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| Comment by | Mrs Judith Howles |
| User ID | 1120809 |
| | Matter 3 Site allocations |
| Issue | 5 Are the proposed sites justified, effective and consistent with national policy? |
| Para | 5.3 The likely impact of the proposed development upon <i>inter alia</i> strategic and local infrastructure including transport and whether this indicates that the site should not be allocated. |
| Allocation | site H3.1 Netherhampton Road |
| Previous comment nos. | To Draft WHSAP: 336 – 342 inclusive. To Schedule of proposed changes: 106 |
| Soundness | I consider this allocation is unsound as it has not been justified by supporting evidence, is ineffective and inconsistent with national Policy. |
| Comment | <p>This is a Greenfield site which lies beyond a reasonable walking distance from Salisbury’s facilities. There is no safe cycle route into the city. Moreover Figure 2.2 of The Salisbury Transport Strategy Draft Strategy Refresh 2018 (STS2018) shows the site to be remote from bus services so that residents would be wholly dependant upon the private car contrary of the aims of the WCS and the NPPF.</p> <p>Para 2.14 (of the STS2018) identifies the A3094 as forming part of the major road network. Table 2.5 shows the road to have had the highest rate of growth in traffic of Salisbury’s major roads over a 10 year period.</p> <p>Fig 3.2 of the Salisbury Transport Strategy Summary November 2012 (written prior to and therefore excluding the allocation of this site) shows the Park Wall and Harnham Gytratory Junctions operating close to or at capacity in 2026. It proposes alterations to the Harnham Gytratory but this does not provide additional capacity eastbound on the A3094 and bearing in mind the high proportion of right turning traffic (towards the hospital and the A338) is likely to lead to longer dwell periods at the traffic lights. Moreover the scheme does not make provision for improvements to walking and cycling routes.</p> <p>The STS2018 does not propose anything different from the STS2012 and therefore fails to demonstrate that the capacity of these junctions can be sufficiently increased to accommodate the additional traffic that the site allocation will create (particularly cumulatively with site H3.3). It proposes no physical alterations to the Park Wall junction.</p> |

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| | <p>Fig. 2.1 of the STS2018 is flawed in failing to include the park and ride sites and frequent bus services on the plan which would inform the relationship of proposed sites to existing public transport infrastructure. Other allocations feed into Park and Ride sites (e.g. CS5 Bishopdown P & R) and DPD2 (bus route R1). DPD1 (H3.1) does not relate to a Park and Ride site and is not served by buses.</p> <p>Table 2.2 is flawed. Figure 2.1 shows there not to be strong accessibility to the city centre, access to the hospital is on a par with access to the city but neither is within reasonable walking distance, all require use of a car. The Harnham Trading Estate is not a major employment site. It is small scale. The nearest major employment site is the hospital. Access to secondary schools is poor. The nearest secondary school shown on Fig. 2.1 is within cycling distance, but it is a selective boys' grammar school for which 90% of secondary pupils will be ineligible. There is no safe cycling route to Sarum Academy nor the Laverstock Schools and both are too far away to walk. For this reason the proposed trips from the site shown on table 2.3 is a serious underestimate given the number of dwellings proposed.</p> <p>Table 4.3 PT05 proposes high frequency buses from allocated sites but table 3.2 highlights that the bus network is unattractive because of its high cost. For a short duration of visit it is cheaper to drive and park in the city centre. It is only more attractive than the car to concessionary pass holders.</p> <p>The impact upon a defined major traffic route (A3094) by the additional traffic which would be generated by the development and that the updated STS2018 lacks measures to significantly increase the capacity of the road would indicate that this site should not be allocated.</p> |
| Change sought | That the allocation of this site is removed from the plan. |
| Further comment | If, despite the lack of supporting infrastructure, this allocation is taken forward, I would request that an additional proviso be added to policy H3.1 as follows: <i>'The route of the Harnham Relief Road (as shown on withdrawn application S/2002/1961) is safeguarded from any development that could prejudice its future construction.'</i> |
| Comment by | Mrs Judith Howles |
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| Issue | 5 |
| Question | 5.6 <i>Is the site in an accessible location with good access to everyday facilities by a range</i> |

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| | <i>of means of transport? Does the plan provide an adequate basis to address any areas of deficiency?</i> |
| Allocation | site H3.1 Netherhampton Road |
| Previous comment nos. | To Draft WHSAP: 336 – 342 inclusive. To Schedule of proposed changes: 106 |
| Soundness | I consider this allocation is unsound as it has not been justified by supporting evidence, is ineffective and inconsistent with national Policy. |
| Comment | <p>This is a Greenfield site which lies beyond reasonable walking distance from Salisbury’s education, healthcare, cultural and shopping facilities or even the local shop in West Harnham. There is no safe cycle route into the city from the site. .</p> <p>Figure 2.2 of The Salisbury Transport Strategy Draft Strategy Refresh 2018 (STS2018) shows this Greenfield site to be remote from bus services so that residents would be wholly dependant upon the private car contrary of the aims of the WCS and the NPPF.</p> <p>Policy H3.1 of the Housing Allocations Plan Submission Document July 2018 contains a number of requirements for the development. However, it gives no indication of timescales for their provision.</p> <p>The supporting text is silent on the mechanisms for providing a local centre and what goes in it.</p> <p>Para 5.132 does not secure the delivery of employment development. Bearing in mind that land has lain vacant at the Harnham Business Park adjacent for a number of years there is a risk that the site will become a dormitory estate.</p> <p>Para. 5.136 is ‘putting the cart before the horse’. This work needs to be carried out before any allocation is made as it may be neither achievable not deliverable. The Salisbury Transport Strategy 2018 does not include sufficient measures to improve the transport network at a scale necessary to accommodate the scale of development envisaged.</p> <p>The same comment goes for drainage issues.</p> <p>There is no indication of how and where a sufficient increase in healthcare provision could be accommodated.</p> |

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| | <p>Land for a primary school is proposed, but not a secondary school; the site has poor access to the present secondary schools at Laverstock and Sarum Academy, neither of which are within safe walking or cycling distance. There is no public bus service proposed to either.</p> <p>The proposed primary school is for a size in excess of that required by the development itself and will therefore lead to an increase in car travel into the site from elsewhere. the impact of which has not been addressed</p> <p>Fig. 2.1 of the STS2018 clearly shows that contrary to what is stated in the supporting text to policy H3.1 at 5.137 the site is not reasonably well located in relation to the city centre owing to the limited access points across the river Nadder This is confirmed by SA objective 2 Q1 of the WHSAP Sustainability Appraisal Report Annex 1- A6 Salisbury and Wilton May 2018 which states " <i>As the site is on the edge of the settlement it is not considered to be within a reasonable walking distance to the city centre.. . Future residents will rely on the private vehicle to access some of the city centre services'</i></p> <p>In my opinion, the plan does not provide sufficient detail on the provision and timing of the local centre and school to address the shortcomings of the site's poor accessibility to everyday facilities.</p> |
| Change sought | That the allocation of this site is removed from the plan. |