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Our Ref: - PD/LB

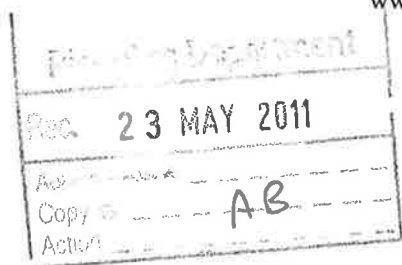
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Mr A. Bidwell  
Planning Officer  
Wiltshire Council  
Development Services  
PO Box 2281  
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Wiltshire, SP2 2PX



Dear Mr Bidwell

**Re: Planning Application S/2011/0517/OL: Demolition of Existing and Erection of 450 Dwellings and 3 Hectares of Employment Space at Erskine Barracks, Wilton, Salisbury**

Persimmon Homes Special Projects have an interest in land at Fugglestone Red, allocated in the emerging Core Strategy for a mixed-use development. After careful consideration, we wish to comment on Application S/11/0517 at the UKLF site due to what we consider to be a lack of detail contained in the submitted planning application and to address the issues that we believe will have an impact on Fugglestone Red. We note that Wiltshire Council arranged a meeting recently to discuss implementation issues on all the emerging Core Strategy proposals West of Salisbury, which confirmed that, whilst each site would obviously come forward independently, they each need to be aware of and take account of wider issues.

In view of the above, we consider there are a number of areas where the submitted application is deficient, or at the very least does not provide sufficient information for its impacts to be properly assessed. This could have implications for the planning application we are preparing at Fugglestone Red. The matters of particular concern to Persimmon Homes are set out below.

**1. Education Impacts**

The application does not demonstrate how education will be addressed and in particular how primary school pupils will be accommodated, which in the template for the UKLF site contained in the emerging Core Strategy requires the provision of a one form entry primary school. The Fugglestone Red proposal includes a new two form entry primary school. In the absence of provision of a primary school at the UKLF site and the absence of any other primary schools in the vicinity, the Fugglestone Red primary school will meet primary education needs West of Salisbury and will therefore facilitate the primary provision at UKLF. This needs to be dealt with by the UKLF application, both in provision of contributions towards the school and demonstration of links between UKLF and Fugglestone Red to show how pupils will be able to get to the school.

## 2. Playing Field Provision

An issue related to the primary school concerns provision of playing fields. Playing field provision at Fugglestone Red will be through dual use provision at the primary school, which will be sufficient to meet the needs of Fugglestone Red, but no more. It cannot therefore contribute towards meeting playing field requirements of the UKLF site, where the Illustrative Master Plan does not appear to make any on site provision.

## 3. Provision of Off Site Links

In respect of off site links, we note that one of the key design principles of the UKLF application is to improve access and connectivity to Wilton and the surrounding area. However, the application does not address this comprehensively (particularly in relation to links to future primary school provision, as set out above) and in one particular instance the Planning Statement distances itself from the provision of a link. Paragraph 3.41 of the Planning Statement says "It is suggested that Wiltshire Council and the Developers of the proposed Fugglestone Red site continue negotiations with Network Rail if it is decided that a public right of way to enable future residents of Fugglestone Red to cross the application site is desired". In addition, Paragraph 3.42 says "If Wiltshire Council decides they do not wish to enter into such negotiations, in which case, the Reserved Matters Application shall not facilitate access through from the Fugglestone Red site" (our emphasis). It is not right to say the green link is required "from" the Fugglestone Red site and indeed if the green link is required to facilitate safe pedestrian access from UKLF to the Fugglestone Red primary school, the balance of need lies with UKLF having to facilitate that link. That would be in accordance with the Core Strategy template for UKLF, which says under green infrastructure that UKLF should make contributions towards "links through to proposed Fugglestone Red development".

Another important access issue West of Salisbury is the provision of a new access to enable development of the Imerys proposed allocation for employment. We note that the application does not address this issue and in particular the Transport Assessment does not assess the impacts of a new access for Imerys on its traffic flows.

## 4. Impact on New Cut Crossroads

We note that the Transport Assessment carries out a comprehensive assessment in the vicinity of the UKLF site. However, we consider it fails to assess the implications of traffic from the development on the A360/The Avenue New Cut Crossroads, where Wiltshire Council have carried out a Feasibility Study into measures which would reduce the number and severity of the collisions at this location. Fugglestone Red will deliver a new junction in this location and the implications of traffic arising from the UKLF site on this junction needs to be assessed and taken into account.

## 5. Other Comments

Persimmon Homes are currently preparing a planning application at Fugglestone Red and it is important to be able to understand the implications of other developments West of Salisbury. To that end, we have the following additional comments on the UKLF application: -

- (a) We do not consider the Environmental Statement properly addresses cumulative impacts generally.
- (b) Although the application confirms 40% affordable housing will be provided, no details are given and in particular a breakdown of affordable housing provision, as required by emerging Core Strategy Policy CP10, is not provided.
- (c) The application includes no details of how The Avenue will be enhanced in place shaping terms in accordance with the Core Strategy template, both in relation to the direct on site frontage and elsewhere along The Avenue.
- (d) Again, in relation to dealing with cumulative impacts, the application does not appear to deal specifically with the protection of the River Avon SAC and the impact on phosphate and pollution levels through the Phosphate Management Plan. Indeed, one of the conclusions of the Water Study is that further investigation is needed to assess the benefits of using soakaways. We note that the Planning Statement says "The details of the proposal shall be dealt with at the Reserved Matters Stage" and "Until the detailed design has been finalised an appropriate scheme of mitigation cannot be agreed".

We accept that final detailed schemes are not appropriate now, but it is important to ensure sufficient detail is provided to enable an assessment of the likely impacts to be made in relation to the measures that the Fugglestone Red application will need to make.

- (e) We are unclear about the statement in Paragraph 6.3.2 of the Transport Assessment that the site is "Likely to come forward as an interim development being brown field and vacant" (our emphasis). The site is an allocation in the emerging Core Strategy, which is not affected by the current advertised proposed changes and will need to meet the requirements of that Policy document.
- (f) Issues on the SRN that the critical A36/A30/The Avenue and the A36/A3094 Junctions are unresolved.

## 6. Conclusion

Persimmon Homes considers: -

- i) The application contains insufficient details, as set out above, to enable a proper assessment of the impacts of the development to be made, in particular its impacts on Fugglestone Red.

ii) Development at UKLF cannot be looked at in isolation.

iii) Fugglestone Red has a role to play in helping facilitate development of the UKLF Site.

We are happy to discuss these issues with the Council and the applicants, as necessary.

Yours sincerely

Paul Davis  
Strategic Land Director