

LAVERSTOCK & FORD PARISH COUNCIL

Report for Agenda Item 21.024

Subject: Local Plan Consultation Joint Responses
Date: 12th February 2021
Author: Trudi Deane, Deputy Clerk.

1. Report Summary.

- 1.1 This Report describes the background to proposed joint responses from Laverstock and Ford Parish Council and the Laverstock and Ford Neighbourhood Planning Group to the public consultation on the Wiltshire Local Plan Review.

2. Background.

- 2.1 The Wiltshire Core Strategy, which is a substantive part of the Development Plan for Wiltshire, is under review, and this review is called the Local Plan Review.
- 2.2 The review will set out aims up until 2036, with a framework for addressing housing needs and other economic, social and environmental priorities.
- 2.3 The Local Plan will be the basis against which planning applications are determined and neighbourhood plans developed. It is a legally required document containing planning policies and site allocations to deliver the Council's strategic priorities.

3. Public Consultation.

- 3.1 On Tuesday 26th January, Wiltshire Council ran an online consultation event, where a number of the core proposals were outlined, together with a presentation on Planning for Salisbury.
- 3.2 Based on Government guidance, the emerging strategy for the Salisbury Housing Market Area identifies the need for an additional 5240 in the period 2016 – 2036. Of these, 1100 have already been built, and a further 3200 either already have permission, or are in the pipeline. This leaves a shortfall of 940.
- 3.2 Three primary sites were identified for possible development to address the bulk of this shortfall (610 units) with the assumption that the remaining 330 would be met through infill or small scale brownfield conversions by 2036.
- 3.3 One of the suggested primary sites (Site 1 – 275 properties) falls within Laverstock and Ford Parish, at Old Sarum (see map below).
- 3.4 Two other sites were suggested outside of the Parish, at Britford, taking a total of 335 houses.

4. Joint Response

- 4.1 Because of the Neighbourhood Planning Groups work on the various SHELAAs in the parish and knowledge of the current Wiltshire Core Strategy, it is proposed to submit a joint LFPC/NPG response to the consultation.

- 4.2 The NP team submitted draft responses to the sections of the review most affecting the parish;
- Planning for Salisbury
 - Climate Change
 - Town Centre and Retail
 - Transport
- 4.3 On 9th February, these responses were discussed at a joint meeting of the Parish Council and the Neighbourhood Planning Group.
- 4.4 The proposed joint response for each section is detailed below.

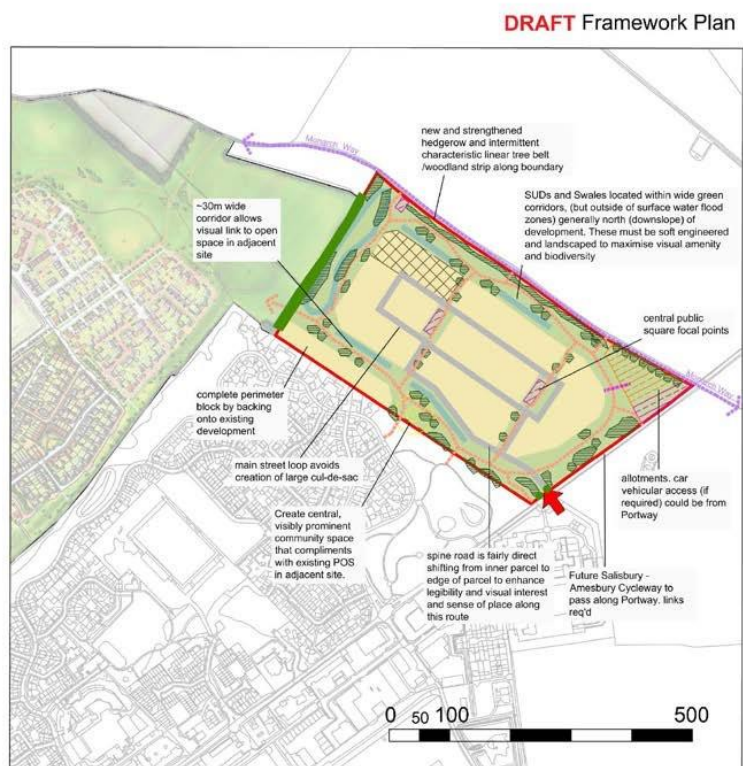
5. Recommendation

That the council approves the responses below to be submitted to Wiltshire Council as Laverstock and Ford Parish Councils response to the Local Plan Review.

Slide from Public Consultation Presentation showing location of Site 1

Salisbury: where development might take place - Site 1 North East of Old Sarum

- - Approx. 275 new homes to include self-build, custom-build and specialist housing
- - Open space provision / two public squares
- - Walking and cycling links
- - Woodland planting
- - Community orchard / allotments



Salisbury Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council,
County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
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Last name	Prince	
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Section Two – Questions

SB1. What do you think to the scale of growth? Should there be a brownfield target?

Should this figure be higher or lower?

Answer:

SB1. What do you think to this scale of growth?

Focusing growth on the principal settlements for environmental and economic reasons as laid out in the Emerging Spatial Strategy is a sensible policy and Salisbury currently has a healthy supply of new homes in the pipeline. However, the economic and working practice impacts of the current pandemic, and of government policy to preferentially support economic growth in the northern regions of England, would suggest that lower growth may be expected in future, so scaled back development may be inevitable. The scale of growth quoted is therefore probably optimistic and may need to be reduced as the future situation becomes clearer. Furthermore, the bulk of the housing requirement is proposed to be met by development on greenfield sites continuing a pattern in place for many years. WC acknowledge the ongoing problem associated with further expansion of the city outwards, in particular the adverse impact on its landscape setting and the views when approaching the city, so any further greenfield growth needs to be very carefully planned to avoid permanent damage to the city's visitor attractiveness.

Should there be a brownfield target?

Certainly, and it should be more ambitious than that included in the proposed strategy. Rather than turning immediately to greenfield sites as a solution to providing additional housing land and treating brownfield site availability as a contingency/windfall, the identification of brownfield sites should be given the highest priority. Much effort has gone into planning and consulting on the Central Area Framework for Salisbury (including the Maltings/Central Car Park redevelopment), which shows the potential to easily achieve the proposed 410 target (incidentally, how is this figure reconciled with the "around an additional 300" quoted in the later section 30?). In response to the pandemic driven changes, there is a major opportunity - and necessity - to undertake a fundamental review of the CAF and to systematically assess the scope for additional housing development within the city generally.

Should they be higher or lower?

The likelihood is that the pandemic impact on office based working and town centre retail will release far more brownfield opportunities than anticipated, since the CAF planning preceded the pandemic. As soon as the future effect of this impact is understood, the brownfield target should be revised upwards. Related to this is, as the document recognises, the effect of the changed business environment on the future demand for employment land. There are a number of employment land sites with outline or full planning permissions around Salisbury which remain undeveloped, including sites in Old Sarum, Fugglestone Red, and the "Asda" site at Hampton Park. The likely future demand for these as business sites needs to be re-evaluated in the light of the above circumstances and with the decision not to reduce employment use of parts of the Churchfields commercial area. The document says "Planning positively for brownfield sites, however, can also work alongside allocations of greenfield land". It would seem prudent to instead put a moratorium on progressing the allocation of greenfield sites and concentrate effort on a wide ranging brownfield plan.

SB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

SB2. Are these the right priorities?

i. Delivering opportunity sites, including The Maltings and the Railway Station, to ensure long-term city centre resilience

Yes, but the CAF will need to be refined to take account of the long term behavioural shifts around business and retail so that it better addresses the long term future opportunities.

ii. Realising Salisbury Central Area Framework measures to maximise the visitor economy and secure the place as a cultural destination

Yes, the visitor economy will continue to be important for the city.

iii. Conserving the landscape setting of Salisbury, notably in terms of the city skyline and views to / from the cathedral and Old Sarum

Essential if ii is to be achieved. Also, conserving the landscape setting of Salisbury should include that of Laverstock and Ford parish, due to its proximity to the city and the potential impact of development in the parish on the landscape setting of both settlements

iv. Maintaining separation and distinctiveness between Salisbury and Wilton, and between Salisbury and adjacent settlements, notably Ford, Laverstock, Britford, Netherhampton and Quidhampton

Essential if the city is to maintain its current “human scale” and avoid coalescence. Hence Old Sarum/Longhedge settlement should be added to the list. There is currently the opportunity to centre foot and cycle tourism on the city with routes out of the city which quickly open up into semi rural surroundings.

v. Expanding affordable housing provision, notably for education and healthcare personnel

Yes, but why limited to these? Workers providing other essential services should not be forgotten.

vi. Identifying suitable locations in the area to facilitate around 5ha of business growth that responds to needs

No, for reasons explained above. If there proves to be a need for additional land, it needs to be clear what type of business growth is envisaged. As WC’s own Economic Land report in 2018 pointed out, there is little economic incentive to build smaller scale business units for sale or lease. If this is what is needed, it must be planned as part of mixed development with the units cross subsidised by the profit on the housing. If a larger scale site is required for a specific purpose it is likely to dictate the choice of site, most probably within a large business park if industrial.

vii. Improving Churchfields such that it integrates better within the city, particularly for non-vehicular access, and presents a more accessible and attractive location to a greater diversity of businesses

A long term plan is now required for Churchfields, including improved vehicular access as well as non-vehicular, if it is to be the longer term commercial area of Salisbury

viii. Facilitating the regeneration of the District Hospital site to underpin its key role in the community and as a University-level skills provider for Salisbury

Yes. Some development adjacent to the hospital site could also could deliver priority (v) above

ix. Providing infrastructure to improve air quality, flood resilience and connectivity

Yes, all important. Connectivity has many connotations, and may need to be clarified

What priorities may be missing?

Improving the network of footpaths and cycleways to improve connectivity from existing and newer settlements (both new and established) to the city centre and to and along existing and proposed “Green and Blue Network and Improvement Corridors”. This then links to the comment on iv above regarding opportunities to expand the tourism offering. Making the improvement of this network a priority would contribute towards the achievement of other key WC objectives, notably improving health and well being and reducing car usage.

How might these place shaping priorities be achieved?

Shift the balance of future housing development much further towards brownfield sites closer to the centre of Salisbury and away from greenfield sites located on the periphery. This would require a fundamental review of existing plans especially for the Salisbury Central Area.

SB3. Do you agree these sites are the most appropriate upon which to build?*If not, why not?***Answer:****SB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?**

Accepting that a robust methodology has been developed for site selection, we nonetheless have reservations on how it has been applied. We question:

- Can greenfield development be avoided, as queried in the previous responses?
- If not, is the scale of development appropriate for the proposed sites. The answers below will only address site 1 at Old Sarum (SHELAA S80) which is within our parish.
- Has the methodology been consistently applied?

Regarding our third question, The WC assessment of site S80 in its Housing Site Allocations Plan Sustainability Appraisal Report February 2020 was that it was less sustainable and should not be considered for development. This changed in the January 2021 assessment to it being the most sustainable option for development in the Salisbury area. The table below shows the change in the assessment of the individual objectives making up the 12 point sustainability assessment (the Objectives numbering changed between the two assessments and one of the 2020 objectives has been dropped and the renewable energy one added). The direct comparison is:

Objective	February 2020 Rating	January 2021 Rating
1 Protect and enhance all biodiversity and geological features and avoid irreversible losses	Moderate Adverse	Minor Adverse
2 Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings	Moderate Adverse	Minor Adverse
3 Use and manage water resources in a sustainable manner	Moderate Adverse	Moderate Adverse
4 Improve air quality and reduce all sources of environmental pollution	Minor Adverse	Moderate Adverse
5 Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation)	Minor Adverse	Minor Adverse
6 Increase the proportion of energy generated by renewable and low carbon sources of energy	Not assessed	Moderate Positive
7 Protect, maintain and enhance the historic environment	Moderate Adverse	Minor Adverse
8 Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place	Moderate Adverse	Minor Adverse
9 Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures	Major Positive	Major Positive

10 Reduce poverty and deprivation and promote more inclusive communities with better services and facilities	Minor Positive	Moderate Positive
11 Reduce the need to travel and promote more sustainable transport choices	Minor Adverse	Minor Adverse
12 Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth	Moderate Positive	Moderate Positive

Why over such a short period of time should the assessment have changed on so many criteria, in particular from moderate adverse to minor adverse on four of the 12 objectives (1,2,7 & 8) where physically nothing has changed on or around the site?

It is particularly difficult to understand the rationale for assessing the potential impact of large scale development as “Minor Adverse” in relation to Objective 8. The Landscape Sensitivity Assessment recently commissioned by our Parish Council assessed the area as High/Medium sensitivity, and unsuitable for large scale development, even if mitigation measures were put in place.

It is understandable that as additional development land is required progressively less sustainable sites will need to be chosen, but altering the evaluation rating is not appropriate when nothing has changed regarding these factors. A minor adverse implies that less mitigation is required than for a moderate adverse – this is not the impression which should be conveyed, especially to the developer.

We also have difficulty with the conclusions of the Place Shaping assessment as summarised in the table below. Again, the conclusions stated would give a developer entirely the wrong impression of the sensitivity with which this site would need to be developed. Our views of each PSP are given, together with our rating using the same colour coding as your document.

	Wiltshire Council Assessment/Rating		Our Comment/Rating	
PSP1 City Centre and Visitor Economy	A benefit for this Priority group would be an increased quantum of Site 1 residents able to support city-centre patronage		But WC acknowledges poor connectivity and adding to congestion on Castle Road, the route into the city	
PSP2 Landscape Setting	A benefit for this Priority would be an improved urban edge and countryside transition at Site 1; Further effects depend upon effective mitigation and detailed design and master planning to retain settings to nearby heritage assets - including views from Old Sarum and the setting of Ende Burgh scheduled monument. The urban -rural transition at Old Sarum when approaching along The Portway from the NE could be improved. On balance, strengths and opportunities are more likely than weaknesses and threats against this SP.		Definitely not the case with the proposed scheme as explained in the response to SB4 below. The urban edge would become much harder and visible from a greater distance with the proposed concept plan. This statement is clearly not correct	

PSP3 Separation and Distinctiveness	An advantage for this Priority would be the designation of a countryside gap between the urban area and The Winterbournes, albeit the separation between which would be reduced following development. On balance, strengths and opportunities are more likely than weaknesses and threats against this SP.	An interesting but illogical argument! What is the planning significance of “designating” this gap? Does it mean that no further development will be permitted between Old Sarum and the Winterbournes? Are gaps to be “designated” around other settlements eg Ford or is this an exceptional designation? Neutral at best
PSP4 Employment	A benefit for this Priority group would be an increased quantum of Site 1 residents able to support growth and resilience in general at Salisbury, as well as at specific locations including Churchfields and the District Hospital; strengths and opportunities are more likely than weaknesses and threats against this SP group.	Why Churchfields and the District Hospital would be mentioned when they are on the opposite side of Salisbury is unclear, especially with the Castle Road traffic issues. In particular, the likely contribution to the growth and resilience of the District Hospital would be minimal. For those living in Old Sarum, the hospital is not a particularly favoured employment destination: according to the 2011 Census, only 5% of Old Sarum employed residents worked at the hospital, a lower proportion than for either the Parish or Salisbury. For those employed at the hospital, Old Sarum is not a particularly attractive residence location, with less than 1 per cent of employees choosing to live in Old Sarum (2011 Census).
PSP5 Affordable Housing and Infrastructure	Benefits for this Priority group would be the ability of Site 1 to yield a range of affordable housing products and to support required infrastructure; On balance, strengths and opportunities are more likely than weaknesses and threats against this SP group.	No additional infrastructure appears to be proposed, and no indication is given that the promised but undelivered infrastructure in Old Sarum will finally be provided. The village centre in the adjacent Longhedge is at the diametrically opposite corner of the combined sites, so it is unclear whether it will support that. Affordable housing provision is a given on this scale of development

Regarding the other site within the parish considered for development, site 3554b, we would agree with its exclusion from further consideration due to traffic and heritage issues.

SB4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

SB4. What are the most important aspects to consider if these sites are going to be built on?

Site 1 lies at the very northern edge of our parish and the greater Salisbury area. It lies just over a slight ridge as you approach Old Sarum along the Portway from the north east. At the moment Old Sarum is hidden by the ridge so the approach along the Portway by car is in a rural setting until the ridge is crossed. The transition into the built environment is then currently softened by the country park with its recently planted trees, which lies in front of the existing housing to the right and there is Throgmorton Hall with its surrounding mature trees to the left. If Site 1 is built on it appears likely to be seen over the ridge on the approach along the Portway. The height and positioning of houses and any screening planting will need to be carefully planned and modelled to ensure that the approach views are not spoiled. Similarly, care will need to be taken with the first view of the built environment to maintain the current soft transition, by providing a green buffer between the road and the housing, as described above. A further concern is that the Monarch's Way long distance national footpath runs on the ridge along the north east boundary of the site. This is also identified as a key green corridor in the Green Blue Infrastructure mapping on p23 of the Planning for Salisbury Local Plan paper. The adjoining Longhedge Village to the north west has a country park in the equivalent field to Site 1 separating the housing from the Monarch's Way and forming part of this green corridor. Development of this site will bring housing much closer to the Monarch's Way and cause a blockage to the green corridor. Great care will be needed to maintain the rural feel of the footpath and avoid significant biodiversity harm (even before providing the 10% net gain requirement). A WW2 pill box is situated on the site adjacent to the Portway. This would need to be preserved, together with its context, in any development.

Finally, parts of this site are visible from Old Sarum scheduled monument and, due to the elevation of the field rising away from the monument the roofs of any houses will be higher than the current roof line. Again, scale of development, roof heights and mitigation will require careful thought and questioning of whether the site can support 275 houses without excessive impact. The concept plans do not appear to adequately address any of these issues.

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

The Portway, Old Sarum Site 1

SB5. How can these concept plans be improved?

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The concept plans are very simplistic. Much more detail is required to judge the actual landscape visual impact, biodiversity impact, etc., but since they are part of a document setting out the proposed spatial strategy for the next 15 years effort in this direction is probably inappropriate as much can change in that timeframe. What is required is consultation on detailed plans in the year or so before sites are considered for planning permission. Responses at this stage need to help formulate the constraints within which the scheme needs to be developed. These constraints should include, but not be limited to:

- Housing set back from the Portway in a similar way to the current Old Sarum north east boundary
- Reducing housing density and height, preferably to single storey, across the development towards the Monarch's Way
- Adequate green space and planting adjacent to the Monarchs Way to provide visual screening and suitable habitat for its green corridor status.

SB6. Do you agree with the range of uses proposed? Which other uses should be considered?

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There is no apparent suggestion of mixed residential/commercial use on site 1. A range of community facilities and opportunity for self build is appropriate. However, there is no indication of the range of facilities which are envisaged.

SB7. Do you agree with the location of the proposed uses? What should be located where and why?

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The layout needs to be guided by a detailed landscaping and ecological study and 3D modelling of the development to enable its impact from various viewpoints to be evaluated **before** it is progressed to the planning application stage.

SB8. Do you agree with the proposed locations for self-build and custom-build housing? Would you prefer alternative locations? If so, please explain

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These are likely to be more heterogeneous in design/appearance than those of a volume builder. This may be positive, provided adequate guidance on and control of design features is in place (the parish would expect to contribute to the guidance). If such guidance is not envisaged, they would be better sited away from the north-eastern perimeter of the housing development, in order to minimise their impact on views of the development.

SB9. Is there any other issues or infrastructure requirements that should be identified?

Answer:

SB9. Are there any other issues or infrastructure requirements that should be identified?

There have been major issues in the adjoining Old Sarum development regarding non-delivery of promised amenities, such as GP surgery, pharmacy (apparently driven by a wish to centralise provision of these facilities close to the centre of Salisbury itself?), and other facilities. Will this development address any of these issues and contribute towards their provision and will this be implemented before/during the construction, rather than left until after completion and then forgotten? The absence of these amenities contributes to the pressure on the road system into Salisbury and exacerbates problems of air pollution, and also results in the failure to establish new vibrant local communities – a WC aim which is clearly not met in the recent developments in the parish. A long term master plan to achieve this seems to have been lacking. We would encourage Wiltshire Council to engage with the relevant NHS authorities in relation to their refusal to allow the establishment of pharmacies at Longhedge and/or Old Sarum.

A village centre has been constructed in Longhedge (the premises are not yet occupied), but this is at the diagonally opposite corner of the developed area, so hardly convenient.

During construction of Longhedge an upgrade of the sewer along Green Lane was needed to cope with the additional load. Has the capacity for a further addition been checked? It is worth noting that there are significant odour issues from the man holes along Green Lane, which will presumably get progressively worse as Longhedge is built out and if this site is added.

Over the past decade, continued expansion of housing in the north of the parish has put considerable strain on the existing traffic infrastructure as shown in the Transport Review supporting document. The with and without mitigation morning peak period volume/capacity maps for Salisbury (on p28) show Ford Road is at 100% capacity, as is Castle Road.

Development of Site 1 (SHELAA S80) would further exacerbate the problems. The site allocation notes suggest that there would be secondary school capacity at Sarum Academy but the reality is that students from this site would probably displace out of area students in the Laverstock schools or go to the city's grammar schools. Some of the former would undoubtedly be taken by car along Ford Road and perhaps some of the latter along Castle Road, although public transport is available in the latter case. Travel to city centre amenities and attractions, as encouraged by this Plan, would further exacerbate the problems. There does not appear to be any proposed mitigation of these traffic issues other than the proposed cycle ways shown in Fig. 3.3 of the Transport Review. Regarding foot and cycle travel, we believe that there is insufficient street lighting along the Old Sarum stretch of the Portway, and, if development of S80 were to take place this lighting would need to be extended along any connecting foot/cycle paths.

Our final and most important comment is that there is currently sufficient green field development planned or in progress around Salisbury, including in our parish at Longhedge, to be able to defer any further firm allocation of green field sites until a full evaluation of brownfield availability or ability to re-designate allocated employment land to housing has been completed. An acknowledgement that there is the potential for limited green field expansion as a last resort is all that should be necessary at this stage.

If you have any further comments you wish to make, please detail them below.

Land Supply Issues

We agree with the Wiltshire Area Localism and Planning Alliance that the aim of this Plan - to create a framework for coherent future development based on Housing Market Areas through to 2036 - is undermined by the continuing absence of a 5 year land supply for housing.

We believe you can do so much more to facilitate a shared action plan to tackle the issues preventing Wiltshire having a 5year land supply for housing. The statement by the Leader of Wiltshire Council in August 2020 that "I think we've got a problem with developers not building out the planning permissions they've got." must be followed up. In particular we would like the opportunity to propose a number of practical steps that will enable us together to more quickly achieve the aim that 'The views of the local community, particularly those of Town and Parish councils will be important in considering potential benefits and impacts of proposals when planning applications are determined.'

Brownfield sites

The document's greater emphasis on using brownfield sites to help meet the future housing requirements for Salisbury is very welcome. However, brownfield site utilisation needs to be at the heart of WC housing delivery strategy, rather than just playing a subsidiary role. Accordingly, high priority should be given to a fundamental review of the scope for additional housing development inside the Salisbury Settlement Boundary, notably in and around the city centre.

Infrastructure

Continuation of the policy of locating housing development within or immediately adjacent to the Salisbury Settlement Boundary has the clear benefit of making use of extensive existing infrastructure, facilities and amenities. However, continued housing development has put considerable strain on the existing infrastructure, including, but not restricted to, the existing road system. This has led to increased air pollution, "rat running" through residential areas and traffic delays on major routes such as Castle Road. In addition, new developments have not seen the provision of facilities originally promised by developers for various reasons, including the consequences of various government agencies pursuing their own planning strategies e.g.:

- the promised primary school at Longhedge has yet to be built due to the decision of WC Education department to defer its provision until capacity elsewhere is fully utilised
- there is still no surgery or pharmacy at Old Sarum or Longhedge Village due to the NHS strategy of centralising provision of facilities close to the centre of Salisbury itself.

This has impaired the development of local community identity, and appears to be contrary to Wiltshire Council's stated aim. Continuation of the current approach to infrastructure/facilities provision will exacerbate the problems highlighted above. Accordingly, if further development is to take place on greenfield sites located at the edge of the Salisbury Settlement Boundary, it is vital that WC Spatial Planning work with other WC departments, government agencies and developers in order to ensure that the required investment in infrastructure and local facilities/amenities takes place in a timely fashion.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

☐

NO:

☐

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Addressing Climate Change and Biodiversity Net Gain through the Local Plan Consultation Response Form

Ref:

(For official use only)

The paper 'Addressing climate change and biodiversity net gain through the Local Plan - raising the ambition' outlines the challenge of climate change, describing how the preparation of the Wiltshire Local Plan can, in part, help address the issue.

To view the paper please visit the Council's Local Plan Review Consultation page on its website at:
<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council,
County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

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Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable) *
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Section Two – Questions

Consultation Question A1: Land-use policies need to be evidence based, realistic, viable and achievable. Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030?

Answer:

From past evidence this seems unlikely, unfortunately, but you should certainly be making every effort. There will be two main factors governing future carbon emissions:

- Improvements in the carbon emissions associated with new vehicles, new buildings, white goods etc.
- Individual behaviour such as car choice and usage, aviation usage, attitude to existing home insulation improvement and heating usage, etc.

From the former, Wiltshire Council can and must mandate building codes which require low carbon construction and zero carbon operation without delay. It has little control over the other aspects.

Regarding the latter, improvements will be driven by a combination of persuasion and legislation. It would appear that WC can only address persuasion, with such things as better and greener public transport, provision of safe and enjoyable foot and cycle routes. Whether central government has the resolve or ability to enact effective legislation in a 2030 timescale is doubtful considering its past lack of resolve on such things as fuel duty.

Consultation Question A2:

What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?

Answer:

- Implement appropriate building codes.
- Mandate a move to electric buses and improve public transport
- Support green energy generation on roofs and on poor quality agricultural land
- Implement safe, usable and attractive cycle routes where it is clearly demonstrable there is a demand
- Ensure that all new homes have an allocated parking space with facility to easily install a dedicated and secure ev charging point linked to their home supply

Consultation Question A3:

How should these actions be delivered and measured?

Answer:

You are in the best place to judge how to deliver, but this delivery should be regularly audited using a pre-published audit framework and the results made public.

Consultation Question B1:

If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?

Please explain your answer

Answer:

We would support all the points listed. Whether the future risks increase to the point where these are insufficient will depend on the success in limiting climate change.

Consultation Question B2:

If we are to successfully enhance our natural capital through place shaping and nature based solutions, would the measures set out above go far enough?

Please explain your answer

Answer:

Yes, provided they are delivered BUT can we have any confidence in this. The GBI Strategy has been promised for years but is not yet delivered. It often seems that statements like "All new development will provide a minimum of 10% net biodiversity gain" are extremely difficult to measure and how will they be audited? Do WC have the capacity to ensure that these things are really delivered?

Consultation Question B3:

If we are to successfully plan for a net zero carbon future through sustainable design and construction, would the measures set out above go far enough?

Please explain your answer

Answer:

The question is again not whether these go far enough but whether WC has the capacity to ensure delivery. Building codes should have been tightened years ago but were not, presumably due to pressure from house building companies. Evidence is that even these codes were often not fulfilled due to on site errors which there appears to be insufficient capacity in the building control department to identify and require resolution of.

Consultation Question B4:

Is the move to a position where all new development is rated as zero carbon achievable from the date the Local Plan is adopted (i.e. from 2023)? How might this be achievable and if not, why not?

Please explain your answer

Answer:

Presumably you have to have central government support to achieve this, since most house builders will be against it. If so, are you confident? If you can implement the building regulation requirement yourselves and ensure compliance then, yes, you should go all out for it.

Consultation Question B5:

Would a move to support the delivery of zero carbon new development materially affect scheme viability?

Please explain your answer

Answer:

Inevitably house builders will say that it will, but WC need to take the long view. It is clear that a relatively small increase in cost now will save much more in the long term (as well as the planet, hopefully)

Consultation Question B6:

In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

For example, should we rely on current Building Regulations, or the Government's proposed 'New Homes Standards' (or any successor scheme, such as that promoted through the Planning White Paper) to achieve an uplift in the performance of new buildings?

Answer:

Not competent to comment

Consultation Question B7:

How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

Please explain your answer

Answer:

Not able to comment on the approach, but whatever is done has to be a long term scheme which gives confidence of continuity for installation companies and gives protection to homeowners (and tax payers) from rogue and incompetent players and confidence that what is done will achieve the promised performance. There will be a need for information events and WC resources to provide impartial advice on types of schemes and qualifications of installers. Support for new businesses in the sector through loans/guarantees/advertising/etc.

Consultation Question B8:

If we are to make headway in terms of decarbonising energy production, consumption and emissions, would the measures outlined above go far enough? If not, what are we missing and how would additional measures be delivered?

Please explain your answer

Answer:

The general approach seems right but WC may need to get involved in the detail of new developments to ensure the most efficient rather than the cheapest systems are adopted. For instance, air source heat pumps will be preferred to ground source, but there may be noise issues if many are installed in a small area. Perhaps communal green space could be used for ground source systems or perhaps bore holes could be relatively cheaply installed if many are done together – in areas on chalk this should be relatively easy to achieve. The long term efficiency and hence economic/environmental advantage over air source pumps is clear. Similarly, integrated solar pv roof systems rather than add on panels have clear advantages, but WC may have to mandate the maximum possible generating area in a roof (you often see a nominal area of integrated panels covering a small fraction of the area) and modify site layouts to optimise pv output (which should give the best passive solar heating potential for the homes too).

Consultation Question B9:

Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?

Please explain your answer

Answer:

See reply to B8 above

Consultation Question B10:

Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?

Please explain your answer

Answer:

WC should certainly set demanding targets for renewable energy generation in any new housing or commercial development. WC could also set a commercial renewable energy target, for instance from solar pv farms, but this will need to be carefully managed to guard against BMV agricultural land loss and significant visual impact in sensitive areas.

Consultation Question B11:

What steps should be taken to retrofit existing buildings with ultra-low or zero carbon forms of energy production? In particular, how could such technology be incorporated into buildings within sensitive locations such as Conservation Areas and/or Listed Buildings?

Please explain your answer

Answer:

Integrated solar pv tiles appear to be the only viable option. Some relaxation of listed building and conservation area rules will inevitably be needed to meet not only energy generation but also insulation targets.

Consultation Question B12:

If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?

Please explain your answer

Answer:

Unclear. However, future house design must recognise the need for and facilitate working from home to help minimise travel, across all types of housing.

Consultation Question B13:

What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?

Please explain your answer

Answer:

WC need to have clearly thought out plans for public and active transport development and make planning permissions contingent upon the builder delivering a part of that plan in the local area.

Consultation Question B14:

The electricity grid system may not be able to cope with a rapid take-up of electric vehicles and the charging infrastructure needed to power them? What measures should the Council explore with Distribution Network Operators/Distribution Service Operators to resolve this?

Please explain your answer

Answer:

This must form part of the forward planning but it is clear that central government must take the lead on this since it is a national problem. It is inevitable that all levels of the grid will need upgrading.

Consultation Question B15:

If all new development is to be future proof promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?

Please explain your answer

Answer:

Not competent to comment in detail, but it is an issue where central government need to take a lead in design standards and perhaps even low interest long term loans to cover any substantial extra cost. Excessive developer profit margins should not be allowed to compromise energy performance and future proofing when new buildings will hopefully be around for a hundred years or more

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

☒

NO:

☐

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

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Signature:

Date:

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Supporting Evidence Consultation Response Form

Ref:

(For official use only)

To support the progress of the Local Plan review a number of documents have been prepared and published including a series of evidence base documents. If you wish to comment on one or more of one of these documents, please fill out ONE FORM PER DOCUMENT.

To view the evidence documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council,
County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your comments on the evidence documents. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	Mr	
First name	Andrew	
Last name	Prince	
Job title (where relevant)	Parish Clerk	
Organisation (where relevant)	Laverstock and Ford Parish Council	
Address Line 1	3 Pilgrims Way	
Address Line 2	Laverstock	
Address Line 3	Salisbury	
Address Line 4	Wiltshire	

Postcode	SP1 1RZ	
Telephone Number	07900 580986	
Email Address	Parish-clerk@laverstock-ford.co.uk	

Section Two –

To which document does your comment relate?

Retail and Town Centre

Please Provide your comments here:

These comments relate to Salisbury and the potential impact of retail changes on our parish which adjoins the city.

The study makes reference to the impact of the covid-19 epidemic but, due to timing is unable to draw any conclusions:

“In light of these events, and whilst there is hope that the health of high streets will make a speedy recovery after the events in the first part of 2020, there is a need to rebalance the suite of land uses in town centres in order to ensure that a wider range of opportunities exist to visit, work and live in town centres.”

It now seems to be widely acknowledged that the epidemic will have brought forward by several years the changes which were trending pre-pandemic and that city centre usage has probably fundamentally changed. It seems necessary to revisit this study, as it relates to Salisbury, alongside a review of the Salisbury Central Area Framework, as soon as some degree of “new normality” has returned. There seems to be a strong possibility for Salisbury city centre to become a more residential community, supporting its hospitality sector, with a more focussed/specialised retail offering (the likes of BHS and Debenhams seem to gone forever). Any brownfield development in the city will have a double benefit, helping revitalise the city’s hospitality sector and reducing green field development pressure on surrounding areas.

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	1. Personal details	2. Agent's details (if applicable)*
Title	Mr	
First name	Andrew	
Last name	Prince	
Job title (where relevant)	Parish Clerk	
Organisation (where relevant)	Laverstock and Ford Parish Council	
Address Line 1	3 Pilgrims Way	
Address Line 2	Laverstock	
Address Line 3	Salisbury	
Address Line 4	Wiltshire	

Postcode	SP1 1RZ	
Telephone Number	07900 580986	
Email Address	Parish-clerk@laverstock-ford.co.uk	

Section Two –

To which document does your comment relate?

Transport Review

Please Provide your comments here:

Atkins' assessment of the impact of the proposed Local Plan housing growth for Salisbury is that traffic volumes would increase on all key local roads, with the greatest increases on Ford Road and Church Road. The proposed mitigation measures will have only a marginal effect on vehicle traffic. As a result, even with the proposed measure, traffic volumes in the morning peak period (8-9 am) would be:

- at 100% of capacity on Ford Road and Castle Road
- at 85-100% of capacity on the "rat run" between the A36 and Milford Mill Bridge

The Site Allocation document for Salisbury shows Site 1 (SHELAA S80) at Old Sarum as the preferred green field housing expansion site. The supporting evidence suggests that there would be secondary school capacity at Sarum Academy but the reality is that students from this site would probably displace out of area students in the Laverstock schools or go to the city's grammar schools. Some of the former would undoubtedly be taken by car along Ford Road and perhaps some of the latter along Castle Road, although public transport is available in this case. There does not appear to be any proposed mitigation other than the proposed cycle ways shown in Fig. 3.3. The cycle way proposals are welcome but, although costings are included, no detailed descriptions are given, so comment is difficult. Regarding the easterly cycle way shown on the map we would offer the following suggestions:

- If it is to be well used it will require tarmac surfacing of Green Lane from the Portway to Pearce Way in those parts where it is currently missing and routine shrub and bramble cutting where this restricts the path width.
- The crossing of the Portway from the end of Green Lane onto the country park paths is dangerous and requires some form of traffic control
- The crossing of Ford Road at the intersection with Green Lane is dangerous, partly because of restricted views from Green Lane and partly because of weight of traffic at peak times. Some form of traffic control is needed.
- The current cycle way across the front of the BP garage on the A30 London Road is unsatisfactory, as is the short shared pathway between the garage and the entrance to the path connecting to Jewell Close/Seth Ward Drive, which is shared with the Park and Ride return bus stop.
- If there is to be significantly increased cycle traffic to the Laverstock schools from this route the traffic light crossing of the A30 at the Barrington Road junction will probably need revision due to the limited capacity central reservation.

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