Working towards a Core Strategy for Wiltshire

Topic paper 10: Transport

Addenda

Wiltshire Core Strategy
Consultation January 2012

Wiltshire Council
Where everybody matters

CONTENTS.

1.0   EXECUTIVE SUMMARY

1.1   This report represents a supplementary paper to Topic Paper 11 on Transport. This has been produced to respond to the 'Wiltshire Core Strategy Consultation Document' (WCSCD). The document was consulted during June 2011 and August 2011. This builds on the original Wiltshire 2026 Consultation that took place during 2009.

1.2   The paper firstly summarises the representations received from the latest consultation with respect to transport The paper then looks at relevant individual comments that were made to ascertain if there are any additional areas that needed looking into to ensure the submission draft is to be sound. This addendum Topic Paper will also be updated with any new evidence that has either been produced by the council or by external bodies or new government guidance that has been published. The analysis of all of this information has resulted in the formulation of draft policies for the Core Strategy (now to be known as the Local Plan) submission draft. These have also been appraised through Sustainability Appraisal and Habitats Regulations Assessment to identify any amendments required to ensure that the plan and policies are in conformity with the relevant European directives.

2.0   INTRODUCTION, PURPOSE OF DOCUMENT AND CONTEXT

2.1   This document is the second element of the series topic papers that were published in order to present an audit trail how firstly the evidence upon which the WCSCD was based , and secondly shows the results of the consultation and demonstrates which policies should be taken forward in the submission document.

2.2   This Topic Paper approach has been decided upon in order to make it easier for stakeholders to understand how conclusions have been reached. It has been a key part of identifying the challenges facing Wiltshire and feasible options for addressing them.

2.3   The Topic Paper Addenda identifies the response received for the WCSCD consultation and identifies how the result have influenced and evolved to create the submission draft.

2.4   Assessing the Local Issues - Why is the Council Developing Policies on Transport?

The need for this topic to be included within the emerging Local Development Framework has emerged clearly from an analysis of planning policy and an appraisal of the growing body of specialist literature and guidance given to local planning authorities. Furthermore original work that has formed part of the base of evidence which will inform the Local Development Framework process has highlighted that there is a need for a new and effective set of policies to help meet our objectives.

2.5   What is the Council e trying to achieve - what is the Council's overall objectives?

The core objectives as envisioned at the outset of the Core Strategy were to develop a set of planning policies, which contribute to the following patterns of land use:

- Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport.
- Creating the right environment to deliver economic growth, delivering the jobs Wiltshire's population needs locally, and taking a flexible and responsive approach to employment land delivery.

- Phasing development to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting, in particular to areas outside of Wiltshire, is not increased and development does not have a detrimental impact on infrastructure.
- Working towards lowering Wiltshire's carbon footprint through providing renewable energy, sustainable construction and location of development.
- Protecting and planning for the enhancement of the environment, wherever possible, including development of green infrastructure to support the health and wellbeing of communities.
- Providing high quality, well designed development, and ensuring full local community involvement in planning for significant new proposals.
- Providing the framework to deliver Neighbourhood Plans.

3.0 FINDINGS OF THE WILTSHIRE CORE STRATEGY CONSULTATION DOCUMENT (WCSCD)

3.1 What did we ask?

Transport affects the environment, the economy and social well-being. The strategy needs to ensure that transport needs are managed in a sustainable manner. At the same time, strategic transport links are vital for the efficient function of Wiltshire's economy. Transport is therefore a key element within the WCSCD consultation. The document asked some specific questions about transport, and also had a general question (Question 22) where respondents could comment on anything in the document not covered by a question.

3.2 Area Wide – Strategic Objectives and overarching policies

One of the strategic objectives of the WCSCD is to promote sustainable forms of transport in Wiltshire. Transport affects the environment, the economy and social well-being. Evidence identified that The strategy needs to ensure that transport requirements are managed in a sustainable manner. At the same time, strategic transport links are vital for the efficient function of Wiltshire's economy.

3.3 Strategic objective 8: to promote sustainable forms of transport

This objective was also scrutinised as part of the previous Wiltshire 2026 consultation, and in this document it was numbered SO07. The objective now states:

'*Strategic objective 8: to promote sustainable forms of transport*
Transport affects the environment, the economy and social well-being. The strategy will need to ensure that transport needs are managed in a sustainable manner. At the same time, strategic transport links are vital for the efficient function of Wiltshire's economy.'

The following comments were made about Strategic Objective 8:

1. The County must address the infrastructure problems first and in detail! It is unacceptable to declare the number of houses needed and then to lightly brief over the traffic congestion problems

2. When assessing infrastructure needs, especially in primary settlements, it is important to ensure that the infrastructure needs of smaller settlements that are entry/exit routes to the larger settlements, are dealt with appropriately, especially where road widening, traffic calming, by-passing, etc. may be appropriate (in consultation with the relevant communities). The council will clearly need to coordinate with the Highways Agency to achieve this.

3. I broadly support this approach. But with respect to Para 5.9.8 suggests that the proposed - "Traffic demand management solution to congestion in the town centre", would benefit from some clarification. What precisely is meant by this statement and how is this to be agreed with the community? What in my estimation is needed is a town bus service which is sufficiently frequent, reliable, and cheap enough to persuade car owners wishing to visit the town centre to leave their car at home, and this needs to be extended over time to the surrounding villages. Also, much improved access to and usage of our only long stay car park needs to be much improved. And because of the non existent or far from adequate bus service in the town and surrounding area early consideration must be given to the provision of cheap car parking for those who are employed in the town.

4. there are 2 key issues which require addressing: - 1). The historic centre of Malmesbury, which also supports what diminishing retail capability the town has, will never be capable of dealing with the infrastructural and traffic demands of today's society let alone that of 2026. So what are the alternatives? Pedestrianisation? Park and ride? Root and branch assessment of the centre's possible development as a tourist attraction rather than a traditional high street? There is no indication in the document that any alternatives to the current situation have been examined. Subsequently the conclusion to be drawn is that either not enough imagination/vision has been applied or Wiltshire Council have no idea what to do with the centre of Malmesbury. 2). The infrastructural, economic and social issues which a residential expansion on the scale suggested would bring to the rest of Malmesbury. Such expansion would almost certainly occur to the north and west of the town and it would certainly have helped if the document had set out more precisely where such expansion would take place.

5. Access to Malmesbury's historic town centre must be improved. The increase in car parking charges has reduced the number of visitors to the town and steps must be taken to reverse this trend before the retail heart of the town is damaged beyond repair. Instead of acting as a service centre for the large rural community area residents of the villages as well as those living on the outskirts of the town often find it easier to travel to other larger towns.

6. The transition of the former RAF Kemble on the Wilts/Glos border into a regeneration employment area is worthy of note here. In terms of sustainability the main railway line that borders Oaksey has been identified for re-doubling of the track way between Kemble and Swindon to support further development. Perhaps Wiltshire Planners should campaign for the re-opening of Oaksey Halt or Minety Railway Stations? Wiltshire Council Policymakers should note the business case rationale for upgrading the railway line is derived from economic inflows to the area for which further development is required to deliver this financial return. Coupled with the sustainability of better public transport links needs to be supported by local demand. Any counter arguments would be purely subjective without any factual basis.

7. You do not mention the north-south lorry problem in the town. Traffic in the town must be one of the residents' main complaints and it is not addressed. Swindon and Salisbury will grow and with it there will be more activity between them, exacerbating the current lorry problem. It may be that some long distance trips will go via A34 and M4 but I imagine that this will not be sufficient to overcome the unsatisfactory situation of lorries lumbering up the hills on A346 on both sides of the town. There could be secondary effects on Salisbury. A business seeking good transport links is likely to prefer a location near A34 than A346 if contact with the north is desirable. The A346 is not a good route generally and extra traffic

congestion in Marlborough might be a deciding factor. There should be some proposal for a north-south by-pass of Marlborough, even if it has to go to the end of the plan period.

8. Page 21, item 3.1 1. Strategic Objective 8 We strongly support the intention to create a safer and more integrated transport system that would achieve a major shift to the use of sustainable modes including bus and rail especially in the larger settlements and along the main commuting corridors. We believe the Great Western main line electrification will help achieve this, not only by providing faster and more frequent services at Swindon and Chippenham but also through the cascade of relatively modern diesel rolling stock from the London area which could relieve overcrowding on the Cardiff- Portsmouth and Bristol-Weymouth routes.

9. We agree that the subjects covered are ones that the Core Strategy should address but permission for barn conversions as a rural enterprise policy, re-cycling MOD land, addressing climate change by building lower energy homes and so forth will remain worthy aspirations unless the transport nettle is grasped. The parking strategy is the right way ahead but sticks cannot work without carrots, and the carrots must be afforded ahead of the sticks.

10. The tough message is that without addressing the crossing cutting transport issues comprehensively the key aims to create an economy fit for the future, reduce disadvantage and inequalities and tackle the causes and effects of climate change, these aims are bound to remain aspirational.

11. Core Policies 42-48 The Core policies in 6.8 should be more closely linked to SO2 i.e. the policies in 6.2 Tackling the issue of climate change is an 'overarching priority' for the core strategy (1.7), and this cannot be achieved without the issue of transport being prioritised and considered as a major contributor to climate change.

Changes Required

Comments noted. No changes are proposed to Strategic Objective 8 as a result of the comments made.

3.4 Core Policy 42: Sustainable transport

Transport features either directly or indirectly in a number of the challenges and objectives of the Core Strategy. To help resolve these challenges and achieve the objectives, a sustainable transport system needs to be developed for Wiltshire. Core policy 42 has been written to try and help with this objective.

> **Core Policy 42: Sustainable transport**
>
> The Council will use its planning and transport powers to help reduce the need to travel, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.
>
> This will be achieved by:
> - planning developments in accessible locations
> - promoting sustainable transport alternatives to the use of the private car
> - maintaining and selectively improving the local transport network in accordance with its functional
> - importance and in partnership with other transport planning bodies, service providers and the
> - business community
> - promoting appropriate demand management measures
> - influencing the routing of freight within and through the county
> - assessing and where necessary mitigating the impact of developments on transport users, local communities and the environment.
>
> As both the Local Planning Authority and Local Transport Authority, the council will use its planning and transport powers to develop, maintain and improve a sustainable transport system for Wiltshire. The way in which this will be achieved is set out in the remaining policies in this chapter in association with other relevant plans including the community plan, local development framework and local transport plan.

Summary of responses

There were numerous responses to this question, and they are as follows:

1. We are really pleased to see the emphasis on sustainable transport. However we do suggest that the policies are augmented with more data and a firmer commitment to the Wiltshire Community Plan aspirations. The Community Plan is very clear on sustainable transport objectives and policy SO8 needs to quote the text directly. In essence the Community Plan says that there is to be a major shift to sustainable transport especially on commuting corridors and in Trowbridge, Chippenham and Salisbury.

2. It would be very useful to provide diagrams showing commuter corridors and existing public transport provision - can supply if useful. Equally it would be useful to include congestion maps of Wiltshire. The county has produced a map which we have, but it is not referenced in the Core strategy or the Transport Topic Paper. In general there is a lack of real data about where we are with transport. Without this it is hard to see the repercussions of new or committed development nor understand the implications regarding infrastructure and public transport service requirements. Something is needed about bridges over the Avon - these are all congestion black-spots. The problem needs at least to be highlighted. It's a sub-regional problem. Rail and bus surely need their own sections. By keeping things vague you otherwise end up with a weak case for lobbying for better public transport provision or setting expectations for developers. Overcrowding on the railway needs highlighting - urgently. The Trans Wilts lines as an aspiration needs clear mention, somewhere.

3. Cycling: need to put forward a network connecting towns and larger villages in Western Wiltshire. For each of the large urban extensions one needs to give an indication of how the development will be served with public transport and where and how the new walking and cycle routes will link with town centres. Other local authorities produce maps in their Core strategies to indicate what is planned. Transport cannot just be an add-on, which is the way it appears in the core strategy at the moment.

4. Good to see something about the design of new development for the bus, but think you need to explain that the distributor road model whereby the bus stops are on the road or roundabouts, doesn't get people on buses. It might be worth mentioning business parks too in this context - their design must be for the easy servicing by buses that go actually into the estate. Are we going to say anything about the importance of linking buses to trains - interchanges, and the improvement of stations?

5. With regards to freight and road improvements we think that you need to be up-front about what is envisaged and present some analysis of HGV numbers along the A350, A361, A36, and other lorry routes through the county. Otherwise it is difficult to grasp and assess any problems. Much is implied in the way of road construction, but the specifics are not accessible to readers. This doesn't work as a strategy for preparing a key document. The routes of major new distributor road complexes, junction improvements and other major road construction need to be indicated at least. We hope that bus priority measures will be part of any improvement to the road network.

6. Lastly we remain very much unconvinced about the emphasis on out-commuting as a theme at the heart of much of what the Core Strategy and associated topic papers argue about a sustainable future. The whole notion has been tried for years but hasn't worked, largely because people commute and live where they want according to type of work, how good the roads are, schools, whether the area is attractive, house prices and so on. Certainly aspirations to improve the road system will promote more commuting - both in and out commuting. Regional stats show that Salisbury and Trowbridge have more in-commuting than out commuting - the location of out-of-town business parks are attractive destinations for people in distant places. Many people in Wiltshire live close to county borders. It is unclear why it is so bad if they commute over the border - is it better that they commute further but stay in Wiltshire?

7. The Rt. Hon. Philip Hammond MP Secretary of State for Transport, made clear the Government strategy in a speech on the 28th of June 2011. He said, "We have made clear our vision: A transport system that is an engine for economic growth, cleaner and greener and improves the quality of life in our communities. A system in which rail has a key role to play. With a safe customer focused rail system that supports a growing economy by improving capacity, connectivity, performance and productivity. Contributing to our wider climate change objectives by reducing transport carbon emissions and encouraging modal shift from road and aviation." Government strategy completely aligns with Wiltshire's stated Long Term Transport Strategy Vision " To develop a transport system which helps support economic growth across Wiltshire's communities, giving choice and opportunity for people to safely access essential services "

8. Integrated Wiltshire transport infrastructure Wiltshire business community is focusing upon the issues around business growth, business connectivity, access to skills and the importance of an overall sustainable transport infrastructure policy for Wiltshire. Until now the Wiltshire transport policy has focused on individual schemes and regional needs without setting an overall agenda for Wiltshire. In particular the core strategy does not provide an overall transport infrastructure policy. This is a serious omission and should be addressed in the final document. Geography The towns of Wiltshire consist of separate urban centres set in a rural landscape. Yet they are already well connected by a rail infrastructure. The stations, with the exception of Westbury, are situated at the centre of our towns. Most of our town's key

services and high street retail opportunities are contained in a walking distance (800m radius) of the station. This makes the station a natural focus for town centre regeneration, access to jobs and services and a natural location for sustainable transport interchanges. The geography of Wiltshire means that the majority of the County's population is contained within the towns which are on the existing TWR rail corridor linking Swindon to Salisbury via Chippenham, Melksham, Trowbridge, Westbury, and Warminster. By 2026, two thirds of Wiltshire's total population will be within 5000m of a station. Indeed more than 50% of the population will be within a short bus or cycle ride (2000m) of a station.

9. Regeneration of Town Centres The availability of regeneration land adjacent to or close to the railway station is a critical strategic opportunity. The existing availability of such land (e.g. Langley Park Chippenham, Bowyers Trowbridge, Salisbury) is not included in the strategic housing and employment growth allocations. Neither is their importance to Wiltshire as a whole and the potential for regeneration of town centres recognised.

10. Town Centres and incorporating the Vision strategies. We recommend that the importance of the existing town centre station sites, and any adjacent development sites, is more clearly recognised in the strategy and that the local town vision agendas are incorporated in the overall Wiltshire transport and business regeneration strategy. The potential regeneration sites (located inside a 800 m radius from stations) should be identified and included in the core strategy. Ad hoc developments should not be allowed to prejudice the future developments around the stations. Indeed these areas should be considered as a key part of town centre enhancement and regeneration opportunities in Wiltshire. Inevitably, new housing and business park developments are outside the town centre and access is from the periphery of the town. The redevelopment of the station area to provide a public transport interchange will enable public transport to provide radial access between the town centre and the various peripheral developments. In addition attractive office and leisure and hotel developments can be considered in the station locality. There are significant regeneration opportunities alongside the station in the identified development towns of Chippenham Salisbury and Trowbridge, for example Langley Park in Chippenham and Bowyers site in Trowbridge. These sites are of strategic importance and provide the opportunity for transport interchanges and job opportunities which are accessible not only to the local town but to others who can access these areas easily by rail. By locating the bus services alongside the station an integrated transport system can be provided to access the peripheral developments in the towns. The use of cycle trails and bus lanes potentially further improve the ease of access to the town centre and the peripheral business parks and retail parks. Carbon Footprint The railway station provides public transport infrastructure and potentially an interchange serving bus passengers and cyclists. A regular and frequent regional rail service will encourage the transfer of road users and thus provides a substantial taxation benefit in terms of Wiltshire's carbon footprint. The provision of cycle storage and (potentially) cycle hire at stations in combination with appropriate cycle routes and buses will provide low carbon access between town centre, housing estates and employment parks. Employment Land Location and potential new regional rail stations Business growth benefits by clustering similar skills and business sectors together. The core strategy shows that the land allocations for these larger employment land developments will be found on the periphery of the major communities of Chippenham, Salisbury, Trowbridge and Westbury. These sites are typically 2000m plus from the town centre. If we are to consider an alternative to road only access, we need to consider, in the longer term, the potential of adding additional rail stations once a regional service is established. These will be low cost "bus stop" style halts within walking/cycle distance to the employment sites, but including car parking and coordinated bus connections. These local rail connections would substantially improve the attraction, accessibility and value of such industrial parks, which typically suffer from poor access, inadequate or overcrowded car parking and an unattractive

image, especially for major businesses. Wootton Bassett We have already recognised in the TWR proposals, that the addition of a Wootton Bassett station is justified to support commuting demands to Swindon whilst providing a key public transport access for Lyneham redevelopment. Chippenham Showell Farm Other potential business related sites are; the Chippenham Showell Farm site, which is adjacent to Thingley Junction and is a potential south Chippenham station which could provide park and ride service linking to the town centre also serving Wiltshire College Lackham and tourist access to Lacock. Trowbridge North Bradley In south Trowbridge, the Ashton Park and Whitehorse Business Parks could be served by a station situated in the North Bradley area. The feasibility of restoring a Staverton/Holt station to serve the area of north Trowbridge, eastern Bradford on Avon and with tourism access to the Kennet & Avon Canal, Hilperton Marina and NT properties has already been explored with Network Rail. Westbury station is not situated in the town centre but is ideally placed to serve the proposed employment land areas. The attraction, potential and strategic importance of Westbury as a rail connection to east Wiltshire Pewsey and Bedwyn as well as having excellent connections to London and the SW should be included in the core strategy.

11. The need and location of additional regional rail stations to serve new employment and housing areas and their potential locations should be identified in the Core Strategy. These future station sites should be protected from ad hoc development restricting their future use. Westbury station should be considered as part of the employment development plan for the area. Chippenham Example (see map) Using Chippenham as an example, the town's high street and leisure facilities are easily accessed from the station and contained within an 800 m radius of the station. These include High Street shopping, Olympiad Leisure Centre, Hospital, river access, and Town Museums. Most of the town's population (61%) and all the new housing developments are contained within a 2000 m radius of the station. Business Parks and similar developments are already located or proposed at a 2000 m radius from the station. Access to these jobs is therefore dependent upon access to the peripherals of the towns. The proximity of the A350 and link to the M4 encourages the use of road transport and commuting by road. This is compounded by the lack of "radial" public transport access to and from the town centre and the 2000m ring. The proposed Showell Farm/Hunters Moon housing and employment development is at the extreme south of Chippenham, some 3000m from the town centre and adjacent to the A350 link to the M4. The Thingley Junction is the exit from the main line and start of the regional TWR route, it could in the future support a station as part of the TWR regional rail service. The location could usefully provide rail park and ride access to Chippenham town centre and the wider main line rail services. This could potentially be a "prestige" gateway link for the businesses locating at Showell Farm.

12. Conference Tourism The Wiltshire landscape is an outstanding asset and could feature in and encourage business conferencing packages. Whilst Wiltshire is well served by country hotels, we lack modern accessible conferencing facilities which support overnight stays. Sites adjacent to stations are particularly well placed for such developments, providing nationally accessible locations.

13. Under the Core Strategy, the Vision Towns proposals (Chippenham, Salisbury and Trowbridge) should be aligned with the overall Wiltshire core strategy and include the need to provide Wiltshire with international standard hotel and conferencing facilities located in developments adjacent to town centre rail stations.

14. Core Policy 42 Third bullet, after "maintaining and" add "and where there are major new developments" Delete "selectively" The aim to reduce journey time is outdated and has been proved to be ineffective. More roads mean more cars, so the volume of traffic builds. After a short time, journeys take as long as they used to. The need is for really sustainable transport.

15. Trowbridge Community Area Strategy   Specific reference should be made to improving cross boundary public transport links, particularly between those areas where strong functional interrelationships exist such as between Trowbridge and Frome. The emerging Mendip Core Strategy policy for Frome highlights this as a major opportunity - specifically in terms of improving connectivity and capacity of bus and rail services - that joint working with Wiltshire and BANES can address.
16. We have looked at the SW Regional Assembly maps charting the role of SSCTs in the context of in-commuting and out-commuting for the Frome-Chippenham-Trowbridge area. The main commuter corridors affecting Western Wiltshire are as follows: In-commuting: Swindon to Chippenham, Bristol to Chippenham Bath to Chippenham Bristol and Bath to Trowbridge Frome to Trowbridge Warminster/Westbury to Trowbridge Devizes to Trowbridge Salisbury to Trowbridge Out-commuting Chippenham to Bath Chippenham to Bristol Chippenham to Malmesbury Trowbridge to Frome Trowbridge to Bath Trowbridge to Westbury/Warminster Overall Trowbridge has more in-commuting than out-commuting but Chippenham has more out-commuting than in-commuting, probably because it has faster road access. We would suggest that the policies associated with sustainable transport take these commuter corridors into account especially with respect to the improvement of public transport, as described in the Wiltshire Community Plan. Certainly if new employment land is to be built in the vicinity of Trowbridge, Melksham, Chippenham and Westbury, catering for more people commuting in and out of these areas by bus and train needs to be taken account as a matter of priority.
17. Again words. I see nothing real in this strategy that will take us any way towards making transport in Wiltshire more sustainable.   There is almost nothing on actual plans to provide improved public transport or rail freight encouragement.   On the other hand there is a very firm commitment to build a 'strategic' A350, which can only have the effect of making transport in Wiltshire more unsustainable than it already is.
18. I do not agree with core policy 42 Sustainable transport. It is wrong to say we must reduce the need to travel. We need to reduce the need to travel by polluting means of transport. We should be promoting walking and cycling given their multifarious health benefits - it is not travel that is the problem it is the means we currently use. Wiltshire Council also needs to be looking at developments in transport not just trying to put limits on it. For example, in the core policies it needs to address how the county will support the use of electric vehicles, cycles etc. Wiltshire Council should also acknowledge that for many living in western Wiltshire, it is much better to travel to work outside the county i.e. Bath / Bristol by train than it is to travel within Wiltshire i.e. Corsham, Devizes or Malmesbury where the only practical option is to use a private car
19. Core Policy 42 Sustainable Transport. This policy, conflict with other statements relating to developments in villages and need to be reconsidered. For example, Core Policy 42 refers to 'planning developments in accessible locations' and 'promoting sustainable transport alternatives to the use of the private car'. Neither of these statements are consistent with developing in rural areas as rural locations could be classed as inaccessible and due to the lack of public transport there is reliance on the use of private cars.
20. Core Policy 42 - Sustainable transport. Holt Parish Council encourages the influencing of routing of freight within and through the County and assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment.
21. The AONB is keen to promote sustainable forms of transport as set out in Strategic Objective 8 and Core Policy 42. Nevertheless, there should be reference within these polices to the tranquillity of the AONB and the need to ensure that routes through the AONB do also benefit the AONB. I have already mentioned that one railway line has no stops within the AONB and is, therefore, no use whatsoever to the AONB, and the second railway route has

only one stop which means that it has only limited value as sustainable transport. Affordable parking is crucial to encouraging people to use public transport so the AONB recommends a policy is included to provide for affordable parking linked to public transport nodes and connection points. We are aware that the roads of the AONB are not to a high technical standard and may therefore be difficult for disabled, pedestrians, and cyclists.

22. CORE POLICY 42 Suggest after: 'maintaining and' 'and where there are major new developments' selectively improving the local transport network. If Wiltshire's aim is to reduce journey time, perhaps this should be rethought It would seem that major road improvements have been proved to be ineffective in improving sustainable transport systems.?

23. Core Policy 42 Change to bullet point 3. Insert after "maintaining and" "where there are major new developments and " There should be a map showing the HGV network and showing the status of all major routes

24. There is not a sound transport plan credibly promoting the necessary and overdue modal shift to public transport, walking and cycling. The A350 is over engineered in parts and should provide capacity for a north-south bus corridor. This, together with railway development, should provide the capacity needed to deal with congestion in the north-south corridor and air quality problems in Westbury. Cycling and walking are not credibly promoted, but vaguely affirmed. The Core Strategy should specify approaches to these modes, with corridors where relevant, and mention of programmes for action and initiatives (e.g. inter-urban cycling in West Wiltshire, safe routes to schools, segregated versus on-highway facilities, cycle-parking, integration with public transport etc.) Some existing and proposed schemes (such as the Bradford on Avon-Trowbridge shared-use path and the proposed Bradford on Avon cycle-footbridge) are inadequate and misguided. A walking and cycling evidence-base and substantial strategy statement are required.

25. Core Policy 42 Change to bullet point 3. Insert after "maintaining and" "where there are major new developments and" There should be a map showing the HGV network and showing the status of all major routes.

26. The Parish Council would highlight the lack of investment in safe cycle paths in rural areas that link them directly with local towns but avoided the need to use private vehicles and/or public transport. A local scheme recently suggested by this Parish Council was flatly refused with little thought as to the overall positive impact investment of this type can have on local communities and tourism.

27. The issues around north/south through traffic on both the A345 and the A338/A346 roads between the A303 and Junction 15 of the M4 near Swindon must be addressed, and it is high time that Wiltshire Council applied more effort, thought and resources to resolving these problems than has been the case so far. The Cabinet Member for Highways and Transport and the Service Direct for Strategic Services have already received extensive information through the Area Boards concerned and the A338/A346 Working Group, nothing appears to have been done and I look forward to a more positive approach to this matter by Wiltshire Council.

28. Crest and Redcliffe support the principle of this policy to create a transport system for Chippenham which is sustainable, safe and efficient. They consider that priority must be given in the future transport strategy for the area to walking, cycling and public transport initiatives. However an important component of this strategy is to ensure that planned development is identified in the most accessible locations. Crest and Redcliffe are promoting a southern expansion of Chippenham with a mixed use employment and residential development. The development will be fully .integrated into the existing town and town centre via the River Avon Corridor with improved walking and cycling routes. There is also the potential to improve public transport routes as a result of the development. Accordingly

a southern expansion for Chippenham with a mixed use development would be fully compliant with this policy

Changes Required

Comments noted. The following changes are proposed as a result of the comments made:

- The first sentence of Core Policy 42 to be amended to: "The council will use its planning and transport powers to help reduce the need to travel, **particularly by private car,** and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire".

In addition, to remedy a drafting error, the last two sentences of Core Policy 42 will be moved to explanatory text; this reflects the correct text in the Transport Topic Paper.

3.5 Core Policy 43 Transport and Development and Policy 44 Development impacts on the transport network.

New development can potentially have both a positive and negative impact on transport. It is for this reason that the transport impacts of new developments need to be assessed in accordance with national guidance and established best practise.

Planning developments in locations that are, or can be made accessible means that communities can access their needs (e.g. shops, schools and employment) easily and without always needing a car. Providing good accessibility can also change people's travel behaviour towards more sustainable transport alternatives such as walking, cycling and public transport.

In the past, however, some new developments have not always catered (e.g. by having layouts which are bus friendly) or provided (e.g. by having convenient cycle storage) for the needs of sustainable transport users or operators. This is no longer acceptable. Therefore, as part of a required transport assessment, it must be demonstrated that the needs of all transport users (where relevant) have been considered in accordance with the identified hierarchy.

A key consideration is to ensure that development proposals achieve a suitable connection to the highway that is safe for all road users.

In these times of 'just in time' deliveries, the failure to provide adequate loading/unloading facilities in developments can lead to congestion, safety, community and environmental impacts as Heavy Goods Vehicles (HGVs) seek to park on the highway or elsewhere while waiting for allocated delivery time slots.

All new development is required to assess the transport issues related to that development. Where a development will have significant transport implications, the council will require a transport assessment to be prepared and submitted alongside a planning application in accordance with national guidance.
Developers will be required to make a contribution towards sustainable transport improvements as part of their development proposal. The required transport assessment will help determine what is needed in each case.

Developers will also be required to submit a travel plan with planning applications which are likely to have significant transport implications. The travel plan should aim to promote more sustainable forms of transport including, where relevant, more sustainable freight delivery and routing arrangements. The detailed requirements for travel plans will be set out in an SPD.

Outside of built-up areas, proposals that involve a new direct access onto the national primary route network will not be permitted in order to assist with traffic flow and reduce risk. Exceptions will only be made where the type of development is such that it requires a primary route location, such as a roadside service facility.

Core policies 43 and 44 have been written to try and help with these issues.

Core Policy 43: Transport and development

New development should be located and designed to reduce the need to travel and to encourage the use of sustainable transport alternatives.

As part of a required transport assessment, the following must be demonstrated:

- that consideration has been given to the needs of all transport users (where relevant) according to the following hierarchy:
  - visually impaired and other disabled people
  - pedestrians
  - cyclists
  - public transport
  - goods vehicles
  - powered two-wheelers
  - private cars
- that the proposal is capable of being served by safe access to the highway network
- that fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.

Where appropriate, contributions will be sought towards sustainable transport. improvements and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.

Core Policy 44: Development impacts on the transport network

Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

Summary of responses

There were numerous responses to these policies, and they are as follows:

Core Policy 43

1. In general I believe your zoning for employment uses provide site sizes which are too large to be considered "green". If they were smaller and mixed in more with residential areas there is more chance of a resident being able to walk or cycle to work. With the areas you propose, I can see most workers still driving, as bus routes could be inefficient and too costly.
2. This policy conflicts with other statements relating to developments in villages and need to be reconsidered. Core policy 43 says 'New development should be located and designed to reduce the need to travel and to encourage the use of sustainable transport alternatives'. This statement is inconsistent with developing in rural areas where sustainable transport alternatives are limited.
3. Core Policy 43 supported
4. New development should also be assessed against its impact on the capacity of the local transport infrastructure and on the quality of the surrounding environment.
5. I do not agree with core policy 43 - Transport and development. It is wrong to say we must reduce the need to travel. We need to reduce the need to travel by polluting means of transport. We should be promoting walking and cycling given their multifarious health benefits - it is not travel that is the problem it is the means we currently use
6. The AONB does not see goods vehicles as necessarily priority ahead of private vehicles in connection with Core Policy 43 as it is clearly recognised that for many parts of the AONB public transport is not a realistic option and private transport becomes essential. In connection with the transport policies it is important that landscape character is taken into account and that the provision of appropriate materials for bridges and highway furniture are taken seriously and are properly assessed at the initial stages of a project. The Rural Roads Protocol that the AONB has taken on from by our colleagues in Dorset should be incorporated in these policies.
7. Core Policy 43 Change of wording Final paragraph of text: delete the words "where appropriate"

Core Policy 44

1. Core Policy 44 supported
2. Transport infrastructure improvements must take place before additional housing or employment premises are built to afford the problem of traffic using unsuitable rural roads to escape congestion in urban areas. This might entail restrictions on the use of some rural roads that are seen as rat runs.
3. The need to provide major roads in particular on the A350 to serve the proposed number of houses and development areas for industrial sites up to 2026 will severely damage the County's pleasant environment, increase "carbon" contrary to the government's expectations. In addition the need to provide additional supplies of water and for sewerage disposal will prove difficult to sustain. Finally lots of land for farming (which is a finite quantity) for a constantly increasing population is not supportable nor sustainable PS. You will recall the Government turned down a Westbury Eastern bypass

Changes Required

Comments noted. The following changes are proposed as a result of the comments made:

- The first sentence of Core Policy 43 to be amended to: "New development should be located and designed to help reduce the need to travel, **particularly by private car,** and to encourage the use of sustainable transport alternatives".
- Add reference to 'Manual for Streets' to explanatory text.

- Included in explanatory text that a development management DPD would be produced that would include consideration of detailed transport-related matters such as site permeability, transport mode integration and parking standards.

In addition, to remedy a drafting error, the following sentence will be added to Core Policy 44: "Proposals for new development should not be accessed directly from the national primary route network outside built up areas, unless an over-riding need can be demonstrated". This reflects the correct text in the Transport Topic Paper.

3.6 Core Policy 45. Transport strategies

Core Policy 1 focuses development growth primarily in the principle settlements of Chippenham, Trowbridge and Salisbury. To support their enhanced strategic employment and service roles, and better self containment, packages of integrated transport measures will be developed and implemented.
The Wiltshire Community Plan sets out that the council and its partners need to:
"Provide a safer and more integrated transport system that achieves a major shift to sustainable transport, including walking, cycling, and the use of bus and rail networks, especially in the larger settlements of Trowbridge, Chippenham and Salisbury, and along the main commuting corridors".
Given this challenging objective, as part of each transport strategy, the council will need to consider a range of measures based on a 'ladder of interventions' that seek to 'nudge' people and businesses to make more sustainable transport choices.

Core policy 45 has been written to try and help with this objective.

Core Policy 45: Transport strategies
Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury to help facilitate sustainable development growth. The packages will seek to achieve a major shift to sustainable transport by helping to reduce reliance on the private car and by improving sustainable transport alternatives.

Each of the packages will consider the implementation of the following:

- new and improved networks of routes for pedestrians and cyclists
- enhanced public transport services and facilities
- traffic management measures
- demand management measures
- selective road improvements
- interchange enhancements that are accessible by all
- smarter choices measures.

These will be supported and implemented through developer contributions, LTP funding and joint working with partners and others.

Summary of responses

There were numerous responses to this policy, and they are as follows:

1. 5 th Bullet Delete "selective" and re-write. "Where there are major new developments that will be supported and implemented through developer contributions."   6 th Bullet After

"are" add "safe and"   The proposed improvements to M4 Junction 16 are not found to be safe. The land markings are too narrow for lorries on the bends and the cross-over is not according to the DMRB. Although the A3102 is not a trunk road, safety needs are paramount. Last sentence. Please differentiate between what will be implemented be developer contribution and what by LTP funding.   Rail should be mentioned, not just indirectly.

2. A major shift to sustainable transport indicated in Core policy 45 Transport strategies should not be limited to Chippenham, Trowbridge and Salisbury. Whilst there may be a more extensive range of strategies that can be applied to the larger number of people in these centres, other areas also need to think about sustainable transport strategies.

3. The A350 is not upgradable to major strategic route status without massive expenditure and disruption. "Selective road improvements and interchange enhancements" will not provide much improvement. Trowbridge should be dropped as a major development centre.

4. The safety of the very busy A3102 is important. May we please know the extent of developer funding v LTP funding? Rail?

Changes Required

Comments noted. The following changes are proposed as a result of the comments made:

- Amendment of 6th bullet text to "interchange enhancements that are **safe and** accessible by all".

In addition, to remedy a drafting error, the following sentence will be added to Core Policy 45: "Transport strategies may also be developed for other urban and rural areas in the plan area". This reflects the correct text in the Transport Topic Paper.

3.7 Core Policy 46. Demand Management

Demand management forms an important and essential part of an integrated approach to helping reduce reliance on the private car and encouraging the use of more sustainable alternatives.
A parking study, commissioned by the council in January 2010, included a comprehensive review of parking standards, charges and policy within both the Plan Area and neighbouring areas. The resulting Local Transport Plan 3 Car Parking Strategy was adopted by the council in February 2011 and includes the following policies:

PS1 – Overall management
PS2 – Managing the council's parking stock
PS3 – Parking charges
PS4 – Private non-residential parking standards
PS5 – Managing publicly available private non-residential parking
PS6 – Residential parking standards
PS7 – Parking enforcement
PS8 – Residents' parking zones
PS9 – Visitor attraction parking
PS10 – Park and ride
PS11 – Parking at railway stations
PS12 – Improving access and use
PS13 - Workplace parking levy
PS14 – Residents' overspill parking

Along with parking, traffic management measures are a key component of any integrated approach to transport planning. They can enhance the management and efficiency of the highway network and encourage the use of sustainable transport modes through a variety of measures such as the reallocation of road space, speed controls, pedestrian crossing facilities and intelligent transport systems. The implementation of any traffic management scheme will only be made after its effect on the surrounding highway network has been considered.

Charging measures, such as road user charging and the workplace levy, may become important tools in reducing traffic growth and encouraging the use of sustainable transport modes over the plan period. However, given the predominantly rural nature of Wiltshire, it is unlikely that these types of measures would have a significant impact on traffic levels outside of the principal settlement areas.

Core policy 46 has been written to try and help with this objective.

Core Policy 46: Demand management
Demand management measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives. These measures include:

- car parking management - efficiently and effectively managing the car parking stock through the implementation of appropriate supply, maintenance, charging and enforcement measures. These measures include:
  - public car parking charges – parking charges will be set taking account of a number of factors including the service role and strength of the local economy, the utilisation of existing parking spaces, the availability of sustainable transport modes and parking charges in neighbouring areas.
  - private non-residential parking standards – the provision of parking associated with new private non-residential development will be limited to maximum parking standards (except for disabled parking spaces). These maximum standards will be reduced to reflect local circumstances and the relative accessibility by sustainable transport modes in accordance with an accessibility framework.
  - managing publicly available private non-residential parking – there will be a presumption that any planning application which includes provision for publicly available private non-residential parking will be required to provide an accompanying car park management plan and, subject to a case-by-case analysis, to implement parking restrictions and charges consistent with those of council run car parks in the local area.
  - residential parking standards – the provision of car parking associated with well designed new residential development will be based on minimum parking standards. In determining the appropriate mix of parking types, the presumption will be that unallocated communal parking will be included in the majority of new residential development. Reduced residential parking requirements will be considered where there are significant urban design or heritage issues, where parking demand is likely to be low or where any parking overspill can be controlled.

- traffic management measures - traffic management measures will be developed to promote sustainable transport alternatives, reduce reliance on the car, lower the risk of accidents and improve the environment.
- charging measures – opportunities for charging measures, such as road user charging and the workplace levy, will be kept under review.

Summary of responses

There were numerous responses to this policy, and they are as follows:

1. Experience has shown that if insufficient parking is not provided on a site then road parking becomes a problem. I can take you around Trowbridge to show you some good examples. How will you be able to realistically control publically available private non-residential parking? What sanctions could be employed? Residential parking standards – Past experience indicates that few garages are used for car parking and some estates are very difficult for a fire appliance or bus to negotiate. So-called communal parking leads to on-road parking in front of properties with the same problem. There is no point in trying to achieve a pleasant residential environment if the road is cluttered up with cars and residents end up with disputes with neighbours.
2. The LTP3 Strategy omits the issue of Park and Ride in towns away from Salisbury and so can hardly be described as comprehensive. My experience with the Salisbury scheme suggests to me that the normal use of a dedicated bus service to sites would be uneconomical and sites will have to be sited alongside or close to existing bus routes. Existing services could then be enhanced to give the general bus passenger a better service. Trowbridge certainly needs this approach and you should be looking at reserving a site along West Ashton Road.
3. A criterion of "Value for Money" should be applied. Is the parking convenient for the facilities it serves? Would a longer journey to a free out-of-town centre be justified for the consumer? There is already evidence that LTP3 has had a negative impact on Malmesbury.
4. Core Policy 46 supported
5. Bullet point two - parking standards do not take into account the rural nature of Wiltshire and it is believed that the need for car use will remain very important and standards should be adjusted accordingly. Bullet point three - delete the words 'to implement parking restrictions and charges consistent with those of council run car parks in the local area.' There is no planning justification for this statement. Public transport is poor.
6. Core Policy 46 Word change Line 1 - delete "where appropriate" and replace by "and pursued"

Changes Required

Comments noted. No changes are proposed as a result of the comments made.

Added to explanatory text that a development management DPD, or other planning mechanism, would be produced that would include local parking policies, including cycle parking standards.

3.8 Core Policy 47. Movement of goods

The way in which an efficient and flexible freight distribution system supports economic vibrancy and growth cannot be at the expense of local communities or the environment. The council recognises this and takes seriously the need to achieve a more sustainable distribution of freight that balances the needs of the economy, local communities and the environment.

Core policy 47 has been written to try and help with this objective.

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Core Policy 47: Movement of goods

The Council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks. In particular:

- developments which generate large volumes of freight traffic or involve the movement of bulk materials should make use of rail or water transport for freight movements wherever practical.
- where carriage of freight by rail and water is not realistic, encouragement will be given for Heavy Goods Vehicle (HGVs) traffic to use those roads where a minimum of community and environmental impacts will occur, principally the advisory freight network. Where problems caused by HGVs making unnecessary and undesirable use of routes are identified (other than on advisory freight routes), freight management measures will be considered.
- overnight lorry parking should be provided in the vicinity of the advisory freight network, either where demand can be demonstrated or to alleviate nuisance caused in local communities.
- the provision of intermodal and other rail freight terminals in suitable areas will be supported and land required for realistic proposals will be protected from inappropriate development.

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Summary of responses

There were numerous responses to this policy, and they are as follows:

1. Who do you see providing overnight lorry parking? My experience has been that the subject of lorry parking is one of the most difficult matters to deal with. I cannot see too many private operators coming forward if they have to develop a site from new.
2. I support 'Core Policy 47 ' in particular bullet point 2. However, I question whether Wiltshire Council has either the will or the finance to impose freight management measures on those roads not identified in the Wiltshire Local Transport Plan 2011- 2026 Freight Strategy as advisory freight routes.
3. Core Policy 47 supported
4. This needs strengthening with regard to towns like BoA which simply cannot accommodate large HGVs.   A final point about the broad treatment in the Core Strategy of the A350 as a growth corridor. This goes against other provisions for BoA which acknowledge the risks of further development to the already serious traffic situation in the town. A related transportation issue which affects BoA is the inadequacy of the river crossings of the Avon. Growth on the scale envisaged will necessitate by-passing / diverting traffic from the BoA pinch point, never mind further damage to the town itself and the local environment.
5. Thingley railhead should be preserved as an important part of the local infrastructure
6. I agree the Core Policy. However it will not be possible to apply it to developments round Trowbridge as the existing road and rail infrastructure do not allow it. Trowbridge should be ruled out as a development centre. Transfer the development to the M4 corridor and the main rail route through Chippenham.
7. We welcome the recognition that growth in the freight distribution system cannot be at the expense of local communities and the environment. We also support the proposal to encourage HGVs to use those routes where a minimum of community and environmental impacts will occur, primarily the advisory freight network. We look forward to the early

implementation of the policy of identifying areas where problems are caused by HGVs making unnecessary and undesirable use of routes and the application of appropriate freight management measures. We believe that more consideration needs to be given to alleviating existing traffic problems alongside policies aligned solely to future development.

Changes Required

Comments noted. The following changes are proposed as a result of the comments made:

- Adding a reference to the Wiltshire Local Transport Plan 2011-2026 Freight Strategy to explanatory text.

3.9 Core Policy 48. The Strategic Transport Network.

The function of the strategic transport network is primarily to cater for the efficient movement of inter-urban and long-distance trips. In doing so, the strategic transport network can support the vision and objectives of the Core Strategy. The A350 corridor links five major towns in the west of the Plan Area including the principal settlements of Chippenham and Trowbridge. The corridor is made up of the A350 national primary route between the A303 and M4, and the rail line between Warminster and Chippenham.

The A350 primary route carries the highest volume of traffic and HGV movements on the county's non-trunk road primary routes. Because of its strategic importance, and the locally significant traffic growth that has occurred in the last ten years, the route will be selectively improved to maintain and enhance journey time reliability. The proposed improvements to the A350 primary route, including those at Yarnbrook/West Ashton where journey times are unreliable, will provide significant relief and environmental benefits, particularly for local residents, and the improved standard of provision of this road will aid the employment growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster.

Road improvements on non-trunk road national primary routes will be restricted to single carriageway enhancements to achieve positive road safety and environmental benefits, unless there is a need to provide continuity with existing standards and this can be achieved without unacceptable impacts on the natural environment.

Work will be undertaken, in conjunction with the Department for Transport, train operating companies and other agencies, to support the opening and improvement of local rail stations and the provision of additional rail services where these facilitate short distance passenger journeys such as those wholly within Wiltshire or to destinations in adjacent areas. Where appropriate, the council will consider financially supporting such initiatives. Priority will be given to new stations at Corsham and Wootton Bassett and an improved service at Melksham. Developments that would prevent realistic rail proposals such as these would be refused planning permission.

Core policy 48 has been written to try and help with this objective.

Summary of responses

There were numerous responses to this policy, and they are as follows:

1. In the "following improvements" you should consider A350 Chippenham By-pass and the single lane section alongside Chippenham Golf Club. Also, have you completely overlooked the need for a by-pass to Westbury? Also, should the Highways Agency not be given some "gentle" encouragement to improve A36?

2. Second para after "In particular" add "The Trans Wilts Rail Link will need to be in place before any major greenfield development takes place at Chippenham, Trowbridge and Salisbury Delete "selectively approved".. Delete first bullet. Improving the A350 at Yarnbrook will help to produce more road traffic, will only give short term relief and will result in pressure to improve other parts of the A350. Please correct the Transport Topic Paper re improvements to the A350 Re-opening the rail stations is supported. See under policy 42, re maintaining and enhancing journey times and reliability.

3. The Town Council strongly supports the inclusion of Corsham rail station and is pleased that it is specifically highlighted.

4. Include Staverton Station as recommended in Network Rail Route Utilisation Strategy. Also consider the possibility of a station at White Horse Business Park, Trowbridge, to accompany extension of employment allocation.

5. The A346 and A350 are shown on Map 4.1 as being to the same standard as the A34 (which is a major dual carriageway trunk road) and the A303 which is dual carriageway from London to the Amesbury roundabout and again shortly afterwards. In fact the A350 is only dual carriageway down to Chippenham and the A346 nowhere to my knowledge. This is quite clear on ordnance survey maps; Map 4.1 is misleading As noted elsewhere the A350 south of Chippenham is not suitable as a transport route supporting further development. The

council proposals should be amended to put the Trowbridge development in areas better served by road transport.   The strategic rail route shown from Trowbridge to Chippenham does not exist for passengers at any rate. Passenger travel is from Trowbridge to Bath, change and back to Chippenham.

6. Second para Suggest insert after 'In particular' add The Trans Wilts Rail Link will need to be in place before any major greenfield development takes place at Chippenham and Trowbridge'. The strategic road network along the A350 will be 'selectively approved' - Delete 'to assist with' and insert 'where it is necessary to develop areas for ...' Strategic network: Suggest delete first bullet To improve the A350 at Yarnbrook would assist in producing additional road traffic. It is suggested that such a move could result in pressure to improve other sections of the A350. Please see under policy 42 regarding maintaining and enhancing journey times and reliability. The Transport Topic appears to have an error regarding adverse environmental effects.

7. Word change After the words "In particular" insert "The Trans-Wiltshire Rail Link will need to be in place before any major Greenfield development takes place."

8. Crest and Redcliffe support this policy in so far as it states that the A350 corridor will be managed, maintained and selectively improved to assist employment growth at Chippenham etc. Crest and Redcliffe will be bringing forward employment land (Showell Farm) as part of the early phase to their southern expansion to Chippenham. Showell Farm has been identified as a strategic employment site for a number of years and there is a need to release the site early to provide a range of sites for existing employers to relocate to. It is their proposals to access the site via a new roundabout on the A350. It is considered that such a proposal would assist the sites attractiveness as a prestige employment site whilst not diminishing the A350 as a strategic transport route. It is considered that the policy should be amended to make reference to the proposed access off the A350 to serve land at Showell Farm.

9. The Showell Protection Group believes that the proposed development of Chippenham is seriously flawed as it is based on out-dated and conflicting research on out-commuting. Furthermore, the very existence of its excellent transport links and close proximity to Bath and Swindon, means it will always be encourage both out-commuting and in-commuting. The Showell Protection Group explores this in great detail in its full submission on the consultation available as a separate document. The Showell Protection Group further believe that the almost total ability to reach the proposed Industrial Estate at Showell Farm, Lacock, either on foot or by cycle, makes it an inappropriate site for development.

10. Corsham Community Area Our main concern here is the statement relating to reopening Corsham railway station, that it is 'unrealistic to consider this will occur in the plan period' i.e. before 2026. The case was agreed in 2005 to reopen the station, and since then there has been considerable further development which only strengthens the case, particularly Katherine Park and MOD Corsham. Wiltshire should be more active in lobbying Network Rail to reopen the station, working in collaboration with BANES, Bristol and Swindon, all of whom would benefit from increased rail use from Corsham reducing commuting and leisure road traffic into these adjacent areas. The Strategy also states that 'improvements to bus services could help encourage a shift from car use'. In our discussions with Wiltshire Council on bus services, we have always been told that the Council can do nothing to influence bus services - so how is this to be achieved, and why is it any more likely that the Council will be successful in improving bus services than it could be in influencing the reopening of Corsham Station? We strongly suggest that the final Strategy should state reopening Corsham Station as a priority and commit the Council to an active policy of lobbying for and planning for this key infrastructure development.

Changes Required

Comments noted. The following changes are proposed as a result of the comments made:

- Amend the first sentence of the policy to: "Work will be undertaken in conjunction with the Highways Agency, Network Rail, transport operators, **neighbouring authorities** and other agencies…"
- Added the following text at the end of the policy: "The land required for these and other realistic proposals on the strategic transport network which support the objectives and policies in the core strategy and local transport plan will be protected from inappropriate development".
- Defined the strategic transport network in a new explanatory text paragraph.

In addition, the following changes should be made:

- Clarify that the national primary route network includes the strategic road network.
- Reflect the fact that the 'key bus route network' is now termed the 'strategic bus network' in the Wiltshire Local Transport Plan 2011-2026 Public Transport Strategy.
- Change the term "assist employment growth" to "support development growth" to reflect the terminology used in the core strategy.

4.0   NATIONAL PLANNING FRAMEWORK

Since the WCSCD has been out for consultation, the government have published the draft national planning policy framework. This is intended to replace the existing planning guidance with one document. The following table assesses whether the document as written complies with the draft NPF, and if not, what changes would be needed in order to conform to it.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
82. Transport policies have an important role to play in facilitating development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.	Strategic Objective 8 'To promote sustainable forms of transport' and Core Policy 42 'Sustainable transport' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.
83. Where practical, encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. The planning system should therefore support a pattern of development which, where reasonable to do so, facilitates	Strategic Objective 8 'To promote sustainable forms of transport', Core Policy 1 'Settlement strategy' and Core Policy 42 'Sustainable transport' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
the use of sustainable modes of transport.		
84. To this end, the objectives of transport policy are to: • **facilitate economic growth by taking a positive approach to planning for development; and** • **support reductions in greenhouse gas emissions and congestion, and promote accessibility through planning for the location and mix of development.**	Strategic Objective 8 'To promote sustainable forms of transport', Core Policy 1 'Settlement strategy' and Core Policy 42 'Sustainable transport' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.
Facilitate economic growth **85. Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable economic growth, including large scale facilities such as Rail Freight Interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user.**	Core Policy 47 'Movement of goods' and Core Policy 48 'Strategic transport network' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.
86. All developments that generate significant amounts of movement, as determined by local criteria, should be supported by a Transport	Core Policy 'Transport and development' and Core Policy 44 'Development impacts on the transport network' largely deal with these issues.	Conforms partially to this part of the Draft National Planning Policy Framework. If this part of the NPPF comes into force, then local criteria

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
Statement or Transport Assessment. Planning policies and decisions should consider whether: • **the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.** • **safe and suitable access to the site can be achieved for all people; and** • **improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Subject to those considerations, development should not be prevented or refused on transport grounds unless the residual impacts of development are severe, and the need to encourage increased delivery of homes and sustainable economic development should be taken into account.**	However, there is currently no 'local criteria' in place that sets out the level of "significant amounts of movement" and Core Policy 44 talks in terms of "adverse" and not "severe" impacts.	for Transport Statements and Transport Assessments would have to be formulated and adopted, and Core Policy 44 would have to be amended to reflect the third bullet point in paragraph 86 of the NPPF.
87. When planning for ports, airports and airfields that are not subject to a separate national policy statement, planning policies should consider their growth and role in serving business, leisure, training and emergency service needs. In doing this, planning policies should take account of this Framework as well as the principles set out in the relevant national	No specific policies.	Conforms to this part of the Draft National Planning Policy Framework.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
policy statements and the Government Framework for UK Aviation.		
Support reductions in greenhouse gas emissions and congestion **88. Planning policies and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.**	Core Policy 1 'Settlement strategy' and Core Policy 42 'Sustainable transport' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.
89. Planning strategies should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to: • **accommodate the efficient delivery of goods and supplies** • **give priority to pedestrian and cycle movements, and have access to high quality public transport facilities** • **create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians** • **incorporate facilities for charging plug in and other ultra-low emission vehicles; and**	Core Policy 1 'Settlement strategy', Core Policy 42 'Sustainable transport', Core Policy 43 'Transport and development' and Core Policy 47 'Movement of goods' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
• **consider the needs of disabled people by all modes of transport.**		
90. A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement, as determined by local criteria, should be required to provide a Travel Plan.	Core Policy 43 'Transport and development' largely deals with these issues. Paragraph 6.8.9 requires that development with significant transport implications will be required to submit a travel plan. However, at present, the threshold for this requirement is set out in PPG 13 'Transport' (para. 88).	Conforms partially to this part of the Draft National Planning Policy Framework. If this part of the NPPF comes into force, then relevant local criteria would have to be formulated and adopted.
91. Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.	Core Policy 1 'Settlement strategy', Core Policy 42 'Sustainable transport' and Core Policy 43 'Transport and development' address these issues.	Conforms to this part of the Draft National Planning Policy Framework.
92. For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.	It is intended that the strategic sites allocated in the Core Strategy will have a mix of uses, and where required, primary schools and shops will be located within walking distance of most properties.	Conforms to this part of the Draft National Planning Policy Framework.
Planning for prosperity **93. When setting local standards for residential and non-residential development, local**	Core Policy 46 'Demand management' addresses these issues.	Conforms to this part of the Draft National Planning Policy Framework.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
planning authorities should take into account: • the accessibility of the development • the type, mix and use of development • local car ownership; and • an overall need to reduce the use of high-emission vehicles.		
94. Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.	Core Policy 48 'Strategic transport network' and relevant saved local plan policies have identified those sites and routes that need protection.	Conforms to this part of the Draft National Planning Policy Framework.

5.0 Changes made as a result of consultation comments.

The text below shows how the text of the Core Strategy would change when the modifications proposed as a result of consultation and other factors, such as sustainability appraisal, are incorporated.

Promoting Sustainable forms of transport

Transport features either directly or indirectly in a number of the challenges and objectives of the Local Plan. To help resolve these challenges and achieve the objectives, a sustainable transport system needs to be developed for Wiltshire.

Core Policy 42: Sustainable Transport

The Council will use its planning and transport powers to help reduce the need to travel, particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.
This will be achieved by:

   i.   planning developments in accessible locations
  ii.   promoting sustainable transport alternatives to the use of the private car
 iii.   maintaining and selectively improving the local transport network in accordance with its functional importance and in partnership with other transport planning bodies, service providers and the business community
 iv.   promoting appropriate demand management measures
  v.   influencing the routing of freight within and through the county
 vi.   assessing and where necessary mitigating the impact of developments on transport users, local communities and the environment.

As both the local planning authority and local transport authority, the council will use its planning and transport powers to develop, maintain and improve a sustainable transport system for Wiltshire. The way in which this will be achieved is set out in the remaining policies in this chapter in association with other relevant plans including the community plan, local development framework and local transport plan.

Transport and Development

New development can potentially have both a positive and negative impact on transport. It is for this reason that the transport requirements and impacts of new developments need to be assessed in accordance with national guidance (e.g. 'Manual for Streets' March 2007, DCLG/DfT and 'Guidance on Transport Assessments', March 2007, DCLG/DfT). The Development Management DPD will include more detailed local policies concerning transport-related matters such as site permeability, transport mode integration and parking standards.

Core Policy 43: Transport and Development

New development should be located and designed to reduce the need to travel, particularly by private car, and to encourage the use of sustainable transport alternatives.

As part of a required transport assessment, the following must be demonstrated:

  i.   that consideration has been given to the needs of all transport users (where relevant) according to the following hierarchy:
         a.   visually impaired and other disabled people
         b.   pedestrians
         c.   cyclists
         d.   public transport
         e.   goods vehicles
         f.   powered two-wheelers
         g.   private cars
 ii.   that the proposal is capable of being served by safe access to the highway network
iii.   that fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.

Where appropriate, contributions will be sought towards sustainable transport improvements and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.

Planning developments in locations that are or can be made accessible means that communities can access their needs (e.g. shops, schools and employment) easily and without always needing a car. Providing good accessibility can also change people's travel behaviour towards more sustainable transport alternatives such as walking, cycling and public transport.

In the past, however, some new developments have not always catered (e.g. by having layouts which are bus friendly) or provided (e.g. by having convenient cycle storage) for the needs of sustainable transport users or operators. This is no longer acceptable. Therefore, as part of a required transport assessment, it must be demonstrated that the needs of all transport users (where relevant) have been considered in accordance with the identified hierarchy.

A key consideration is to ensure that development proposals achieve a suitable connection to the highway that is safe for all road users.

In these times of 'just in time' deliveries, the failure to provide adequate loading/unloading facilities in developments can lead to congestion, safety, community and environmental impacts as Heavy Goods Vehicles (HGVs) seek to park on the highway or elsewhere while waiting for allocated delivery time slots.

Core Policy 44: Development Impacts on the Transport Network

Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.

All new development is required to assess the transport issues related to that development. Where a development will have significant transport implications, the council will require a transport assessment to be prepared and submitted alongside a planning application in accordance with national guidance.

Developers will be required to make a contribution towards sustainable transport improvements as part of their development proposal. The required transport assessment will help determine what is needed in each case.

Developers will also be required to submit a travel plan with planning applications which are likely to have significant transport implications. The travel plan should aim to promote more sustainable forms of transport including, where relevant, more sustainable freight delivery and routing arrangements. The detailed requirements for travel plans will be set out in an SPD.

Outside of built-up areas, proposals that involve a new direct access onto the national primary route network will not be permitted in order to assist with traffic flow and reduce risk. Exceptions will only be made where the type of development is such that it requires a primary route location, such as a roadside service facility.

Transport Strategies

Core Policy 1 focuses development growth primarily in the principle settlements of Chippenham, Trowbridge and Salisbury. To support their enhanced strategic employment and service roles, and better self containment, packages of integrated transport measures will be developed and implemented

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Core Policy 45: Transport Strategies

Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury to help facilitate sustainable development growth. The packages will seek to achieve a major shift to sustainable transport by helping to reduce reliance on the private car and by improving sustainable transport alternatives.

Each of the packages will consider the implementation of the following:

    i.   new and improved networks of routes for pedestrians and cyclists
    ii.   enhanced public transport services and facilities
    iii.   traffic management measures
    iv.   demand management measures
    v.   selective road improvements
    vi.   interchange enhancements that are safe and accessible by all
   vii.   smarter choices measures.

These will be supported and implemented through developer contributions, LTP funding and joint working with partners and others.

Transport strategies may also be developed for other urban and rural areas in the Plan area.

The Wiltshire Community Plan sets out that the council and its partners need to:

> *"Provide a safer and more integrated transport system that achieves a major shift to sustainable transport, including walking, cycling, and the use of bus and rail networks, especially in the larger settlements of Trowbridge, Chippenham and Salisbury, and along the main commuting corridors".*

Given this challenging objective, as part of each transport strategy, the council will need to consider a range of measures based on a 'ladder of interventions' that seek to 'nudge' people and businesses to make more sustainable transport choices.

Demand Management

Demand management forms an important and essential part of an integrated approach to helping reduce reliance on the private car and encouraging the use of more sustainable alternatives.

Core Policy 46: Demand Management

Demand management measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives. These measures include:

   i.   Car parking management - efficiently and effectively managing the car parking stock through the implementation of appropriate supply, maintenance, charging and enforcement measures. These measures include:

      a. Public car parking charges – parking charges will be set taking account of a number of factors including the service role and strength of the local economy, the utilisation of existing parking spaces, the availability of sustainable transport modes and parking charges in neighbouring areas.

      b. Private non-residential parking standards – the provision of parking associated with new private non-residential development will be limited to maximum parking standards (except for disabled parking spaces). These maximum standards will be reduced to reflect local circumstances and the relative accessibility by sustainable transport modes in accordance with an accessibility framework.

      c. Managing publicly available private non-residential parking – there will be a presumption that any planning application which includes provision for publicly available private non-residential parking will be required to provide an accompanying car park management plan and, subject to a case-by-case analysis, to implement parking restrictions and charges consistent with those of council run car parks in the local area.

      d. Residential parking standards – the provision of car parking associated with well designed new residential development will be based on minimum parking standards. In determining the appropriate mix of parking types, the presumption will be that unallocated communal parking will be included in the majority of new residential development. Reduced residential parking requirements will be considered where there are significant urban design or heritage issues, where parking demand is likely to be low or where any parking overspill can be controlled.

   ii. Traffic management measures - traffic management measures will be developed to promote sustainable transport alternatives, reduce reliance on the car, lower the risk of accidents and improve the environment.

   iii. Charging measures – opportunities for charging measures, such as road user charging and the workplace levy, will be kept under review.

A parking study, commissioned by the council in January 2010, included a comprehensive review of parking standards, charges and policy within both the Plan Area and neighbouring areas. The resulting LTP3 Car Parking Strategy was adopted by the council in February 2011 and includes the following policies:

- PS1 – Overall management
- PS2 – Managing the council's parking stock
- PS3 – Parking charges
- PS4 – Private non-residential parking standards
- PS5 – Managing publicly available private non-residential parking
- PS6 – Residential parking standards
- PS7 – Parking enforcement
- PS8 – Residents' parking zones
- PS9 – Visitor attraction parking
- PS10 – Park and ride
- PS11 – Parking at railway stations
- PS12 – Improving access and use
- PS13 - Workplace parking levy
- PS14 – Residents' overspill parking

Along with parking, traffic management measures are a key component of any integrated approach to transport planning. They can enhance the management and efficiency of the highway network and encourage the use of sustainable transport modes through a variety of measures such as the reallocation of road space, speed controls, pedestrian crossing facilities and intelligent transport systems. The implementation of any traffic management scheme will only be made after its effect on the surrounding highway network has been considered.

Charging measures, such as road user charging and the workplace levy, may become important tools in reducing traffic growth and encouraging the use of sustainable transport modes over the Plan period. However, given the predominantly rural nature of Wiltshire, it is unlikely that these types of measures would have a significant impact on traffic levels outside of the principal settlement areas. The Development Management DPD will include more detailed local parking policies, including cycle standards.

Movement of Goods

The way in which an efficient and flexible freight distribution system supports economic vibrancy and growth cannot be at the expense of local communities or the environment. The council recognises this and takes seriously the need to achieve a more sustainable distribution of freight that balances the needs of the economy, local communities and the environment. Further details on the council's approach to freight management is contained in the Wiltshire Local Transport Plan 2011-2026 Freight Strategy

Core Policy 47: Movement of Goods

The Council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks. In particular:

i. Developments which generate large volumes of freight traffic or involve the movement of bulk materials should make use of rail or water transport for freight movements wherever practical.

ii. Where carriage of freight by rail and water is not realistic, encouragement will be given for Heavy Goods Vehicle (HGVs) traffic to use those roads where a minimum of community and environmental impacts will occur, principally the advisory freight network. Where problems caused by HGVs making unnecessary and undesirable use of routes are identified (other than on advisory freight routes), freight management measures will be considered.

iii. Overnight lorry parking should be provided in the vicinity of the advisory freight network, either where demand can be demonstrated or to alleviate nuisance caused in local communities.

iv. The provision of intermodal and other rail freight terminals in suitable areas will be supported and land required for realistic proposals will be protected from inappropriate development.

Strategic Transport Network

The function of the strategic transport network is primarily to cater for the efficient movement of inter-urban and long-distance trips. In doing so, the strategic transport network can support the vision and objectives of the Local Plan.

The strategic transport network is made up of the following:

1) The national primary route network (including the strategic road network)

   Strategic Road Network – M4, A303, A36, A419
   Primary Route Network – A4 (west of Chippenham), A30 (St. Thomas's Bridge to Salisbury), A338 (south of Burbage), A346 (M4 junction to Burbage), A350, A354, A361 (west of Semington), A429.

2) The strategic advisory freight route network – M4, A303, A350, A36, A419, A34 (east of Wiltshire).

3) The strategic bus network – services linking the towns and larger villages with each other and with higher order centres, or providing them with access to the rail network if they do not have a rail station.

4) The rail network -

   Berks & Hants Line (London - South West England via Westbury)
   Greater Western Main Line (London - Bristol/South Wales)
   Heart of Wessex Line (Bristol - Weymouth)
   Waterloo-Exeter Line

Wessex Main Line (Cardiff - Portsmouth)
Westbury-Swindon Line (via Melksham)

The A350 corridor links five major towns in the west of the Plan Area including the principal settlements of Chippenham and Trowbridge. The corridor is made up of the A350 national primary route between the A303 and M4, and the rail line between Warminster and Chippenham.
The A350 primary route carries the highest volume of traffic and HGV movements on the county's non-trunk road primary routes. Because of its strategic importance, and the locally significant traffic growth that has occurred in the last ten years, the route will be selectively improved to maintain and enhance journey time reliability. The proposed improvements to the A350 primary route, including those at Yarnbrook/West Ashton where journey times are unreliable, will provide significant relief and environmental benefits, particularly for local residents, and the improved standard of provision of this road will aid the employment growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster.

Road improvements on non-trunk road national primary routes will be restricted to single carriageway enhancements to achieve positive road safety and environmental benefits, unless there is a need to provide continuity with existing standards and this can be achieved without unacceptable impacts on the natural environment.

Work will be undertaken, in conjunction with the Department for Transport, train operating companies and other agencies, to support the opening and improvement of local rail stations and the provision of additional rail services where these facilitate short distance passenger journeys such as those wholly within Wiltshire or to destinations in adjacent areas. Where appropriate, the council will consider financially supporting such initiatives. Priority will be given to new stations at Corsham and Royal Wootton Bassett and an improved service at Melksham. Developments that would prevent realistic rail proposals such as these would be refused planning permission.