

**Wiltshire Housing Site Allocations Plan  
Examination in Public**

**Draft Statement of Common Ground**

**Between**

**Wiltshire Council**

**and**

**Highways England**

**March 2019**

## Introduction

1. Wiltshire Council ('the council') and Highways England have worked closely and collaboratively in relation to the development of the transport evidence base for the Wiltshire Housing Site Allocations Plan ('the Plan').
2. This Statement is structured to provide the examination Inspector with a summary of the areas of agreement between the council and Highways England, and how that agreement was reached, in relation to the Plan.

## Wiltshire Housing Site Allocations Plan ('the Plan')

3. In July 2018, Wiltshire Council submitted the Plan, along with a Schedule of Proposed Changes and supporting evidence, to the Secretary of State, for independent examination.
4. The Plan will, once adopted, form part of the Development Plan for Wiltshire. It has been prepared to support the delivery of the Spatial Strategy set out within the Wiltshire Core Strategy (adopted January 2015).
5. The purpose of the Plan is twofold:
  - Allocate sites for housing which are additional to those allocated in the Wiltshire Core Strategy to ensure the delivery of homes across the plan period to help maintain a five-year land supply in each of Wiltshire's three Housing Market Areas (HMAs) over the period to 2026; and
  - Review and, where necessary, revise settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.

## Highways England

6. Highways England has been appointed by the Secretary of State under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and Highways England is responsible for ensuring that it operates and is managed in the public interest, both in respect of current activities and needs, and in providing effective stewardship of its long-term safe operation and integrity.
7. Within Wiltshire, the SRN comprises the M4 motorway and the A36 and A303 trunk roads.
8. Highways England policy relevant to the acceptability of new developments is set out in Department for Transport Circular 02/2013 – "The Strategic Road Network and the Delivery of Sustainable Development". Paragraphs 9, 10 and 11 of the Circular summarise the correct approach to development proposals.
9. Applying the principles of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating over-capacity; at a level that cannot be safely accommodated, i.e. a development which adds traffic to a junction which

already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise.

10. These principles are reflective of the National Planning Policy Framework (NPPF) which requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands. The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.
11. For the Plan to satisfy the requirements of the NPPF it would therefore need to be supported by an assessment of the infrastructure necessary to ensure that traffic impacts are not severe. Highways England will be content with the proposed additional site allocations provided that there is reasonable certainty that the impacts of those allocations can be appropriately mitigated and that the plan includes policies which adequately manage the delivery of development so that severe transport impacts do not arise.

#### Wiltshire Housing Site Allocations Plan Pre-Submission consultation

12. Wiltshire Council published the draft Plan, along with accompanying evidence reports, for formal consultation from 14th July 2017 to 22nd September 2017.
13. Highways England confirmed in their representation to that consultation that the area of specific interest to them is the allocation of new housing sites that have the potential to impact on the SRN. In particular, the following issues were raised:
  - **Salisbury sites and impact on A36** - Policy H3.1 Land at Netherhampton Road, Salisbury requires "*Transport network improvements necessary to accommodate the scale of development envisaged*". Highways England stated that there was no equivalent policy quoted for site H3.3 North of Netherhampton Road and considered that both should be subject to the same requirement.
  - **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.
  - **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.
14. At that stage, the council was in the process of developing the transport evidence base to support the development set out in the Plan and the scale or cost of any necessary highway interventions, or extent of the SRN likely to be impacted by the development included in the Plan had not been identified. However, Highways England confirmed their commitment to working with the council to help support the production of the transport evidence base, which may include the use of a number of Highways England transport models, including, for example, a new VISSIM model of

A36 between College roundabout and Petersfinger, which could be used to test the impact of the site allocations on the A36.

Salisbury Transport Strategy Refresh 2018 and A36 Southampton Road (Salisbury) Study

15. The Salisbury Transport Strategy (STS) (2012) was developed to support the growth identified in the South Wiltshire Core Strategy (SWCS), covering the former Salisbury district area within Wiltshire. The allocations included within the Wiltshire Housing Site Allocations Plan represent an overall increase of 577 houses above the 6,186 allocated in the Core Strategy. However, the Wiltshire Housing Site Allocations Plan 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”.
16. In order to support the additional housing site allocations proposed in Salisbury in the Plan, Highways England has worked collaboratively with the council to refresh the STS which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city. The STS confirms and addresses a number of current and future transport issues facing the city and takes account of the additional housing site allocations included in Salisbury in the Plan.
17. The Netherhampton Road allocations represent the largest focused area of additional development in Salisbury. In terms of the SRN, these developments would principally impact on College roundabout and Park Wall junction. The impacts would be proportionate to that of the Core Strategy, ie, up to 9% greater with the Wiltshire Housing Site Allocations Plan than without. The STS indicates there is limited scope for improvements at the Park Wall Junction (A36/A3094).
18. Highways England supports the package of mitigation measures and conclusions outlined in the refresh of the STS. In relation to the SRN, the STS includes A36 Southampton Road upgrades and Park Wall Junction (A36/A3094) improvements.
19. 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 the 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. Highways England is working closely with Wiltshire Council in the development of this study, which will dovetail with the Salisbury Transport Strategy. The study is due to conclude in 2019.

Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents

20. In August 2018, the council received a procedural letter from the examination Inspector. In response to that letter, the council undertook a consultation on the ‘Schedule of Proposed Changes’ to the Plan, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence documents. This consultation took place from 27<sup>th</sup> September 2018 to 9<sup>th</sup> November 2018.

21. Highways England note in their representation to that consultation certain matters arising from the Schedule of Proposed Changes, namely:

- **250 additional dwellings proposed in Trowbridge across 4 site allocations** without supporting transport evidence but unlikely to result in severe transport impacts.
- **All site allocations within Market Lavington (80 dwellings) and Crudwell (50 dwellings) have been omitted from the Plan**

22. Strategic Road Network (A36) updated references:

- **PC74 Warminster** – Updated to include a reference that new developments are required to address any direct or indirect cumulative impact on the A36.
- **PC100 Policy H3.1 Netherhampton Road, Salisbury** – Update provided to highlight that a refresh of the Salisbury Transport Strategy has taken place in dialogue with Highways England.
- **PC106 Policy H3.3 North of Netherhampton Road, Salisbury** – Updated to highlight that Transport Assessment is necessary, in addition to the provision of network improvements in conjunction with development proposals

23. Highways England welcomes these updates to the Plan which it considers strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the SRN is not severe. 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. A number of other local planning authorities have chosen to adopt this as a policy position, strengthening the advice contained within NPPF. This has been achieved by incorporating into policy, wording that confirms that Planning Permission will be granted only where the transport impact of development is not considered to be severe. 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.

24. Highways England confirms that the Schedule of Proposed Changes addresses all of the changes requested, and any outstanding concerns noted, in its representation to the Pre-Submission consultation in 2017.

### Conclusions

25. Highways England confirms that the Plan is supported by a transport evidence base that satisfies the requirements of the NPPF in terms of adequately assessing the infrastructure necessary to ensure that traffic impacts are not severe. Highways England confirms that, applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be acceptable and that there will not be a severe

impact on the SRN provided that development is not permitted to proceed in advance of the necessary schemes highlighted within the transport evidence being delivered.

26. Both the local planning authority and the strategic and local highway authorities recognise the transport issues of the existing situation and the challenge of providing local mobility while at the same time facilitating strategic accessibility and growth along the A36T through Salisbury.
27. Highways England welcome the opportunity to continue to work with the council to further develop a joint understanding of the issues, problems and limitations of the existing network, and thus work towards the identification of interventions that will enable the safe accommodation of growth whilst also providing the transport infrastructure to sustain economic growth through improvements to journey times and journey reliability.

**Signed on Behalf of Highways  
England**

**Signed on Behalf of Wiltshire Council**

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**Date: 1<sup>ST</sup> April 2019**

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**Date: 29<sup>th</sup> March 2019**