

Salisbury Campaign for Better Transport **Matter 4. Core Policy 1. Distribution of Development**

Introduction

Salisbury Campaign for Better Transport will be focusing on the transport aspects of proposed development. As such, the majority of our contribution will be under Matter 5. We do however have some points to raise relating to the distribution of development insofar as this relates to transport issues.

Question 4.1 Suitability of the Saved Local Plan Allocation

- 4.1.1 PPS1 states (para 27) that land allocations should take into account issues such as accessibility and sustainable transport needs, and that planning authorities should ensure new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car. PPS1 recognises that this may be more difficult in rural areas; however the saved plan allocations are based around existing sizeable communities. Accessibility & sustainable transport needs should be a key consideration in the selection of these sites.
- 4.1.2 It is disappointing therefore that transport has **not** been recognised as integral to the selection of key sites. While the Salisbury Transport Strategy Options Assessment Report (STSOAR) has now been made available the following key deficiencies must be pointed out:
- This is **not** a Transport Strategy – there are further stages to go before arriving at this, including (we hope) a meaningful stakeholder and public consultation.
 - There is also the issue as to whether Wiltshire Council – not historically renowned for their willingness to adopt ‘radical’ transport measures - will support their consultant’s view that a ‘radical’ approach is the best way forward.
 - The area covered only includes Salisbury and Wilton. Amesbury, Downton, Mere and Tisbury are excluded – with Amesbury being probably the most serious omission due to the large amount of growth proposed there.
 - The Options Assessment is weak on various key areas – for example rail infrastructure and service improvement and cycling. These are the sort of points which our group would seek to raise during any consultation on the Transport Strategy.
- 4.1.3 It is noteworthy too that, with a planning application recently submitted for one of the strategic allocations under Core Policy 2 (Hampton Park – 525 dwellings - S/2009/1943) that this fails to embrace fully the options which are put forward in the Transport Options Assessment (e.g. STSOAR suggests a high frequency (six/hour) bus service from Hampton Park into town, the planning application suggests only a half hourly service which does not extend into the development itself).
- 4.1.4 The above example can clearly be dealt with in more detail under the Core Policy 2 discussions under Matter 5 – the point being made here is that a site

may be suitable and sustainable **if** appropriate transport measures are in place. Without firm details of the transport measures to be put in place, and without any evidence that developers will have to supply transport measures which might be proposed, it is not possible to make a sound judgement on the suitability and sustainability of a location from a transport perspective.

Question 4.6 Porton Down and Boscombe Down are treated as saved local plan sites while Solstice Park is not. Why is this?

Introduction

- 4.6.1 Salisbury Campaign for Better Transport have an interest in this matter because of the transport issues associated with the Solstice Park site – notably the cancellation of the Stonehenge Improvement scheme, the removal of aspirations to dual the A303 from the RSS and the need to reconsider development options for Amesbury in the light of this.
- 4.6.2 We believe that the decision not to save Policy E8A is correct. A full transport assessment of the impact of development on the Amesbury area is crucial and there needs to be a transport strategy for the area (see 4.1.2 above). Changes then need to be made to the SWCS – we would suggest that, as recommended in the Evidence Base provided, the development of Solstice Park in the SWCS plan period should be limited to a further 10 ha above the 22.75 already allocated in the current Local Plan period.
- 4.6.3 More detail is provided below of the Solstice Park background and the lack of support for the current scale of development at the site in the evidence base.,

A303/Solstice Park Background

- 4.6.4 Solstice Park is a 64 ha site which is clearly of strategic importance by reason of its size. Outline planning consent for employment use for the whole site was granted in 2002, with one of the conditions being that the developers made a contribution of around £10 million to the Highways Agency for construction of an all-ways junction from Solstice Park (then called Folly Bottom) onto the A303.
- 4.6.5 At the time of the outline consent a flyover at Countess Roundabout to the west of the site and dualling of the A303 past Stonehenge was a planned road improvement. This improvement was assumed in the traffic modelling conducted in 1999, when it was noted that “the principal traffic impact will be on that section of the A303 between Countess Roundabout and Folly Bottom where traffic flows will increase by a material amount” but that “major improvements to the junction have been assumed in the modelling work undertaken by Mott MacDonald on behalf of the Highways Agency”.
- 4.6.6 When the Solstice Park slip roads and side roads order was confirmed in 2002 GOSW noted that modelling of the junction was on the basis that the Countess Roundabout – approximately 1.5 km to the west of the Solstice Park junction – would be grade separated.
- 4.6.7 The “Stonehenge Improvement Scheme” – including dualling of the A303 past Stonehenge and the Countess Roundabout improvements - was cancelled by

the Government in December 2007 after cost estimates had risen to £540 million.

- 4.6.8 As our representation on para 8.24 of the Proposed Submission version of the SWCS pointed out dualling of the A303 is no longer supported in the RSS.
- 4.6.9 The Section 106 agreement for the outline planning consent included the following clause (quoted in the officers report on planning application S/2009/0794, section 5.1.2 of S106 26/01/02)

“No more than 18 Hectares (net) of the site shall be developed for employment purposes and no more than 4.75 hectares (net) of the site shall be developed for leisure / hotel purposes and no further development for said purposes pursuant to the planning permission shall take place on the Site during the lifetime of the replacement local plan PROVIDED THAT at the date of publication of the next deposit draft local plan the Council shall review the extent to which it would be appropriate to vary this restriction in the light of policies contained in such draft plan shall review the requirements in relation to infrastructure and sustainable transport and shall assess additional requirements in respect of any further development and the developer shall enter into any agreement under Section 106 of the Act reasonably required by the Council to give effect to requirements reasonably imposed in connection with such further assessment”.

- 4.6.10 The Section 106 agreement quoted above suggests that the Council needs to review the amount of land which might be brought into employment use at the date of publication of the next deposit draft local plan (i.e. this Core Strategy). This review would need to take account of the current situation regarding the non-dualling of the A303 and the need to consider alternatives. **Such a review has never taken place.** Instead Wiltshire Council has seen fit to recommend approval of planning permission (S/2009/0794) for a 27.09 ha (gross) Regional Distribution Centre (in addition to the Robert Wiseman Distribution centre which is now operational at Solstice Park). At the time of writing the status of S/2009/0794 is believed to be as reported to Wiltshire Council’s Strategic Planning Committee on 16.12.09 – the application is currently undetermined, although a resolution to be approved has been made subject to a legal agreement being entered into.

Lack of support for Solstice Park in the Evidence Base

- 4.6.11 Topic Paper 9 ‘The Economy and Employment’ June 2009 sets out in para 5.6 – 5.10 the planning conditions which have got us to this point. The outline consent for Solstice Park set a timeframe for approval of reserved matter on the 22.75 ha of land which accorded with the current Local Plan by 1.1.2011. Reserved matter for the remainder of the land is to be by 1.1.2014, presumably subject to the review mentioned in 4.6.9/4.6.10 above. It is correctly concluded in Topic Paper 9 that the supply of land at Solstice Park does not conform to the RSS (para 5.10).
- 4.6.12 We believe that Topic Paper 9 **incorrectly** makes the assumption that “Solstice Park could well be used for lower intensity employment such as distribution” (para 5.10) This is simply not supported in policy terms

- The Employment topic paper (June 2009 update) suggests that the employment land requirement to 2026 “*translates into employment land requirements of between 25 and 30 hectares (approximately 50% for B1 office, 10% for B2 general industrial and 40% of B8 storage and distribution)*”. This would suggest a maximum 12 hectares of B8 storage and distribution for Salisbury TTWA as a whole.
- Paragraph 6.17 of the South Wiltshire Core Strategy document indicates that “*The Strategy will deliver 13,400 jobs including on 36 ha of employment land based on B1, B2 and B8 uses and up to 40,000 sq m gross external area retail and leisure floorspace. Evidence suggests that the market need is for around 19 ha of B1 business use (offices), in the region of 4 ha for B2 general industrial uses and the remaining approximately 13 ha for storage and distribution.*”

Both these documents suggest **12-13 hectares** of storage and distribution in **the whole Salisbury TTWA**, and the majority of employment land is supposed to be focused around Salisbury. There is now another distribution outlet operational on Solstice Park - namely Robert Wiseman Dairies. Further B8 usage in the Amesbury area is not supported in the evidence base.

- 4.6.13 Not only would large amounts of distribution type employment provide an unbalanced job mix to the Amesbury area, but the transport implications have not been considered. The Highways Agency noted at the Stonehenge A303 Public Inquiry in 2004 that ‘*During surveys undertaken in August 2003, queues of up to 60 vehicles were observed for westbound traffic approaching Longbarrow Crossroads, whilst at Countess Roundabout, queues in excess of 70 vehicles for westbound traffic were observed at peak times.*’ There are now no plans to improve the A303 and congestion on this route will inevitably lead to more traffic using unsuitable residential roads around Amesbury and Salisbury. Government guidelines (PPG13) and Regional Policy (RTS4) suggest that developments which generate large volumes of freight movements should be located close to appropriate rail or water freight facilities, which Solstice Park of course is not.
- 4.6.14 The “Wiltshire Workspace and Employment Land Delivery Plan” produced by consultants DTZ, dated August 2009 concludes that: “*There is a very large supply of available land at Amesbury, which is not dissimilar to the requirement at the SSCT’s. Arguably, the supply of land is disproportionate to the role and function of the settlement. As Solstice Park benefits from planning permission we recommend that, for the purposes of creating a reasonable balance of supply between the market towns, Amesbury is excluded. Including Amesbury could result in under allocation at other market towns given that Solstice Park represents a significant proportion of the forecast demand for the 7 market towns. However, we also note that this approach could result in an over allocation that could place sites under pressure for change of use to alternative sites.* No site specific actions are required because Solstice Park has planning permission and the supply of available land is more than sufficient. Boscombe Down and Porton Down are both allocated, but are special cases. If the existing outline consent lapses at Solstice Park we recommend that a reduced area of about 10 hectares is brought forward at Solstice Park.”

- 4.6.15 The Sustainability Appraisal of the South Wiltshire Core Strategy Proposed Submission Draft Appendix IV page 72 states (in relation to the continuation of existing employment allocations and the issue air quality/greenhouse gas emissions that *“However the saved allocation at Solstice Park is remote from existing settlements and undermines the overall spatial strategy. The supporting text to Core Policy 13 (transportation Strategy) recognises this and does state that “Strategic development at Amesbury will consider links with the town centre and Salisbury”, and the policy wording requires that transportation assessments will be required. A specific reference in either policy 13 or this policy to Green Transport Plans would improve the performance of the plan.”*
- 4.6.16 Core Policy 13 referred to above was deleted during the Spring 2009 revisions of the Core Strategy. It is noted in the main body of the Sustainability Appraisal that *“The majority of the deleted policies were deleted as they were considered inappropriate for a Core Strategy under the backdrop of Local Government Re-organisation. These will now need to be carried forward into a Wiltshire wide Development Management Development Plan Document (DPD) to be produced at a later date.”* Following deletion of CP13 it would seem that any mitigation referred to in the SA regarding links between Solstice Park & Amesbury/Salisbury is not now covered in the Core Strategy.
- 4.6.17 The Habitats Regulations Assessment (HRA) report does not refer to policy E8A or the Solstice Park development – from which one deduces that this development has not been included in the HRA. When Solstice Park **was** included in as one of the Preferred Options (PO42) in a previous consultation it was deemed that this Policy would be likely to have a significant location specific adverse effect (see Appendix 4 of the Interim Habitats Regulations Assessment (August 2008)).
- 4.6.18 From the above references in the Evidence Base it can be seen that policy E8A/Solstice Park is not supported and indeed that its inclusion in the Core Strategy could breach the Habitats Regulations.

Conclusions

- 4.6.19 We agree with GOSW (in their comments dated 29.9.09) that the core strategy should give clearer guidance on the future of Solstice Park. Transport constraints are a key consideration here – and for development in Amesbury generally and the lack of any Transport Strategy for Amesbury is a serious omission which we believe makes the SWCS unsound.
- 4.6.20 To support the growth of Amesbury we believe that transport options including the re-opening of a Salisbury/Amesbury rail or light rail link should be considered. The Solstice Park Master Plan needs to be revisited (as was suggested when the site was included in the Preferred Options consultation in February 2008). The development of the whole 64 hectare site for employment uses is not supported by the RSS or the SW Core Strategy, but development of a further 10 hectares in addition to the 22.75 allowed in the period to 2011 might be appropriate, as recommended by Wiltshire Council’s consultants DTZ.