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The Salisbury Cathedral Close Preservation Society
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Development Management
Wiltshire Council
Bourne Hill
Salisbury, SP1 3UZ

23rd May 2018

FOR THE ATTENTION OF BECKY JONES

**PLANNING APPLICATION 18/03096/FUL – TEMPORARY CHANGE OF USE TO
HOLD A CHRISTMAS MARKET OVER SPECIFIED DATES IN 2018 ONLY**

Dear Ms. Jones,

I attach a copy of a second submission by the Salisbury Cathedral Close Preservation Society re the above application. I have submitted it today via the Wiltshire Council website. I am also sending it to you via email. I was concerned whether the problems with the website could mean that you might not get a copy of it prior to the expiry of the consultation tomorrow. For completeness, I am attaching a hard copy.

Yours Sincerely



Heather Olsen

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This second submission is made by the Trustees of the Salisbury Cathedral Close Preservation Society ("the Society"), registered charity 1015692. It is prompted by the "Agent Statement in response" submitted by Mr Dean Speer of Myddelton & Major, and Board member of Salisbury BID, on 02 May 2018 (the "Response"). The Society is disappointed that it was felt necessary to supplement the original Planning Application Support Statement submitted by Salisbury BID (the "Statement"). This underlines the paucity of detail in the Statement. We would comment as follows:

1 Congestion

The Society hopes a traffic management plan can "minimise additional vehicle traffic" by encouraging use of public parking and so on. However, there will be considerable additional traffic with servicing the Christmas Market, set up and dismantling. A plan may be able to try and manage the additional traffic caused directly by the Market, but can have no control over the legitimate day to day traffic coming into The Close. In the run up to Christmas, deliveries, for example, to properties in The Close will be much more frequent. A traffic management plan encouraging pedestrian visitors will increase the delays at, and the road safety issues arising at, the High Street Gate bottleneck. No plan can manage the much-exacerbated conflict between the normal daily vehicular traffic entering and exiting The Close with the thousands of pedestrian visitors who may visit the Market daily, let alone conflict with the additional Market traffic. With that conflict there will also be an increased potential for traffic to build up not only in the High Street but extending into Crane Street and New Street, with implications for traffic movement throughout central Salisbury.

The Society notes the plan will be operated in conjunction with the Cathedral Close's traffic management operatives, located inside The Close. The traffic team also field pedestrian queries from visitors, give directions to delivery drivers and visitors to The Close and deal with all day to day queries arising. They will have to find safe places for vehicles servicing the Market to park. In addition, they will be trying to operate a set up schedule for stallholders and a plan for the erection and dismantling of the Market.

To manage the traffic, they will be stopping every vehicle that they do not recognise to check if it is servicing traffic for the Market, visiting properties in The Close, a stallholder, or Market visitors wishing to park and so on. This will, with large volumes of traffic, cause traffic to back up into the High Street Gate bottleneck. The Response is somewhat ambiguous on how the traffic team can minimise additional vehicle traffic. If the traffic team are also to explain to drivers that there are car parks outside The Close, say, this will make matters even worse. When cars are turned away, they usually make a U turn beyond the parking cabin and seek to leave by The High Street Gate, which will further add to the congestion at the bottleneck. This will be inevitable if they are being recommended to use to city centre car parks as this is the shortest way to get to them.

Crucially, the traffic team are not on duty all the time the Market is open. A plan cannot operate without them. The plan must address staffing for the period of the Market/set up/ dismantling.

2 Security Risk Assessment

The Society notes there will be a detailed security plan and risk assessment and security provided "out of hours". How this security will operate, at what hours and what lighting will be involved is something that should have been contained in the Statement. Lighting at night in winter when The Close is usually dark and quiet will be overly intrusive.

It should be noted that the security issues in The Close will be very different to the Guildhall Square which is well lit and compact. The Stalls in The Close will, the Society understands, be more spread out alongside the paths and in a dark environment.

3 Noise/Music

The Response acknowledges that there will be visitor noise but is silent on other sources of noise arising from the Market, save for music. The Response is at odds with the Statement. The Response says "It has already been indicated that amplified music will not be allowed to be played by stallholders." The Statement has a section called "Entertainment". This says nothing of the kind and is silent on amplified music from stallholders. The Response says "There is no intention to have any form of background music.". The Statement says there "will be incidental, background music". The Response and the Statement conflict so it is unclear what the true position is. The Response suggests that reasonable planning conditions will be accepted regarding noise, including 'music'. This suggests that music **will** be played. We welcome the change that amplified music will not be allowed. We need an unequivocal statement that there will be no loud speakers installed, and no background music played by stallholders or any other agency.

4 Landscaped areas

The Exeter Cathedral Christmas market takes place on grass. The Devon Gardens Trust gives specialist advice on planning/conservation matters affecting designed landscapes and responds to consultations on Devon planning applications. In 2017, they commented on the Christmas market application that they had "been very concerned about the damage to the grass caused by the siting of the Christmas Market in previous years, because the resulting bare earth has had a negative visual impact on the Cathedral Close for the whole of January, February and most of March. The Green has looked very unsightly during these months, and is unavoidable if the Christmas Market is allowed, as the laying of new turf and grass seeding cannot take place until the Spring. The Devon Gardens Trust advises that the adverse visual impact of the proposed Christmas Market would harm the significance of the Cathedral Green. We recommend that your Council should refuse consent for this proposal."

This makes it absolutely clear that the damage will not be merely "some degradation". It will result in dead/yellow grass for several months at the very point where most visitors coming to the Cathedral first set eyes on the green space of the Cathedral lawns. The only EFFECTIVE solution is not to hold the market in The Close.

5 Impact on ecclesiastical Activities

The Society notes the comments in the Response but is concerned that the Statement says, "stall layout will accommodate pedestrian movement on to and across the site and in to the Cathedral without significant hindrance". The "Darkness to Light" service is held on 3 consecutive weekend evenings at the beginning of Advent and attracts a full house of almost 2,000 people each evening. The dates are known well in advance and the Market should **not** be installed or operational until these services have ended. The Advent services bring a lot of footfall onto the paths where the Market will be. This is a concern for increased slipping and tripping hazards from a health and safety perspective, as well as security more generally.

6 Assembly & dis-assembly

Set up/dismantling at the Guildhall Square is very different to The Close, the former being a flat space with no grass or trees to protect. Vehicles will drive onto paving stones. After several years of doing this exercise in the Guildhall Square, perhaps those cabins could be set up/taken down in two days, but The Close is a **significantly** different place. Setup and takedown must be performed in a way that minimises noise and light disturbance for residents and local visitor attractions and protects the grass and trees. There is nothing in the Statement or Response about **when** it is to take

place, which must be during the working day to minimise disturbance to The Close. This will also ensure the traffic team are there to manage the process.

7 Planning Conditions

The Society has already given reasons why The Close is not the place for an overtly commercial market for 31 days plus set up and dismantling times. However, were this Application to be granted we urge that there must be detailed planning conditions to protect the unique nature of The Close. The Society has reviewed the only remotely comparable developments to this Market, being Exeter and Winchester Cathedrals and Bath Abbey. They are **very** much less sensitive areas since they are in the commercial hearts of their cities and are not located in such a substantial green space and obvious residential area. The Bath market only runs for 18 days. Based on that review, the Society requests the planning authority to make it clear, if they give their consent, that this is consent to an application of a temporary nature, solely for a Market in 2018, and that any future similar undertakings would require a new and complete application. This Application should not be seen in any way as potentially setting some sort of precedent for the future. We also request that the planning authority impose conditions making the following subject to their prior written approval: -

1 A detailed plan of the final layout of the proposed market in October, when it is agreed, such plan to position cabins and all other facilities, plant and equipment so as to minimise disturbance and proximity to neighbouring residential properties. This must include numbers of stalls (not exceeding 50 in number, all of an agreed size and none of which to serve food or alcohol), stall layout, details of any loudspeakers/sound equipment, lighting location (particularly if there is any additional lighting for security purposes), locations of generators and generator fuel and fire extinguishers, location of any portable toilets, if applicable.

2 The final dates for the Market being open, as the dates in the Statement are provisional – to be no longer than those proposed - and also the final opening hours for the Market. This (with 3 and 4 below) would be to safeguard the amenities of nearby properties.

3 A schedule for set up and dismantling of the Market - that should take place during working hours only and avoid early morning and school time busy periods and weekly waste collection.

4 A schedule for the servicing of the Market, to include details of how deliveries will be staggered and during what hours this will be taking place. That should not take place outside the Market hours.

5 A detailed event management plan - to include the traffic management plan, and parking management; details of the means of power supply (including location(s) and sound levels of any generators); details of any general or floodlighting scheme and its timing; a confirmation that the lights will be switched off after Market hours, save for necessary security lighting; a scheme for the collection and disposal of waste, recycling and any cleaning of the Market area; a full health and safety assessment, including tripping and slipping hazards, as well as a risk assessment of the operation of the Market; a noise abatement plan, to cover a ban on amplified music or announcements, music, generators, and other Market associated noise; a security plan; a crowd management plan, to include identifying crowd pinch points; a fire emergency plan and emergency plan generally including ambulance access; and details of adequacy of provision of WCs.

A number of the above provisions were conditions attaching to the most recent planning consent for Exeter Cathedral and the Market could not commence until the local authority's written approval was received. The reason given for some of the conditions for Exeter market was "insufficient

information has been submitted with the application and in the interests of visual amenity". The Response acknowledges that **"Not all of the details of the proposal have yet been submitted..."**, so detailed conditions seem particularly appropriate for this very sparse Application. Winchester Cathedral is required to produce an events management plan to the local authority for approval 28 days before the event. Bath Abbey has to submit for the local authority's approval an extensive access plan, covering a wide range of traffic management issues including loading and unloading, parking and event management structure.

6 An arboricultural statement to protect the trees within the Market area, a plan for the protection of the grass during setup, dismantling and operation of the Market and for the reinstatement of the grass and statuary. The most recent planning consent for Exeter Cathedral contained a condition that the grass must be reinstated to the condition it was in prior to the market "to the satisfaction of the local authority", the reason being "to protect the appearance of the Cathedral Green".