

SOUTH WILTSHIRE CORE STRATEGY

REPRESENTATIONS ON MAJOR CHANGES WITH OFFICER COMMENTS

18 JUNE 2010

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REPRESENTATIONS ON MAJOR CHANGES WITH OFFICER COMMENTS

REF: MAJ/ALL

11065 (CAA)

Comments:

General requirements for specific development proposals.

Officer Response:

Noted.

11074 (Nickol)

Comments:

Letter: I refer to your letter DX 116892 Trowbridge 3 dated 12th May and I have read – skimmed through – the 70 page document of changes to the plan and whilst you do not welcome comments on the whole scheme, but only on the amendments, I once again urge you to abandon the entire project which would be so damaging to Salisbury. It would no longer be the charming medieval cathedral city for which it is famous. The Plan is supported only by landowners and developers and a few professionals such as architects, solicitors, surveyors and of course builders and suppliers of concrete. As you appear to be working hand in glove with them and have little regard for the wishes of the ordinary people of Salisbury, you may not even be aware that something like 90% of them are wholly against the scheme. There is no good reason for it, no call for it, save from the handful of people listed above. Their motive is rather to make money than protect this once lovely city from damage. I fear that any hope I had that the Inspector would throw it all out has gone in that in your 70 pages he is quoted as wanting consistency and that is about all he is credited with wanting. My best hope now lies in the welcome change of government and its honest finding that there is no money left, and the possibility that it will abolish the Regional Assembly, and perhaps even the Unitary Authority too. Then there would be a glimmer of democracy and an end to steamroller bullying.

Addendum: At a public meeting just before the election, Mr Jon Glen now our MP was urged to say on his travels that the authors of the

Salisbury Vision and the Core Strategy were barking mad. This was met with loud applause. Two examples of what is thought be extremely foolish are a to wipe out some 200 flourishing business in Churchfields and replace it with 1100 houses, 40% of which would be cheap high density Coronation Street houses a slum in the making? and simply by allocating a small area of employment land this does not result in large or small industry suddenly springing up. On the contrary it would lead to unemployment. Churchfields is successful, is the only major industrial complex in the district and provides essential employment. What it needs most is the Brunel bridge to take heavy trucks out of the city centre and a road to cross the A3094 on a flyover where there would be no left turn to the East into the city but would pass over the chalk downs and join the Southampton Road just beyond Petersfinger. B the plan to build 400 homes to the south of this netherhampton road on good farmland is a crime in itself but becomes criminal folly in that it blocks out the route of the essential relief road out of the industrial estate. Having regard to the time it has taken to produce the Core Strategy one cannot believe that this was a slip but looks like deliberate and very costly damage. Here the plan to add 10 hectares of employment land disregards the fact that there is no appetite for it from industrial entrepreneurs, witness the fact that there is and has been for some years vacant industrial land close to Bookers and the Harnham commercial estate. On the other hand, there appears to be an insatiable appetite for building land which would cause havoc to the roads and services, and at the same time bring about widespread unemployment because there is little or no industry here save for Churchfields and of course tourism. How much of that would survive? The whole plan reeks of political and social engineering, changing the very nature and ethos of Salisbury. Were it to come about, nobody would thank you, certainly not the unemployed, nor those caught in traffic gridlock trying to get to work at the Hospital and at Friends Provident. Whether Mr Glen said it or not, there is no doubt at all that it is indeed barking mad to spend 3 million on the Market Square and 140,000 on Elizabeth Gardens. For God's sake, just leave them alone.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11081 (Godshill PC)

Comments:

1. Changes in Local Government Structure

In view of the structural local government changes currently being made by the Coalition Government, including the removal of compulsory force of law from Regional Spatial Strategies (see the Minister of State's letter to Council Leaders dated 27th May), does it remain compulsory for those policies which have been imposed by the South West Regional Assembly to be included in the Core Strategy? For instance, the

impression given at the Examination was that the Council was obliged to concentrate the great majority of strategic development in and around Salisbury, but did not really like this policy. Since the Minister of State's letter immediately frees both Inspectorate and planning authorities from the obligation to follow RSS rules, would Mr Yuille allow Wiltshire County – if it is willing - to re-think unpopular targets, locations etc?

2. Absence of a Transport Strategy

Godshill PC can find no changes which address its main concern - the effects of traffic to and from the Core Strategy's major proposal sites. It is surely illogical to install strategic developments in advance of accurate knowledge of the amount of extra traffic expected, without ensuring that a maximum number of lorry trips would be specified per site and without adequate plans for coping with the increase. The Transport Model for Salisbury falls short of providing satisfactory proof of the "insurmountability" of the problems to be expected, especially on roads serving the wider area. Such concerns would hopefully be dealt with in the Transport Strategy, which is now 6 months overdue. To be described as "sound" in the absence of this Strategy the Core Strategy needs to address these problems itself, which it fails to do. Like other North West Forest parishes, the Council has also been disappointed at the lack of robust support for the National Park from the NFNPA.

Officer Response:

The Council is aware that the Inspector has sought the further views of all representors with regard to the status of the RSS. Otherwise we do not feel that this representation is adding any new material to that rehearsed at EIP.

11105 (SCfBT)

Comments:

The new Government has announced that it will remove the framework provided by the Regional Spatial Strategies and allow Local Councils to make their own decisions on housing supply. Concerns have been expressed about the level of development being imposed on Salisbury in representations made on the Core Strategy and at the Examination in Public. We would support a review of the levels of new housing to be built in South Wiltshire in this Core Strategy period, especially given the current absence of a definitive Transport Strategy which clearly demonstrates that the levels of development proposed can be accommodated without unacceptable environmental impacts.

Officer Response:

The Council is aware that the Inspector has sought the further views of all representors with regard to the status of the RSS.

11113 (Indigo)

Comments:

Whilst we appreciate that a number of potential changes to the Core Strategy were discussed at the EIP, the Inspector has yet to publish his binding report regarding the soundness of the Submission Core Strategy. We understand that the Inspector's Report is anticipated to be published in late June or early July 2010. It is premature and confusing to publish possible major changes ahead of the Inspector's Report. There is absolutely no reason why the possible major changes could not have been delayed until the Inspector's Report was available.

Officer Response:

Disagree. The Council feel this is the appropriate stage to advertise such potential changes, as directed by the Inspector.

REF: MAJ/01

11077 (Richardson)

Comments:

This change might cynically be viewed as the result of special pleading by would-be developers during the Inspector's hearing sessions. For example, the amplified statement on Matter 2 – the distribution of development, dated 1 February 2010 by Bernard Cole and Partner who are representing a client wishing to develop 14 houses at 6 Firs Road, Firsdown (2010/0152). The point we wish to make is as follows: If a review of sustainability of small settlements is to be undertaken, the criteria for assessment should be transparent, otherwise they may be susceptible to contamination by vested interests. Transparency would be ensured by publishing these criteria for comment by the communities under consideration before the assessment commences.

Officer Response:

The change is proposed in light of previous consultation responses and the resolution of Full Council to review the status of Housing Policy Boundaries, Housing Restraint Areas and Special restraint Areas at the earliest opportunity. The review process and criteria will be transparent and involve full public consultation.

11078 (DPDS)

Comments:

My client, Blanefield Property Co, expresses support for possible major change MAJ/01, which proposes a county-wide review of the sustainability of the smallest settlements. Blanefield hopes that the exercise will allow the improving sustainability of Ford with development of the local centre at Old Sarum, to be recognised. The possible change states that relevant adopted SBLP 2011 policies would be retained in the interim and saved policy H23, controlling development outside Housing Policy Boundaries, excludes land in such locations identified for development in SBLP 2011. Blanefield seeks clarification that this exclusion will apply to areas identified for development in the Core Strategy when adopted, including any potential areas for development associated with Core Policy 9.

Officer Response:

Support noted. Confirm that exclusion to Saved Policy H23 will apply to areas identified for development in the Core Strategy when adopted,

including any potential areas for development associated with Core Policy 9.

11123 (Weaver)

Comments:

I need to make several points which relate to MAJ/01...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/02

11066 (Arundale)

Comments:

Houses: Your own evidence give the Salisbury housing needs assessment as 3968 houses. You persist with the excessively high figure of 7480 houses in spite of much contrary evidence presented at the EIS

Type and scale of employment: Allocating “employment land” is not the same as defining what people will do to earn a living. I am disappointed that nothing at all has been added for this crucial issue. Your additional information to the Inspector showed a reliance upon generalised factors (Cambridge Econometrics etc) rather than Salisbury/S Wilts realities.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11124 (Weaver)

Comments:

I need to make several points which relate to...MAJ/02...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/03

11067 (Arundale)

Comments:

Transportation: There are insurmountable barriers unless very major changes are made to the road network around Salisbury and throughout South Wiltshire (and elsewhere in SW England). The Atkins Report is a superficial review with the wrong terms of reference. Their Options, whether conservative or radical, only address the current congested Salisbury traffic situation. They simple do not relate to the SWCS situation when tens of thousands of people and associated movements are added to the existing network.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11070 (Highways Agency)

Comments:

Further consultation on the refinement of the Transport Strategy will be undertaken in partnership with the Highways Agency. Ultimately the Transport Strategy will need to support the proposed growth identified through the Strategic Growth Sites. It is accepted in developing the Salisbury Transport Strategy a refinement of the radical option along with other site specific mitigation measures will be the optimum solution to enable Salisbury to meet the challenges of addressing future growth of travel demand in a sustainable way.

Officer Response:

Noted.

11071 (McGarry for Harnham Neighbourhood Association)

Comments:

Your wording seeks to perpetuate the myth that the existing transport model demonstrates that there are no insuperable barriers to delivery of the Core Strategy. It does no such thing. For example, the proposed template for the Imerys Quarry site MAJ/20 (page 66 of your schedule)

contains a restriction at the instigation of the Highways Agency that development will only be permitted if it can be demonstrated that operation and highway safety of the adjacent road is not compromised, OR that a package of suitable mitigation measures is identified and implemented prior to operation of this site. It is clear from this that the Highways Agency are not satisfied that the existing transport model provides sufficient evidence that this aspect of the Core Strategy is deliverable. We have sought through our revised text to extend a similar safeguard to **all** Strategic Sites.

Suggested new wording: With respect to Salisbury, the Council has constructed a transport model, which has been used to assess the implications of the Core Strategy on the transport network. Although future growth will have an impact on the highway network, based on limited work so far the Council believes that, with a commitment to demand management interventions, there will be no insuperable barriers to delivery of the Core Strategy. The Council is currently producing a Salisbury Transport Strategy that will assess in detail the impacts of the additional transport demand throughout the network, and will define a set of transport initiatives to address those impacts. Development of a Strategic Site will be permitted only if it can be demonstrated that the operation and highway safety of roads around and leading to the site are not compromised OR through the completion of a Transport Assessment and Travel Plan a package of suitable mitigation measures is identified and implemented prior to operation of the site.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11079 (Gillham)

Comments:

During the EiP the Transport Strategy transport matters were presented in a late-appearing report, which now appears to be regarded as a Transport Strategy, purportedly published in 2009. This report clearly was not a transport strategy and if one has been published since the EiP I have not been made aware of it.

In the EiP transport papers and subsequent attempts at clarification, it was manifest that there was a profound disconnect between several of its transport assertions, between them and previous assurances given (such as central parking removal on provision of Park and Ride) and between them and reality and even elementary arithmetic. Nothing in these modifications suggests that any attempt has been made to make the transport policy add up. The burden of the changes, moreover, seems to be aimed at so emptying the policy of meaningful content that it can be used to

mean all things or nothing according to whatever Humpty Dumpty wants to do with it. Much of the motive can be inferred from what has been changed.

For example:

Initial modelling work, involving partnership work with the Highways Agency has concluded that the transport network, with improvements, will be able to support the levels of growth over the plan period. Also, there are unlikely to be significant new road building requirements in order to enable strategic site allocations to be developed. has been deleted. This original paragraph clearly relates to Question 5.5 of the EiP Inspector, effectively What is the evidence to support the statement that there are no insurmountable barriers to delivery of strategy because the transport network can support the planned growth without new road building? Nothing put in its place suggests an answer to this question (and no sensible answer was given at the EiP), except ominously:

Measures to treat additional pressures on the ring road

There can be only two interpretations of this deletion. Firstly that the network will not be able to support the levels of growth over the plan period. Or, secondly, that WC anticipates further road building.

The Sustainability Appraisal of the changes explains that the change to Maj/03 provides:

Positive supporting text, which will have obvious long-term cumulative positive benefit for accessibility for all, sustainable transport and road safety. In addition indirect benefits are accrued for all aspects of the local economy and the integrity of the buildings on which Salisbury's distinctive character is based.

Let us examine this supporting text.

Optimisation of benefits from the five Park and Ride sites. Since at the EiP it was apparent that the only benefit of the Park and Ride would be the provision of additional access, but at the cost of worsening traffic in the centre (see below) it is not clear what optimisation can mean. The only way that P&R can provide an environmental benefit to Salisbury is by removing more (more because single turnover occupation by commuter trips is replaced by multiple turnover) car parking from the centre than is provided at the periphery. Since WC made it clear at the EiP that it did not intend to honour its original commitment to remove any central car parking, 'optimisation' can have no environmental

meaning. It is very hard to see how a city centre increasingly choked with traffic will gain any economic benefit either, since it would lose all the up-market commercial value of an attractive environment.

Measures to treat additional pressures on the ring road. It is not clear that this can mean anything except increasing capacity of pinch points, thus reducing the resistance of Salisbury to through traffic and increasing the overall levels of traffic through the town with concomitant pollution and nuisance consequences. The sensible way to treat pressures on the ring road is to introduce more traffic resistance along the A36 corridor (in particular), for example by general lowering of speed limits.

Improvements to the coverage and linkages of the cycle and footpath network.

This would be welcome, though such measures should not blind us to the fact that the biggest encouragement of healthy modes of transport would be to make the existing road network much more friendly – i.e. much safer and much less intimidating. A city-wide 20mph limit would help and a stated inversion of the unwritten status quo of road priorities. Declaring a precedence for the streets of Salisbury to be pedestrians before cyclists, before buses and taxis, before private cars, would go a significant way towards the concept of a street-sharing, civilised city.

Support for Network Rail's long-term plans to increase the capacity of the railway between Salisbury and Exeter. This would be very welcome if it amounts to more than pious wishing. Wiltshire has not so far shown much real inclination to support rail improvements – just consider how much support for additional services could have been bought for the £7M odd that Wiltshire has thrown away on roadscheme development over the last 4 years!

Wiltshire remains obsessed with increasing use of the A303, especially in its encouragement of major traffic generation developments at Amesbury and Stonehenge. It persists in this futile pursuit, even though it must know by now that there is no chance of further dualling of this road for decades, indeed before the end of the Oil Age. The rail alternative to the SW corridor¹, however, is in desperate need of improvement and this is where WC should now channel its strategic transport ambitions. Material support for the Trans-Wilts service improvements between Chippenham and Salisbury would also indicate a waking up to the real transport needs of the County.

Review of the parking strategy. It is not clear what is meant by this. Is parking strategy to be reviewed in the light of the fact that no coherent strategy was forthcoming at the EiP? The wording that follows suggests that nothing has actually changed since the 'Options Assessment' presented to the EiP, which appeared nonsensically to believe that you can increase trip-ends in the city centre and reduce traffic. This supplementary strategy document appears not to have reflected on this arithmetic absurdity at all.

Despite the fact that the 'radical' approach is nothing of the sort and clearly does not achieve what is claimed for it anyway, WC are still apparently torn between this useless strategy and one (the 'established' approach) that is even worse (or more properly unachievable since it implies laying waste even more of the city centre to car parking). Despite the fact that at EiP it was favouring the 'radical' approach it still claims to have two 'deliverable and affordable options'.

This is no transport strategy at all, but a carte blanche for doing whatever the Council happens to feel like doing in the future.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11082 (Godshill PC)

Comments:

1. Strategic Objective 8, 7th bullet point, of the draft Core Strategy states: "Strategic growth in Wiltshire will have been supported through the timely implementation of sustainable transport requirements and effective mitigation of their traffic impacts." MAJ/03 states that the Transport Strategy will be available in December 2009. As this is in fact still not available, how can the public be assured that the above-mentioned sustainable transport requirements will be in place?
2. It is disturbing to note the deletion of the sentence: "Also, there are unlikely to be significant new road building requirements in order to enable strategic site allocations to be developed". While this sentence did not actually make a policy of no new roads, it did at least spell out that they were not expected to be necessary. As Strategic Objective 8 points out, "Ultimately, the transport strategy will need to support the proposed growth". The sentence should therefore be reinstated but amended to read: "No significant new road building will be required to serve the strategic site allocations", or "No strategic sites will be allowed which may require significant new road building".
3. The consensus of opinion at the Examination, apparently noted by the Inspector, was that only the radical approach would be able to offer Salisbury transport sustainability. Therefore the sentence, "Both approaches illustrate realistic options between which the eventual strategy will sit" is in contradiction of the hearing consensus and should be replaced with "The radical approach offers the greater possibility of a sustainable future and therefore no strategic development will be allowed which cannot conform with the radical approach."

4. In the continued absence of a Transport Strategy, the Core Strategy needs to be more specific on the matter of freight transport – particularly that which is destined for Southampton /Portsmouth docks, London and other eastern areas. The Council says it is currently working on a detailed Salisbury Transport Strategy. This is not enough, as the Core Strategy covers the whole of South Wiltshire.

5. Salisbury has a railway and several stations, as was pointed out at the Examination, and it is disappointing to see that the Major Changes do not include any policy of investment in rail transport to remove much heavy lorry traffic – quite apart from passenger transport – from South Wiltshire and neighbouring authorities' roads.

Godshill PC therefore objects to these changes, requests amendment of the date and scope of the Transport Strategy, and the addition of a rail strategy.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11085 (Robeson)

Comments:

Support is given to the adoption of the radical approach which is, as the text highlights, a realistic approach.

Support is also given to the Strategic Objectives identified, particularly the “*measures to treat additional pressures on the ring road*” and “*Improvements to the coverage and linkages of the cycle and footpath network*”.

Officer Response:

Noted.

11094 (New Forest NPA)

Comments:

The first paragraph refers to the fact that the Council is producing a detailed Salisbury Transport Strategy and that the Strategy will be published “...in December 2009.” Obviously, as this date has now passed, it would seem pertinent in light of all the other changes that are proposed, that the opportunity is taken to quote the date when the Strategy is either likely to be published, or an actual publication date if the document is now complete.

Officer Response:

Noted.

11096 (SCfBT)

Comments:

It is unclear why the statement that “*The [Transport] Strategy will be published in December 2009*” has been retained in the changed paragraph, since the Transport Strategy was **not** published in December 2009 (and as far as we know has not been published at the time of writing, June 2010). This sentence should be deleted.

1. We are concerned that the statement that “*there are unlikely to be significant new road building requirements in order to enable strategic sites to be developed*” has been deleted. The environmental consequences of major infrastructure such as new roads would need to be evaluated as part of the Sustainability Appraisal and the Habitats Regulations Assessment. This statement should therefore be re-instated and indeed made stronger – ‘there are unlikely to be’ should be replaced by ‘there will be no’.
2. The addition of a commitment to improve cycle and walking networks is to be welcome. It is suggested that the reference to ‘cycle and footpath’ network be changed to refer to ‘cycle and walking’ network since a walking network covers infrastructure including crossings, dropped kerbs, traffic calmed areas etc which is somewhat broader than what is implied by the term ‘footpath network’.
3. We welcome the addition of support for plans to increase the capacity of the network between Salisbury and Exeter. There should be reference for the potential in the plan period for further rail improvements – Salisbury Campaign for Better Transport have already made reference to the potential for new stations (e.g. Wilton/Porton) in earlier representations, and to the need to support the growth of Amesbury, especially in the absence of A303 dualling, by considering the re-instatement of a rail or light rail link from Salisbury. The Core Strategy should refer to rail improvements which are currently being proposed, for example:

- improvements to the Salisbury-Chippenham service (either directly or via better connections Westbury-Chippenham or Westbury-Swindon) – see Great Western Route Utilisation Strategy, Network Rail, March 2010 [GWRUS], para 6.9.10.5
 - potential to electrify the Basingstoke and Exeter line, being considered for the period beyond 2019 [GWRUS, 9.8]
4. Reference should also be made to the potential for freight to be moved by rail, noting that Network Rail’s current position is that “*Consideration is being given to gauge enhancement over the section between Salisbury, Westbury and Melksham, for Southampton – West Coast Main Line traffic as a diversionary route in addition to the Eastleigh and Laverstock (east of Salisbury) alternative to the South Western main line route through Winchester.*” (Route Plan K, West of England, Network Rail, March 2010).
5. The conclusions in respect of the adoption of a transport strategy do **not** accurately represent the discussions at the EiP. In respect of the “established” and “radical” approaches it is concluded on page 6 that “*Both approaches illustrate realistic options between which the eventual strategy will sit*”. Taken together with the sentence in the following paragraph that “*Ultimately the transport strategy will need to support the proposed growth*” this seems to give carte blanche for almost any transport strategy to be adopted.
- Discussions at the EiP brought forward the following points:
- The “radical” approach put forward in Atkins’ Option Appraisal in fact represents current mainstream thinking on transport matters, it does not even touch on truly radical solutions like road user charging, work place parking levies etc
 - Only a radical approach would allow Salisbury to develop in a sustainable manner

Given the environmental constraints around Salisbury and the urgent imperative to reduce car use and CO2 emissions, the conclusion should not be that ‘the transport strategy will need to support the proposed growth’ but that “growth may need to be curtailed **unless** a radical transport strategy can be adopted which will allow growth in travel demand to be met in a sustainable manner”.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11111 (Pheby)

Comments:

Wiltshire Council, as part of their package of amendments, have produced a revised section pertaining to transport. Allegedly, this is an amendment to Para 5.31(e) - Highways, on Page 56 of the Development Plan Document. In fact, the amendment is to Para 6.31(f) – Highways,

on Page 42 of the DPD. The effect of the change is to delete the passage:-

“Initial modelling work, involving partnership work with the Highways Agency has concluded that the transport network, with improvements, will be able to support the levels of growth over the plan period. Also, there are unlikely to be significant new road building requirements in order to enable strategic site allocations to be developed.”

and replace it with:-

“These transport initiatives will complement the key strategic outcomes sought in Strategic Objective 8 in Chapter 4, which include:

Optimisation of benefits from the five Park and Ride sites

Measures to treat additional pressures on the ring road

Improvements to the coverage and linkages of the cycle and footpath network.

Support for Network Rail's long term plans to increase the capacity of the railway between Salisbury and Exeter

Review of the parking strategy to seek a balance between providing adequate spaces for visitors and shoppers, while realising major regeneration schemes, which may mean a loss of spaces at the Maltings/Central Car Park and the Market Place.

The careful planning of the major growth sites around Salisbury based on the mixed-use strategy, to provide jobs, services and shops that are locally accessible via a range of means including walking, cycling and bus.

The exploration of access linkages between major new strategic sites to maximise benefits of community infrastructure and new job opportunities

As part of the work to develop the Transport Strategy, an ‘Options Assessment Report’ has been prepared. This report sets out a range of deliverable and affordable options and their consequential outcomes.

In broad terms, the report looks at the difference between two approaches; an “established” approach, which is a continuation of the existing strategy, and a “radical” approach, which is more in line with current practice of demand management interventions. Both approaches illustrate realistic options between which the eventual strategy will sit.

Further consultation on the refinement of the transport strategy will be undertaken. Ultimately, the transport strategy will need to support the proposed growth and the 'Options Assessment Report' concludes that a strategy based on the radical option would best enable Salisbury to meet the challenges of addressing future growth in travel demand in a sustainable manner."

The "transport initiatives" to which the first line of this new passage refers are those which will ultimately be outlined in the detailed Salisbury Transport Strategy, which, Wiltshire Council states in its current set of amendments to the DPD:-

"... will define a set of transport initiatives that will address the impacts of the additional transport demand. The strategy will be published in December 2009."

It is curious that the intention to publish the Transport Strategy in December 2009 remains unaltered in the amended DPD, as it is now May 2010. There should be some explanation as to why the Transport Strategy has not been published, when the Council has once again expressed its confidence in the transport model which was intended to underpin it, and in respect of which it asserts:-

"With respect to Salisbury, the Council has constructed a transport model, which has been used to assess the implications of the Core Strategy on the transport network. Although future growth will have an impact on the highway network, with a commitment to demand management interventions, this Strategy can be implemented as there are no insurmountable barriers to its delivery."

In fact, my evidence at the examination in person demonstrated conclusively that the model, as evidenced by the Model Validation documents, was seriously flawed. I itemised the various problems with the model, which, in summary, were:-

- 1) *The journey time surveys adopted arbitrary routes, diluting congestion points.*
- 2) *The justification for augmenting the HGV responses was dubious.*
- 3) *I agreed with Wiltshire Council's observation that movements within the roadside interview cordon were possibly underobserved.*
- 4) *Observed and expected values for trip ends were significantly different.*

- 5) *The link length validation indicated a minimum error rate of 27%.*
- 6) *Model validation was largely confined to the A36.*
- 7) *The model failed to consider the knock-on effects on surrounding areas.*
- 8) *The impact of the errors on the model predictions should have been assessed by sensitivity analysis.*
- 9) *The model predictions to 2026 should have been given as a range, determined by calculating 95% confidence intervals for the input variables, to reflect uncertainty.*
- 10) *Parking. The so-called 'radical' option says that motorised traffic to the city centre in peak hours will not increase, but it is very clear from the revenue projections for parking (envisaging a nine-fold increase in revenues) that, overall, traffic will increase substantially (NB. Prices are due to rise by 50%, and short-stay parking is more expensive anyway, so probably a three to five-fold increase in traffic is indicated).*

The Council's response failed to answer most of these points, i.e. :-

- (1) to (5): Not answered at all.
- (6) Accepted.
- (7) Not answered at all.
- (8) "Sensitivity tests will be undertaken as part of the transport strategy finalisation process." Since the whole point of this would be to assess the impact of the errors in the model on the predictions, it is not adequate to leave this to the final stages, after finalisation of the Core Strategy which depends very much on these predictions.
- (9) Not answered.

- 10) The parking question is referred to very briefly, but the statement “... the percentage increase in car park trips being relatively minor in contrast to the overall number of movements” is not consistent with the projected nine-fold increase in parking revenues, nor with the predicted changes in emissions.

I concluded:-

“The main thrust of Wiltshire Council’s response is that the model has been constructed according to an appropriate methodology. That is not in dispute. What is a matter of concern is the number of data errors and apparent distortions that have crept in, which must impact on the model outputs, the inadequacy of the validation, and the lack of sensitivity analysis. As a result, some of the assertions, re parking for example, or peak time flows at certain key locations, appear contradictory or frankly bizarre.

It is a pity that the transport model was not subject at a much earlier stage to the sort of critical review that we have only now been able to give to it. We still do not have a transport strategy, we have an option appraisal based on rather flimsy foundations, and a preferred option in which the figures, for example on parking, simply do not stack up. The whole thing needs revisiting, and quickly, as at the moment it is far too hazardous to make far-reaching strategic decisions on such a flimsy basis.”

The preparation of a series of amendments to the DPD gave the Council another opportunity to address these problems, but they have not done so, and so they remain unresolved. The Council’s new text confirms that “Further consultation on the refinement of the transport strategy will be undertaken.” What Wiltshire Council is envisaging now is a strategy somewhere between their so-called “established” and “radical” approaches, both of which are described as “realistic options”. However, at the Examination in Public, Wiltshire Council conceded that the “established” option was unsustainable, and that only the “radical” option (which is not in fact particularly radical) had any chance of delivering the sustainable transport infrastructure that the Core Strategy requires. The sustainability of the radical option, though, is also in considerable doubt, as its claim to feasibility derives from the transport model which is seriously flawed, and some of the outcome predictions of which, for example with respect to parking volumes and revenues, simply do not add up.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11119 (Savills)

Comments:

No fundamental concern with the proposed wording, but the following observations are made:

- Amend existing text from Strategy will be published in December 2009, to Strategy **was** published in December 2009.

Additional text be added to reference that '**all residential developments within Salisbury will be expected to contribute towards a future adopted strategy**' Reason, to emphasise the agreed position at the EiP, that it will not just be the Strategic Allocations that will be expected to fund any future levy/tariff.

Officer Response:

No objections to suggested amendments.

REF: MAJ/04

11068 (Arundale)

Comments:

Retail Centres: There is no objective evidence of need for more retail outlets in Salisbury. The locality is adequately served already with shops and offices although the access arrangements (transport, traffic) require intelligent improvement. The “market” for retail is local consumption plus tourism; expansion (with employment opportunities) can only follow if customer demand is established. The priority is to create gainful employment for Salisbury's present population and for the inhabitants of new housing.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11086 (Robeson)

Comments:

Firstly, the generalised statement that Salisbury City Centre is “*vulnerable to possible edge of or out of centre retail and leisure development*” is unjustified.

Salisbury City Centre is trading well. Existing retailing is strong and comprises an appropriate offer (albeit with certain specific deficiencies) for a sub regional centre and offers a largely different shopping experience from Southampton or Castlepoint.

Given that all the retail needs in the area over the plan period cannot be met in the City Centre alone, the Core Strategy should not preclude the development of other retail proposals which cause no ‘significant harmful impact’ on the City centre (the test in PPS4). Restricting retail development elsewhere in the District will neither serve to promote Salisbury as a retail and tourism destination nor properly meet the needs of its residents.

This sentence should therefore be deleted.

Secondly, it is ineffective to promote a strategy which seeks *“Rather than looking for opportunities for new retailing, which is likely to be limited, the challenge is to protect the centres that already exist”*

This strategy is contrary to the Government principle of sustainable communities. The needs of Salisbury’s residents must be properly and effectively met in order to prevent the leakage of trade to surrounding centres. Given the extent of retail needs in the area new retailing will be essential. New retailing and the growth of existing centres must be promoted alongside each other.

We therefore propose that the final sentence of the second paragraph:

~~*“Rather than looking for opportunities for new retailing, which is likely to be limited, the challenge is to protect the centres that already exist”.*~~

Should be replaced with:

“The challenge is to promote the centres that already exist, those proposed and to ensure the needs of the area are met”

Thirdly, it is ineffective and unjustified to require *“all application outside or on the edge of Salisbury City... include retail or leisure floor space of over 200 sq m should be accompanied by an impact assessment”*.

Policy EC1.1 (b) of PPS4 advises that the volume and detail of the evidence should be proportionate to the importance of the issue. 200m² gross is the size of a small corner shop and therefore seems disproportionate.

The Council clarified at the Examination that the need for such a low threshold was to ensure cumulative development is assessed. However the need to assess the impacts of cumulative development is robustly covered in PPS4 Policy EC17.1.b.

Perhaps somewhere between 1,000m² (gross) and 1,500m² (gross) would ensure that a modest retail warehouse or discounter would be caught within the net.

Setting the limit too low would result in over regulation. Evidently this test only applies for sites which have already passed the sequential test and are outside the town centre as sites failing the sequential test will be refused planning permission. These proceeding tests will largely prevent inappropriate developments and direct developments for example mini warehouses to appropriate locations e.g. Southampton Road,

London Road or the town centre. Only developments which have passed the sequential approach which have an appropriate role will be subject to the impact assessment.

We therefore propose that the following amendments are made:

“all application outside or on the edge of Salisbury City... include retail or leisure floor space of over ~~200~~ 999 sq m should be accompanied by an impact assessment”. Disagree – Salisbury has experienced a large amount of pressure recently for out of centre retail development that would impact negatively on the city centre.

Officer Response:

Disagree. Retail need can be accommodate on the Maltings and Central Car Park site. As discussed at examination, the Core Strategy does not preclude the development of other retail proposals which cause no significant harmful impact on the City Centre, so long as any proposal can meet the requirements of PPS4.

Policy EC1.1 (b) of PPS4: Disagree, this refers to the other Local Centres of Wilton, Tisbury, Downton and Mere and the evidence shows this challenge to be the case.

Otherwise, do not believe that this is adding any new material to that rehearsed at EIP.

11114 (Indigo)

Comments:

Our previous representations supported the continued allocation of the Salisbury Retail Park (SRP) site at London Road for retail development, and confirmed that the allocation of the Maltings/Central Car Park (MCCP) within the Core Strategy should not preclude development of SRP. These representations were submitted on the basis that both sites are required to meet significant retail need in Salisbury identified in the Salisbury Retail and Leisure Needs Study (SRLNS), and that in order that retail development can be adequately planned, it is necessary to identify sufficient sites in the Core Strategy, to meet the identified need. The credentials of SRP for retail development have been examined by an Inspector and it was concluded that the site is an appropriate retail site.

Against this background, we make the following representations.

We are aware that the Council are seeking to insert a new paragraph after Core Policy 5 in order to protect retail centres against possible edge-of-centre or outof-centre retail and leisure development and that consequently all applications outside or on the edge of Salisbury City, Amesbury, Wilton, Tisbury, Mere and Downton that include retail or leisure floorspace of over 200m² should be accompanied by an impact assessment. This issue was discussed at the EiP and advice will be given in the Inspector's Report. It is premature to make a recommendation on this matter ahead of seeing the Inspector's view.

This proposed requirement is unnecessary, given that Policy EC14.4 of PPS4 identifies that an impact assessment is only required for retail developments over 2,500m² (gross). As we stated at the EiP, Policy EC14.7 confirms that the level of detail and type of evidence and analysis required in assessing impact should be proportionate to the nature of the proposal and its likely impact.

Whilst Policy EC14.4 identifies that local floorspace thresholds can be applied in accordance with Policy EC3.1.d, the rationale and reasoning behind the proposed 200m² threshold has not been provided, and there is no indication whether the threshold is a gross or net figure.

However, if an additional paragraph is inserted, it should acknowledge our saved allocation/existing consent for retail warehousing and position in the retail hierarchy as the preferred location for out-of-centre retail development. The Inspector concluded the impact on Salisbury City Centre would be too great for a non-bulky scheme: '...the development should be allowed subject to a bulky goods condition and one controlling the minimum size of units'. As discussed at EIP the Salisbury Retail Park site has an up to date planning permission (for bulky goods) and has had the benefit of planning permission since 1998 (reserved matters). The merits of the scheme are discussed in the council's response to Matter 10.4.

The non-delivery of the site over a period of twelve years leads the council to consider the site is not deliverable. Salisbury Retail Park is further discussed in Topic Paper 8, paragraphs 1.56 and 1.57.

Officer Response:

The rationale is provided in the Council's response to Matter 10.5. The Council's position of Salisbury Retail Park is discussed in Topic Paper 8 paragraph 1.48 to 1.57.

REF: MAJ/06

11088 (O'Rourke)

Comments:

We welcome the proposed amendments as they reflect the discussions at the Examination in Public.

Officer Response:

Noted.

11106 (Pegasus)

Comments:

My clients welcome the proposed change to Para 12.2, in particular the revisions to the final paragraph which incorporates some flexibility to enable potential impacts on the SAC to be mitigated on or near site or through contributions to the Mitigation Strategy. Any such contributions need to be fair, reasonable and proportionate, having regard to overall viability and other infrastructure requirements.

Officer Response:

Noted.

11116 (Pro Vision)

Comments:

The proposed strategic development site at Netherhampton Road, Harnham is downstream of the urban area of Salisbury and most of the watercourse where problems have arisen. The proposed development at Netherhampton Road is unlikely to have an adverse impact on the drainage network. As such a contribution towards the management and mitigation of phosphate levels is considered unreasonable in this location. Hence, Bemerton farms object to the possible financial contribution – MAJ/06 and MAJ/07 towards the management and mitigation of phosphate levels in the River Avon SAC and their threat to protected species.

Officer Response:

Disagree. The fact that the Netherhampton Road site is downstream of the urban area and where existing problems have arisen is irrelevant to its potential for impact on the River Avon SAC. There is no evidence that the proposed development is 'unlikely to have an adverse impact on the drainage network'.

REF: MAJ/07

11089 (O'Rourke)

Comments:

We welcome the proposed amendments as they reflect the discussions at the Examination in Public.

Officer Response:

Noted.

11107 (Pegasus)

Comments:

My clients welcome and support the proposed change MAJ/07.

Officer Response:

Noted.

11117 (Pro Vision)

Comments:

The proposed strategic development site at Netherhampton Road, Harnham is downstream of the urban area of Salisbury and most of the watercourse where problems have arisen. The proposed development at Netherhampton Road is unlikely to have an adverse impact on the drainage network. As such a contribution towards the management and mitigation of phosphate levels is considered unreasonable in this location. Hence, Bemerton Farms object to the possible financial contribution – MAJ/06 and MAJ/07 towards the management and mitigation of phosphate levels in the River Avon SAC and their threat to protected species.

Officer Response:

Disagree. The fact that the Netherhampton Road site is downstream of the urban area and where existing problems have arisen is irrelevant to its

potential for impact on the River Avon SAC. There is no evidence that the proposed development is ‘unlikely to have an adverse impact on the drainage network’.

11120 (Savills)

Comments:

Support is given to the changes made to Core Policy 20, which clarify the position in respect of phosphate levels. The changes are considered appropriate and do not conflict with the strategy adopted to deliver the strategic allocation at Hampton Park.

Officer Response:

Noted.

REF: MAJ/09

11108 (Pegasus)

Comments:

Persimmon & Wilton support the proposed deletion of Core Policy 21.

Officer Response:

Noted.

11080 (Gillham)

Comments:

This change disavows all responsibility for not poisoning the citizens of Salisbury - by the simple pressing of a delete key the policy disappears. The justification appears to be that technology will solve the problem with improved engines. There are at least two objections to this

Firstly it is a matter of attitude. The Council seems to take the view that all it has to do, by way of a duty of care to its citizens, is ensure that a certain statutorily required threshold should not be exceeded. This minimalist tick-box attitude shows little regard for the wellbeing of people. We know from the Environmental Audit Committee Report published this year that air pollution, and especially that from road transport is far more serious than central government has so far acknowledged.

Poor air quality probably causes more mortality and morbidity than passive smoking, road traffic accidents or obesity. Yet it receives little or no attention in the media and scant attention in Parliament and within Government.

The UK should be ashamed of its poor air quality and the harm this causes.

Local authorities have a key role in delivering improved air quality. They need better support from across central government to achieve this.

Poor air quality reduces the life expectancy of everyone in the UK by an average of seven to eight months and up to 50,000 people a year may die prematurely because of it. Transport causes the most exposure to harmful air pollutants, and air quality targets will not be met without a significant shift in transport policy. Local authorities need to do more to tackle poor air quality, and they must be given information on how to develop local air quality strategies.

Road transport contributes far more to the public's exposure to pollutants and is responsible for up to 70% of air pollution in urban areas.

Air pollution from transport is not something that is going to go away by merely biding one's time in anticipation of improved technology. It kills people, many people, and if central government makes any response at all to this devastating report, the burden on local authorities to demonstrate proper concern for their citizens' welfare will be increasing, not decreasing.

Secondly WC's abnegation of responsibility for meeting its air quality obligations is based on the predictions of a traffic model, which was

shown to be highly suspect at the EiP. The traffic model itself was not validated for use in predicting traffic in central Salisbury (it was only validated against corridor traffic). More importantly it was clear at EiP that there was a profound mismatch between the assumptions of the traffic model and what officers were saying about parking policy – one suggesting that central traffic would reduce while the other was clearly conceding that traffic would grow (claiming that the growth was alright because it was spread more throughout the day – but total traffic is total traffic and the pollution burden on the residents of Salisbury increases accordingly). This is a highly irresponsible deletion.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11083 (Godshill PC)

Comments:

1. It is true that efforts are being made by vehicle manufacturers to reduce harmful emissions, but these will never be nil and the process of reduction must take many years. Quite apart from the continued suffering of central Salisbury – despite the claimed reduction in emissions – the fragile ecology of the New Forest National Park must not be allowed to receive anything over the irreducible minimum of harmful deposits from traffic emissions
2. Wiltshire Council promises in its draft air quality strategy that it “will engage in all practicable opportunities for improving air quality through the transport planning and spatial planning processes and will ensure that air quality is considered as a material planning consideration within the development planning processes”. Core Policy 15 also promises protection for the National Park.
3. Para 12.10 states: Furthermore, the HRA has identified that their critical loads of nitrogen deposition are likely to be exceeded at the following sensitive sites
λ New Forest SAC, λ Dorset Heaths SAC, λ Fontmell and Melbury Downs SAC.

It is irresponsible to remove Core Policy 25 simply on the finding of the Salisbury Transport Model that emissions are decreasing because of technological improvements, and Godshill Parish Council therefore objects to this deletion.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11095 (New Forest NPA)

Comments:

As you are aware, the Authority did not attend any of the examination hearings and were therefore not party to the discussions surrounding the reasons for deleting Core Policy 25 Air Quality. Notwithstanding this, the Authority is particularly concerned at the proposal to delete this policy (MAJ/10) and raises an objection to the deletion for the following reason.

The Core Strategy states that the Habitats Regulations Assessment identified that critical loads of nitrogen deposition are likely to be exceeded at certain sensitive areas, including the New Forest Special Area of Conservation (paragraph 12.10) and on this basis presumably, such a policy was included in the Core Strategy. The proposed deletion of Core Policy 25 would appear to conflict with this conclusion and the Authority is particularly concerned that without such a policy sensitive areas including the New Forest SAC could potentially be exposed to air quality problems.

The Authority is concerned that the Council's justification for deleting this policy is based on the Salisbury Transport Model which shows that due to technological advances, '*emissions should decrease rather than increase*'. While this may be the case in the long-term, there has to be a policy in place which protects sensitive areas from air pollution in the short-term. The Authority therefore request that this policy remains in the Core Strategy.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11097 (SCfBT)

Comments:

We **object** to the deletion of the Core Policy and associated section re Air Pollution.

It is clearly nonsense to delete a policy which is designed to protect people and habitats from air pollution based on the suggestion that “*evidence through the Salisbury Transport Model now shows that due to technological advances emissions should decrease rather than increase*”. Such a policy should only be deleted as and when year on year evidence collected on the ground has demonstrated that the city and surrounds no longer suffer from air pollution and there is no likelihood of the problem re-occurring.

Air pollution problems in South Wiltshire are caused by traffic emissions. The latest published report (Air Quality Action Plan progress report for Wiltshire, November 2009 [AQAP 11.09]) shows that Nitrogen Dioxide emissions were above the annual mean objective and showing a rising trend in various locations in Salisbury including Exeter Street, Queen Street, Wilton Road, London Road and Minster Street. Clearly development around Salisbury is likely to lead to an increase in traffic, especially on the corridors subject to development. Some of the ideas proposed in the Atkins Options Appraisal – such as the conversion of long stay city centre parking spaces to short stay will also lead to more traffic in city centre streets which are already causing concern in respect of air quality. The latest air quality action plan also states that “*it is important to note that the proportion of diesel cars is rising which means that in the future, the average car may produce more NOx and PM10*” [AQAP 11.09 p.34].

So even if technological improvements were guaranteed to lead to decreased emissions it is still the case that volumes of traffic and congestion hotspots could lead to air quality issues. Engine technology has been improving for years already, and yet air quality problems in Salisbury city have remained and in many cases worsened. The wording which has now been deleted quite rightly made reference to the need to ensure that development proposals would not lead to any significant rise in air pollution emissions, and stated that consideration would also need to be given to the potential impact on the designated AQMA as well as the environmental quality of European designated sites.

We would point out that the current draft Air Quality Strategy for Wiltshire (January 2010) makes the commitment that “Wiltshire Council will engage in all practicable opportunities for improving air quality through the transport planning and spatial planning processes” and “will ensure that air quality is considered as a material planning consideration within the development planning processes”. **Core policy 25 and the associated wording must be retained if the Council is to keep to this commitment.**

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11109 (Pegasus)

Comments:

Persimmon & Wilton support the proposed change MAJ/10.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11112 (Pheby)**Comments:**

Excessive reliance on a flawed transport model is apparent also in Proposed Change Reference MAJ/10, in which the entire section of the Development Plan Document addressing the question of air quality (i.e. paragraphs 12.9, 12.10 and 12.11, and Core Policy 25, are deleted. The justification given for this is that: “Evidence through the Salisbury Transport Model now shows that due to technological advances emissions should decrease rather than increase.”

However, there is no certainty that model predictions will be realised over the lifetime of the Core Strategy, and, given the problems with the model, it is more than likely that they will not be. To link to this certain assumptions about the pace and nature of technological change, at a time of a great economic stringency and uncertainty, is reckless indeed. Parameters of air quality should be kept under continuous review, in order that an assessment can be made as to extent to which predicted trends conform to real outcomes.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11121 (Savills)**Comments:**

Support is given to the deletion of Core Policy 25.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

11129 (WC PPS)

Comments:

The Specialist Environmental Protection Team of Public Protection Services is responsible for monitoring air quality and discharging the council's duties under the Environment Act 1995 Part IV (Air Quality Review and Assessment). We have built up considerable expertise and data in this field of work.

The position with regard to air quality in Salisbury and likely trends are detailed in the council's annual reports to DEFRA, which can be found on the council's Air Quality web page.

These reports have been formally reviewed and approved by DEFRA in connection with the council's duties to review air quality conferred by the Environment Act 1995 Part IV and provide the authoritative and informed view of the council, as it pertains to air quality in Salisbury.

In Summary the Air Quality Management Areas for the city centre, Wilton Road and London Road are required owing to exceedances of the annual mean objective for nitrogen dioxide. In line with the requirements of this legislation the following actions are being taken

- A Detailed Assessment is being carried out for Queen Street Wilton in connection with potential exceedances of the annual mean objective for nitrogen dioxide. The assessment for Wilton will determine whether a further Air Quality Management Area is required on the A36(T) at Wilton. It will be published on the council's web site and submitted to DEFRA shortly.
- A Draft Strategy on Air Quality, which has been sponsored by our colleagues in the Transport Planning Department, is currently subject to public consultation.
- It is our intention to publish SPD on Air Quality Review and Assessment in the near future to provide further guidance to developers and assist them with the challenges raised by air quality

- The existing Air Quality Action Plan for Salisbury will be reviewed together with those for the remainder of Wiltshire (Bradford on Avon and Westbury) in order to update the measures and draw the various elements together into one cohesive document.

Core strategy 25 is regarded as being integral to a multi-disciplinary approach to achieving the air quality objectives and eventual revocation of the Air Quality Management Area Orders made under the Act.

Officer Response:

Spatial Planning Officers have no objection to either the deletion or retention of Core Policy 25.

REF: MAJ/12

11098 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11122 (Savills)

Comments:

The changes to the Development Template for Hampton Park II are noted and are considered consistent with those agreed between parties at the Examination in Public. Where there remains a disagreement between the Council and Savills/ Barratt Southern Counties over precise wording within the Template, our suggested changes are with the Inspector for consideration and are not repeated within this letter.

Officer Response:

Noted.

REF: MAJ/13

11075 (English Heritage)

Comments:

English Heritage are concerned by the Council and Pegasus Planning proposal to omit the previous commitment to contribute towards improvements to the Wilton House park and garden. Such a reasonable planning obligation appears to have been removed without justification and should, we believe, be reinstated.

Officer Response:

This suggestion was originally included to provide mitigation to potential increased recreational use of the New Forest National Park arising from the development. Further evidence has shown that this site would be outside of the parameters from where such increased pressure would be likely to arise, and the suggestion is not therefore justified.

11099 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

It is noted that the amendment MAJ/13 refers to “Salisbury Transport Model Study 2010” rather than the Salisbury Transport Model. We would suggest that in fact “Salisbury Transport Strategy 2010” [or whenever is the year of final publication] would be a better title than “Salisbury Transport Model”. Models may be used to predict traffic impacts and the effect of different interventions, but the selected interventions are (or will be) defined in the final Transport Strategy which is to be produced.

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11110 (Pegasus)

Comments:

Persimmon & Wilton welcome and support the majority of the suggested changes to the Fugglestone Red template. However, my clients remain concerned about the wording regarding Green Infrastructure provision. Whilst this matter was discussed at the EIP, my clients re-iterate their concerns below.

Persimmon and Wilton support the inclusion of the revised plan.

Persimmon and Wilton support the revised objectives for the development
Persimmon and Wilton support the revised Land Uses and Quanta of Development

Persimmon and Wilton note the changes to the Essential Infrastructure Requirements. The change relating to the Academy is supported. It is noted that the transport infrastructure requirement will be identified by the Salisbury Transport Model Study 2010, the subsequent Transport Assessment and Travel Plan for Fugglestone Red.

Persimmon and Wilton welcome the deletions from the text concerning a link to the River Avon, contributions to improvements to Wilton House historic park and garden, roosting bats and the minimisation of impacts on the New Forest protected sites.

However, strong objection is raised to the inclusion of the text ‘Other essential GI and BAP Habitat and species requirements will be determined at or prior to master planning’ and consider the wording unsound and it is not the most suitable and appropriate option. As stated at the EIP, my clients have very grave concerns over the deliverability of off-site Green Infrastructure. The viability and deliverability of the Fugglestone Red urban extension must not be undermined by unreasonable and unrealistic GI aspirations. The emerging Masterplan has been formulated with significant on-site Green Infrastructure and has scope for BAP Habitat and species enhancements on-site. The development can not be either directly or indirectly dependent on third party land. The open ended nature of the wording means that the implications for scheme viability can not be determined. The uncertainty created by the additional text will also impact on the delivery of the Sarum Academy. A preferable alternative wording is suggested as follow ‘Other on-site GI and BAP habitat and species requirements will be identified and incorporated as part of the master planning of the site’

Persimmon and Wilton object to proposed word changes regarding the River Avon SAC. The wording is inconsistent with MAJ/06 & MAJ/07. The wording should be subject to a further minor word change to ensure consistency. A suggested alternative wording is as follows ‘On or near site mitigation and/or a contribution towards an off site Mitigation Strategy to address phosphate levels in the River Avon SAC and their threat to protected species’ The proposed alternative wording is more flexible as it enables on-site or near site mitigation solutions to address phosphate pollution rather than making an off-site contribution.

Persimmon and Wilton welcome the flexibility regarding the provision of new or improved doctors and dentist surgeries.

Persimmon and Wilton note that infrastructure requirements will be negotiated and delivered on a site by site basis until the Wiltshire wide Planning Obligations DPD is prepared.

Persimmon and Wilton support the changes to the Place Shaping Requirements for Fugglestone Red.

Persimmon & Wilton object to the proposed Strategic Linkages change and further clarification is required in the text. As previously made clear to the Council and at the Examination, the Fugglestone Red scheme cannot deliver improved linkages to Wilton House Historic Park and Garden and the UKLF site if this involves third party land. Land is under option to third party interest which precludes delivery of such links. However, my clients remain happy to work with the Council to achieve improved linkages on existing footpaths, roads or Council controlled land. Such links can be identified as part of the master planning process.

Persimmon & Wilton note and support the revised text regarding the Key Delivery Milestones.

Persimmon and Wilton query whether the final paragraph concerning independent viability review should be omitted from the templates as this appears unnecessary given the revised text agreed between the Council and the developers/agents.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11073 (Theatres Trust)

Comments:

We note the proposed amendments to the text and that the ‘improved cultural area’ around the Playhouse Theatre will be deleted. As our previous queries concerned an explanation for these ‘improvements’ we now have no further comment to make. Please ensure we are consulted on any future master plan for this particular development.

Officer Response:

Noted.

11087 (Robeson)

Comments:

As discussed at the Examination we consider the wording in the template to be too prescriptive which is counter productive to the scheme’s deliverability.

It would be inappropriate to add unnecessary obstacles to the scheme’s delivery, which might provide ammunition for objectors at the application stage arguing that the development is not in accordance with the Core Strategy.

This development needs flexibility to deal with changing circumstances and to avoid the need for frequent updating of the Core Strategy, as supported by PPS12 (paragraph 4.14).

For example, the ability to deliver “*around 200 residential units*” is questionable within the first five years particularly given Harvest’s concerns about the residential element (Point 4, Page 2 of their Amplified Written Statement). Instead the policy should seek an aspiration for residential use.

As we promoted at the Examination a Master plan is an effective approach for the scheme to assist in producing a consensus as to the right strategy for the area (paragraph 5.5, PPS12) and it is a more appropriate way for the public to have an effective participation in the biggest change to Salisbury City Centre for decades, if not centuries, rather than an application which is too final.

Then the planning application becomes more certain, quick and with less risk of call in.

We therefore recommend the following changes to the proposed major change (MAJ/14):

“Land at The Maltings and Central Car Park

Site Description

A city centre site situated to the west of the city's established secondary shopping area. The southern part of the site predominantly comprises The Maltings shopping centre. To the north is the central surface level car park. To the north east is the 'Millstream' coach park. To the east of the coach park is the Boathouse bar and brasserie. To the south of the coach park are offices owned and occupied by the Probation Service and the Wiltshire PCT. To the immediate south of Avon Approach, leading to Central Car Park, is a service yard and private car park owned by Tesco's. The Playhouse Theatre, City Hall and Summerlock House (Department of Work and Pensions) are situated adjacent to The Maltings, to the south west of the site. Public Open Space runs along the eastern boundary and the city Library and Galleries are adjacent. To the extreme north of the site is an electricity substation and private car park. Several courses of the River Avon SAC flow through the site. To the west lies a railway embankment.

Objectives for the development

To ensure a viable and vibrant city centre through the development of a retail led mixed use regeneration scheme through a high quality development, which delivers an appropriate sense of place having regard to the South Wiltshire Design Guide, 'Creating Places' in a sustainable location within Salisbury city centre, in a manner which complements the existing retail provision and makes a significant strategic contribution to meeting local housing needs of south Wiltshire..

Specific issue to be addressed are:

- To provide a range of retail unit sizes including from a department store format ~~and supermarket and a mix of major shop units and to~~ smaller store units
- ~~To ensure the continued viability and vibrancy of the whole of Salisbury city centre (repetition)~~
- To provide a range of homes including affordable suitable for a city centre location
- A relocated library
- To provide a range of office space

Site constraints

- Protection of views of Salisbury Cathedral
- Protection and proximity of the River Avon SAC
- Salisbury city centre Air Quality Management Area
- Salisbury Conservation area and a number of listed buildings
- Electricity Sub-station
- Flooding
- Some fragmented land ownership
- Access, parking and servicing (including coach parking)

Land uses and quanta of development

- Potential for a total of 40,000 sq m of retail floorspace (gross external area).
- ~~A single, or a few large retail outlets providing the whole of the floor area will not be appropriate to achieve the aims of the development and will not be permitted~~
- Comparison shopping uses, comprising a range of unit sizes including a department store format and a mix of major shop units and smaller store units
- Convenience floor space replacing the net loss of such floorspace
- ~~Around 200~~ Residential dwellings of which 40% will be affordable. The breakdown will be as detailed in Core Policy 6.
- Office use
- Leisure uses (~~15% of comparison floor space~~), to improve the quality of leisure facilities
- A replacement library

- *Adequate car parking spaces using undercroft and multi-storey car parking*
- *A new park based around existing watercourses and opening linkages to the Market Square and Fisherton Street.*
- *Improved cultural area around the Playhouse and City Hall, improving legibility from the new development through the cultural area to Fisherton Street*

Essential Infrastructure Requirements

Education: Contributions towards primary and secondary.

Transportation: Any infrastructure requirement outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan. A Transport Assessment which sets out how the modal shift promoted at national and RSS level will be achieved, including improved, bus, cycle and walking routes.

Green infrastructure: Formal and informal public open space to be provided on site including a new park. Adequate land to be set aside for treatment of surface runoff. Incorporation of at least buffer strips adjacent to the river, restricting lighting near river. Construction method statement required with application. Other essential GI and BAP habitat and species requirements will be determined at or prior to master planning.

Flooding: Requirements of SFRA level 2 to be incorporated into design. No development in Flood Zone 3b.

Development should be directed to areas of lowest risk from flooding with lower flood depths and velocities.

Old landfill sites should be avoided where possible due to the risk of potential contaminants. Culverts both at the site and upstream need to be maintained. Model shows that safe access/egress will be possible via both Churchill Way West and Avon Approach during a 1 in 100 year flood event with climate change.

Heritage: Archaeological investigations should be undertaken prior to finalisation of the site design with the design responding to finds.

Drainage and Water: On site sewers provided by developers with separate systems of drainage, no spare capacity in local networks for a development of this scale. Off site surface water disposal to local land drainage systems with attenuated discharge to satisfy PPS25 is required. May require a pumped discharge and an off site link sewer to agreed point of connection, subject to engineering appraisal and network modelling to confirm the scope and extent of capacity improvements. There is a high probability of capacity improvements being necessary

associated with downstream overflows to reduce risk of pollution and maintain water quality. A contribution towards management and mitigation of phosphate levels in the River Avon SAC and their threat to protected species as well as its implementation.

PCT: Financial contribution towards new or improved doctors and dentist surgeries.

Emergency services: Contributions towards the Fire Service for new or improved fire stations in order to provide a comprehensive and flexible responses to future emergencies.

Renewable Energy: 10% renewable energy generated on or near the site as per RSS policy.

These infrastructure requirements will be negotiated and delivered on a site by site basis as part of section 106 agreements until the Wiltshire wide DPD on planning obligations to incorporate the CIL, setting out a tariff approach is adopted.

Place shaping requirements

As the site sits in a sensitive location between two river courses of the River Avon SAC any proposal will also need to meet the following requirements:

- *Softening the hard edges of the river to provide better marginal habitat for wildlife including improved cover for fish and invertebrates*
- *Meet the requirements of Policies 19 (water efficiency) and 20 (phosphate levels) of this Core Strategy*
- *Be designed and provide for flood defences and mitigation measures in accordance with the SFRA level 2 for the site.*
- *Protection of views of Salisbury Cathedral.*
- *A development that upgrades public open space including riverside walks*
- *A holistic approach to addressing the piecemeal nature of car parking, rear aspects of properties and land ownerships in a comprehensive manner.*
- *A development that is well integrated and opens up links to Fisherton Street, Market Walk and the surrounding City Centre*
- *Retention and enhancement of the 'Shopmobility' scheme.*
- *Continued provision of public toilets*
- *Massing of new development respects the scale and building forms of the historic urban fabric*

- *The development can protect and enhance both the built and natural conservation interests surrounding the site*
- *The character of the development creates a sense of place that responds to and is sympathetic to locally distinctive patterns of development*
- *Providing a high quality public realm that promotes public spaces that are attractive, safe, uncluttered and work effectively for all in society*

Strategic Linkages

Provision of a key link in the retail circuit of Salisbury, particularly between the High Street, Fisherton Street and Market Place/Castle Street.

Delivery Mechanism

This site should be the subject of partnership between public and private sector based on frontloading a master plan to be approved by the Local Planning Authority as part of the planning application process. This Master Plan will guide the private sector led delivery of the site.

Key delivery milestones, monitoring and review

~~*This site has been chosen not only because strategically, environmentally and consultatively it can make a significant contribution to meeting local needs through regeneration, but also because early discussions with land owners, agents and prospective developers have encouraged the Local Planning Authority that this site can be brought forward within the first five years.*~~

~~*In order to expedite the delivery of development within this period the Council will work closely with the developers and landowners to facilitate delivery, and will expect to see significant, tangible progress towards a planning application within 18 months of the date of adoption of the Core Strategy. This work should include master planning, community engagement and progress on the necessary assessments. If the Council is concerned that significant progress is not being made on the preparation of a planning application, or that, subsequent to the grant of planning permission, as identified through regular monitoring work, there does not appear to be a reasonable prospect of development commencing in a timely manner, a review into the delivery of the site will be instigated. The review will comprise:*~~

- ~~• *Detailed dialogue with the landowner, developer and their agents to ascertain the cause of delay.*~~

- ~~• An update of the Strategic Housing Market Availability Assessment to identify whether market demand has reduced or is being met through other sources~~
- ~~• A further independent viability study of the site to assess its delivery~~
- ~~• Using the Council's influence to try and remove any barriers identifies that stand in the way of progress, such as working with statutory consultees and the community~~
- ~~• As a last resort if the Council feels that new evidence renders the site undeliverable. A new allocation or allocations equivalent to the Strategic Allocation will be considered through the appropriate development plan process~~

~~An independent viability review of the site will be undertaken by Wiltshire Council within two years to review the standards of delivery set in view of the projected recovery from the recession of 2009. This review will not be undertaken where the developer has demonstrated commitment through delivery in the first two years of the Strategy.~~

- Within 1 year of the adoption of the Core Strategy a development partner will have been appointed.
- Within 2 years of the adoption of the Core Strategy a planning application will have been submitted for the whole scheme.
- Within 3 years of the adoption of the Core Strategy planning permission will have been granted for the whole scheme.

Failure to meet any of the above deadlines without production of compelling justification will lead to conclusion that the site is not deliverable and the site could be de-allocated in a mini-review of the Core Strategy.” Disagree with all suggested amendments. The Examination discussed whether Core Policy 7 was too prescriptive, not the development template. At examination it was discussed that maybe CP7 was too prescriptive and repeated some of the development template.

Officer Response:

The Council's statement under Matter 10.1 explains the Council's position. This area of the plan was discussed in detail at examination and agreed by all parties present.

11100 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements

outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11115 (Indigo)

Comments:

The Council has proposed a number of changes to the Development Template for MCCP and has provided specific information regarding the delivery mechanism for the MCCP and key delivery milestones.

In terms of the delivery mechanism for MCCP, it is identified that the site should be the subject of partnership between private and public sector based on frontloading a master plan to be approved by the Council as part of the planning application process.

Moreover, in terms of the delivery of the MCCP, it is set out that the LPA are “encouraged” that: the site can be brought forward within the first five years of the lifetime of the Core Strategy; that significant tangible progress will be made towards the submission of an application within 18 months of the adoption of the Core Strategy; and that if significant tangible progress has not been made in this timeframe (i.e. master planning, community engagement and progress on the necessary assessments) then a review of the deliverability of the MCCP will take place. We note

that the Council identify that it will be at this stage and as a last resort that a new allocation equivalent to a Strategic Allocation will be considered through the appropriate development plan process.

Evidence presented on behalf of The Harvest Partnership at the SRP Inquiry stated that the MCCP will be developed and opened in December 2013. The Inspector considered that development could be open in the period to 2015, which appears to be consistent with the Councils proposed major changes for the deliverability of the MCCP. We consider that it is possible that the site can be brought forward by 2015, but it is very ambitious timeframe and leaves little margin for slippage. As such, in order for significant tangible process to be made towards the submission of a planning application and the deliverability of the MCCP within the first five years of the lifetime of the Core Strategy, we consider that this work should commence now, rather than waiting until the adoption of the DPD.

Whilst we welcome the proposed review into the delivery of the site if tangible process is not made, we consider that it is necessary for the Council to identify sufficient sites to meet the significant identified need in Salisbury now, rather than wait for the findings of a review to determine whether the MCCP is deliverable. If it is found after a review in 18 months that the MCCP is not deliverable, the resultant process of determining new allocations to meet retail need through the appropriate development plan process could take a number of years to finalise and will have significant implications for retailing in Salisbury.

In order that retail development can be adequately planned and avoid this situation, we consider that it is necessary for the Council to identify sufficient sites now to meet the significant identified need in Salisbury in the short term. If the deliverability of the MCCP slips beyond 2015 or is not considered to be deliverable when a review is undertaken, there will be a requirement to provide new floorspace earlier. The most appropriate site to meet this need is SRP. The allocation of SRP was saved in 2007 as the Council's retail strategy was to have two retail development sites (SRP and the MCCP) to meet the significant need for retail floorspace. Nothing has changed in the interim to make this strategy redundant, except the appropriateness of SRP for retailing has been re-confirmed by an Inspector. The clear and pressing need in Salisbury remains. In order to meet this need, SRP must remain as an allocation as well as the MCCP.

Officer Response:

The timeframe for delivery is provided in the Salisbury Vision response to Matter 10 at examination, which confirms that work has commenced on the delivery of the Matlings /Central Car Park. Amendments to delivery milestone were discussed, agreed and amended at EIP. The MCCP site is deliverable and will be delivered. The Council have found sufficient sites to meet the retail need through the allocation of the MCCP.

No analysis has been undertaken to show that Salisbury Retail Park is the most appropriate location (outside of the MCCP) to meet Salisbury's retail needs. Since 2007 the emphasis of the planning system has shifted towards ensuring that sites proposed within plans are deliverable, a process that the council did not have to go through for the 'saving' of local plan policies process. As discussed above and at the EIP the council are concerned that Salisbury Retail Park is not deliverable as the site has not come forward since planning permission was originally granted 12 years ago. The site has planning permission and if Salisbury Retail Park is deliverable as the agent lead us to believe they should do just that – deliver the site with the planning permission they benefit from.

REF: MAJ/15

11101 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11102 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/17

11069 (Arundale)

Comments:

A3094: The fact that the Netherhampton Road is already overloaded with traffic morning and evening has been completely ignored in spite of compelling evidence presented to the EIS.

Geography: The New Town you want to build will never be integrated into Harnham. It will not be complementary because it will be an extension too far to an already long thin ribbon development (Does anybody realise the distance from Britford to In-Excess is three miles?). It will be over a mile to get to the beginning of the Town Path and two miles to the only traffic exit. No options available unless you propose to build a bridge over the Nadder river. I strongly recommend you leave the office and make a few site visits on foot.

Undue influence?: You cite various statutory bodies and appear to listen to certain favoured developers and landowners. What about the other evidence presented to the EIS by involved local inhabitants?

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11072 (McGarry for Harnham Neighbourhood Association)

Comments:

Our revised text is essentially a specific statement of the same point as it affects the Netherhampton Road site i.e. that no development be permitted to operate until a proper transport and safety assessment has been made and any necessary mitigation measures have been identified and implemented.

Suggested Rewording:

Transportation: Any infrastructure requirement outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan, which will cover the following:

- An updated Transport Model based on updated traffic counts and traffic generation impact assessment on the local network including the links to the site and the city centre.
- An assessment of the road safety, noise and pollution implications of the increased traffic volumes on the residential sections of the A3094 through Harnham.
- Implementing measures to prevent significant additional volumes of HGV traffic from using the residential sections of the A3094 through Harnham.

Development of the site will only be permitted if it can be demonstrated that the operation and safety of roads around and leading to the site are not compromised OR if a package of suitable mitigation measures is identified and implemented prior to operation of the site.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11084 (Godshill PC)

Comments:

1. This change appears to remove all limitations on new roads and infrastructure.
2. The Council admits that the increase in traffic generated by this strategic development (especially if the extension of the area of development comes to pass) will inevitably cause increased congestion, even allowing for the reconfiguration of the Harnham Gyratory and other minor improvements
3. The Netherhampton development is virtually a small town in itself. Whilst it may be practicable for smaller developments to deal with traffic issues at a later stage of planning, such a major proposal needs its own travel and transport infrastructure plan. It is surely illogical to specify its inclusion in the Core Strategy – effectively giving it outline planning permission – merely on the promise of future unspecified infrastructure which may prove to be very major indeed. This would place the New Forest National Park in even greater danger of harm from South Wiltshire-generated traffic.

Godshill PC therefore finds the underlined change to be inadequate.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11103 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

11118 (Pro Vision)

Comments:

The Local Education Authority have confirmed that no primary school is needed at this time – see attached correspondence. Hence, Bemerton Farms object to the requirement for a New Primary School to be stated in the Development Template. However, it is acknowledged that there is a need for a site to be reserved should it be needed at a later stage. NB: E-mail from LEA attached: ...the Netherhampton Road development, by

itself, would not generate the need for a new primary school. However...if any other allocations are made in this area...we would lack capacity. We therefore suggested that a precautionary approach may need to be taken and to request a 1FE primary school site.

Officer Response:

Consider that the need for a Primary School needs to be retained in order to protect the availability of a site during master planning.

REF: MAJ/18

11104 (SCfBT)

Comments:

We note that the development templates referenced have been changed as follows “Transportation: Any ~~major~~ infrastructure requirements outcomes identified by the Salisbury Transport Model or subsequent Transport Assessment and Travel Plan.”

Our original representation in September 2009 stated that we felt the Core Strategy was unsound “*because the transport infrastructure requirements have not been determined and are not available to review against alternatives and the policy framework. Also the impact of any infrastructure requirements has not been considered in the Sustainability Appraisal and the Habitats Regulations Assessment*”.

The changes which have been made do nothing to address the concerns which we raised. Indeed, they simply acknowledge that the Salisbury Transport Model (/Strategy) which is to be produced may not in fact contain all the necessary transport interventions which are required and these may not be identified until subsequent documents. We contend that the Core Strategy needs to be considered together with a complete and finalised Transport Strategy which has been the subject of full consultation with the local community and stakeholders. Until this document is available the Core Strategy, in our view, continues to be unsound.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/19

11090 (O Rourke)

Comments:

Development Template Plan

We object to the plan used at the start of the development template because it does not accurately reflect the areas developed during phase 2 of the Archers Gate development. The A345 has also been mislabelled as the A3.

We suggest that the concept master plan that we are submitted on the Core Strategy examination should be used as the basis for a revised plan instead and a copy has been included with this letter for ease of reference.

Green Infrastructure

We would be happy to support the addition of the text “other essential GI and BAP habitat and species requirements will be determined at or prior to master planning”, provided that the words “on site” are inserted after the word “essential”. As was discussed at the public examination, it is unreasonable of the Council to expect developers to acquire third party land off-site to implement GI and BAP habitats.

Drainage and Water

We object to the inclusion of text which requires our clients to make “a contribution towards a management and mitigation plan to address phosphate levels in the River Avon SAC catchment and the threat to protected species as well as its implementation”. This matter is satisfactorily addressed under Core Policy 20 and it is not necessary to repeat it in the development section. We also did not suggest or agree this wording with Wiltshire Council as the source information suggests. We therefore request that this text is deleted.

Place shaping requirements

For grammatical reasons, the ‘place shaping requirements’ section should be reworded as follows:

“In addition to the provisions of ‘Creating Places’ and saved Local Plan policies, the master plan should:

- Ensure the built form integrates well with existing natural features.
- Ensure that building design and massing respect the edge of settlement location.
- Show how the new development will integrate with earlier phases of development at Archers Gate.
- Take account of the adopted design code.
- Protect views from the designated parkland at Amesbury Abbey and water meadows.
- Limit any adverse impact to the setting of the Stonehenge World Heritage Site.
- Minimise light pollution and skyglow.
- Respond to the important archaeology beneath the site through a programme of archaeology evaluation.

The above changes remove repetition and limit the master plan requirements to land that is within the control of JS Bloor (Newbury) Ltd.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/21

11125 (Weaver)

Comments:

I need to make several points which relate to...MAJ/21...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/22

11126 (Weaver)

Comments:

I need to make several points which relate to...MAJ/22...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/23

11127 (Weaver)

Comments:

I need to make several points which relate to...MAJ/23...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MAJ/24

11128 (Weaver)

Comments:

I need to make several points which relate to...MAJ/24...the correction of hearing records and the website information. The points made during the hearing remain as stated and I expect to have a reply in due course? I understand that the representation relating to unlawful discrimination on the basis of property stands and has not been answered. The Inspector was to seek a ruling ; I have not received any progress information or notification of any outcome of this? The review of the Housing Policy Boundaries described in Cabinet Meeting Resolution has not taken place. As below, following a Data Request, I informed the Programme Officer that the records of the hearing were incomplete and inaccurate. I provided the correct information as an attachment. The information on the website remains inaccurate and incomplete undermining the effectiveness of consultation.

Officer Response:

Do not believe that this is adding any new material to that rehearsed at EIP.

REF: MIN/ALL

11091 (New Forest NPA)

Comments:

In terms of the Schedule of Minor Changes to the submitted South Wiltshire Core Strategy DPD, the New Forest National Park Authority notes that the areas of common ground as endorsed by this Authority and Wiltshire Council in the Statement of Common Ground (19 February 2010) have all been incorporated into the schedule. The Authority welcomes the intention to clearly illustrate the area of the New Forest National Park on all of the relevant South Wiltshire Core Strategy maps to avoid potential confusion over the planning responsibilities of Wiltshire Council and the National Park Authority.

Officer Response:

Noted.

REF: MIN/91

11076 (English Heritage)

Comments:

English Heritage understood the following change to paragraph 8.25a had been agreed and would therefore appear within one of the schedules:

*The primary aim of the Plan is to protect the **Outstanding Universal Value of the World Heritage Site** ~~prehistoric monuments which give the World Heritage Site its Outstanding Universal value, taking into account~~ . Other interests such as tourism, farming, nature conservation, research, education and the local community **must also be taken into account**.*

Officer Response:

Agree that this change was agreed verbally at Examination and therefore have no objection to it. This response has been conveyed to the Inspector.

REF: MIN/98

11092 (New Forest NPA)

Comments:

The Authority offers particular support to proposed change MIN/098 which states that sites for the 740 new homes to meet the needs of the Southern Wiltshire Community Area will be identified in a subsequent Site Specific Allocations DPD and that, “...*this DPD will also include the identification of a range of mitigation measures to address the potential impacts on the New Forest National Park.*”

Officer Response:

Noted.

REF: MIN/99

11093 (New Forest NPA)

Comments:

I would like to point out that there is a grammatical error on page 46 under proposed change reference MIN/099 paragraph 2, the word 'included' should read 'including'.

Officers Response:

Agree.

END