

## **Matter 2: Consistency with the Wiltshire Core Strategy**

### **Issue 4: Has the site selection process for housing allocations been soundly based?**

#### **Question 4.1: Have the site allocations been undertaken on a consistent basis having regard to the strategic objectives and policies of the WCS, the policies of the NPPF and the evidence base?**

1. My previous concern with respect to site selection in respect of 'brownfield' sites in Salisbury was made in representation 780 on the draft Wiltshire House Sites Allocation Plan (WHSAP). [WHSAP/12, App Q, p. 847]
2. I note that the Wiltshire Council's response to my representation number 780 was grouped together with 490 comments in total re the South Housing Market Area [WHSAP/11, Appendix M, Table 21.22 and paras 21.106 to 21.112]. However this response made no reference to the reasons for delay in bringing forward housing in Central Car Park and at Churchfields, specifically on the Engine Shed site.
3. I submitted further comments on the omission of the Engine Shed site when comments were being invited [WHSAP/31, response ID 16, p. 41-42]. The response was that *"the Churchfields site is allocated as a strategic site in the Wiltshire Core Strategy but the WHSAP acknowledges the complexity of bringing this site forward for mixed-use development within the Plan period (to 2026). The location of this site in proximity to the railway station and city centre are acknowledged but alternative sites for housing have had to be allocated in Salisbury in the WHSAP to meet housing needs in the absence of housing delivery at Churchfields."*
4. This does not explain why a site which is purported to already be in the ownership of Wiltshire Council cannot be made available for housing. Back in 2014 work was undertaken with a view to constructing a new Custody Suite for Wiltshire police on this site. Ultimately this was not done, with the Police citing financial constraints as the reason, so the site is still currently vacant.
5. The points which have been made in Comment Id 780 regarding the prioritisation of the development of brown field sites still stand [NPP/01, para 111], as does the policy regarding the protection of the 'best and most versatile agricultural land' [NPP/01, para 112].

6. I consider the site selection process is unsound in that insufficient reasons have been given for the prioritisation of green field over brownfield sites for development.

Words = 397

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### **Issue 4: Has the site selection process for housing allocations been soundly based?**

#### **Question 4.4: Have the cumulative transport related implications of allocated sites been fully assessed and are measures to address them sufficiently clear and deliverable?**

1. I am a resident of Salisbury, and have taken an interest in transport matters relating to Salisbury for a number of years. I am particularly keen to ensure development is based on sustainable transport solutions and my representation below is entirely about the Transport Strategy which has been presented for Salisbury.
2. My previous concerns with respect to the Salisbury Transport Strategy were made in representation 796 on the draft Wiltshire House Sites Allocation Plan (WHSAP). [WHSAP/12, App Q, p. 872]. That representation considered the draft WHSAP unsound because it was not positively prepared, justified or effective.
3. A Salisbury Transport Strategy, the 'Draft Strategy Refresh 2018' which is dated 3 July 2018 has since been prepared [WHSAP/08]. However for reasons given below I consider this refresh is also unsound.

#### Legal Compliance – failure to mention Salisbury Transport Strategy in LDS

4. The Salisbury Transport Strategy does not feature as a document in the current Local Development Scheme [LDS/01]. One could query why it does not – at one stage (e.g. Nov 2011 version of LDS) the Salisbury Transport Strategy was mentioned as a document which would be produced, and the Chippenham Transport Strategy is mentioned in the current LDS [LDS/01, para 4.5].

#### Legal Compliance – consultation not in accordance with SCI

5. The Statement of Community Involvement indicates that *"The principles in the SCI will also guide consultation on the Local Transport Plan (LTP) ..."* [SCI/01, para 1.7; see also SCI/01, para 2.29 & 2.30]
6. It is confirmed in the Local Transport Plan 3 Strategy document that the Salisbury Transport Strategy document is a part of Local Transport Plan 3 [TRAN/01A, para 1.18]. One would therefore expect consultation to be undertaken as specified in the SCI. This does not appear to be the case: a draft strategy was sent out for comments on 11/5/2018 with a request for comments to be returned by 25/5/2018. However this

consultation, and the responses received to it, are not mentioned in the draft document which has been made available. The Consultation process referred to mentions only two stakeholder workshops in Dec 2017 and Feb 2018 and a Salisbury Area Board meeting in Jan 2018, there is no mention of the further consultation in May. [see WHSAP/08, 'Consultation Process' paras 1.25 – 1.33]. The two weeks which were allowed for comment is short of the period (four or six weeks) which is set in the SCI for Local Plan documents [SCI/01, para 4.1, 4.2].

7. Arguably since the document is described as 'draft' it is not necessary for it to have followed due process as outlined in the SCI. However is it appropriate for a 'draft' document to be presented for Examination?

Unsound – not compliant with national policy

8. The 2012 version of the NPPF indicates that "*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*" [NPP/01 , para 32]. It is not apparent that the Salisbury Transport Strategy refresh has presented evidence on this point. A comparison of the scenarios modelled in this refresh, compared to the previous transport strategy, is given below.
9. Figures in the previous transport strategy [TRAN/17J] took 2008 as the 'base' year. Predicted trips in 2026 were then estimated for three different scenarios in terms of transport policies: 'do nothing', the 'Established Approach' and a 'Radical Approach'. Based on this modelling the Wiltshire Core Strategy stated that, in the Salisbury Community Area, "*transport solutions will be delivered in accordance with the evolving Salisbury Transport Strategy, and will support growth, as concluded through the Options Assessment Report, based on the radical option identified which would best enable Salisbury to meet the challenges of addressing future growth in travel demand in a sustainable manner.*" [WCO/01, para 5.112]
10. The extensive data collection undertaken in 2008 for the 2010 Options Assessment Report allowed reasonable estimates to be made in the Problems and Issues report of existing travel patterns, including overall levels of trip making, mode share etc [TRAN/17H, e.g. section 3]. Importantly it also gave indications of current junction performance [TRAN/17H, para 4.14 – 4.16 and Fig 4.6].
11. It seems that 2016 is now being taken as the 'base' year however it is not readily apparent from what has been provided how the network was performing in this base

year. Although there is information about traffic growth to 2016 (WHSAP/08, table 2-5) and junction performance taken from Traffic Master (WHSAP/08, Figure 2-4) there is rather less detail than in the 'existing travel patterns' section referred to above.

12. The current Transport Strategy tests only two scenarios, both for the 2026 forecast year. There is a 'Without Strategy' scenario and a 'With Strategy' scenario – the latter includes all development and transport schemes included in the 'Without Strategy' scenario and a full package of transport schemes [see WHSAP/08, Section 6]. Unsurprisingly the 'With Strategy' scenario does better than 'Without Strategy', and this is used to justify the development sites and transport strategy as proposed.
13. This approach does not demonstrate the transport impacts of the proposed developments to 2026 compared to a current position, it only shows that a 'do something' would be better than 'do nothing' in that period.
14. There is reference in the Salisbury Transport refresh to a 'Salisbury Highway Model Development and Forecasting Report, V7.1, April 2018' [WHSAP/08, footnotes 6, 7 & 8]. This report could potentially offer some insights into the methodology used, however it has not been made available to this Examination (although earlier reports relating to Modelling and Forecasting from 2009 are available – TRAN/17A – TRAN/17F, TRAN/17I).
15. It is not apparent from what has been made available that the transport impacts of development will not be severe. This would make the proposed developments non-compliant with the NPPF on transport grounds.

Unsound – not effective (a) performance against predictions in previous Strategy

16. Given the time which has elapsed since the 2010 Transport Strategy – we are now over halfway through the plan period to 2026 - it would be helpful to understand how the Transport Strategy has performed to date, what aspects of this strategy have been delivered, and whether it has met expectations. This type of review is promised in the WHSAP "*...refreshing the Salisbury Transport Strategy will allow the effectiveness of existing measures to be reviewed ...*" [WHSAP/01/01, para 5.128].
17. There were some specific commitments in the 2010 Transport Strategy, some of which are summarised in the 2012 Salisbury Transport Summary:

- *There is forecast to be an additional 5100 trips to the city centre in 2026 compared with 2008. The Salisbury Transport Strategy results in over 1300 extra trips by public transport and 900 extra trips by walking or cycling. This improves accessibility to the city centre which will contribute to enhancing the local economy. [TRAN/17M, para 5.2]*
- *Implementing the transport strategy could ensure that 45% of these new trips to the city centre are made by sustainable modes in 2026. If the Salisbury Transport Strategy was not adopted (the business as usual approach), the forecasts show that only 20% would be by sustainable modes. [TRAN/17M, para 5.3]*

18. To evaluate the effectiveness of the Salisbury Transport Strategy there needs to be some indication as to whether the number of new trips has been as predicted and whether the shift to sustainable modes has been as forecast.

19. In respect of Air Quality, emissions from Transport were predicted to decrease, with NOx decreasing by 22% between 2008 and 2026, and PM10 decreasing by 23% in the same period. [TRAN/17H, Table 6.3]. Has there been a decrease in emissions to date, and will these quantified improvements be realised?

20. Unless or until the performance of the Salisbury Transport Strategy currently is reviewed against the earlier commitments the Transport Strategy must be considered as unsound since it is ineffective.

Unsound – not effective (b) future performance of refreshed Strategy

21. The performance of the refreshed strategy, as has been mentioned above (para 12), provides information about the difference between the ‘with Strategy’ situation compared to ‘without Strategy’. This does not seem to give any indications about the transport impacts of the proposed development sites but only gives confirmation that development with a transport strategy will work better than development with no transport strategy.

22. The previous Transport Strategy gave some specific commitments, for instance regarding the numbers of additional trips and the percentage which would be by sustainable modes, and the improvements in air quality which would take place in the period to 2026 (see para 17 above). There are no equivalent commitments in the refreshed strategy, the ‘forecast differences’ provided only give an indicative view of the differences between modelling ‘with strategy’ and ‘without strategy’. [WHSAP/08, Table

6-1]. This does not provide a way to measure objectively the effectiveness of the 'with strategy' option against current performance.

23. At the time of the initial transport strategy there were concerns that the Park Wall junction and Harnham Gyratory were under pressure, particularly in peak hours. Along with various other junctions (St Marks, College, Exeter Street) these two were categorised as 'red' under 2026 'Business as Usual' Forecasts [TRAN/17M, STS Summary 2012, Figure 3-2]. This was under a scenario when housing allocations south of the river were not being proposed, and there must be particular concern about these junctions with 840 additional houses in total proposed at H3.1, H3.3 and H3.4 [WHSAP/01/01, Policy H3].
24. Given the additional pressures which the proposed housing in policy H3 will place on Harnham Gyratory and Park Wall junctions particular attention should have been paid to the base (2016) performance, and the sorts of modifications which might improve throughput, at these junctions. It is noted that modelling suggests that Park Wall junction will continue to remain an issue [WHSAP/08, para 7.14], but there is no indication as to how the Harnham Gyratory will perform, other than the prediction of improvements when comparing 'with strategy' to 'without strategy' in 2026 [WHSAP/08, Table 6-1]. As has been noted elsewhere, this is not adequate for the purposes of seeing how this junction would operate compared to current performance.
25. It was stated that the original Salisbury transport model must be able, among other things, to *"identify the impact on the transport network of locating development in each of the strategic residential and employment sites"* [TRAN/17E, STS Highway Local Model Validation Report, para 1.4]. The refresh does not appear to be able to do this, and hence the effect of the new sites on the transport network is not readily apparent. It is considered the transport strategy is therefore unsound because not effective.

Unsound – not effective (c) delivery of components of Salisbury Transport Strategy to date

26. The initial Salisbury Transport Strategy covered the period to 2026. Whether it started taking effect from the date of the 2010 Options Assessment Report or somewhat later is a matter for debate. However since 2010 there have been considerable developments underway or completed around Salisbury so it seems relevant to consider what components of the Strategy have now been delivered, or are being progressed.

27. There is no indication regarding which parts of the Salisbury Transport Strategy have been implemented, nor any review of the performance against objectives in the initial period since the Strategy was proposed in 2010. Without this sort of information it is not possible to establish whether the Strategy has been effective in terms of being deliverable over the plan period.
28. Various 'Sustainable Transport Schemes' are listed in the Infrastructure Delivery Plan (IDP) for Salisbury, date Dec 2016 [WCO/07N], see SAL004 – SAL012. None of these show any 'secured funding' despite the fact that several major planning applications have been concluded in the period with (presumably) Section 106 and CIL funding being made available. If nothing has yet been secured for any of the transport schemes in the IDP one must question whether the Salisbury Transport Strategy as a whole will be deliverable in the plan period to 2026.
29. Various footnotes indicate some instances where developments will contribute to the cost of specific schemes through S106 agreements [WHSAP/08, footnotes 34 – 39]. However there is no indication as to how much will be, or has been, contributed, how much of the total this represents or how (or indeed if) any shortfall will be covered.

Unsound – not effective (d) future delivery of components of Salisbury Transport Strategy

30. The indicative cost of the Salisbury Transport Strategy is estimated to be in the region of £32.29 million [WHSAP/08, para 4.8 & Tables 4-1, 4-2, 4-3 and 4-4]
31. Some of the above figures perhaps need further explanation or clarification – is £2,400 correct for H07 (A36 Bourne Way Capacity Enhancements) and H09 (Park Wall Junction Improvements)? This seems a low figure for highways projects. [WHSAP/08 Table 4-4].
32. It is unclear where the money will come from, the report indicates that not all will come from development funding and '*a range of funding options will be considered*'. [WHSAP/08, Para 4.9]. There is a considerable amount of money to be found and there does not seem to be any clarity over potential sources for this funding, which must bring into doubt the overall effectiveness of this strategy.

Unsound – not positively prepared

33. There seem a number of uncertainties in respect of the deliverability of the proposed transport strategy, for instance:



- It is stated that this Strategy is not intended to be an exhaustive list of measures to mitigate the specific transport impacts of development. [WHSAP/08, para 1.7]
- It is noted that modelling indicates that Park Wall junction will continue to remain an issue [WHSAP/08, para 7.14]
- Junctions on A36 Southampton Road are also predicted to be an issue [WHSAP/08, para 7.15]

34. To be 'positively prepared' the plan should be prepared based on a strategy which seeks to meet objectively assessed infrastructure requirements. In light of the doubts over whether this strategy is an exhaustive list and whether some of the interventions will achieve the required result the strategy can be considered unsound – not positively prepared.

#### Changes being sought

35. Further work is required to produce a Transport Strategy for Salisbury which is fit for purpose and which:

- evaluates existing travel patterns and mode share
- shows what components of the existing Transport Strategy have been implemented
- reviews performance of the network against commitments made in the existing Transport Strategy to show progress to date
- provides a definitive list of schemes which will be implemented, showing funding sources and a timeline for delivery
- gives criteria against which the future performance of the network can be judged.

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