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Dear Sirs

**Wiltshire Local Plan Review
Further Submissions in relation to Amesbury**

We act for a consortium of local Amesbury residents who wish to make further representations in relation to the forthcoming draft Wiltshire Local Plan.

1. PURPOSE OF THIS LETTER

1.1 We refer to our letter of 21 October 2021 ("the October Letter") in which we raised concerns about the following sites that have been put forward by others for inclusion in the forthcoming local plan:

- High Post (north site) – a site of 59 hectares with a proposal that this will accommodate 47,500 square metres of employment space;
- High Post (south site) - a site of 144 hectares with a proposal that this will be suitable for 500 homes and 117,000 square meters of employment space; and
- Viney's Farm – a site of 74 hectares with a proposal that this will be suitable for 1,200 homes (we note that promoter is shortly to host a public event to reveal plans for up to 850 homes)

(collectively referred to as "the Speculative Sites"). Another copy of the October Letter with enclosures is at Appendix 1.

1.2 In the October Letter, we set out clear and cogent reasons why the inclusion of any or all of the Speculative Sites in the local plan would not in our view be sound and in accordance with national policy. The October Letter attached reports on landscaping, highways and planning matters which supported this view.

1.3 We referred in the October Letter (paragraphs 3.8 and 3.9) to the potential to commission further reports on ecology and archaeological matters. Our client has now commissioned such expert reports (from Darwin Ecology and HCUK respectively), together with further analysis by Velocity (on transport matters), Sphere 25 (on planning) and Chilmark (on

Housing Needs and Supply Analysis). These additional reports (collectively "the Further Reports") are enclosed in the Appendixes to this letter.

- 1.4 The Further Reports, in our view, not only corroborate the objections set out in the October Letter but put the position beyond doubt that the Speculative Sites should not be allocated in the local plan. We explain this in further detail below.
- 1.5 Since the October Letter, Lincoln College, Oxford and Classmaxi Limited, a company connected with the promoter of Viney's Farm, have submitted a proposal to double the size of Solstice Park in Amesbury by allocating a further 64 hectares of adjacent farmland for development of 204,000 sqm of employment space. Although the Further Reports do not specifically analyse the suitability of the Solstice Park Site for development, as a greenfield site various points raised in the archaeological, ecology and transport reports will equally apply to that site.

2. **TIMING**

- 2.1 Since the October Letter, timescales have been pushed back for the local plan review. We understand that the next stage in the process is that the Council intends to publish a pre-submission plan for consultation in Q4 of this year.
- 2.2 Our client is of course aware that it will have an opportunity to respond to the formal consultation at that time. However, as the Speculative Sites did not feature as part of the January – March 2021 consultation and our client only became aware of them after that consultation, our client does not know whether the Speculative Sites will feature in the pre-submission plan.
- 2.3 Equally, and as set out in the October Letter, as the Council is still at the stage of formulating its policies and collating the evidence base to support its policies, our client wishes to take advantage of this "window" to submit additional representations at this stage to bring to the Council's attention to the further analysis it has undertaken.

3. **FURTHER ANALYSIS ON THE SPECULATIVE SITES**

- 3.1 Sphere25 have outlined in their letter (Appendix 2) the main points in the Further Reports. There are compelling environmental factors on a number of fronts to disregard these sites.

Ecological Factors

- 3.2 The Council will of course be aware of Natural England's (and the Government's) advice in relation to SACs within the country on the need to reach phosphate and nitrate neutrality. It is estimated that over 100,000 homes are currently locked in the planning process with approval delayed due to this issue. Viney's Farm's immediate proximity to the River Avon SAC, which is in an unfavourable position already, is a real cause for concern. Any surface water run-off from development of that site could significantly impact the integrity of the SAC. An Appropriate Assessment under the Habitats Regulations would need to be carried out by the Council and a suitable mitigation strategy would be needed. Devising adequate mitigation to address this issue is proving a problem for many sites throughout the country.
- 3.3 In addition to the impact on the River Avon, Darwin Ecology's report (Appendix 3) confirms that as a greenfield agricultural site comprising woodland and mature native hedgerow, Viney's Farm has the potential to provide good quality habitats with high intrinsic ecological value. Any development would be likely to have a significant impact on such ecological valuable habitats.

Archaeological Factors

- 3.4 The analysis by HCUK (Appendix 4) corroborates the comments at paragraph 3.8 of the October Letter.
- 3.5 Viney's Farm sits in an area of rich archaeological potential. The Stonehenge, Avebury and Associated Sites World Heritage Site is directly visible from the site. The site also sits immediately adjacent to a linear boundary earthwork scheduled monument. There are 10 scheduled monuments within 1 km of the site. Records show 314 archaeological monuments within this 1km, with 31 sitting within the site itself. The site has been graded as having "high to very high" archaeological potential in relation to the prehistoric period which is of regional to national importance.
- 3.6 There is a high potential for direct physical impact with heritage assets on the site due to earth works during construction. Further, there may be physical and visual impacts on the scheduled monument linear earthworks immediately adjacent to the site. Importantly, there is the likelihood of detrimental impact on the setting of the many other heritage assets in the locality including The Stonehenge, Avebury and Associated Sites World Heritage Site.

Transport

- 3.7 Velocity has undertaken a further analysis of the High Post Sites (Appendix 5) to supplement their original report which was submitted with the October Letter.
- 3.8 The heart of their conclusions is that the development in this location would inevitably result in vehicle dominated access solutions. This is because access by public transport and bicycle from the nearby towns is unviable.. New infrastructure would be required including a new dual carriageway between the A303 and the A36 which would have a considerable detrimental impact on the environment.
- 3.9 Velocity conclude that development of the High Post Sites is "*fundamentally unsustainable*".

4. NEED FOR DEVELOPMENT OF THIS SCALE IN AMESBURY

- 4.1 Chilmark Consulting's detailed analysis on Amesbury and Wiltshire Housing Needs and Supply Analysis is at Appendix 6.
- 4.2 The quantum of housing attributed to Amesbury in the emerging local plan is overstated. It is not based on actual evidence of housing need derived from proper local analysis. Rather, it appears to have been derived by a generic "rolling forward" of figures for past delivery and completions.
- 4.3 Amesbury, Bulford and Durrington have experienced significantly high population growth linked to the military debasing programme and new housing development. Rolling forward such growth to future projections distorts the picture and does not lead to an accurate account of housing need. There has been no granular, local housing needs assessment undertaken by the Council.
- 4.4 Further, in parts, the Council's assessment lacks clarity given that over time there has been changes to geographical descriptions (particularly the disaggregation of Amesbury Market Town from Bulford and Durrington). It is not clear how the previous approach and figures are consistent or align with the new local plan geographies.
- 4.5 We endorse the Council's policy that the development of brownfield sites should be prioritised, which conforms with national planning policy. We consider that the identified need can be met within Amesbury without encroaching onto open greenfield land.

- 4.6 Similarly, we question the need for employment use on the Speculative Sites and Solstice Park. The promoters claim that there is a shortage of employment land in Salisbury and South Wiltshire. That is clearly not the case. We endorse the Council's current policy approach that employment use should be focussed on brownfield sites within the Principal Settlements, Market Towns and Local Service Centres. As such, employment development outside of those areas would need to demonstrate, amongst other things, that it is supported by adequate infrastructure. Employment on these greenfield sites without the supporting infrastructure would clearly not be appropriate.

5. **SUMMARY**

- 5.1 The Further Reports are compelling. They demonstrate clearly that development of the Speculative Sites would be unsustainable on a number of fronts.
- 5.2 The allocation of these large greenfield sites in inaccessible locations is unnecessary. It would clearly not satisfy the test of legal test of soundness. The allocations would not be justified as they would not be the most appropriate strategy or based on proportionate evidence. The plan would not be positively prepared as it would not be based on meeting objectively assessed development and infrastructure requirements.
- 5.3 Based on the original expert reports submitted by our client and the Further Reports, the national policy requirement to achieve the objective of contributing to the achievement of sustainable development (NPPF 2021, para 16 (a)) would clearly not be met.
- 5.4 We note that a full planning application was submitted to the Council to build 137,000 sqft of office and industrial buildings on High Post (north site). Objections were submitted (including from statutory bodies) on a wide variety of matters relating to the inadequacy of transport infrastructure, impact on landscape and inappropriate land use proposal in this location. We understand that the Council did not look on the application favourably and it was withdrawn. The Council and community's response to the proposal was in our view the correct approach and supports the points made in this letter.
- 5.5 We urge the Council to dismiss each of the Speculative Sites and Solstice Park and not take forward their inclusion in the pre-submission local plan.
- 5.6 There is considerable objection against the allocation and development of the Speculative Sites as evidenced by the significant resource our clients have expended on commissioning 8 expert reports to analyse the feasibility of the future development on these greenfield sites in addition to legal representation. Such strength of feeling is also evidenced by the fact that over 300 objections were received to the HPN Application.
- 5.7 If any of the Speculative Sites, or Solstice Park, are taken forward in the draft plan our client has instructed us that they will continue to pursue vociferously an objection.

Yours faithfully

Ashurst LLP

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Appendixes

1. Letter dated 21 October 2021 from Ashurst LLP to Wiltshire Council enclosing:
 - Report dated October 2021 prepared by Sphere 25
 - Report dated x prepared by David Jarvis Associates
 - Technical Note: Access To Services prepared by Velocity Transport Planning Limited (September 2021)
2. Letter dated June 2022 from Sphere25 to Wiltshire Council.
3. Report dated May 2022 prepared by Darwin Ecology.
4. Report dated April 2022 prepared by HCUK.
5. Report dated April 2022 prepared by Velocity.
6. Report dated May 2022 prepared by Chilmark Consulting.