



Laverstock & Ford Parish Council

Incorporating Milford, Bishopdown Farm, Old Sarum & Longhedge

Meeting of the Parish Council held on Monday 20th November 2023 at Old Sarum and Longhedge Community Centre

MINUTES

Councillors present: Baker (Chair), Barker, Jones (until 9.15pm), Lynn, McDonald, Rigiani, Smith, Waller

In attendance: Brain (Communications and Community Engagement Officer CCEO), Deane (Clerk), Prince (Responsible Financial Officer)

Wiltshire Councillors in attendance: Cllr McLennan

There were 51 members of the public in attendance, with a further 5 joining the meeting online.

Cllr Barker opened the public session by reading the proposed response to be debated regarding the planning application for Old Sarum Airfield PL/2023/07368. 5 members of the public also spoke about this application, thanking the Parish Council and Cllr Barker for their work consulting residents, and highlighting concerns including proposed mitigations during construction should the scheme be approved, ecology, drainage, the continuation of flying from the airfield and heritage. Cllr Baker commented that he had previously received verbal assurance from the scheme promoter that there would be no access for construction traffic through Ford, and that all construction access would be from The Portway. Cllr Barker thanked members of the public present for their engagement and help in answering her questions during her investigations of the issues around the application.

A representative of Boscombe Down Aviation Collection BDAC presented information regarding their grant application, for improvements to display areas and cabinets to preserve artefacts in the collection.

The meeting commenced at 7.30pm.

23.136 Apologies

Apologies had been received from Cllrs Schneider and Vanstone.

Resolved: to accept the apologies received

23.137 Declarations of Interest

Cllr Rigiani declared an interest in item 23.138 PL/2021/04084, as a resident of Block C and abstained from voting on this item.

Cllr Smith declared a non-pecuniary interest in item 23.139 Grant Applications as a serving officer at Boscombe Down.

23.138 Planning

PL/2023/07368 Land at Old Sarum Airfield

Following comments received during the public session, Parish Councillors amended the draft response to include specific reference to the comments in the Historic England report that the best remaining remedy is reinstatement of much of the hanger rather the restoration, and specific reference to the impact on Stone Curlews under the ecology concerns. Cllr

McDonald raised concerns over the calculations of trip rates in the Transport Assessment, and it was agreed to add reference to this under traffic concerns.

Resolved: that the Parish Council OBJECT to the application for reasons given.
The full response agreed is attached as Annex One.

20/11598/OUT Land East of Church Road, Laverstock

Cllr McDonald had circulated Report 23.138(2) in advance of the meeting, suggesting an additional submission from the Parish Council in response to this application, following the submission of an updated Traffic Assessment by the applicant.

Resolved: to approve the additional response of OBJECT to the application for reasons given.

The additional response submitted is attached as Annex Two.

PL/2021/04084 Land west of Roger Way and Block C Old Sarum Centre

Councillors had been advised that updated documents had been submitted regarding this application. The Parish Council had previously submitted the response 'Object with Reasons'. Councillors agreed that the changes made included the provision of electric vehicle charging points and storage of refuse bins, but felt that all of the other reasons for objection had not been addressed.

Resolved: to approve the response OBJECT to the updated application for the reasons given
The full response is attached as Annex Three.

Planning Log

PL/2023/07727 Erection of a new dwelling, landscaping and associated works. Beehive Cottage, Portway, Old Sarum, Salisbury

Councillors agreed that the modern design was inappropriate for its setting, due to proximity to a listed building, the historic Old Sarum Airfield and the ancient Old Sarum Monument. Cllr Barker also raised concerns over the large trees on, or close to, the site and the impact these works may have.

Councillors agreed that they wished to review the application in more detail, and proposed to agree a response at the December meeting, accepting that this was after the consultation deadline.

Resolved: to approve the following responses:

PL/2023/09098 Proposed first floor and single storey extension and alterations at 1 St Albans Close, Bishopdown NO COMMENT

PL/2023/09082 Installation of Octopus Heat Pump at 2 Tryhorn Drive, Bishopdown NO COMMENT

PL/2023/09498 Lawful Development Certificate for a Proposed Use 17 Ash Crescent, Bishopdown, NO COMMENT

PL/2023/08424 Revised application of PL/2022/07787 - Single storey extensions to east and west elevations. Insertion of bay window to front and associated works. 11 Riverside Close, Laverstock, Salisbury NO COMMENT

23.139 Grant Applications Boscombe Down Aviation Collection

The Clerk had circulated the application in Report 23.139 in advance of the meeting, and the applicant had outlined their application in the public session, confirming that they had also applied for funding towards the project from Southern Wiltshire Area Board. Councillors expressed their support for the application and appreciation of the excellent work of the Boscombe Down Aviation Collection, and encouraged the applicant to also apply to other adjoining Parish Councils for funding, whose residents would also be visitors to the collection.

Resolved: to grant £2,000.00 to Boscombe Down Aviation Collection towards a display cabinet, new doors and blinds, under the powers granted by Section 137 of the Local Government Act 1972

23.140 Approval of Minutes

Resolved: to approve the minutes of the meeting held on 2nd October 2023

Resolved: to approve the minutes of the meeting held on 16th October 2023

23.141 Matters Arising

There were no matters arising.

23.142 Election of Vice Chair and Committees

The Chair announced the resignation of Cllr Maskell, thanking him for his contribution to the council. This left a vacancy for Vice Chair and Chair of Operations. Cllr McDonald confirmed he wished to resign as Chair of Personnel, and stand for election as Chair of Operations Committee. Cllr Jones confirmed she wished to stand for election as Vice Chair and Chair of Personnel Committee. There were no other volunteers or nominations.

Resolved: to elect Cllr McDonald Chair of Operations Committee

Resolved: to elect Cllr Jones as Vice Chair of the Parish Council

Resolved: to elect Cllr Jones as Chair of Personnel Committee

Cllr Jones signed the Declaration of Acceptance of Office for Vice Chair. The RFO reminded Cllr McDonald that he automatically became a member of the Finance and General Purposes Committee as Chair of Operations.

23.143 Finance

Resolution to sign side agreement to permit transfer of Play and Youth & Adult contributions relating to 19/02482/FUL Longhedge Parcels B and C

The Clerk had circulated Report 23.143(2) including details of a planned side agreement with Wiltshire Council, negotiated by the RFO, relating to £17,361.80 towards upgrading existing Play Areas, and £7,129.26 towards youth and adult facilities, resulting from the application for additional homes on Parcels B and C at Longhedge.

Resolved: To sign the side agreement to permit transfer of Play and Youth & Adult Contributions relating to 19/02482/FUL - Longhedge Parcels B and C

CIL Spending

This item was deferred to the next meeting.

Budget 2024/25

The RFO had circulated Report 23.143(3) in advance of the meeting, highlighting possible changes to calculations in Wiltshire Council's Council Tax Support Scheme, and the impact this may have on tax base for the new financial year. A final decision was expected on 12th December.

Appointment of Ockenden Tree Services, Tree Works Old Sarum

The Clerk had circulated Report 23.143(2) including details of required tree works at Old Sarum.

Resolved: to appoint Ockenden Tree Services to carry out works at Old Sarum in line with their quote QU-0851 for the sum of £10,760 plus VAT.

The Clerk advised councillors that the Operations Officer had successfully negotiated a contribution of £1,000 from an adjoining landowner towards the costs of these works.

Approval of Payment to CLS Electrical, Works at Old Sarum and Longhedge Community Centre

The Clerk had circulated Report 23.143(2) including details of works to install energy efficient lighting at Old Sarum and Longhedge Community Centre. The Clerk has been assisting the Centre Manager, who had obtained 3 quotes, selected the cheapest and was successful in obtaining a £2500 grant from Southern Wiltshire Area Board towards the project. This sum has been passed to the Parish Council towards the cost, with the remaining balance funded from the Parish Councils Community Centre Support budget.

Resolved: to approve the payment of £6,111.55, plus VAT, Total £7,333.86 to CFS Electrical for Installation of light fittings at Old Sarum and Longhedge Community Centre

Cllr Waller confirmed she had checked monthly accounts and was satisfied all were correct.

Adoption of Monthly Accounts for October 2023

The Financial Statements had previously been circulated in Report 23.143. The total funds held on 20th November 2023 were £1,873,169.52 of which £1,629,548.20 were earmarked or restricted reserves.

Resolved: To adopt the monthly accounts as a true record of the Council's finances.

Authorisation of Payments

The lists of payments had been circulated in Report 23.143. Total cheque and BACS payments in November 2023 amounted to £43,910.01, including increased salaries payments due to the agreement of a pay award back dated to 1st April 2023. Debit card and direct debit payments in October 2023 amounted to £1,252.28.

Resolved: To approve the cheque, BACS, direct debit and debit card payments.

Review of Reserves and Treasury Deposit Report

Reserves and Treasury Deposit Reports had been presented in Report 23.143. Earmarked and Restricted Reserves at the end of October 2023 were £1,629,548.20. The RFO, in agreement with the Clerk, invested £390,000.00 into a 173 days fixed term account with Lloyds on 6th October 2023 at a rate of 3.5%. The expected interest of £6,469.73 will be added at maturity. The balance on the 32 Day Notice Account at the end of October 2023 was £325,395.33 including interest of £13,511.92. The balance on the CCLAPSDF was £1,108,855.81 including dividends awarded of £42,911.81. There was a total of £1,824,251.14 on deposit at the end of October 2023.

Resolved: To note the reserve and treasury deposit reports

23.144 Clerk's Report and Correspondence

The Clerk informed councillors of the recent agreement of the National Joint Council Pay Award. The pay award had been implemented in line with staff contracts and backdated to the award date of 1st April 2023. Councillors noted the update.

The Clerk confirmed that Cllr Smith has met with the new directors and River Bourne Community Farm and that amendments to the Memorandum of Understanding may be proposed to bring this more up to date with their educational plans for the future.

The Clerk updated councillors on a recent meeting with the Land Trust regarding Castle Hill Country Park, and the possibility that they may receive significant BioDiversity Net Gain funds from two planning applications, if approved.

The Clerk reported on continuing discussions with Devenish Bradshaw Trust DVBT regarding plans to lease land adjacent to Castle Hill Country Park. The trust are hoping to obtain grant funding to meet both their own legal costs and those of the Parish Council. The Clerk is optimistic the legal agreements can be in place for the spring so that the trust can start to

manage the land in line with their environmental objectives. The Clerk also updated the council on land acquisitions by DVBT and their work on registration for biodiversity net gain. The Clerk encouraged councillors to promote the anti-social behaviour survey currently online, and reported on a meeting held with the local Police team, progressing plans for dealing with anti-social behaviour in the Parish. Cllr Jones left the meeting at this point.

23.145 Exempt Business – Exclusion of the Press and Public

Councillors agreed to hold this item in the public sessions, and no exclusions were made.

Wiltshire Draft Local Plan

The Clerk had circulated Report 23.145(1) in advance of the meeting, requesting councillors confirm the amendment of instructions to Landmark Chambers, as recommended by the Finance and General Purposes Committee at their meeting on 2nd October 2023.

Resolved: that in accordance with Standing Order 7 (Previous resolutions), to amend the previous resolution recorded under item 23.113, passed in September 2023 regarding instructions to Landmark Chambers, to:

that the Parish Council instructs Landmark Chambers to provide written advice on the Wiltshire Draft Local Plan to a cost of no more than £4000 + VAT, based on instruction from the Parish Clerk in consultation with the Chair.

Approval of Parish Council Response

The Clerk had circulated Reports 23.145 (2a), (2b) and (2c) in advance of the meeting, with proposed responses to the Wiltshire Draft Local Plan, following receipt of the advice from Landmark Chambers.

Resolved: to approve the responses to Policies 23 Old Sarum, 30 Church Road and 85 Sustainable Construction and Low Carbon Energy as circulated unchanged.

The responses submitted are attached as Annexes Four, Five and Six.

Cllr Waller proposed that thanks be recorded in the minutes to Cllrs McDonald and Barker for their work on the planning issues covered in the meeting. This was supported by all present.

The Clerk reported no update available regarding Hampton Park Pavilion with documents still in negotiations between solicitors.

The meeting closed at 9.29pm.

NEXT MEETING. The next Parish Council Meeting will be held at 7pm on Monday 18th December 2023 at Old Sarum and Longhedge Community Centre.

SIGNED:

DATE:

Annex One Old Sarum Airfield

AGREED RESPONSE TO PL/2023/07368 LAND AT OLD SARUM AIRFIELD

At it's meeting on 20th November 2023, Laverstock and Ford Parish Council resolved to OBJECT to the application on the following grounds-

- 1. After carrying out a systematic evaluation of local housing needs and a comparison of suitable sites with the potential to address this, Wiltshire Council has deleted the current Core Strategy 25 from the emerging local plan concluding that other sites are more suitable for development and that "the necessary protections for the site are already provided for through national and local planning policy..."
Therefore to allow development on this site would undermine the emerging Wiltshire Plan.*
- 2. The existing Wiltshire Council Core Strategy 2 and Policy 1 in the emerging local plan both identify Ford as a small village, only suitable for small scale infill development to meet community needs. However, the proposed development of Old Sarum Airfield, intending to build 155 houses in Ford, flies in the face of these long established policies. It will almost double the size of the village of Ford and significantly erode the distinctive settlement pattern of the parish which is protected through Policy 1 of the Laverstock and Ford Communities Neighbourhood Plan.*
- 3. We have serious concerns over whether the proposal would be effective as an enabling development securing the future of the listed assets in the airfield. There is a lack of clarity as to the ownership of the listed hanger that is the centrepiece of the development and the fact that it has been allowed to fall into its current shocking state of disrepair shows a lack of regard for statutory obligations. The application does not contain a detailed statement of how the site will be operated in the future to maximise the heritage asset and to work in co-operation with other occupiers of the Conservation Area. We note with concern the comments in the English Heritage report and that the best remaining remedy is reinstatement of much of the hanger rather the restoration, limiting any positive heritage impact of this application.*

If permission was to be granted we would request that a clear timescale for works to the hanger should be set out via planning conditions/s106 agreement with remediation of the hanger roof being required within a year of the granting of planning permission.

- 4. The continuation of flying activity at the airfield is central to the concept of the development, and in the opinion of the parish council, essential to the preservation of the heritage asset. However, this proposal does not contain any mechanism to prevent future residents of the 315 new dwellings on the airfield site from making a complaint of noise nuisance which could lead to the prevention of flying activity. Without a legal mechanism to prevent this happening this proposed development poses a long term threat to the heritage asset and the continuation of flying activity which has taken place for over one hundred years on this site.*

Old Sarum Airfield is one of only three surviving WW1 grass strip airfields of its type in Britain and is not only of local importance but of National importance. It is the most valuable Heritage asset in the Laverstock and Ford Parish and deemed as a Conservation Area. The perimeter of the flying field is largely unchanged. This proposed development would cause irreversible damage to that appearance and character through the substantial development of the three areas of that perimeter.

- 5. In 2019 an earlier planning application for housing on this site was taken to appeal by the scheme promotor. The Appeal Inspector concluded that harm, to both the airfield conservation area and setting of Old Sarum scheduled monument could not be satisfactorily mitigated under any circumstances. In fact, she concluded that the damage to the Heritage aspect would be so severe, that it alone was*

enough for her to deny permission. She did not even consider the lesser aspects of the application. The Airfield and Old Sarum are classified as being of National Heritage Significance.

- 6. The proposed development in areas A and B will lead to increased car use due to the limited facilities available within walking distance. There is a doctor's surgery in Bishopdown Farm but this is more than a 3 mile walk there and back from Area A and involves using a muddy unpaved, unlit, narrow footpath. In practice, residents have to go into the centre of Salisbury to be able to access these services. There is one full time nursery in Longhedge but this would involve approximately a mile walk to reach it. Old Sarum primary school serves both Old Sarum and Longhedge. Since the last planning application was made public transport services in Old Sarum have been reduced by 50%, from a bus every 15 minutes to a bus every 30 minutes and they are unreliable, often running late or not at all. This will increase pressure on already congested local roads, particularly Castle Road into Salisbury. The emerging Wiltshire Plan has taken account of the existing traffic and planned future development. Adding further housing in this area beyond that in the local plan could put unsustainable strain on the local highways.*
- 7. The highways impact of development in area C is even more significant. The Ford Road is already one of the most significant highways concerns in our parish. Due to the lack of pavements it is frequently used by pedestrians from the village accessing the Country Park and local footpaths, and it is also regularly used by recreational horse riders and cyclists. However it is also a notorious 'rat run' for traffic from the A30 and A36 trying to access the A345; particularly in the evenings and nights excessive speed is frequently a problem, with the highest speed recorded by the Parish's SID being over 80mph in a 30mph zone. The road is also narrow and wider vehicles are unable to pass safely at speed in several places.*

Adding all of the traffic created by the planned 155 dwellings in area C and the creation of an additional, significantly used junction, would further exacerbate these problems, and due to the character of the road the parish council believes that no effective mitigation is possible.

The council believes that Para 8.2.3 of appendix 13.1 of the transport assessment, significantly understates trip rates by not taking account the concentration of schools in the local area producing significant traffic flows prior to the 17.00-18.00 peak used in the report and this document therefore cannot be relied upon.

- 8. The airfield site currently provides a wildlife corridor, connecting Green Lane to the open landscape beyond the Old Sarum historic monument. We note with concern the issues raised by in the RSPB report about the nature survey methodology and the potential impact on the rare stone curlew population. We believe that development of this site would therefore cause significant harm both the ecology of the site but also the wider area.*

Annex Two PA 20/11598/OUT Church Road

Laverstock and Ford Parish Council Additional Response to PA 20/11598/OUT

Transport Assessment

The Parish Council considers the Transport Assessment to be substantially flawed and should be considered unreliable as supporting evidence that the development will not encourage significantly increased private car use. Furthermore, the Parish Council considers the Transport Assessment to be misleading in its assessment of the impact of the development on local traffic.

The Manual Traffic Surveys (Traffic Assessment Part 3), include the period of school drop-off by covering the period 0730 to 0930 but exclude the school pick-up time, covering only 1630 to 1830. The omission results in conclusions skewed in favour of sustainability and is far from accurate.

The Highway Network considered in Traffic Assessment Part 2 (Fig 4.8) includes the junction of Church Road with the A30 to the north and with the A36 to the south but excludes the junction with the A36 Southampton Road at Petersfinger, accessed via Manor Farm Road and Milford Mill Road.

Milford Mill Road provides the shortest distance and the fastest travel time between Laverstock and the A36 Southampton Road and gives access to a substantial range of employment and retail opportunities as well as a faster route to the New Forest and Southampton. Because of traffic congestion in Salisbury, the road is a major 'rat-run' for Salisbury traffic in both directions. It is narrow; contains two 'pinch points' (the medieval bridge, and the railway arch at Petersfinger); suffers from irregular, potholed edges; is prone to regular flooding from run-off throughout the year; and is subject to a 20mph speed limit. Use of the road as an access route to and from the Church Road site receives no mention, and certainly no impact assessment. The Parish Council consider this to be a substantial and major omission from the TA for the site and considers the road is most unsuitable for the additional weight of traffic generated by 135 additional houses on Church Road.

The Traffic Assessment Part 1 Figure 4.2 illustrates walking isochrones for 800m and 2k, measured from the centre of the site. This methodology fails to demonstrate whether or not all those residents situated to the east of the central point are also within "reasonable walking distance" of the facilities listed. As there is but one entrance and exit for the site, all residents will need to reach Church Road before walking further, therefore some will inevitably have further to walk than others.

The Parish Council acknowledges that Traffic Assessments tend to follow generic models, accepted by planning officers. Nonetheless in small villages, the impact from and on unique local conditions can have a critical effect on individual behaviours which is not reflected in the model.

Even at a generic level of modelling, the impacts could be more accurately estimated. The Chartered Institute of Highways and Transportation has published guidance (*Planning for Walking 2015*) which states that about 80 per cent of journeys shorter than 1 mile are made wholly on foot. For journeys that are 1 to 2 miles long, 26 per cent are made on foot. Applying such multipliers to the 800m (0.5mile) and 2k (1.24 miles) isochrones offers a more accurate model of the number of potential journeys on foot, which would correspondingly increase the potential vehicular traffic impact.

The Site Accessibility Audit references in support of its modelling the IHT document (*'Guidelines for Providing for Journeys on Foot 2000'*) but omits the factors impacting acceptable walking distances contained in the Guidelines. The IHT Guidelines note that walking distances are impacted by factors such as age, ability, encumbrances (shopping, pushchairs), journey purpose, time savings, convenience, personal motivation. The Traffic Assessment omits any demographic modelling / assumptions of potential residents and potential impact on walking journeys.

The village of Laverstock is unique for its size in having four schools (Primary and Secondary) all situated on the same short stretch of Church Road. The TA paragraph 4.3.7 states that the 800m and 2km walking isochrones from the site, “roughly equate to a 10-minute and 25-minute walk respectively.” However, the presence of the schools and the impact of pedestrian numbers and vehicles at school drop-off and pick-up times present a significant hindrance and disincentive to walking: lengthening walking times and increasing the hazards to pedestrian safety, especially for those with pushchairs and those with mobility or sight/hearing restrictions. The Audit fails to model or acknowledge the impact of school drop-off and pick-up times on the walking speed and/or motivation of site residents to walk and thus on the level of car use at such times.

There is a lack of appraisal on the expected number of school pupils the development will generate and the capacity of the schools on Church Road to cater for them. The recently published draft Wiltshire Local Plan indicates that the schools currently have constrained capacity and pupils from the proposed site may need to travel to Salisbury schools, thus adding to potential car journeys.

The draft Wiltshire Local Plan Sustainability Appraisal (SA Objective 10) states: “The site is situated approx. 1.1km from Bishopdown Surgery. GP provision in Salisbury was forecast as being subject to a positive capacity gap by 2026, however the closure of one branch surgery in 2020 to relocate services has led to issues. Negative premises capacity gaps are therefore apparent within the primary care network. There is a planned extension to the hospital. Expanded services are to be offered by Porton and Winterslow branch surgeries following this the closure of the Wilton branch. As a result, . . . there may be some negative effects on the capacity of individual surgeries” The location and constrained capacity of local surgeries inevitably requires journeys by car or by long and unreliable public transport.” This site does not in reality offer access to primary health care within a reasonable walking distance, whatever the modelling may suggest.

Annex Three PA PL/2021/04084 Land west of Roger Way and Block C Old Sarum

PL/2021/04084 Land west of Roger Way and Block C Old Sarum Centre

Laverstock and Ford Parish Council had submitted the response 'OBJECT with reasons' to the original application. At its meeting on 20th November 2023, Laverstock and Ford Parish Council discussed the changes made and agreed that the provision of electric vehicle charging points and storage of refuse bins has been addressed in the new plans. However, the Parish Council do not believe any of the other objections have been addressed, and resolved to OBJECT to the updated application for the following reasons.

Regarding residential development of the land to the west of Roger Way.

1. The Parish Council strongly supports the land remaining as employment land as defined in the 2007 S106 agreement, being "6ha of employment land principally comprising uses B1 and B2". No evidence has been provided of sufficient effort made in marketing or developing the land, to encourage take up for this use.
2. The noise and light from the neighbouring Salisbury Football Club, being immediately adjacent to the site, would have a significant adverse effect on any residential properties.
3. The roads approaching the site are already overcrowded. Many cars are parking along both sides of Sherbourne Drive, including near junctions and blind corners. The bus already has great difficulty negotiating this area, and concerns have been raised about access for Emergency Services. Laverstock and Ford Parish Council believe the proposed design does not provide sufficient parking for residents and visitors and will add to the problems already evident.
4. This road is part of the route for many children to nearby Old Sarum Primary School. The lack of parking spaces, and poor parking on the road combined with the increase in traffic to a residential development would make this an extremely hazardous area.
5. The proposed design of the new homes in this area is over-dense, with too many properties in a small area.

Regarding the Old Sarum Local Centre.

Not enough has been done to make this area an easy enough option for any consideration of Community use. We have seen no evidence of any marketing of this area for Community use, and the units have been left empty and unmaintained for some time.

Annex Four Policy 23 Old Sarum

Wiltshire Local Plan

Publication Stage Representation Form

Ref: _____ (For official use only)

Please return to Wiltshire Council, by 5pm on Wednesday 22nd November 2023.

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

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

For further information please visit: www.wiltshire.gov.uk/local-plan or Tel: 01225 713223

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector.
- All personal data will be handled in line with the Council's Privacy Policy on Spatial Planning matters. You can view the Spatial Planning privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>.

**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		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Laverstock and Ford Parish Council	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		
Email Address	parish-clerk@laverstock-ford.co.uk	

Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy:23	Paragraph:	Table:	Figure:
Site:	Other:		

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:		No:	
(ii) Sound	Yes:		No:	X
(iii) Complies with the duty to co-operate	Yes:		No:	
Please indicate with an 'X' as appropriate				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	X
(3) Not effective	
(4) Not consistent with national policy	
Please indicate with an 'X' as appropriate	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Due to the landscape sensitivity of this site we believe that the proposed allocation of 350 dwellings on this site is too high. This scale of development will prevent sufficient mitigation of the impact on Monarch's Way and in particular require the use of higher elevation land which will create a prominent urban edge to the Salisbury settlement, on the approach from the North East, rising above the existing housing and obscuring the views of the hills behind and Old Sarum Hillfort. We would draw attention to points 8.24 and 8.25 of the Landscape Sensitivity Assessment prepared by Landscape Design for the Laverstock and Ford Neighbourhood Plan (attached).

As the parish council representing the communities of Old Sarum and Longhedge we know that one of the most frequently expressed concerns by local residents is about the lack of facilities and amenities within the area which given the geographic location of the site and lack of bus services within the

~~Longhedge~~ estate result in frequent car journeys to access essential health services such as doctors surgeries, pharmacies, and dentists (none of which are present within the communities) and there is also a need for a wider range of other amenities which are currently only represented by two convenience stores and three food outlets.

Notwithstanding the general wording in policy 5 we believe that this issue needs to be specifically addressed within the mitigations in policy 23.

We believe that the wording of the policy in relation to the impact on the River Avon SAC is not sufficiently robust.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In relation to the landscape sensitivity we believe the number of dwellings needs to be significantly reduced to allow only the lower elevation portions of the site to be used while retaining a density in line with national policies and the Wiltshire Design Guide.

In relation to community facilities we believe that the policy needs to be modified to add specific mitigations to encourage the provision of these facilities, and to ensure that any spaces provided are finished to a standard which makes them easily accessible to potential occupiers with minimum 'fit out' costs.

In relation to the River Avon SAC- the measures should demonstrably be able to "neutralise" the levels of phosphates beyond reasonable scientific doubt, not simply be "aimed" at doing so, and this wording can be strengthened.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐	No, I do not wish to participate in hearing session(s)	☒	Yes, I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As the Parish Council representing the residents of the Old Sarum and ~~Longhedge~~ Community and as the qualifying body for the Laverstock and Ford Communities Neighbourhood Plan we feel that we could be of assistance to the inspector in their deliberations on the policies relating to sites in the parish.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	☒
The publication of the report of the Inspector appointed to carry out the examination	☒
The adoption of the Local Plan Review	☒

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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Annex Five Policy 30 Church Road

LFPC Response to Policy 30 (Allocation of 50 Houses on Land East of Church Road, Laverstock)

Laverstock and Ford Parish Council considers Policy 30 (Land east of Church Road, Laverstock) in the Wiltshire Council Draft Local Plan (LP) renders it unsound (not justified, not consistent with national policy) in relation to the Planning and Compulsory Purchase Act 2004 (PCPA 2004) and could be remedied by the removal of Policy 30.

The Parish Council considers policy 30 renders the draft LP unsound because of:

- a) Inconsistency with the spatial hierarchy described in the draft Local Plan;
- b) Policy 30 is not fit for purpose;
- c) Wiltshire Sustainability Appraisal is not fit for purpose in relation to Policy 30;
- d) Landscape impacts not compliant with NPPF; and
- e) Transport Plan impacts not compliant with NPPF and fail to take into account the impact on the existing problems on this road at the start and end of the school day.

INCONSISTENCY WITH THE DRAFT LP SPATIAL HIERARCHY

The Parish Council considers that the allocation of 50 dwellings next to a Small Village contradicts and undermines the settlement hierarchy set out in the draft Local Plan:

- a) Laverstock is identified as a Small Village (LP para 4.159)
- b) Small Villages are defined as having (LP para 3.14) “a low level of services and facilities” which “may accommodate some very modest development . . .” including “infill.”
- c) “Development at Small Villages will be limited to respond to local needs and to contribute to their vitality.” (Policy 1). As set out in the Laverstock and Ford Communities Neighbourhood Plan 2021 – 2036 (NP), local needs are being met from other developments within the Parish.
- d) “new housing development will be limited to infill within the built-up area of Small Villages or should be geared towards meeting local affordable needs through exception sites, or up to 20 homes, or 5% of the size of the settlement (whichever is the lower).” (LP para 4.213)

We agree with the conclusion in the local plan that Laverstock meets the definition of a small village, a conclusion which was also reached in the Neighbourhood Plan which was approved in 2022 and the previous Wiltshire Core Policy 23. Laverstock is in many ways the classic small village, it benefits from a pub, convenience store and church. It also has an overabundance of schools due to the re-location of school facilities from Salisbury in the 1960s. However, with the exception of the schools there is only one employer of any significance (a manufacturing business), no doctors surgery, dentist, pharmacist or even a hairdresser. To access any of these facilities residents generally travel to Salisbury a distance of 1.9 miles, a journey which is most commonly undertaken by car. There is very little scope for the development of any further facilities in the village, hence the small village designation. As a Parish Council we support the principle of identifying small villages, as we believe that there are sites (such as in Old Sarum within our parish) and the potential Brown Field sites identified by Salisbury City Council where new houses can be developed more sustainably and in a way which supports the government’s development policy goals.

Under the criteria of the draft LP itself, Laverstock is simply unsuitable for 50 new houses. There is a mismatch between the kind of development that is said to be suitable for Small Villages and what is proposed for Laverstock. If this level of development were suitable, Laverstock would not be designated as a Small Village. Church Road might be acceptable as a rural exception site but that is not what is being proposed. It is not clear if any other Small Village in the draft LP is required to take this level of housing (which is unsurprising given the definition of a Small Village). This allocation therefore amounts to an internal inconsistency within the draft LP itself.

POLICY 30 IS NOT FIT FOR PURPOSE

Policy 22 (Salisbury Principal Settlement) in the draft LP states: “Over the plan period (2020 to 2038) approximately 4,500 homes and 12.3ha of employment land will be provided at Salisbury including: . . . new allocation for approximately 50 dwellings on Land East of Church Road, Laverstock;” The

document 'Planning for Salisbury' (PfS) identifies site 15 at Church Road, Laverstock as a 'reasonable alternative site' for the housing needs of Salisbury. The Church Road site in Policy 30 is clearly chosen to serve the needs of Salisbury and is not a site chosen to meet the local needs of Laverstock. Such a position accords with NP Appendix 6 (Assessment of Local Housing Needs) concludes (pp.2,3) "A review of available evidence strongly indicates that the local need for affordable housing in the parish is low in both absolute and relative terms. This need is being addressed by the recent (and continuing) extensive programme of house building within the Parish and the requirement of Wiltshire Council for 40% of units to be in the form of affordable housing."

PfS contains eight Place Shaping Priorities (PSP). PSP1 relates to the City Centre, the economy and regeneration of Salisbury City. The strength of site 15 is given as, "the increased quantum of residents from Site 15 generally able to support city-centre patronage and overall resilience at Salisbury, as well as specific activity hubs including Churchfields and the District Hospital." However, the assessment is predicated on the Wiltshire Sustainability Appraisal (SA) which allocates 10.75ha and a capacity of 269-377 houses to site 15. Policy 30 in the draft LP delivers only between 13% and 19% of the anticipated "increased quantum" and the Parish Council considers that no monitoring mechanism would be sufficiently sensitive to measure any impact on PSP1 from only 50 houses. Even were it to be measurable, its contribution would be too negligible to distinguish from a margin of error.

The removal of policy 30 would have a negligible, if any, measurable effect on the overall resilience of the city, and is not required for the local needs of Laverstock. Even without policy 30, a Small Village infill of up to 20 houses to meet local needs could occur in Laverstock. Therefore the difference in impact on Salisbury City, is potentially only 30 houses.

Policy 30 simply cannot deliver the impact required or intended for Salisbury City and is unnecessary to meet any future local needs in Laverstock. Policy 30, as set out in the draft LP is unsupported by the SA and PfS which provide evidence only in relation to a larger site and higher housing capacity. There is no evidence-based rationale for the rejection of the SA housing capacity of 269-377 on a 10.75ha site in favour of the allocation of 50 houses on a 3ha site in policy 30 of the LP. Nor is there any evidence-based rationale rejecting other sites capable of an allocation of 50 houses but previously rejected as too small for an allocation of over 200 houses. The Parish Council, therefore, considers policy 30 should be removed from the LP in order to render it sound.

The Parish Council is also deeply sceptical about the capacity of policy 30 to limit the development to 50 houses for the lifetime of the LP, and to prevent 'development creep' in the small village of Laverstock. Policy 30 permits but does not prohibit: it allocates 50 houses to the site but does not prohibit or constrain further development on or adjacent to it. The SA indicates firstly, a larger area was in view (10.75ha), secondly, a larger number of houses (269-377), and thirdly, on-site employment opportunities which, (from previous experience in the parish) in the absence of business take-up, can later be used for further housing. In the absence of an evidence-based rationale supporting the allocation of 50 houses on a 3ha site, and a rejection of 269-377 houses on a 10.75ha site, the SA and its (in our view, flawed) evaluation of impacts presents leverage for any future planning application to exploit for further house building on and adjacent to the site. Once 50 houses are allocated and built, many of the arguments around landscape sensitivity are weakened, making applications for further development harder to resist and reject.

Landscape sensitivity

SA Annex 2.11 agrees (SA Objective 8, Decision Assessment Question 2) with the NP Landscape Sensitivity Assessment (LSA) and identifies the land at Church Road as of medium to high visual sensitivity, adjoining land of high sensitivity.

Regarding potential development on the Church Road site, the LSA comments:

"Large scale development in any of these areas is not recommended, but individual or small developments where there is local enclosure through topography or vegetation may be possible. Any development along Church Road should be in a series of clusters to allow the views of the Downs

beyond to still be viewed between any houses, in a similar way to the closes on the other side of the road which allow views of the River Bourne. In this way, visual connections will be maintained across this landscape.”

The feedback we have received as a parish council since the draft local plan was published shows the significance local residents attach to this landscape and the role this site plays in connecting the village into its rural setting.

Our reasoning for believing that the policy is not justified on grounds of landscape sensitivity is further developed in our consideration of SA Objective 8.

Transport

Our concerns about the negative impact development of this site will have on local transport are set out in our comments on SA Objective 11. In addition to the detailed points made there, one of the most frequent concerns that local residents have raised to us about the site is the impact of development on the existing traffic problems that experienced on the road at the start and end of the school day. These are identified in section 7.1.2 of the NP and photographic examples are provided in Appendix 1. Church Road is insufficiently wide to allow traffic to flow in both directions around parked cars and this is the cause of significant congestion, pollution and incidences of dangerous driving at the start and end of the school day. As there is not scope for a discrete right turn lane for East bound traffic into this development this site could potentially add significantly to these problems as traffic queues for an opportunity to turn right into any new development on the site. These issues do not appear to have been considered in the sustainability assessment or elsewhere.

For evidence in support of points c), d) and e) above, please refer to the Parish Council response to the Sustainability Appraisal.

APPENDIX 1







LFPC Response to Local Plan Sustainability Appraisal (relating to Policy 30)

Laverstock and Ford Parish Council considers Policy 30 (Land east of Church Road, Laverstock) in the Wiltshire Council Draft Local Plan (LP) renders it unsound (not justified, not consistent with national policy) in relation to the Planning and Compulsory Purchase Act 2004 (PCPA 2004) and could be remedied by the removal of Policy 30.

The Parish Council considers policy 30 renders the draft LP unsound because of:

- a) Inconsistency with the spatial hierarchy described in the draft Local Plan;
- b) Policy 30 is not fit for purpose
- c) Wiltshire Sustainability Appraisal is not fit for purpose in relation to Policy 30;
- d) Landscape impacts not compliant with NPPF; and
- e) Transport Plan impacts not compliant with NPPF and fail to take into account the impact on the existing problems on this road at the start and end of the school day.

For evidence in support of points a) and b) above, please refer to the Parish Council response to Policy 30 in the Local Plan

WILTSHIRE SUSTAINABILITY APPRAISAL IS NOT FIT FOR PURPOSE IN RELATION TO POLICY 30

There is a major disconnect between Policy 30 in the draft LP and the SA which aims to inform site choice. The disconnect denies informed consideration of the draft LP during the reg.19 consultation and also results in a failure to support the site choice in a plausible and reliable manner.

Paragraph 4.159 of the draft LP states "Approximately 3ha of land East of Church Road, Laverstock is allocated to provide approximately 50 dwellings." The SA, table 5.21 lists site 15 (SHELAA S204), which corresponds with the location in the draft LP, as a site of 10.75ha with housing capacity in the range 269-377 and the evaluations against the 12 SA objectives contain no reference to the effect of a reduction in area or numbers to those appearing in Policy 30 of the draft LP. The site area in the draft LP is only 30% that of site 15 in the SA and the housing allocation is between 13% and 19% of the capacity in the SA which becomes significantly unreliable as a result. There may be an assumption on the part of the planners that 'smaller is better' but such a position is not evidence based. The assessment against the SA objectives can produce positive and negative impacts of varying intensity. Positive impacts may increase or decrease by reduction in area and number; negative impacts may reduce or remain unchanged. Without a reliable, evidence based, assessment, one cannot assume that the Church Road

site would have emerged as the preferred choice over one of the other sites under consideration, particularly those considered too small to accept an allocation of over 250 houses.

The Parish Council argues the SA itself contains serious and major omissions in the assessments of Objectives 8 (Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.) and 11 (Reduce the need to travel and promote more sustainable transport choices.) both of which are addressed below, and which further undermine the reliability of the site choice.

There is a confusion of priorities in the SA which affects the assessments against objectives. Readers of policy 30 are advised to read it in conjunction with the PfS document which makes clear that the Policy 30 location was chosen as a 'reasonable alternative site' for the housing needs of Salisbury, not in order to meet the local needs of Laverstock. By way of one example, PfS contains eight Place Shaping Priorities (PSP). PSP1 relates to the City Centre, the economy and regeneration of Salisbury City. The strength of the Church Road Site is given as, "the increased quantum of residents from Site 15 generally able to support city-centre patronage and overall resilience at Salisbury, as well as specific activity hubs including Churchfields and the District Hospital." Notwithstanding Policy 30 would deliver less than 20% of the anticipated "increased quantum" and therefore be unlikely to contribute any measurable benefit to PSP1, this PSP opposes the achievement of SA Objectives 10 (Reduce poverty and deprivation and promote more inclusive communities with better services and facilities) and 11 (Reduce the need to travel and promote more sustainable transport choices) with regard to the community and economy of the small village of Laverstock.

It is unsurprising, therefore, to find mixed messages in the SA regarding benefits to the local (Laverstock) community at the expense of PSP1 and benefits to PSP1 at the expense of the village community, with no determination of the hierarchy of priorities in the objectives.

LANDSCAPE IMPACTS NOT COMPLIANT WITH NPPF

The Parish Council challenges some of the assessments in SA Annex 2.11 Salisbury Sites Assessment for site 15, and specifically under the following objectives:

SA Objective 1 (Preservation and enhancement of biodiversity etc.)

- "Residential development at the site, in close proximity to the river would potentially lead to an increase in recreational / visitor pressure which could give rise to adverse effects on the river and its associated riparian habitat, as well as upon the species it supports. A mitigation strategy will be required to address impacts on the River Avon SAC."
- "Cockey Down SSSI and Cockey Down Chalk CWS lies to the immediate east of the proposed allocation site and could be subject to adverse effects during construction as well as during operation. A public right of way runs through both the SSSI and CWS meaning development at the proposed allocation site would be likely lead to an increase in visitor / recreational pressure and a deterioration of the sites over time."
- "Laverstock Down CWS lies 370m south-east of the site. This CWS is contiguous with Cockey Down Chalk CWS and would also likely be subject to additional visitor / recreational pressure as a result of development at this site. There are several other SSSIs and CWSs within a short distance of the proposed allocation site that are accessible either on foot or via a short car journey, and which could also suffer increased visitor / recreational pressure as a result of development at this site."
- "... It's unlikely to be possible to completely deter additional visits to the designated site by residents of a development at the proposed allocation site and therefore, that the potential for adverse effects could not be entirely offset."
- "Overall a moderate adverse effect is considered likely against this objective."

The Parish Council takes the view that no mitigation strategies will be sufficiently robust to constrain the adverse effects to "moderate" regarding the objective of protecting and enhancing biodiversity on this site or compliance with the mitigation strategy for the New Forest protected sites. The SA lacks

evidential reassurance and admits that the potential for adverse effects could not be entirely offset. Merely indicating requirements for mitigation, without providing some assessment or estimates of magnitude, (e.g. how far will adverse effects not be offset?) and impacts of the suggested actions renders Policy 30 purely speculative. Removing policy 30 does not exclude some smaller future development as Small Village infill to meet local needs, but the adverse effects of such development (maximum 20 houses) is likely to be measurably less than the allocation of 50 houses.

SA Objective 2 (Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings)

- “It is considered that development of this site may not be able to deliver appropriate densities in line with local planning policy and available evidence.”
- “There are no opportunities to maximise the reuse of PDL.” (Previously Developed Land)
- “Development of this site would lead to a significant, permanent loss of Grade 3 agricultural land.”
- “Overall, a moderate adverse effect is considered most likely against this objective.”

If the allocation of 50 houses may not deliver appropriate densities, and development of this site would lead to a significant, permanent loss of Grade 3 agricultural land, the Parish Council argues that the principle of this objective has already been breached. Removing policy 30 does not exclude some smaller future development as Small Village infill (maximum 20 houses) to meet local needs. It too may not deliver “appropriate densities” but is more likely to reduce or avoid “a significant, permanent loss of Grade 3 agricultural land.”

SA Objective 8 (Conserve and enhance the character and quality of rural and urban landscapes)

The Parish Council agrees with the potential for adverse impacts listed in the SA, viz:

- Potential for built form to be intrusive in the rural landscape setting and alter the character of the distinctive views of Salisbury on the approach from the northeast.
- Potential for built form to be conspicuous on the rising slopes that form the rural backdrop and context to the existing settlement of Laverstock and northeast of Salisbury.
- Potential for development to result in expansion of Laverstock to the east of Church Road that would alter the rural character and sense of separation from the hillside of Cockey Down.
- Potential for inappropriate screening planting that would be uncharacteristic in the landscape.
- Potential change from a rural to urban context for visitors to Cockey Down nature reserve.
- Potential loss of hedgerow boundaries, shrubs, trees and woodland that contribute to green links through the local landscape to link river valley vegetation and woodland in the wider context.

The draft LP (para 4.160) does not accurately reflect these points and perversely states one of the advantages of policy 30 to be, “Development will create an improved urban edge and countryside transition”. As the points above reflect, the village of Laverstock is “semi-rural” and is one of the reasons people are attracted to the area. Laverstock is not urban or suburban, requiring an “improved urban edge” like some defensive wall against the natural surroundings, but semi-rural, encouraging the natural surroundings to break into the built environment. Gallent et al* observe, “The fringe is often viewed as periurban but as being strongly influenced by urban pressure and process. But there is an alternative view: that the fringe is perirural and within the rural rather than within the urban.”

* Planning on the Edge: England's Rural-Urban Fringe and Spatial Planning Agenda: Gallent N, Bianconi M, Andersson J; May 2006 Environmental and Planning B Planning and Design; 33(3):457-476

The Parish Council considers there is a significant and critical omission in the considerations under SA Objective 8: the site is certainly a “locally valued landscape,” but its value has been under-represented in the arguments. The road frontage at this point on Church Road is not only valued but is the only unobstructed window onto the Downs now available for people entering the village from the North (and for residents of Salisbury City living on elevated ground to the West), embodying the key features of the

“semi-rural” village. The Parish Council considers the proposal to allocate 50 houses to the space will obstruct the window and render the experience of those travelling southwards along Church Road little different from any urban environment with parks and green spaces. The proposal would not therefore “conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.” Nor would it, “maintain the character of the landscape when viewed from both inside and outside the Parish” in accordance with NP Policy 2. This adverse impact would be compounded by the further urbanization of the village from any physical expansion of the schools on Church Road required to accommodate the estimated number of pupils generated by the development. SA Objective 10 states “Housing development at this site could generate the need for 35-49 early years places, 83-117 primary school places and 59-83 secondary places.” And indicates the local primary school could not accommodate such numbers but would likely need to travel to Salisbury Primary Schools. There is no evaluation of the number of pupils that 50 houses would generate and the impact on local schools.

SA objective 9 - Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures

It is noteworthy that this is the only significant positive impact identified in the sustainability assessment, yet it appears to be predicated on a development of up to 377 homes when only 50 are proposed. In particular at point 2 the plan uses the same language as in objective 10 (which expressly states “The site has the potential to deliver up to 377 houses) saying the site has “potential to provide for a wide range of housing needs and types.” Our experience as a parish council is that a development of 50 houses is unlikely to meet a wide range of housing needs and types, and considering an allocation of 50 houses is considerably less than the current planning application for 135 houses any future developers are likely to raise questions of viability regarding the provision of a significant number of affordable or socially rented homes.

Transport Plan impacts not compliant with NPPF

SA objective 11 - Reduce the need to travel and promote more sustainable transport choices

Paragraph 73 of the NPPF states that when planning for larger scale development, authorities should “ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself.” Similarly, paragraph 105 of the NPPF provides that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” While sustainability has close links to scale of development, in the case of policy 30 it is clear from the beginning that the site chosen was intended as a “reasonable alternative site” for Salisbury and not a development site to meet local needs. NP Appendix 6 (Assessment of Local Housing Needs) concludes (pp.2,3) “A review of available evidence strongly indicates that the local need for affordable housing in the parish is low in both absolute and relative terms. This need is being addressed by the recent (and continuing) extensive programme of house building within the Parish and the requirement of Wiltshire Council for 40% of units to be in the form of affordable housing.” It is unsurprising then that SA objective 11 is unlikely to be met in relation to policy 30.

The Parish Council considers the interaction between this objective, and objectives 10 (Reduce poverty and deprivation and promote more inclusive communities with better services and facilities) and 12 (Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth) have been neglected in the arguments favouring site choice in policy 30.

The Chartered Institute of Highways and Transportation (*Planning for Walking 2015*) states that about 80 per cent of journeys shorter than 1 mile are made wholly on foot. For journeys that are 1 to 2 miles long, 26 per cent are made on foot.

Objective 11 points out that “The bridges to the north and south provide pinch points that may not allow a large vehicle and car to pass. Notwithstanding this, the development is of a scale which may not

exacerbate this but *should this be the case then the scale of development should be reduced further.*" (emphasis mine). The summary also states: "The entirety of Laverstock is restricted in its accessibility by its positioning to the east of the rail line, which isolates it from Salisbury to the west and south. Notwithstanding this, it is well served by education facilities but does rely upon Salisbury for many of its other amenity demands." Objective 10, however, (see below), undermines the statement on education provision since it foresees all or most access to education from the site needing to be away from Laverstock (based on a 10.75ha site and 269-377 houses)

All the schools on Church Road lie within some 800m of the entrance to the proposed site and so are within accessible walking distance. However, objective 10 acknowledges that the local primary school is most likely not capable of meeting the need for the estimated 35-49 early years places and 83-117 primary school places, generated by the development. Such pupils will therefore be travelling further, "This would most likely be Salisbury primary schools." PfS (p.33) states that meeting the demand for 59-83 secondary school places generated by the site, is dependent on increased capacity on the opposite side of the city, "Sufficiency of secondary school places is dependent upon the timely extension of Sarum Academy (developer contributions)." Based on the current SA data, the site is therefore not sustainable in terms of access to local education reducing the need to travel and reducing the need to travel by car.

Primary healthcare is of concern nationally and is reflected locally, particularly, access to GPs and access to NHS dental provision. Bus services from Church Road to the Salisbury District Hospital are only indirect and create substantial time delays for patients and visitors choosing public transport. The history of the Old Sarum and Bishopdown Farm developments gives clear evidence that health provision cannot be attracted out to the edges. While the NHS nationally is seeking to invest in expanded provision, it will take time to realise any benefits and the BMA points out that the supply side of the equation will be a limiting factor for the foreseeable future. The site is therefore not sustainable in terms of access to primary healthcare provision reducing the need to travel and reducing the need to travel by car.

On the accessibility to other amenities by walking or cycling, objective 11 states:

"Other than education facilities, Laverstock does not adequately serve its community, leaving long distance walking trips to non-education amenities and employment.

"Cycling is simply accommodated by on carriageway non-compulsory cycle lane facilities and whilst this does represent informal cycle infrastructure provision, such interventions are no longer supported by technical guidance. Furthermore, the on-carriageway cycle lanes only extend along Church Road and terminate at the railway bridge on Laverstock Road to the south and prior to the A30 roundabout in the north. The cycle facilities may therefore only serve cycle accessibility for Laverstock residents and their trips to local schools within Laverstock."

Analysis of the access by service vehicles ("The low railway bridges to the south (Laverstock Road) and north (A30) should not prejudice most service deliveries associated with a residential use, providing capacity is not exceeded at the pinch point.") and cars ("Like service vehicles, the bridges to the north and south provide pinch points that may not allow a large vehicle and car to pass.") is incomplete and hence presents a more optimistic picture of traffic movement than is the case. There is a third low railway bridge on Manor Mill Road at Petersfinger and the medieval bridge at Milford which create two additional pinch points.

Milford Mill Road provides the shortest distance and the fastest travel time between Laverstock and the Southampton Road. Objective 12 cites access to the Southampton Road as an employment opportunity: "The site is also 2.2km from employment land at Southampton Road" and so, clearly, has in view the use of this road. Because of traffic congestion in Salisbury, the road is also a major 'rat-run' for Salisbury traffic in both directions. It is narrow, suffers from irregular, potholed edges, is prone to regular flooding from run-off throughout the year, and is subject to a 20mph speed limit. A potential site for development along Milford Mill Road was excluded from the SA because of the assessed inability to mitigate traffic impacts and yet use of the road as an access route to and from the Church Road site receives no mention, and certainly no impact assessment. The Parish Council consider this to be a serious and major

omission from the SA for the site and consider the road is most unsuitable for the additional weight of traffic generated by 50 additional houses on Church Road. Objective 11 itself acknowledges that should this be the case then “the scale of development should be reduced further.”

As indicated in previous paragraphs, access to local schools does not correspond with the arguments in Objective 10. The site is furthermore, evidently not sustainable in terms of access to other amenities and employment reducing the need to travel and reducing the need to travel by car.

The local bus services within 1k of the site provide no direct routes to the station and connections with most locations in and around the city are via the centre of Salisbury. The service has been experienced as problematic, with cancellations, delays and staff shortages in the past, serving to lengthen journey times and discouraging those with access to private transport from opting for public transport. Public transport is also more challenging for those accompanying young children, those with mobility issues, or those wishing to undertake family shopping. The lack of convenient access to local amenities and employment serves to emphasise social inequalities.

SA Objective 12 (Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth)

The arguments supporting objective 12 appear prima facie to ignore the challenges posed in objective 11 and even the raison d'être of site choice as a “reasonable alternative site” for Salisbury. In terms of supporting the vitality and viability of the town centre, some 2.3k distant, it concludes, “The site is therefore remote from the centre and the railway station and is unlikely to be able to support it very well.” In terms of providing “a variety of employment land to meet all needs, including those for higher skilled employment uses that are (or can be made) easily accessible by sustainable transport including active travel”, objective 12 offers, “Although situated away from the city centre, the site has good connectivity to the A30, which suggests it could be attractive to higher skilled employment. A residential development could support existing employment land, particularly the higher skilled life sciences and defence, to the north of Salisbury through an enhanced workforce.” Higher skilled employment opportunities via A30 are located at a distance and more likely to require private vehicle use to reach or to travel as part of work. The development at Old Sarum (Roger Way) has already demonstrated the historic failures to attract employers and businesses to the Parish, resulting in a subsequent application to develop the employment land into further residential housing. The Parish Council sees no evidence in Policy 30 for the viability of the site to produce a different result and attract and retain employment opportunities. The character of the Longhedge development “which saw a strong demand for employment unit” and distinguishes it from that of Old Sarum, is not explained. Therefore assuming the factors attracting employment opportunities at Longhedge are present on the Church Road site, rather than the factors affecting Old Sarum, are unsupported and speculative. The earlier arguments concerning ‘development creep’ are equally relevant here. There is no allocation in Policy 30 for on site employment opportunities and, therefore no limit set on such potential development.



Wiltshire Local Plan

Publication Stage Representation Form

Ref: _____ (For official use only)

Please return to Wiltshire Council, by 5pm on Wednesday 22nd November 2023.

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

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

For further information please visit: www.wiltshire.gov.uk/local-plan or Tel: 01225 713223

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector.
- All personal data will be handled in line with the Council's Privacy Policy on Spatial Planning matters. You can view the Spatial Planning privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>

**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		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	Laverstock and Ford Parish Council	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		
Email Address	parish-clerk@laverstock-ford.co.uk	

Part B – Please use a separate sheet for each representation.

Please note, in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. To which part of the Wiltshire Local Plan does this representation relate?

Policy: 85	Paragraph:	Table:	Figure:
Site:		Other:	

4. Do you consider the Wiltshire Local Plan is:

(i) Legally compliant	Yes:	X	No:	
(ii) Sound	Yes:	X	No:	
(iii) Complies with the duty to co-operate	Yes:	X	No:	
<i>Please indicate with an 'X' as appropriate</i>				

4b. If you think the Wiltshire Local Plan is not sound, please indicate the reason(s) why:

(1) Not positively prepared	
(2) Not justified	
(3) Not effective	
(4) Not consistent with national policy	
<i>Please indicate with an 'X' as appropriate</i>	

See separate statement of representation procedure (guidance note) for further information on 'soundness'.

5. Please give details of why you consider the Wiltshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Wiltshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We support the measures set out in policy 85. Despite policy 4 of the Laverstock and Ford Communities Neighbourhood Plan including policies to encourage measures to facilitate household use of 'clean energy' we frequently see proposals where developers appear to be doing what they interpret as the bare minimum to meet National Standards rather than to respond effectively to the statutory target set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019 to achieve net zero carbon emissions by 2050.

We believe that policy 85 will make a significant step towards improving the sustainability of new housing in Wiltshire and reducing the need for costly retro-fitting of sustainability features.

(Continue on a separate sheet/expand box if necessary)

5a. If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal (SA), please make them here.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Wiltshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Wiltshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	No, I do not wish to participate in hearing session(s)		Yes, I wish to participate in hearing session(s)
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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We do not wish to participate in hearings related to policy 85, but we do wish to participate in hearings related to policies 23 and 30.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified of any of the following?

Please tick all that apply.

The submission of the Wiltshire Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up-to-date email address or postal address at which we can contact you.

Signature:		Date:	
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