

Further Statement for the South Wiltshire Local Development Framework Core Strategy Examination

March 2010

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

Representative Reference 2773

Hearing Statement
submitted on behalf of
The Highways Agency

1. **Context**

- 1.1 This statement seeks to build upon the previous representations submitted by the Highways Agency in relation to the Core Strategy and outlines the Highways Agency's concerns with the likely impact of the spatial strategy on the A36 and A303.
- 1.2 The Agency has been involved in the progress of the South Wiltshire Core Strategy since 2007 and has made a series of representations to the Issues and Options document (September 2007), Preferred Options document (March 2008) and more recently the Submission Stage document (September 2009).
- 1.3 The Agency has also given further consideration to the details of the evidence base, relating to transport and subsequent new evidence in the form of the 'Salisbury Transport Strategy: Options Assessment Report' published in January 2010.
- 1.4 The Agency needs to be satisfied that the emerging spatial strategy takes account of the impact of development on the A36 and the A303. We therefore re-emphasise our commitment to greater integration between transport and land use planning with a focus on strategically located mixed use developments designed to facilitate self containment of communities and consequently trip internalisation, in addition to the prioritisation of investment in sustainable transport options.
- 1.5 The statement should be considered as evidence at the sessions relating to Matter 5 focusing on Strategic Allocations.

2. **Performance and Issues facing the A303/A36**

- 2.1 As outlined at the beginning of this statement the Agency is responsible for maintaining and managing the Strategic Road Network (SRN), which in this instance relates to the A36 and A303. The A303 runs across the breadth of

South Wiltshire providing a link to the South West and London. The A36 links South Wiltshire to Southampton and the West of England.

- 2.2 Current traffic volumes on the A36 average per day at approximately 16,500 vehicles two way, with flow variations of between 10,000 and 34,000 at various locations along the route. The route is mainly comprised of single two-way carriageway, although there are a number of dual sections situated in areas of particularly heavy flow. Typically these are close to the intersections with other major routes, for instance the A361 and the A303.
- 2.3 Sections along the A36 experience high levels of congestion in the morning and evening peak hours as well as during the weekend peak periods. This congestion results in significant queuing and delays for vehicles using this route.
- 2.4 The A303 is a mixture of single and dual carriageway road which runs through South Wiltshire. It is subject to peak hour congestion at various points during the weekday peak periods in addition to some limited weekend congestion. This results in queuing and delays at some points, particularly at junctions along the route.

3. Transport Strategy & Sustainable Transport

- 3.1 The Agency has been working closely with Wiltshire Council (WC) in compiling the evidence base required as part of the EiP and welcomes the publication of the Salisbury Transport Study which was published in December 2009. The Agency will provide further commentary on the findings of the study within our statement relating to Matter 5 focusing on transport and our participation at the EIP.
- 3.2 With regards to sustainable transport specifically, the Agency previously expressed our support for the inclusion of Strategic Objective 8 within the Core Strategy which sought to provide a range of transport choices. However, the Agency would wish to see a more succinct wording for this objective which clearly sets out the desired outcomes and how these will be met.

4. Matter Specific Responses

Question 5.1 – Amount and Mix of Development

- 4.1 The Agency provided representations to the proposed strategic allocations identified in the Submission version of the Core Strategy and acknowledges that the delivery of strategic sites is necessary in order to meet the targets set out in the emerging Draft RSS. The Agency supports the principle of directing the majority of growth towards Salisbury particularly in relation to the promotion of the concept of self-containment, internalisation of trips, increased opportunities for sustainable ‘influencing travel behaviour’ measures on a site by site basis and as part of area/corridor wide measures and the delivery of any mitigation/infrastructure requirements.
- 4.2 In line with the DfT Circular 02/2007 ‘*Planning and the Strategic Road Network*’, the Agency considers that the successful delivery of growth in any development plan relies on the provision of infrastructure to ensure the foundations for successful developments. WC in developing its transportation evidence base in support of the Core Strategy has suggested two transport strategies aimed at delivering the planned growth in a sustainable manner. In assessing these two strategies against the requirements of Circular 02/2007 there would appear to be a shortfall as neither option mitigates the impact of the development on the SRN at this stage. However, the Agency is keen to work with WC in ensuring that a robust strategy is in place prior to the publication of the Site Allocations DPD.

Question 5.2 – Frontloading

- 4.3 The Agency’s primary concern in response to the delivery of growth in the early years of the plan period is that many of the allocations will need to be accompanied by a suitable package of measures in order to mitigate the impact on the SRN, which may need to be in place prior to the occupation of the

- development or during the initial phases. At the current time this gives rise to concerns from the Agency as we
1. have not been provided with a robust evidence base which fully demonstrates what the impacts of the allocations will be on the SRN;
 2. have not been provided at this stage with the evidence which demonstrates that the impact on the SRN is mitigated with either of the transportation strategy's proposed; and
 3. do not yet have information as to how the strategy will be delivered and funded during the early years of the planned growth to ensure the SRN is left no worse off than if development had not occurred.
- 4.4 The Agency would have hoped that at this Examination we would have agreed with WC the transportation evidence base, the appropriate level of mitigation required to satisfy Circular 02/2007 and for WC to have developed and agreed a phasing and implementation plan for delivery. At the time of writing the Agency are not yet able to agree any of these items with WC. As we have not yet agreed these items the Agency expects further information to be provided by WC in due course with the Agency being provided the opportunity to comment on this information at the Site Allocations DPD stage. It must be stressed that the Agency's preferred approach would be to see the appropriate planning policy framework in place now to ensure that sites coming forward are considered in a consistent manner in terms of the funding, delivery and implementation of the necessary mitigation measures. However, without being able to agree the transportation evidence base at this stage, the Agency can only reserve its position for future comment at the next stage of the LDF process.
- 4.5 The Agency acknowledges that the Salisbury Transport Strategy (STS) (currently under preparation), is expected to incorporate a clear funding plan. A technical note prepared by Atkins on the 2nd February 2010 identifies that the intention of the STS is to estimate the funding gap in place between the planned schemes in the Core Strategy and existing funding sources. The Agency is unable to fund any mitigation works to the SRN to accommodate proposed developments and would therefore expect this to be provided by other funding sources or developer contributions. Furthermore, as the Agency has yet to agree that either of the

proposed transport strategies proposed by WC mitigates the Plan's impact on the SRN, the Agency wishes to work with Wiltshire further to ensure that not only the package of measures are deliverable, but also that they are the appropriate measures to bring forward.

Question 5.3 – Rate of Development.

- 4.6 The Agency acknowledges that the sites have the ability to be delivered in the early years of the plan provided that they are supported by the appropriate mitigation measures which ensure the plan is delivered in accordance with the Policy framework identified within Circular 02/2007. However, the Agency does not, at this time have sufficient evidence to assess whether their delivery is achievable in terms of ensuring that the appropriate level of infrastructure is identified, funded and implemented prior to their first occupation. In particular, the Agency would expect to see the strategic sites supported by a robust transportation strategy which encourages the use of public transport, and non car modes such as cycling and walking. The Agency has concerns that the rate of development proposed by the strategic allocations will place additional strain on the safe and efficient operation of the SRN without the appropriate mitigation measures being in place prior to their development /occupation.

Question 5.4 – Development Milestones and Phasing

- 4.7 The Agency supports the principle of an agreed phasing plan. However, given the strategic importance of the SRN in South Wiltshire, the Agency would expect to be consulted at the earliest opportunity with regards to the content of the proposed phasing plan. In line with our comments above, we would also expect any phasing plan to be accompanied by a clear funding strategy (as proposed as part of the STS).

Question 5.5 – Transport. An Insurmountable Barrier?

- 4.8 The publication of the 'Salisbury Transport Strategy: Options Assessment Report' in January 2010 has provided the Agency with an essential component of the

required transportation evidence base, albeit at a late stage in the plan preparation process. Having reviewed this document, along with other supporting publications provided at the same time, the Agency is still working towards assessing whether the modelling appraisal undertaken by WC robustly assesses the impact of the core strategy on the SRN. The Agency has requested additional information from WC on various technical matters to which responses are outstanding. We will continue to work with Wiltshire on these technical matters which may, in due course, result in an update to our representations to the Examination.

- 4.9 Of particular concern for the Agency, is that regardless of the acceptability of the modelling approach, WC has proposed two transportation strategy options to support the core strategy, neither of which, at this stage, mitigates the core strategy's impact on the SRN. In our view, the transportation strategy is insufficient as it currently stands and does not fulfil the policy requirements of Circular 02/2007. Therefore, the Agency would seek to work with WC in ensuring that the transportation strategy meets the policy requirements and until this point, we wish to reserve our position on the ability of the SRN to accommodate planned growth.
- 4.10 WC provided the following table of information demonstrating (2nd February 2010, by email, Martin Aldam to Jacqui Ashman) that journey times on the SRN for the three future year scenarios reported show increases in journey time between 20% and 37% in the AM peak hour and between 7% and 78% in the PM peak hour compared to present conditions.

Time Period and Direction	Time (seconds) from Petersfinger to The Kingsway via A36				Change from Base Year (2008)		
	Base (2008)	Do Nothing	Established	Radical	Do Nothing	Established	Radical
AM westbound	791	1006	991	950	27%	25%	20%
AM eastbound	840	1145	1149	1068	36%	37%	27%
PM westbound	767	1362	1373	1343	78%	79%	75%
PM eastbound	796	975	951	851	22%	19%	7%

- 4.11 This clearly demonstrates that upon implementation of the Core Strategy and under the two transport strategies proposed (Established and Radical) the operation of the SRN is significantly worsened under either solution proposed.
- 4.12 Having received documentation from WC late in the plan process we have not been provided with sufficient time to agree matters with Wiltshire, therefore there remains considerable uncertainty regarding the impact that the strategic sites will have on the SRN, the appropriateness or otherwise of the transportation strategy to support the level of growth expected and the phasing and implementation plan to be adopted.
- 4.13 With reference to the Imery's strategic employment site, it is the Agency' view that the site as allocated has considerable constraints in terms of highway safety issues and that the solution would be too costly for a site of this size and therefore likely to render it unviable. The existing access to/from the A36 is unusual in design, is substandard, and falls considerably short of design criteria as set out within the Design Manual for Roads and Bridges (DMRB). The Agency considers that the existing access in its current form could and should only be used by traffic associated with its current use. Any attempt to increase the levels of traffic without significantly improving the access would be dismissed by the Agency on the grounds of highway safety. Furthermore, the Agency has undertaken a desk top study to identify the level of improvement necessary to serve the type of development proposed at this location. This study has demonstrated that although an improved access onto the A36 is possible, the costs for providing such an access would be cost prohibitive for any developer of this site.

Question 5.6 – Transport. What, Who and When?

- 4.14 In line with our comments to the previous questions, the Agency has not yet been able to agree with WC that the modelling work undertaken in support of the plan is robust, that the two transport strategies proposed mitigate the impact of the core strategy on the SRN, and that the plan can be implemented in a manner which does not prejudice the operation of the SRN. We are concerned that the

- evidence presented to date by WC suggests that the operation of the SRN will be significantly worsened with the Core Strategy and transport strategy in place. Indeed, the evidence demonstrates that the traffic associated with the development of the plan cannot be accommodated on the already congested A36.
- 4.15 The Agency deems it important that the transport strategy seeks to ensure that the SRN, in accordance with Circular 02/2007, is left no worse off than if the development had not occurred. The Agency wishes to continue working with WC to ensure that this objective is fulfilled and that the impacts of the core strategy on the A303 and the A36 are mitigated. To this end, the Agency will look to make further comments at the Site Allocation DPD stage on the scope of transport measures required to facilitate and mitigate the planned level of growth during the plan period.
- 4.16 The Agency supports the promotion of meaningful alternatives to the private car and would expect to see such measures provided for all of the strategic sites. We support the specific wording within Appendix E which seeks to implement measures which will reduce traffic delays and disruption, and improve journey time reliability on key routes. Furthermore, we endorse the provision of a range of viable, efficient, sustainable transport alternatives to reduce reliance on the private motor vehicle. The Agency acknowledges that for the strategic sites, it is intended that a site specific Transport Assessment is expected to set out how the modal shift promoted at national and RSS level will be achieved. We would also expect the provision of a robust Travel Plan which identifies how meaningful alternatives to the private car will be provided and to secure future monitoring of modal shift. The Agency will welcome area/zone based travel plans in addition to individual travel plans to ensure that the cumulative impact of the strategic sites is fully mitigated.
- 4.17 Consistent with advice set out in the Circular 02/2007, the Agency will not fund infrastructure improvement works required as a direct result of planned growth and would therefore expect this to be provided through developer contributions or alternative funding sources as identified in the 'Potential Funding Sources' note

(dated February 2010) at nil cost to the Agency. We welcome further clarification from WC in the STS as to how they anticipate that the necessary improvement works will be funded as this is a key concern for the Agency.

Question 5.7 – Do any key strategic elements of infrastructure need to be in place before commencement of development?

- 4.18 In response to the wording of paragraph 5.31 in the Core Strategy Submission document, the Agency, based on the evidence presented by WC, is not able to endorse the statement *“the transport network, with improvements, will be able to support the levels of growth over the plan period”*. The modelling work undertaken by WC indicates a substantial worsening of delays and queues following implementation of core strategy and associated infrastructure. The Agency recognises that the Core Strategy seeks to identify the necessary highway improvements as part of the site specific allocations DPD (Appendix E). Therefore, the scope of improvements at this stage is unknown, and thus not agreed with WC. However, we are concerned that the strategy as presently defined by Wiltshire does not mitigate the impact of the core strategy on the SRN. The Agency will look to offer guidance on the scale and nature of improvements to the SRN in accordance with Circular 02/2007 and demand management measures, where such improvements and measures are required. It is government policy (Circular 02/2007) that, wherever possible, alternatives to building new roads are sought. In light of this position the Agency will wish to reserve the opportunity to make further representations at the Site Allocation DPD Stage where further analysis of the impacts on the overall SRN and its links will be available.

5. Monitoring and Implementing

- 5.1 The Agency would stress that the major development proposals outlined in the Core Strategy Submission Document will all need to be subject to a full Transport Assessment produced in accordance with Circular 02/2007 *‘Planning and the Strategic Road Network’* and the DfT *‘Guidance on Transport Assessment’*. The assessment should also include a detailed Travel Plan (in line with current DfT

Good Practice Guidelines: *Delivering Travel Plans through the Planning Process*, April 2009) which assesses the potential impact on the SRN and outlines a package of mitigation measures, to minimise these impacts. The Agency reserves the opportunity to comment on more detailed locations and site specific proposals when they come forward for determination and are accompanied by the appropriate supporting information