supported, for example. 	<p>Agree. Nothing can be assumed until it has been tested through a planning decision.</p>
<ul style="list-style-type: none"> Some of the greenways are Rights of Way which require funding, but others are routes that Wiltshire Council have already ruled out – and it is recommended that this misalignment be addressed. 	<p>These objections were not raised at Regulation 14. The response does not make clear which routes have been ruled out. SNDP policy 22 refers to the LCWIP (and is therefore subservient to that). Most improvements require funding. The purpose of this comment is unclear. Disagree.</p>
<ul style="list-style-type: none"> Wiltshire Council are unable to 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. It will also not be possible to make this a route accessible for disabled people. We have no objection to an unsurfaced or semi-surfaced route being delivered here, but it will not be the main access route to St Peter's Place as alluded to in the draft SNDP paragraph 162. The route to St Peter's Place 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>These objections were not raised at Regulation 14. These very local circumstances will no doubt be considered though individual proposals whose need for sustainable transport provision cannot at this time be anticipated. Disagree.</p>
<p>In the interests of accuracy, we recommend an amendment to Para 151 to reflect that the multiple rivers that pass through Salisbury are all part of the same SAC – the River Avon SAC – as opposed to each being separate SACs.</p>	<p>Agree.</p>

<p>Policy 10 Safeguarding and enhancing green and blue infrastructure</p> <p>The penultimate paragraph cross refers to Policies 11 and 12. It is unclear as to whether the requirement for 10% improvement refers to the provision of green infrastructure or to biodiversity net gain (BNG). All developments are required to provide at least 10% BNG not just those where harm is unavoidable, and the harm is outweighed by the need for the development. We recommend that, if this refers to BNG, this part of the policy should be removed as there is no need to repeat the requirements of Policies 11 and 12.</p>	<p>Agree that the intention of the policy could be clearer. Suggest change to policy title as “Biodiversity” to avoid confusion.</p>
<p>Policy 11 Biodiversity net gain / Policy 12 Habitat improvement and restoration schemes</p> <p>With reference to the first part of Policy 11 and its supporting text, a minimum of 10% BNG became mandatory for large sites in February 2024 and for small sites in April 2024. It is recommended that this be reflected in the text. Wiltshire Council are proposing a higher threshold of 20% BNG in the draft WLP, which may supersede the neighbourhood plan requirement once adopted, subject to the outcome of the Local Plan EIP.</p>	<p>These objections were not raised at Regulation 14. The 20% requirement is not yet part of an adopted plan policy. The City Council would support a higher BNG provision and would suggest that the wording be changed to “10% or higher”.</p>
<p>Policy 11 cross refers to Policy 12 which identifies six sites detailed in Appendix 2 for the delivery of ‘Habitat improvement and restoration schemes’ as options for offsite biodiversity net gain delivery. Some of these sites are owned by Wiltshire Council and it is understood that others are owned by Salisbury City Council. We would highlight that the Environment Act now requires that land to deliver offsite Biodiversity Units (not owned by the same developer) must be registered on the national register of biodiversity gain sites², which should be reflected with an update to paragraph 181. We are not aware that there has been any communication with Wiltshire Council’s Estates team as landowner about the inclusion of Wiltshire Council owned sites and we are not aware that any of Wiltshire Council’s land has been formally submitted to the biodiversity gain sites register. We would therefore request that Wiltshire Council owned land is removed from Policy 12 and Appendix 2 in the interests of accuracy:</p> <ul style="list-style-type: none"> • Wiltshire Council owned part of Site 1: Avon Valley Local Nature Reserve • Wiltshire Council owned part of Site 2: Bemerton Folly and Bernards Folly Local Nature Reserve (‘The Valley’) • Wiltshire Council owned part of Site 3: Harnham Slope, the Chalkpit, Harnham Folly, The Cliff and Old Blandford Road Open Space • Wiltshire Council owned part of Site 5: Lime Kiln Down <p>We would advise that if not already done so, the remaining land parcels owned by Salisbury City Council should be formally submitted as biodiversity gains sites to the national register by the landowners in order for Policy 11, 12 and 1 to be effective.</p>	<p>These objections were not raised at Regulation 14. No objections were raised at that time.</p> <p>The policy was written in anticipation of the Local Nature Recovery Strategy which is being produced by WC and will be published in 2025. The policy therefore seeks to make specific provision on local sites of local importance to the local community. Whether the sites are owned by WC or the City does not obviate the need for nature recovery and these sites have been submitted to the LRNS team for inclusion in the LRNS map. It would appear that this request to exclude these sites from this policy is motivated more about land ownership than environmental improvement and what is important to the local community.</p> <p>With regard to Lime Kiln Down, the response is disingenuous. The City Council objected to the SANG designation on Lime Kiln Down in its response to the local plan on the basis of this policy and because it is also the landowner of Lime Kiln Down. A meeting was held (29 May 2024) between the senior leaders of the City Council and their planning consultant with WC officers where it was explained that the City Council maintained its strong</p>

	<p>objections to the designation of the SANG to include Lime Kiln Down. SCC made it clear that the neighbouring housing scheme being proposed in the Regulation 19 local plan alongside the SANG designation would threaten the natural integrity of this site by attracting many more visitors. This site is very highly valued by the local community. SCC asked WC to extend the SANG site so that it reduced pressure on Lime Kiln Down. It was felt that if a SANG was necessary here, a larger site would at least mitigate the harm caused by attracting new footfall to Limekiln Down.</p> <p>The WC response apparently is not to seek a solution but to ask for the policy to be deleted from the SNDP so that WC can do what it likes contrary the community's wishes. This is very disappointing and the City Council will continue to vigorously oppose this proposition unless the SANG is significantly extended in size and that provision are made to protect Lime Kiln down. Disagree.</p> <p>It is premature to submit the sites for BNG since the policy has not yet been made. Disagree.</p>
<p>The second part of Policy 11 relates to the introduction of spaces for specific protected species, including bat boxes and specialist bird boxes. These are not covered by the biodiversity net gain metric so we would recommend this paragraph is moved to a new separate policy, which is alternatively titled for clarity.</p>	<p>Habitats are generally understood to form part of "biodiversity" for the purposes of land use planning. It is therefore appropriate to include matters relating to habitats in a policy headed "biodiversity". Disagree.</p>
<p>Policy 13 Open space provision</p> <p>We consider that Policy 13 may require amendment to reflect that a proportion of funds received by the Qualifying Body under Community Infrastructure Levy (CIL) can be allocated to improvement schemes for open spaces in the neighbourhood area.</p>	<p>Improvements can be made and paid for by a number of sources: CIL, S106, voluntary contributions and as part of a scheme. It is not necessary to list them all in a policy because this is set out clearly in the NPPF and PPG. Disagree.</p>

<p>Policy 14 Local green spaces</p> <p>Policy 14 proposes to allocate 131 Local Green Spaces (LGSs) in the neighbourhood area, which are illustrated in Figure 18. We understand that a proportion of the sites proposed as LGSs are owned by Wiltshire Council, but unfortunately our Estates team (as landowner) have no record of having been consulted on the principle of this land being allocated for LGS.</p>	<p>This comment is untrue. WC (which is a corporate body and therefore all departments are part of one organisation) has been made aware of the proposed LGS designations on a number of occasions, many of which they then objected to by WC and the property team in particular because they had not been consulted. This hyperbolic logic is only meant to deflect from WC's lack of clarity in their response to the Regulation 14 consultation. Had WC responded with the clarity that is shown in this response, the NDP could have been amended to reflect that. However, the clarity towards their sites is only provided now, and it is, unfortunately left to the Examiner, to rectify this.</p> <p>The manner in which LGS proposals were consulted on is set out in the Consultation Statement.</p>
<p>In terms of Figure 18, the identified sites have been derived from Wiltshire Council's own register of open spaces that is replicated in Figure 17. In replicating this data, Figure 18 includes a large number of small unidentified and unnamed sites, which are presumably not proposed to be allocated for LGS. For clarity we would recommend that these sites be removed from the map to avoid any confusion over the status of this land. The extent of the numbered sites is also unclear with no defined boundaries. The clarity of Policy 14 would be improved with the introduction of a new appendix which shows each LGS site in more detail to better define its boundaries at closer scale.</p>	<p>These objections were not raised at Regulation 14. All the numbered sites are meant for designation as LGS and all are numbered and named and set out clearly in Appendix 3. The site boundaries are clear and on an OS base. Disagree.</p>
<ul style="list-style-type: none"> We note that a number of sites proposed as LGS are playing pitches associated with schools owned by Wiltshire Council. Wiltshire Council do not support the inclusion of these sites, as this risks restricting the potential for school development/expansion should this be required in future to meet educational needs, and we would therefore request these are removed as proposed LGSs. Although Figure 18 is not clear as to the boundaries of each of these sites, this appears to be applicable to LGS sites 76, 77, 81, 82, 87, 93, 95, 110, 114, 116 and 122. 	<p>These objections were not raised at Regulation 14. Playing fields are used by the community and are of value to the community. They should be protected. Disagree.</p>
<ul style="list-style-type: none"> Some of the proposed LGS sites are associated with formal sports and leisure operations, and we would be concerned with their allocation which could limit opportunities for sport/leisure related development. This appears to be applicable to LGS sites 92, 97 and 98. 	<p>These objections were not raised at Regulation 14. These facilities are used by the community and are of value to the community. They should be protected. Disagree.</p>
<ul style="list-style-type: none"> In addition, Wiltshire Council as landowner has concerns within the inclusion of LGS land at sites 127, 128 and 129 which may limit the opportunity to undertake estate regeneration for affordable housing purposes. 	<p>These objections were not raised at Regulation 14. These sites are of importance to the local community and if the housing department had needed the land for housing, they would have developed the land for that purpose already. In the meantime, these sites have taken on amenity value for</p>

	surrounding residential properties and their status should be formally recognised. A similar argument is made in the Chippenham NDP. Disagree.
<ul style="list-style-type: none"> We would also comment that proposed LGS numbers 23, 26, 32 and 84 appear to cover sites that are identified within the Salisbury River Park Masterplan that was endorsed by Wiltshire Council in July 2021. This document identified a scheme of improvements along the river corridor through central Salisbury, and we recommend removal of the LGS designation to avoid complicating the delivery of this project. 	<p>These objections were not raised at Regulation 14.</p> <p>The sites in the River Park area are of value to the community and the LGS designation will not “complicate” the delivery of the project. Disagree.</p>
<ul style="list-style-type: none"> In addition, several sites are listed as LGS that are also identified for delivery of BNG projects under draft SNDP Policy 12, and we would question the appropriateness of these sites being allocated for both purposes given that the designations serve different purposes. In particular one of the proposed LGS sites (LGS site 10) is Lime Kiln Chalk County Wildlife Site (partly owned by Wiltshire Council). As noted above this site forms part of a site proposed for allocation for Suitable Alternative Natural Greenspace (SANG) under draft WLP Policy 29, which is required to facilitate the delivery of three other strategic housing site allocations in the WLP. To avoid any conflict with the emerging strategic policies of the WLP, we request the removal of this site as a proposed LGS. 	<p>These objections were not raised at Regulation 14.</p> <p>Sites can serve multiple purposes: recreation, leisure, nature recovery, amenity. They can be retained, protected and enhanced via different methods and not a “one size fits all”. Disagree.</p>
<p>To address the above concerns we would suggest that the above sites are withdrawn from the proposed schedule of LGSs, with a view to the qualifying body carrying out further detailed consultation with Wiltshire Council as landowner through the review of their neighbourhood plan that is intended to take place in 2025.</p>	<p>These objections were not raised at Regulation 14.</p> <p>Disagree.</p>
<p>We would also recommend that sites falling outside of the neighbourhood area boundary be removed from Figure 18 for consistency with the extent of the spatial area to which the policy applies.</p>	<p>These objections were not raised at Regulation 14.</p> <p>The neighbourhood boundary is very clearly drawn and the policies do not apply to land outside the boundary. The “coloured areas” on the figures provide context only and do not form any part of the policy. Disagree.</p>
<p>Policy 15 Construction and development management for projects affecting the River Avon SAC</p> <p>Policy 15 appears to be a repetition of existing policy and therefore we would suggest it is removed to avoid duplication.</p> <p>We would suggest that the final bullet point under paragraph 201 is amended to state that betterment of surface water runoff should be provided in line with Wiltshire Council’s betterment policies to ensure consistency.</p>	<p>This was included in discussion with the County Ecologist.</p> <p>Disagree.</p> <p>Agree to the rewording regarding betterment.</p>

<p>Paragraphs 204 and 205 make reference to the draft WLP Policy 22 neighbourhood plan requirement for Salisbury of 60 dwellings, to be delivered over the WLP plan period 2020-2038. This requirement should be considered alongside other sources of evidence gathered by the Qualifying Body, such as local housing needs assessment. With regard to paragraph 205, the draft WLP does not specify whether the neighbourhood plan requirement should be delivered on brownfield sites or not, albeit a brownfield first principle would be generally supported by the council. Site selection is a matter for the neighbourhood plan to address in its evidence base and could include both brownfield and greenfield site options. We would recommend paragraph 205 be reworded to reflect this.</p>	<p>This is a complex argument. The Examiner is referred to the statement in Appendix 1 and in the Basic Conditions Statement. Disagree.</p>
<p>We note that paragraph 214 includes out of date information referring to information that supported the previous WLP consultation in 2021. In particular, the WLP plan period is now proposed to be until 2038, not 2036; and the reference to a requirement for 410 homes is now superseded by the proposed neighbourhood plan requirement of 60 homes. For information, 410 relates to a 'brownfield target' that was previously consulted upon, that no longer forms part of the Local Plan proposals. Out of date references to the 410 brownfield target also appear in paragraphs 215 and 218, which should be corrected.</p>	<p>Agree that the out of date reference to 2036 should be amended. Agree that reference to the brownfield target should be removed.</p>
<p>Wiltshire Council are unclear how the figures for windfall development, as set out in paragraph 215, have been reached and we remain of the view that it is unlikely that, across 15 years, 2,250-2,850 new dwellings will be realised at Salisbury from windfall development. It is noted that assumptions about windfall development form part of the justification for not including any housing allocations in the draft SNDP. However, the draft SNDP also states that an early review of the SNDP may take place which could include housing allocations, which is accepted.</p>	<p>The data was supplied by WC as stated in the text. WC did not question the figures at Regulation 14 and it is unclear why this is raised now.</p>
<p>Policy 16 Housing mix and affordable housing</p> <p>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 53% 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, Wiltshire Council currently seeks to negotiate between 25% and 30% of the Affordable rented units as 1 bed units.</p>	<p>Para. 226 fully reflects WC requirements for one bed dwellings and the text points out that this is "different" from what was stated in 225. The point is that it is difficult to know what the market requires but the SNDP has considered all available evidence. Disagree.</p>
<p>Policy 16 sets a requirement of 40% Affordable Housing, which while broadly corresponding with the Affordable Housing requirement in the WCS and draft WLP, does not provide any flexibility to accommodate for exceptional circumstances where this may not be possible to achieve. An amendment may be needed to address this, or it may be more appropriate to revert to the strategic policy.</p>	<p>These objections were not raised at Regulation 14. Policy 16 is subservient to WC policies and the flexibility will be agreed at application stage according to the provisions of NPPF 57. The target of 40% is used to make clear that the policy refers in the main to this sub-category of the total housing provision (as opposed to 60% market rate). This policy provides local detail and is based on sound evidence. Disagree.</p>

<p>Policy 16 states that 60% of the Affordable Units are to be delivered in accordance with demonstrable need. It is unclear if this means demonstrable need for affordable rented accommodation. It should be noted that WCS Core Policy 43 states that tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs, and the draft WLP proposes the following tenure mix: 65% affordable rented, 25% First Homes, 10% Shared Ownership. We would therefore caution against the draft SNDP specifying a tenure mix to ensure that there is no conflict with the WCS or evidence supporting the draft WLP.</p>	<p>These objections were not raised at Regulation 14. The 60% of the 40% is clearly either rented, owned or part-owned according to what the latest evidence on need is at the time that a planning application is prepared. The policy is clear particularly since Core Policy 43 is negotiated on a site by site basis. The SNDP specifies the tenure mix because this policy is based on Salisbury evidence not Wiltshire wide evidence. Disagree.</p>
<p>Policy 16 also states that 30-40% of affordable housing units in Salisbury should be one bedroom. We are concerned that specifying the percentage of one bed units is too restrictive. It is not conducive to the creation of mixed and balanced communities and could restrict Wiltshire Council in negotiating a mix which reflects demonstrable need (which can change over time).</p>	<p>These objections were not raised at Regulation 14. This is a range and is therefore flexible. It reflects the evidence that WC provided (para. 226). Disagree.</p>
<p>Policy 17 Churchfields and the Engine Shed site</p> <p>Wiltshire Council have concerns with the scope of draft SNDP Policy 17 and the supporting Churchfields Masterplan which seeks to set a direction for the Churchfields Industrial Estate in Salisbury which conflicts with the emerging policy position for this site as set out in the draft WLP.</p> <p>Churchfields is a complex and strategic scale site on which there were long standing ambitions for regeneration and decant of the existing heavier industrial uses which impact HVG traffic through the city. This ambition led to the allocation of the site for mixed use redevelopment within the WCS, which while forming the currently adopted policy position, should be read in the context of more recent evidence which identifies significant issues with the proposed regeneration of the site. Detailed work in the last few years has demonstrated that such a proposition would not be economically viable to be carried forward into the Local Plan. A major constraint is the existence of subsoil contaminants which have accumulated both from previous and current uses at Churchfields, affecting viability. Accordingly, the draft WLP has reframed proposals for the Churchfields Industrial Estate (excluding the Engine Sheds site) around the retention of the site for employment generating uses, which are recognised for their contribution to employment land needs in Salisbury/South Wiltshire. Draft WLP Policy 34 (Churchfields Employment Area) is caveated with policy requirements to ensure that proposals for development of employment uses on this site do not increase HGV traffic to and from the site, along with other criteria to improve the public realm and support sustainable travel; with the nature and scope for improvements to be set out in detail by an Estate Regeneration Plan and Accessibility Study. We therefore remain of the view that, as a strategic site, Policy 17 and the supported Churchfields Masterplan are beyond the scope of the draft SNDP and introduce conflict with the emerging WLP policy position. We therefore suggest that this element of the draft SNDP is removed.</p>	<p>This has been argued extensively in the Basic Conditions Statement and also in Appendix 1 (below). These arguments will not be repeated here. Disagree.</p>

<p>Policy 18 Healthcare facilities</p> <p>With regard to the final paragraph of Policy 18, the wording appears ambiguous and may benefit from clarification to ensure this can be implemented as intended.</p> <p>At paragraph 257, reference is made to the potential for redevelopment of some of the car parks in Salisbury for alternative uses. It should be noted that any such proposed to redevelop city centre car parks will be subject to the outcome of a study on city centre car parking provision and needs by Wiltshire Council, which have not yet been undertaken.</p>	<p>These objections were not raised at Regulation 14.</p> <p>This policy was formulated through extensive consultation with local NHS providers. At the time it was being prepared, it was intended to allocate land on a site promoted by WC and later withdrawn. The need for in-town services is acute. This argument has been covered extensively in the Consultation Statement and the Basic Conditions Statement. The parking study has been promised since the Core Strategy was adopted. It has not been delivered. How long must Salisbury wait until it can have the local health facilities it needs? Disagree.</p>
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Policy 19 Community infrastructure

We consider that there are elements of Policy 19 which lack clarity and may be problematic in the making of planning decisions. It is unclear how use of developer contributions would be managed to coordinate the delivery of equivalent community infrastructure and this part of the policy may need review. The requirement for developer contributions must be clearly evidenced with a demonstrable need, which is currently missing from the policy – and in an urban area may be difficult to demonstrate if alternative facilities are available. We may also caution against reference

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to F Class within the use class order in case this should be changed with any future alternations to the use class order.

Policy 19 Community infrastructure

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These objections were not raised at Regulation 14.

The policy speaks of loss of infrastructure and its replacement with equivalent facilities. It is obvious that when a proposal comes forward for the loss of a facility, it will have characteristics (such as size, location, use class, etc) and will have a usership. These are quantifiable and describable features and it should be obvious how it should be addressed in a planning application.

The reference to “larger major residential development” provides flexibility and gives the decision maker an opportunity to argue that provision might be necessary. However, without a specific site proposal, it is not possible to specify what is required since WC have not published standards. It would be helpful if, in the preparation of masterplans for proposed site allocations in Salisbury, that the emerging local plan would pay heed to this policy and ensure that community facilities were included in housing schemes. To date, this has not happened.

The evidence has demonstrated that these facilities are necessary and already at full capacity. The policy is flexible and it will be up to the planning authority to apply its judgement on what is appropriate for any given development policy or decision.

Disagree.

<p>Policy 20 Allotments</p> <p>We would query the necessity of the first paragraph of Policy 20, given that statutory allotment land is already afforded equivalent protection under the Allotments Act 1925. The second paragraph contains elements which are not land use matters and are otherwise design matters which may more logically sit within the Design chapter of the SNDP.</p> <p>Paragraph 266 states that current demand for allotments will be exacerbated by new planned developments being delivered. In the interests of accuracy, we would note that the draft WLP housing allocations include a requirement for the provision of onsite allotments which will increase the supply of allotments in Salisbury.</p>	<p>Allotments are very important community infrastructure and consultation indicated that they warranted separate policy protection. Allotments aid health and wellbeing and provide food in times of economic hardship. The evidence has demonstrated local demand (that WC is not aware of) and the policy provides a flexibility about how this demand should be met. This is a local policy to meet a locally identified need. Disagree.</p>
<p>Policy 21 Provision for play and sport</p> <p>By way of update in relation to paragraph 287 the Wiltshire Playing Pitch Strategy (PPS) renewal will be completed in July 2024, and will provide a tool to assist in the planning process and to underpin the WLP as an evidence base to conform with the National Planning Policy Framework (NPPF). When the SNDP comes to be reviewed, this updated piece of evidence should be considered.</p>	<p>WC's open space assessment has indicated that there is an undersupply of play space in Salisbury. When the new evidence is available in July 2024, this can be considered but it will probably say the same thing – that there is under provision. Agree that the new evidence should be used.</p>
<p>Paragraph 289 notes an SCC priority for the resurfacing on Multi Use Games Areas (MUGAs) at Bemerton Heath. Wiltshire Council are undertaking a feasibility study for upgrading the Gainsborough Close MUGA at Bemerton Heath with a bid to the Football Foundation. If this is confirmed during the examination of the draft SNDP, then it can be removed from the list.</p>	<p>Agree.</p>
<p>With regard to draft SNDP Policy 21, we recommend that the 'Play' element of the policy/supporting text should reference the need for formal play to align to the Wiltshire Council Play Specification and/or Fields in Trust Guidance to ensure a standard of Play Value. The formal play, sport, pitch, youth and adult recreation S106 contributions for new developments are formulated using the calculators embedded within the Wiltshire Open Space Assessment (WOSA).</p>	<p>Agree.</p>
<p>In addition, we suggest that additional wording be added to require that new housing developments consider a Health Impact Assessment (HIA).</p>	<p>These objections were not raised at Regulation 14. Would the requirement for HIA not fall under the emerging local plan policies? Disagree.</p>
<p>Section 6: Transportation and movement</p> <p>At paragraph 304 reference is made to documentation that supported the 2021 consultation on the WLP, which has now been superseded by material that was consulted on for the 2023 WLP 'Regulation 19' consultation. In the interests of accuracy, we would recommend this be updated.</p>	<p>Agree.</p>
<p>Policy 22 Sustainable transport</p> <p>We would observe that the wording in parts of Policy 22 are quite broad and ambiguous, such as 'appropriate, challenging targets for modal shift' and 'larger vehicles'. This would benefit from further explanation to provide clarity for the decision maker.</p>	<p>This is a subordinate policy and ultimately, the planning and highways authorities will determine how sustainable transport provision is made. This policy provides locally important clauses such as reference to the Salisbury Transport Strategy, the Salisbury LCWIP, impact on Salisbury City Centre, and</p>

	Salisbury's GBI. The intention is that these matters are considered when wider sustainable transport schemes (LTP4 for instance) and individual planning applications take these specific and local matters into account. Disagree.
<p>Policy 24 Cycle parking</p> <p>We note that the first part of Policy 24 is a cross reference to Wiltshire Council's cycle parking policies, and therefore we would recommend its removal to avoid duplication. The second part of the policy may benefit from rewording as this may not be applicable to all developments.</p>	The WC cycling policies are not specific to Salisbury and evidence such as that in Figure 32 is important and should not be deleted. Unless these aspirations are set out in planning policy, they will be ignored in planning decisions. Furthermore, inclusion in the NDP would assist the City Council and residents to fight for provision in the preparation of LPT4. This policy and its evidence is required. Disagree.
<p>Policy 25 Cycling for pleasure</p> <p>We consider that draft SNDP paragraph 328 could be strengthened by stating that all major developments must deliver Travel Plans in accordance with Wiltshire Council's Travel Plan guidance, which includes purchasing and distributing relevant walking and cycling maps as set out in that guidance.</p>	Travel plans do not make provision for cycling for pleasure. Disagree.
<p>Policy 26 Residential parking</p> <p>As a general note on parking standards, we would highlight that Wiltshire Council already sets requirements for parking standards within the adopted Local Transport Plan (LTP3), which is in the process of undergoing review for update.</p> <p>With regard to draft SNDP Policy 26 and its supporting text we would clarify that historically Wiltshire Council have permitted car-free developments within the city centre. These have in the most part been conversions of existing buildings and not necessarily all new builds. We have concern that the wording of the first paragraph in the policy may be used as justification to provide no parking anywhere within the city, creating significant on-street parking problems and related congestion and safety issues. We would recommend that it be made clearer within the draft SNDP that car-free developments will only be accepted in the city centre and not the wider suburban areas.</p>	These objections were not raised at Regulation 14. The provisions of this policy are specific to Salisbury and the policy is written clearly and flexibly. Disagree.
The second paragraph of the policy would benefit from clarification, as it is not clear where this applies to. As noted above it would not be appropriate to support reduced levels of car parking across the whole city.	This applies across the parish.
We note that the final paragraph of Policy 26 may be overly onerous for all developments. Additionally, we would request that reference to lay-by parking be removed, as it is generally not recommended for private car parking to be in lay-by form and would not be accepted within the adoptable area of a new road unless it was for unallocated visitor car parking.	It is flexible – it uses the term “where feasible” so if it proven in the planning application to not be so, they should not result in on-street parking where this is already a problem. This is a policy

	specifically about Salisbury and the parking standards apply to all of Wiltshire. Disagree.
With reference to paragraph 339, whilst the AQMA areas may extend up London Road and Wilton Road, Wiltshire Council do not class these roads as being within the city centre and therefore car free developments are not considered acceptable. We would comment that the fact that these locations are within an AQMA area should not be used as the overriding reason to allow car free developments when the quality issues in these locations are primarily caused by a high flows of through traffic, in particular, that of freight.	There is no policy in the Core Strategy that states that “car free development are not considered acceptable”. The QB therefore does not understand this statement. Para. 339 is not a policy but evidence of the local situation. Salisbury residents feel that measures should be taken in all parts of the AQMA and not just the city centre, and it would be a positive outcome if development outside the city centre has a lower pollution impact because there will be fewer cars. Disagree.
Paragraph 342 refers to the resident/permit controlled car parking schemes that exist within the city. It is Wiltshire Council’s position that this should not be used as an alternative for private off-street car parking as suggested, especially outside of the city centre. This would conflict with Wiltshire Council’s Car Parking Standards. It should also be noted that many of the parking permit zones are at capacity and residents of new developments are not able to apply for these permits.	Noted.
<p>Policy 27 Working from home and live-work units</p> <p>We consider there to be a lack of clarity within the policy regarding the requirement for larger residential schemes to provide community work hubs where practicable. It is unclear what types of development would be permissible under this part of the policy, which may benefit from additional detail.</p> <p>With regard to the second part of the policy we would note that conditions attached to planning decisions are applied on a case-by-case basis and it would be unacceptable to require conditions through policy.</p>	<p>These objections were not raised at Regulation 14.</p> <p>The policy seeks the provision of work hubs (which became popular at the time of writing during the Covid lockdowns). These cannot be specified because it is a new phenomenon and there are therefore no standards that can be applied.</p> <p>The most important part of the policy is the first sentence: “residential development should be designed to facilitate home working”. This applies to how individual properties are designed to enable home working (para. 345).</p> <p>If a home working hub is created, there should be a planning condition attached to retain that use (Class F).</p> <p>Disagree.</p>
<p>Policy 28 Visitor accommodation</p> <p>We note that Policy 28 is a cross reference to the WCS policy and therefore we would recommend its removal to avoid duplication.</p>	This is a subservient policy that provides local evidence that is absent from the Core Strategy (or emerging local plan). This is a local policy relying upon local evidence of need. Disagree.

<p>Policy 29 Post offices</p> <p>While the premise and intent behind Policy 29 is understood, we do not feel the policy as worded is implementable as the post offices fall within Class E of the Use Class Order.</p>	<p>These objections were not raised at Regulation 14. The policy identifies that post offices are considered to be Class F2(a) and not Class E. This is a designation. Disagree.</p>
<p>Policy 30 Major food retail</p> <p>Policy 28 cross references to the WCS policy and therefore we would recommend its removal to avoid what is largely duplication.</p>	<p>This is a subservient policy that provides local evidence that should be used by applicants and decision-makers. This evidence is local and not found supporting Wiltshire-wide policies. It is not therefore a duplication. Disagree.</p>

Appendix 1: Qualifying Body's response to the Local Plan (main argument)

Salisbury City Council
Response to Wiltshire Council Local Plan Review
November 2023

Argument in support of the City Council's response

Prepared by [REDACTED]

Introduction

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

The SNDP

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

sought to provide significant levels of housing on brownfield land, but all the SNDP site proposals were objected to by Wiltshire Council either as local planning authority or as land owner.

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

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

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

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

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

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

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

Paragraph: 006 Reference ID: 61-006-20190723

Revision date: 23 07 2019

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

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

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

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

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

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

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

17. The current Regulation 19 housing allocation proposals are located on land that will completely erode the green buffer between the City and Britford, contrary to LPR objectives, and will add pressure on the road network, particularly Harnham Gyratory.
18. The crux of SCCs objection to the policies and proposals in the LPR is that the current strategy is over-reliant on the use of greenfield sites and avoids the reuse of previously developed land in the City. Much of the land that could be redeveloped is under the control of Wiltshire Council. The main sites within Salisbury that Wiltshire Council owns and could provide housing on are:
 - a. The Central Car Park (Core Policy 20) – 200 dwellings
 - b. Churchfields (Household Waste Recycling Centre and depot) – 30 dwellings (with the potential for more)
 - c. Brown Street Car Park – 50 dwellings.
19. SCC sought to proactively promote previously developed sites so that greenfield sites would not be required. The City Council now objects that the LPR is proposing greenfield sites on third party land whilst not working with the City Council to reuse previously developed land in its ownership.
20. Furthermore, the City Council has drawn the conclusion that the reason for this greenfield-driven approach is money: the LPA can obtain funding from greenfield development to prop up its undelivered proposals for highways improvements that have arisen from the Core Strategy and are as yet unresolved, whereas it would face costs to develop its own land. The LPR therefore favours financial gain over the most effective use of land. This is illustrated in the Annex at the end of this document which copies tables from the review of the Infrastructure Delivery Plan. This shows that Wiltshire Council is relying almost entirely on developer contributions to fund previously programmed and future transport improvements in Salisbury.
21. **The LPR approach with regard to Salisbury is therefore in conflict with the NPPF 2023 para 119 which states: “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or “brownfield” land.” Para 120c requires planning authorities to “give substantial weight to the value of using suitable brownfield land within settlements for homes...and to support appropriate opportunities to remediate despoiled, degraded, derelict and contaminated or unstable land”. Para. 121 requires LPAs to take a proactive role in identifying and helping bring forward land that may be suitable for meeting development needs including land held in public ownership using the full range of powers available to them.**

The objectively assessed need for housing and commercial land in Salisbury

22. The emerging spatial strategy¹ shows in Figure 23 that for the period 2020 – 2038, Salisbury’s overall housing requirement is 4,500 dwellings with a residual requirement of 1,530 and 12.3 ha of employment land.

The LPR approach to windfall contributions

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

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

1.10 There is, however, strong evidence to show that there is a steady and predictable supply of new homes from windfall on small sites of less than ten dwellings at main settlements. Additional homes result from the conversion of buildings, sub-division and small-scale opportunities and redevelopment. Evidence gathered over the years of recording housing completions shows it is consistent and it can be calculated at a main settlement level. This supports the possibility of relying on an allowance for new homes from this source (set out in the chapter on windfall in the Housing Land Supply Statement²).

24. It would appear that windfall contributions are not being included except for small sites in the considerations of how much land is required.
25. Whatever methodology was utilised towards windfall contributions remains unclear. For Salisbury, the supporting documents to the LPR do not explicitly state how contributions from windfall (from small sites or large), how the Maltings Masterplan (which is a result of Core Policy 20) or how other sites such as Brown Street Car park might make a contribution. From the information provided, it is impossible to understand how the requirement for 1,530 for the Salisbury area has been arrived at.
26. In the preparation of the SNDP, SCC asked for and was provided with housing completions data for the Salisbury neighbourhood area. This data showed that for the calendar years 2016-2019 **579 dwellings were delivered on brownfield land in Salisbury for this five year period**. Over the same period, and following allocations in the Core Strategy, only 200 homes were delivered. Policy 22 expects only 350 dwellings to be delivered on brownfield land which is not justified in any of the background evidence and appears to be a low figure relative to past performance.

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

27. The Inspector is reminded that in Salisbury City, there were 579 dwellings delivered on brownfield sites. SCC did not obtain evidence of what was delivered in the remainder of the Salisbury area – it is surely more. The Regulation 18 consultation draft LPR contained a figure of 410 dwellings for the period 2021 - 2031 as brownfield target. The current Regulation 19 draft now expects 350 dwellings. The reasoning behind this change is not clear and simply does not make sense on the basis of past performance.
28. NPPF 2023 para. 71 states that “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will supply a reliable source of supply.” Clearly, the past performance of windfall delivery plus the aborted site allocations in the SNDP in Salisbury is such compelling evidence.

The performance of proposed allocation sites in the Strategic Environmental Assessment

Alternative development strategies

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

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

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

32. The final comment from this quote is clearly untrue and the validity of the SEA as an objective assessment of alternative is therefore open to question. No brownfield sites were included in the Strategic Environmental Assessment and therefore they were not considered as realistic options for housing provision.
33. However, the discussion above regarding sites that the SNDP sought to progress for housing on brownfield/PDL and the recent pattern of windfall allocations belies this assumption. There are brownfield sites in Salisbury that can be developed.

34. For the greenfield sites proposed for Salisbury, the SEA concluded the following (emphasis added):
- a. *Biodiversity: Biodiversity issues in the Salisbury HMA are mainly focused on the Salisbury Plain SPA/SAC and SSSI and the River Avon SAC, which are likely to be a factor in decisions on any future development locations. This is particularly noteworthy in the Salisbury/Wilton area where the highest levels of growth are proposed, being the Principal Settlement – for this reason, **moderate adverse effects** are considered likely for all growth scenarios at Salisbury.*
 - b. *Water resources: All strategies propose a significant level of growth at Salisbury which has a number of water protection designations including Zone 1 SPZ and Drinking Water Safeguarding Zones. Salisbury is subject to planned future investment in water resources - Wessex Water have stated that they plan to invest in Salisbury to reduce phosphates and provide additional capacity between 2020 and 2025 - so there may be an opportunity to continue improvements to the water network. However, due to the scale of growth proposed, **moderate adverse effects** are considered likely.*
 - c. *Air quality: For all strategies **moderate adverse effects** are likely in Salisbury as mitigation will be problematic.*
 - d. *Flooding: The city is particularly at risk through fluvial flooding arising from the Avon and four other rivers that converge. Development may be able to take place without increasing flood risk but as site locations are not known, all strategies for Salisbury/Wilton are considered likely to have **moderate adverse effects** given the scale of growth proposed.*
 - e. *Historic environment: There are a significant number of heritage designations around Salisbury/Wilton which could be harmed by development. As no locations for development are known at this stage, the scale of growth for all strategies is considered likely to have **moderate adverse effects**.*
 - f. *Landscape: There is potential for **significant adverse landscape effects** and harm to key views to/from Salisbury Cathedral and Old Sarum, depending on where new development is located.*
 - g. *Transport: At this stage of appraisal it is difficult to make notable observations on the precise suitability of access along with the impacts on local transport capacity. More detailed assessment may be possible at the site assessment stage where impacts along with mitigation/improvement measures may become clearer. **Salisbury hosts a number of key routes, all passing through or around the centre. These routes, namely the A36, A345 and A30 each suffer from peak time delays at key junctions. This congestion also needs to be considered against its impact on the AQMA present within Salisbury. All strategies propose a level of growth to Salisbury that is likely to exacerbate existing transport issues in the city, whether below or above current WCS requirement. The Salisbury Transport Strategy was refreshed recently for the WHSAP and may need to be looked at again if mitigation***

measures are going to reduce the level of impacts. For all strategies, moderate adverse effects are considered likely (emphasis added).

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

SEA of individual sites proposed in Salisbury

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

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

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

- a. *Water - Investigations and agreement with Wessex Water's regulators and mitigation measures are likely to be implemented over a long lead in time (~10 years). Significant development in the Salisbury area is likely to trigger the need for new mains and service reservoirs to transport potable water from elsewhere within Wessex Water's network to satisfy demand. **It is unlikely that Wessex Water would be able to provide available capacity before 2030.***
- b. *Air quality: Salisbury has **three Air Quality Management Areas (AQMAs)** in respect of the nitrogen dioxide annual mean objective. Exceedances exist on A36, A30 and at several hotspots in the city centre. Significant traffic management measures are needed to remove levels of traffic from the A36 in particular. If site allocations are made in the LPR, CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAs. This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation. **A wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAs needs to be modelled and assessed.***
- c. *Landscape: The site contributes to a sense of separation between the suburban edge of Salisbury and the rural, low-density, linear village of Britford to the east. It forms part of the river valley setting and the rural approach to Salisbury from the southeast, across which there are clear views of Salisbury Cathedral. The site forms part of a locally distinctive water meadows landscape. There is high scenic quality and value associated with the river landscape, although this is reduced within the site. The site and adjoining landscape is in generally good to moderate condition with few intrusive elements. **Overall, it is considered that the site is of generally medium landscape sensitivity to development, with higher sensitivity to the north and east of the site due its contribution to the rural approach to Salisbury and historic water***

meadow landscape. The site has generally medium capacity to accommodate development.

- d. *Traffic: Delivery of Salisbury Transport Strategy with a focus on Harnham Gyratory and strategic footway/cycleway links.*
38. The conclusions that can be drawn from this is that the site provides an important green buffer separating Salisbury from Britford (which both parishes wish to preserve), that the proposals of the development will require significant highways improvements based on the Salisbury Transport Strategy (which is part of LTP 3 and therefore linked to the Core Strategy) and that there will be negative impacts on air quality. Whether brownfield development in Salisbury could have performed better has not been considered.
39. The SEA concluded that for land adjacent to A354, south of Harnham (but this is also relevant for land west of Coombe Road which is outside the City):
- a. *Biodiversity: **The location has implications for designated sites.** There will be a need to offset in-combination effects of recreational pressure on the two local County Wildlife Sites (CWS). Lime Kiln Chalk CWS, a publicly accessible grassland site partly owned by Salisbury City Council, lies immediately adjacent to the site. Harnham Slope CWS would also be vulnerable to increased recreational pressure as it lies 600m away and can be accessed directly by a public right of way. The location has implications for designated sites. There will be a need to offset in-combination effects of recreational pressure on the two local County Wildlife Sites (CWS).*
- b. *Water: The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Significant new development in Salisbury would require investigations and agreement with Wessex Water's regulators and mitigation measures are likely to take time, and **unlikely to deliver capacity before 2030.***
- c. *Air Quality: Salisbury has three Air Quality Management Areas (AQMAS) in respect of the nitrogen dioxide annual mean objective. Exceedances exist on A36, A30 and at several hotspots in the city centre. Significant traffic management measures are needed to remove levels of traffic from the A36 in particular. If site allocations are made in the LPR, CIL/S106 contributions will be required to enable the council to take actions to enable the revocation of the AQMAS. **This site connects with the Harnham Gyratory which is congested, and further development has the potential to worsen this situation. A wider view is required of the network capacity and the effects this will have on air quality on Downton Road, and in particular on Harnham Road. The cumulative effects of proposed development on Harnham Road, Downton Road and existing AQMAS needs to be modelled and assessed.***
- d. *Traffic: This site connects with **the Harnham Gyratory** which is congested, and further development has the potential to worsen this situation.*
- e. *Historic environment: **The site is close to Scheduled Monument Woodbury hillfort and settlement and the contribution to the setting requires further assessment. Site likely to have archaeological interest. Contribution to significance requires assessment before potential for mitigation or impact on capacity can be***

considered. The site is within the 100m buffer of Scheduled Monument - Woodbury Ancient Villages (NHL: 1005652). The site spreads into the eastern buffer area which is of high value. There are several high value features on site, including a series of late prehistoric to Roman ditches spreading into the eastern site area, possibly associated with the Iron Age hillfort and hundreds of undated pits (medium to high value). The site is within the 100m buffer of Bronze Age round barrow and an early Bronze Age cremation burial site ring ditch. Following further investigation, mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required, particularly in the eastern area of the site. Should preservation be part of a mitigation strategy, opportunities to interpret and enhance understanding and / or improve land management regimes could be taken forward. Also, in the western site area, mitigation strategy could include preservation by record where preservation in situ is not required. Consider opportunities to enhance the understanding and setting of the Scheduled Monuments.

- f. **Traffic: Necessary Strategic Mitigation Delivery of Salisbury Transport Strategy, with a focus on walking and cycling links and enhancements to Harnham Gyatory.**
- g. **The Town Centre and Railway Station are approximately 3000m from the site and thus too far to walk.** With regards to cycling, significant gradients present a barrier along with steps serving the public right of way network, however the distances are traversable.

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

Economic development and Churchfields

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

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

Sarum that is allocated for economic development on the grounds that there is no demand for employment land.

Figure 3.1: Market Signals

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

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

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

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

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

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

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

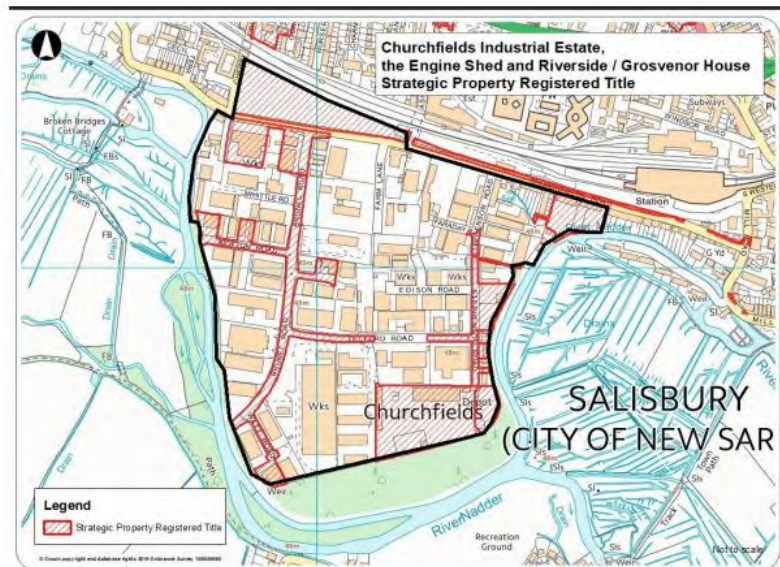
It would be appropriate to develop an estate regeneration plan to implement improvements. Such improvements could vary in scale, and recommendations include:

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

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

will not be done either. The SNDP on the other hand has undertaken engagement on the future of Churchfields and has produced a masterplan for its improvement and regeneration.

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



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

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

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

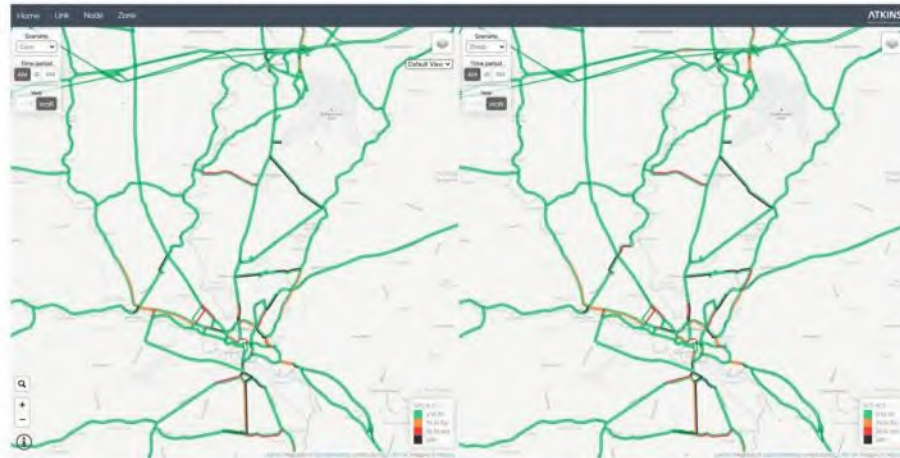
Salisbury	Waste Management	Revelopment/ relocation of Salisbury Household Recycling Centre	To reduce queues and improve access. Scale of future development suggests that a larger site will be required over the Plan period.	2023-2038	Wiltshire Council; Private contractors	0.774	0.000	Developer contributions;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

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

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

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



60. The review indicated that key measures from the Salisbury Transport Strategy were more than likely to be implemented by 2026. These include the Harnham Gyratory remodelling and Exeter Street roundabout enhancements, St Marks Roundabout and Park Wall junction. Other matters were reasonably foreseeable (St Pauls Roundabout enhancements and the development of a hierarchy of routes that restrict traffic movements in the city) and others that were hypothetical (College Roundabout enhancements, Bourne Way enhancements).
61. SCC's concern is that all the projects listed in the previous paragraph should have been delivered by the Core Strategy and LTP3 and they have not. As a result, as shown in the capacity flow diagrams above, some parts of the local road network are very congested or at standstill. If the last set of highways mitigation provision for the last set of allocations have not been delivered, how can it be possible to add more strain to the network through more allocations, thus making a bad situation worse? There is uncertainty about whether even the limited improvements to one arm of the Harnham gyratory are viable, according to a WC presentation to SCC in a recent presentation, though this is not referred to in any of the supporting evidence to the LPR.
62. What is lacking from the transport review is a parking study and the future use of parking infrastructure owned by Wiltshire Council. The parking study was part of LTP3 and it was meant to assess why the park and ride system was not being taken up and how much of the city's parking spaces were unused or redundant. The lack of a parking strategy was raised as the main objection by Wiltshire Council to the allocation of Brown Street Car Park as a residential site as proposed in the Core Strategy and the Central Area Framework. SCC is therefore perplexed and concerned that this important parking study has not been considered in the transport review and hopes that it might be included in LTP4. It is not mentioned in the reviewed Infrastructure Delivery Plan as a project.
63. The local plan review should have been prepared against up to date transport evidence. LTP 3 has clearly been used in the preparation of the local plan policies but is now significantly out of date. A better and more robust transport assessment than the one presented in the LPR supporting evidence would have been more appropriate and accurate.

64. Current evidence provided in support of the LPR does not give adequate consideration of potential transport impacts. The LPR should be supported by an up to date Transport Plan, LTP4.

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

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

Conclusion

70. National policy (NPPF 2023 para 35) requires LPA's to prepare plans that are sound because they are:
- a. **Positively prepared:** providing a strategy that is consistent with achieving sustainable development. However, SCC is concerned that the plan has not been

prepared with a view to delivering sustainable development as shown by the SEA which

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

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

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

Wiltshire Infrastructure Delivery Plan - Appendix 1

September 2023

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

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

Salisbury	Leisure Facilities	Upgrades to sport and recreation facilities within Five Rivers Health and Wellbeing Centre - upgrade pool, flumes etc.	Income generation	2023-2038	Wiltshire Council	0.000	0.000	Developer contributions; Football Foundation
Salisbury	Leisure Facilities	Development of a second 3GATP	Identified in the current Wiltshire Playing Pitch Strategy (PPS)	2023-2028	Salisbury Town Council	1.000	0.000	Developer contributions; Football Foundation
Devizes and Salisbury	Arts and Heritage	Salisbury and Wiltshire Heritage Museums	To provide additional storage space for archaeological finds during new development.	2023-2038	Wiltshire Council	1.300	0.200	Developer contributions; Wiltshire Council
Salisbury	Libraries	New internal and external signage	To ensure new people to the area are aware of the library location and able to navigate the services within the building.	2023-2033	Wiltshire Council	0.006	0.000	Developer contributions
Salisbury	Libraries	Book collections	To support the needs of new residents. Areas where demand exceeds core book funding, e.g. children, employment support and health and wellbeing.	2023-2033	Wiltshire Council	0.010	0.000	Developer contributions
Salisbury	Libraries	New build/ refurbishment	Improve the overall visitor experience to accommodate the increase in population from local developments.	2023-2033	Wiltshire Council	0.100	0.000	Developer contributions; Wiltshire Council
Salisbury	Police	New Police Station and site	Bourne Hill site will not meet future needs of police. Relocation to new site of 1.5 acre within 5 miles of Salisbury City Centre required.	2023-2033	Wiltshire Police; Police and Crime Commissioner for Wiltshire & Swindon	0.000	0.000	Wiltshire Police; Police and Crime Commissioner for Wiltshire & Swindon

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

September 2023

Location	Category	Project	Rationale	Timescale	Delivery	Funding (£m)		
						Cost	Secured	Potential Source(s)

Salisbury	Transport	A338 Southern Salisbury Junction improvements (Exeter Street Roundabout, Harnham Gyrotory and Park Wall Junction)	Salisbury Transport Strategy - highways	2023-2028	Wiltshire Council	17.495	1.552	Developer contributions
River Avon SAC	Environment	Nutrient Management Plan	To make phosphate neutral development with no adverse impact on the River Avon Special Area of Conservation.	2023-2038	Wiltshire Council; Natural England; Environment Agency; Developers	0.000	0.850	Developer contributions; Wiltshire Council
Salisbury	Environmental Protection	Provision of air quality monitoring infrastructure	Strategic monitoring of air quality in the three AQMAs (City Centre, Wilton Road and London Road AQMAs).	2023-2038	Wiltshire Council	0.156	0.045	Developer contributions; Wiltshire Council
Salisbury	Leisure Facilities	Upgrades to sport and recreation facilities within Five Rivers Health and Wellbeing Centre	To meet an identified need in the Indoor Facilities and Playing Pitch strategies. Upgrade swimming pool, e.g. flumes etc.	2023-2038	Wiltshire Council	0.000	0.000	Developer contributions; Wiltshire Council
Devizes and Salisbury	Arts and Heritage	Salisbury and Wiltshire Heritage Museums	To provide additional storage space for archaeological finds during new development.	2023-2033	Wiltshire Council	1.300	0.200	Developer contributions; Wiltshire Council
Salisbury	Libraries	New internal and external signage	To ensure new people to the area are aware of the library location and able to navigate the services within the building.	2023-2033	Wiltshire Council	0.006	0.000	Developer contributions
Salisbury	Libraries	Book collections	To support the needs of new residents. Areas where demand exceeds core book funding, e.g. children, employment support and health and wellbeing.	2023-2033	Wiltshire Council	0.010	0.000	Developer contributions
Salisbury	Libraries	New build/ refurbishment	Improve the overall visitor experience to accommodate the increase in population from local developments.	2023-2033	Wiltshire Council	0.100	0.000	Developer contributions; Wiltshire Council

The Qualifying Body's response to Network Rail comments to the Regulation 16 Consultation of the Draft Salisbury NDP

Prepared by [REDACTED] on behalf of Salisbury City Council (the Qualifying Body)

July 2024

Introduction

This response has been prepared to provide to the Neighbourhood Plan Examiner with an understanding of the Qualifying Body's (QB's) views on the Network Rail (NR) response to the Regulation 16 Salisbury Neighbourhood Development Plan (SNDP).

NR has raised objections to Policy 16 as follows:

Network Rail note the reference to the Churchfields Masterplan and Salisbury Design Guide. The Masterplan and Design Guide set out that the Engine Shed site (site 1) should be developed for residential use within the context of the Churchfields area.

As part of this Strategic Study, Network Rail are reviewing land around the station and near the railway to identify suitable sites to provide options to meet railway needs. The Engine Shed site is one of several areas of land that are being considered to support the railway.

The emerging Wiltshire Local Plan proposes that flexibility be applied to the Churchfields area to allow for the future master planning of the site to identify various land uses that are suitable. As such, the promotion of residential use on the Engine Shed site conflicts with the emerging Local Plan as it does not retain flexibility and is too prescriptive about the type of land use considered suitable. The Neighbourhood Plan also fails to consider other suitable options.

Therefore, Network Rail object to draft Policy 16.

This is a misunderstanding of the Churchfields masterplan which is advisory only. It does not constraint land owners. Please see excerpts below:

It presents high level vision and development scenarios, all of which are in conformity with the current and emerging local planning policy context. It sets out how the area can evolve to better meet the city's needs for smart employment and housing, contributing to the economy and the need to address climate change. In doing so, it also sets a course for dealing with the some of the area's negative impacts on other parts of the historic city, particularly relating to traffic and air quality.

The design studies are high level and illustrative, prepared to demonstrate how the design principles that the City Council wishes to promote could be applied. We have not undertaken technical studies on topics such as ground conditions, traffic and drainage (although AECOM specialists have inputted into design development). It is expected that full co-design exercises are undertaken by applicants on any sites. This report is just a step in that direction, enabling stakeholders to progress from an informed position.

The Engine Shed site has been derelict for many years and could provide housing in a city that needs it. Should Network Rail conclude its study and determine that the site is necessary for operational purposes, then it is free to progress that idea. The masterplan would not stop this from happening.

Should Network Rail determine that the site was not needed, then it could be put to another land use, for instance for housing.

The objection is based on a false premise and should be ignored.