

Via email: David.Way@wiltshire.gov.uk

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18 March 2019

Dear Sir/Madam,

WILTSHIRE COUNCIL WILTSHIRE HOUSING SITE ALLOCATION PLAN SALISBURY TRANSPORT STRATEGY DRAFT STRATEGY REFRESH 2018 -CONSULTATION APRIL 2018

Further to our previous responses in relation to the above, I set out below an updated position statement on behalf of Highways England, which brings together and progresses the points previously made.

Representation Dated 21st Sep 2017

This representation confirmed that the area of specific interest to HE is the allocation of new housing sites that have the potential to impact on the SRN. The following issues were raised:

- Policies H3.1 and H3.3 Land at Netherhampton Road The issue raised was addressed by additional policy wording introduced as part of the proposed changes consulted on in 2018.
- Housing sites in villages to the north and south of the A36 as it passes through Wiltshire – Highways England stated that although these sites are mostly small in nature, there is potential for cumulative impacts on the A36 and this impact on operational performance is not known.
- Policies H2.11, H2.12 and H2.13. Site allocations in the vicinity of M4 junction 17

 Hullavington (50 dwellings), Yatton Keynell (30 dwellings) and Crudwell (50 dwellings). Highways England stated that there is no transport evidence to show that these sites would or would not impact on the SRN.

The Crudwell allocation was removed as part of the proposed changes consulted on in 2018. In relation to the remainder of the allocations referred to above, Highways



England considers that it is unlikely that severe transport impacts will occur as a result of their development.

Representation Dated 11th May 2018

This representation provided an update on the Salisbury Transport Strategy (STS) refresh that was being carried out by Wiltshire Council to support the WHSAP.

The modelling results of the STS refresh indicate that more detailed, micro simulation modelling is required to focus on the A36 Southampton Road in order to refine these high level schemes. In parallel to the STS refresh and recognising these particular constraints at A36 Southampton Road, Highways England is progressing a study to identify potential options to improve the existing performance and operation of this link and to help to facilitate growth aspirations across Salisbury, including the additional housing allocations. We are currently in the process of concluding that study. The study indicates that there are potential options which would be deliverable within the existing highway constraints that would bring some benefit to the performance of Southampton Road. We will continue to work with Wiltshire to refine these options and update the STS as required.

It should be noted that the Netherhampton Road allocations (Policies H3.1 and H3.3) represent the largest focused area of new allocation in Salisbury. In terms of the SRN, the traffic generated by these developments would principally impact on College Roundabout and Park Wall junction (A36 Wilton Road/Netherhampton Road). The impacts would be proportionate to the housing increase from that of the Core Strategy, ie, upto 9% greater with the Wiltshire Housing Site Allocations Plan than without. This is based on the increased housing allocation proposed by the WHSAP.

However, the WHSAP explains (4.65 to 4.67) that due to slower delivery of other sites in Salisbury (principally at Churchfields) the allocation of additional land "will not lead to an increase in the overall scale of housing growth at Salisbury than was proposed by the Wiltshire Core Strategy". On this basis, the impact of the WHSAP on College Roundabout (and Southampton Road) would not be significant; flows along Southampton Road would be unchanged, flows on Churchill Way (E) would reduce slightly and there would be a corresponding increase in traffic on Churchill Way (S).

In relation to Park Wall junction, the Salisbury Transport Strategy Refresh 2018 states that "The results from the modelling indicate that the Park Wall junction, even with optimised signal timings, capacity and delay at this location are forecast to remain an issue. Although it is noted that there is limited scope for improvements at this junction, the recommendation of the transport strategy is that more detailed options are investigated with the use of micro-simulation transport modelling tools". The main reason for this, in so far as the SRN is concerned is the increase in right turning traffic from the A36 into Netherhampton Road, particularly in the PM peak when residential trips are inbound.



Policies H3.1 and H3.3 both confirm that the Netherhampton Road allocations are subject to "Transport network improvements necessary to accommodate the scale of development envisaged". It is not clear from the Plan whether the "scale of development" referred to relates to the cumulative allocations of the plan or the individual allocations. It is also not clear from the evidence if the necessary improvements are achievable within the constraints of the junction.

Representation Dated 1st November 2018

This representation provided Highways England's response to the "Wiltshire Housing Site Allocation Plan Schedule of Proposed Changes - Consultation October 2018". The representation confirmed that Highways England welcomed the proposed changes and went on to provide an update on the Salisbury Transport Study and the A36 Southampton Road Study.

Summary of Residual Issues

From the above it can be seen that the only outstanding concern for Highways England in relation to the WHSAP, relates to whether necessary highway improvements are deliverable at Park Wall junction.

Response to the Inspectors Matters, Issues and Questions published on 8th February 2019, in respect of the WHSAP Examination

Set out below are Highways England's responses to the matters relevant to Highways England in so far as the operation of the SRN is concerned.

Matter 2, Issue 4, 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?

This question is included under Matter 2: Consistency with the Wiltshire Core Strategy (WCS). The response set out below is within the context of consistency with the WCS.

Core Policy 66 - Strategic transport network, states that work will be undertaken in conjunction with the Highways Agency (now Highways England), Network Rail, transport operators, neighbouring authorities and other agencies, that will seek to develop and improve the strategic transport network to support the objectives and policies in the Core Strategy and Local Transport Plan.

In response, a SoCG was reached (dated 10th April 2013) which stated at 17.1 "We (Highways England) welcome the acknowledgement of the need for collaborative working and we are committed to working with the council to support the objectives and



policies in the core strategy and local transport plan where they relate to the Strategic Road Network".

Since that time, Highways England have continued to work with Wiltshire Council to develop Transport Strategies and schemes, including for example M4 J17. In relation to the WHSAP and as confirmed above, the A36 through Salisbury remains a particular challenge and this was recognised by the Inspector in his report on the WCS. In response to this challenge, the inspector confirms (at paragraph 306 of his report) that "transport solutions will need to be delivered in accordance with the evolving Salisbury Transport Strategy".

In response to the WHSAP, Wiltshire have refreshed the Salisbury Transport Strategy to account for the change in housing allocation. In this respect, the allocations within the WHSAP remain consistent with the WCS.

Matter 3: Issues 5 – in respect of all allocations, What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated: strategic and local infrastructure including transport and the efficient operation of the transport network, highway safety.

As set out above, with the possible exception of the Netherhampton Road allocations (Policies H3.1 and H3.3), Highways England are content that the scale and location of individual allocations is unlikely to result in Severe transport impacts on the SRN.

In relation to the Netherhampton Road allocations, the Wiltshire Council's refreshed Salisbury Transport Strategy, highlights Park Wall junction as a residual concern and recommends further work to investigate more detailed options than those investigated to date. Both policies (H3.1 and H3.3) confirm that development is subject to necessary transport network improvements although it is yet to be established if the necessary improvements are deliverable given the constraints at the junction.

It could not be said that the impact of either development indicates that the site should not be allocated but it should be made clear that Planning Permission will only be granted where the transport impact of development is not considered to be severe. A number of other local planning authorities have chosen to adopt this as a policy position, strengthening the advice contained within NPPF. While such a policy may be of benefit in providing clarity to the Wiltshire Housing Site Allocations Plan, it is accepted that such a policy would only relate to the additional allocations now proposed and not to the allocations already included in the Core Strategy. On that basis, such a policy may have little benefit in this case.

As a Statutory Consultee to the Planning Application process, Highways England will advise Wiltshire Council in relation to each planning application received whether, in its opinion, the residual impact of each development is severe, having taken account of any highway measures which the development is conditional upon. Therefore, if the



necessary transport infrastructure can not be identified, there are mechanisms available to restrict or prevent the development.

Highways England intend to attend the hearing session on 10th April to answer any questions the inspector may have in relation to the above.

If you have any comments or wish to discuss any of the above in the meantime, please do not hesitate to contact me.

Yours sincerely,

Rachel Sandy

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