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Page 1 of 4.

South Wiltshire Agenda 21

South Wiltshire Agenda 21 is a voluntary group working towards a sustainable future for South Wiltshire. Membership of the group includes 68 individuals and 40 organisations, including schools and businesses.

Matter 5. Core Policy 2. Delivery of Development –Strategic Allocations.

Question 5.2. Frontloading. *The CS is based on the frontloading of housing and economic development. In other words the intention is that much of the proposed development would occur in the early years of the plan. What is the justification for this approach?*

- 5.2. The Core Strategy is intended to guide development up until 2026. It is likely that, over the course of that time, the economic situation in the country will be subject to fluctuations so that the needs of the area of South Wiltshire for housing and employment cannot be predicted with any degree of certainty. In view of this it is perhaps unwise to adopt a policy of frontloading. It would be better to identify sites for future development but to bring these on stream sequentially, as the need arises. This would avoid the possibility of sites being abandoned through lack of funds in the middle of the construction phase, the failure to provide the promised services required and what could turn out to be unnecessary green field development.

Question 5.4. Development Milestones and Phasing. *With the exception of the Central Car Park site the intention is that all of the strategic allocations will have been the subject of a planning application within 18 months of the adoption of the CS, that delivery will start within a further 12 months and that thereafter it would proceed in accordance with an agreed phasing plan. How reasonable is this and how feasible? Why is the Central Car Park not subject to such requirements when the housing trajectory appears to show it delivering housing from 2012/2013 onwards? Why is Churchfields the subject of such requirements when the CS acknowledges that it is a longer term project because of its complex nature?*

- 5.4.1. As stated in answer to question 5.2 we would question the urgency of proceeding to planning application stage within 18 months of adoption of the strategy in view of the uncertainty of the economic situation. All brown field sites should be taken forward at the earliest opportunity; this should include the Central Car Park, Churchfields, the UKLF site and other city centre sites such as Brown Street and Salt Lane car parks. The use of previously developed sites should be the first priority in accordance with RSS targets, this would contain growth within the existing urban area and reduce the impact of urban sprawl on the landscape setting of the city. Some green field sites will need to be found at an early stage for the relocation of Churchfields businesses that require HGV access, but these need to be carefully chosen so as to have minimum impact on the road network and residential areas.
- 5.4.2. Other green field sites for housing and employment could then be developed sequentially giving the opportunity to assess the impact on the River Avon system and transport infrastructure before proceeding to the next phase.

Page 2 of 4.

Question 5.5. Transport. An Insurmountable Barrier? *The CS states that that there are in, highways and transportation terms, no insurmountable barriers to delivery; that the transport network, with improvements, will be able to support the levels of growth over the plan period; and that it is unlikely that new road building will be required. What is the evidence to support these statements?*

- 5.5.1. We fully support the 'radical' approach put forward by Atkins in the Salisbury Transport Options Appraisal. However we remain concerned that this has yet to go through the consultation process and there is no guarantee that either Wiltshire Council or the people of Salisbury will accept this approach. An agreed Transport Strategy must be in place before the level and distribution of development for Salisbury, contained in the Core Strategy, can be adopted. Salisbury is extremely constrained by its landscape setting and cannot allow development, which then leads to intense pressure for road building overturning all the environmental constraints.
- 5.5.2. Another concern is that the Transport Strategy has only looked at Salisbury in isolation rather than the wider area. Salisbury is the hub of a rural area extending across the border into Hampshire and any increase in traffic generated within the city as a result of growth will have a wider impact on surrounding towns and villages and extend as far as the New Forest. Conversely the traffic modelling has not taken into consideration either growth in other areas of the district, such as Amesbury, or the possible impact of developments proposed in Hampshire such as Dibden Bay.
- 5.5.3. Because of the timing of the consultation on the Wiltshire and Swindon Draft Waste Site Allocations DPD, the traffic modelling has not factored in the significant additional impact of these sites on the road network. Netherhampton Road has been listed as a strategic site which, in addition to the development of housing and employment in this location, would add significantly to the impact of traffic on the residential area of Harnham.

Question 5.6. Transport. What, Who and When? *What are the highway and transportation measures, or range of potential measures, that would need to be put in place in order to ensure that the transport network would be able to support the Strategic Sites? In developing these sites can congestion and safety problems on the major transport corridors of the A303 and A36 be overcome, can pressure on the Salisbury ring road be accommodated and can meaningful alternative transport choices to the private car be provided? Who would be responsible for financing and implementing any measures that would be required and when would they be implemented?*

- 5.6.1. The radical transport measures proposed in the Salisbury Transport Options Appraisal would, if adopted, go some way towards mitigating the impact of growth in Salisbury. However an important factor in this is the choice of location of HGV generating businesses so as to remove their impact on the city centre and residential areas. As we have said in AWS/South Wiltshire Agenda 21/1205/3 para.3.2.3. the majority of current businesses transport goods to/from the north of the city with only 12% coming from the south. Locating these businesses to the south of the city on the Netherhampton Road would increase journey time, add to the already congested Ring Road and Harnham Gyratory and have a major impact on the residential area of Harnham. There are options to the north of the city where access roads do not pass through residential areas, or villages.

- 5.6.2. We welcome the increase in bus services proposed but would like to make some further comments relating to those we made under AWS/South Wiltshire Agenda 21/1205/3 Question 3.3, relating to mixed use development. To overcome the fact that many people will not choose to live close to their employment it is important to provide the necessary links from home to work with good cycleways and bus services. Not all bus services need to pass through the centre of the city with the inevitable increase in congestion, reduced air quality and the frequent necessity to change buses to complete ones journey. Direct services at peak times linking large housing developments with key employment sites should be considered. For example this could include a direct service from Hampton Park and Bishopdown to the hospital and from Fugglestone Red, via Wilton and Harnham to the hospital.
- 5.6.3. The impact of the developments on congestion and safety on the major transport corridors of the A303 and A36 could be reduced by better use of the rail network for passenger and freight transport. However there is a distinct lack of any aspiration for increasing the use of rail. The main line running between Southampton and South Wales runs parallel to the A36, while the Salisbury to Exeter line could take pressure off the A303. Salisbury is located at the junction of main line services to some of our major cities but more use could be made of rail for local journeys by re-opening stations such as Wilton and Porton, dualing the line to Exeter and re-opening the railway line to Amesbury and Stonehenge.
- 5.6.4. There is insufficient weight given to the contribution of cycling towards reducing car journeys. The Salisbury/Wilton urban area is ideal for cycling with most journeys less than 5 miles. A complete network of cycling infrastructure is required linking all new housing developments with employment sites, schools, transport hubs, shopping and leisure facilities.
- 5.6.5. At the planning stage each new site must produce a robust green travel plan and this will need to be in place before occupation of the site. The recent planning application for the Hampton Park development, which has gone ahead before adoption of the Core Strategy, has shown how developers have produced an inadequate plan and have not intended to implement it until after a percentage of the houses were occupied.

Question 5.8. Key Strategic Elements of Infrastructure. What Who and When? *What measures are proposed to ensure: that additional pressures on the sewerage network particularly around Salisbury, be accommodated; that phosphate and pollution levels in local watercourses can be controlled, that adequate water supply can be provided to new developments; that additional demand for emergency services, healthcare and school places be dealt with, and that important green infrastructure is provided and retained? Who would be responsible for financing and implementing these various measures and when would they be implemented?*

- 5.8.1. It is in the area of water quality and water supply that we have particular concerns. Both Natural England and the Environment Agency have expressed concerns about the impact of housing allocations around Salisbury on the integrity of the River Avon SAC and the Avon Valley SPA further downstream (Habitat Regulations Assessment July 2008. 4. Water Quality). The consultants doubted whether, even with improvements to the Petersfinger sewerage works, the 'end of pipe' discharges would be good enough in terms of nutrients. They were also concerned about excessive water abstraction, which is already having adverse effects on the river Avon system and can only increase considerably with the level of proposed development in the area.

- 5.8.2. There appears to be no phosphate management plan available at present and no report on the ongoing Review of Consents due for publication in Dec. 09. If the current situation is unsatisfactory we do not feel confident that the mitigation measures proposed will be robust enough to avoid further damage to this protected river system.