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BY EMAIL

15 June 2022

Dear Georgina,

Local Plan Review **Amesbury Sites**

On the 21 October 2021, Ashurst LLP solicitors wrote to you on behalf of local residents concerning three sites being put forward by promoters as part of the Wiltshire Council's Local Plan review. A copy of that letter is appended. The three sites are at Viney's Farm, High Post North and High Post South.

The sites being promoted were, correctly, not being supported by the Council as future allocations in the Regulation 18 local plan review. This position is robust and supported by the local community. There are clearly a number of fundamental constraints and impacts that would preclude development of these sites.

The Ashurst letter included a planning report by Sphere25; a landscape report by David Jarvis Associates, and a technical transport note by Velocity transport identifying a number of the key issues. Three key conclusions of the research were:

- It is clear that growth can be readily accommodated for the purpose of the Local Plan Review within Amesbury without the need for further speculative greenfield sites.
- The three promoter sites represent unsustainable patterns of development, would increase reliance on the private motor car and lead to a number of adverse highway impacts.

- Land at Viney's Farm lies within a Special Landscape Area (SLA) with views of the Stonehenge and Avebury UNESCO World Heritage Site (WHS). The proposed development of Viney's Farm would constitute a significant change to the local landscape and harm heritage assets.

At the time of this research, the next stage of the Wiltshire Local Plan (Regulation 19) was anticipated to be released for consultation in the fourth quarter of 2021. The hope of local residents was that this advanced stage would reinforce the Council's position to date and remove the uncertainty created by the three promoted sites seeking to change the stance.

Additional Information

In November 2021, the Council tabled a new timetable in which the release of the Regulation 19 Draft Local Plan Review is scheduled for the end of Q3 2022.

In March 2022, the developer promoting Viney's Farm the Lincoln College Oxford jointly tabled a fourth proposal, to double the size of Solstice Park in Amesbury by allocating a further 64 hectares of adjacent farmland for development of 204,000m² of employment space.

Residents have sought to consider further the issues raised by the speculative promotions. The following additional studies are therefore included:

1. Amesbury and Wiltshire Housing Needs and Supply Analysis - Chilmark Consulting
2. Preliminary Ecological Appraisal Report (Viney's Farm) – Darwin Ecology
3. Archaeological Desk Based Assessment (Viney's Farm) – HCUK Group
4. Transport (High Post) – Velocity Transport Planning

Housing Needs and Supply Analysis

A Housing Needs and Supply Analysis for Amesbury and Wiltshire has been undertaken by Chilmark Consulting. The extensive report provides a deep analysis of population projections and housing requirements.

There are a number of key findings raised by the analysis, amongst which is the conclusion that the quantum of housing required for Amesbury going forward is likely to be overstated based on a reliance of generic population growth metrics. The housing allocation figures are not reflective of *"local need or even local ambitions for growth that takes a more sustainable form¹"*.

¹ Paragraph 5.5.

The settlement of Amesbury has already seen a population increase of 16.6% between 2011 and 2020², more than double that of Wiltshire as a whole (6.3%). Even taking into account a wider study area to incorporate Bulford and Durrington, the population change far exceeds that of Wiltshire. The area has supplied a very high level of new dwellings in the period from 2016 to date, reflective of recent greenfield permissions. Adding additional speculative housing allocations beyond this would exacerbate such an imbalance.

Previous growth in the area has not been supported with infrastructure that would allow continued expansion based on past trends. Indeed, the infrastructure capacity of Amesbury to support the current growth targets is questioned.

There is no evidence to support increasing the housing targets for Amesbury to release additional open countryside outside the settlement boundary.

Ecology

Darwin Ecology Ltd have undertaken a Preliminary Ecological Appraisal (PEA) at Viney's Farm, Amesbury, Wiltshire.

The River Avon Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is directly adjacent to the north of the Viney's Farm site. Any future development will almost certainly trigger a requirement for Appropriate Assessment and sufficient mitigation to ensure no negative significant impacts on the integrity of the SAC.

Indeed, the stretch of the River Avon closest to the site is recorded as being in an unfavourable condition, with a need to address existing issues associated with phosphates from the adjacent waste water treatments works before additional stress is added.

The site itself comprises six agricultural fields with hedgerow boundaries as well as sections of woodland and grassland.

Habitats within the site are likely to provide good quality habitat for bats, reptiles, breeding birds, otters (*Lutra lutra*), water voles (*Arvicola amphibious*), dormice (*Muscardinus avellanarius*), and other terrestrial mammals.

Separately from the Darwin Ecology report, Wiltshire have also undertaken their own assessment of site allocations under the Habitats regulations³, including reference to phosphate levels and the River Avon.

² Figure 2.13

³ Wiltshire Housing Site Allocations Plan – Assessment under the Habitats Regulations, February 2020, Wiltshire Council.

The report notes that “*Natural England has assessed several stretches of the River Avon SAC as being in [an] unfavourable condition due to elevated phosphate (P) levels and as a result the river is currently failing its conservation targets⁴*”

It is subsequently stated that development at Amesbury could lead to further significant effects through additional Phosphate loading. Development will therefore require further assessment to determine whether it might compromise the delivery of the NMP [Nutrient Management Plan] reduction targets.

It is clear that there will be an impact on ecologically valuable habitats, both within the site and close proximity if the site were to be developed.

Archaeology

HCUK have undertaken an Archaeological Desk Based Assessment to review the potential impact that would result from the development of Viney’s Farm. The assessment has been prepared in accordance with Standards and Guidance for Historic Environment Desk-Based Assessment published by the Chartered Institute for Archaeologists (CIfA).

The Assessment confirms that the “site sits within an area of high to very high archaeological potential”. There is a wealth of archaeological assets within the 1km study area, which are documented in the report. The importance of these assets should not be underestimated. As the authors note: “*The landscape surrounding Amesbury is a palimpsest of Prehistoric funerary and ceremonial monuments, and along with their setting they are without parallel⁵*”.

HCUK also note there is potential for direct physical impacts to heritage assets from construction. This includes scheduled monuments. Furthermore, the elevated nature of the site would give rise to visual impacts over a wider area – including the World Heritage Site of Stonehenge.

The allocation of Viney’s Farm would run counter to established conservation policies regarding heritage assets.

Transport

Velocity Transport Planning provided a technical note covering the constraints of Viney’s Farm as part of the October 2021 submission. Viney’s Farm is not located within walking distance of any existing services or facilities and would represent an unsustainable location for further growth. The High Post Farm sites were considered even more isolated.

⁴ Page 34.

⁵ Paragraph 5.7

Following the release of additional information contained within the recent planning application (2021/11914), Velocity Transport have provided additional information in respect the High Post Site.

The fundamental constraints are clear:

“The location is not well connected to the strategic network with access to the A303 via Amesbury and access to the A36 via Salisbury inappropriate for increases in traffic, without commensurate increases in highway capacity⁶”.

The highway capacity issues cited are significant. Over 2,000 additional vehicle trips per hour during peak hours are anticipated⁷. This requires the equivalent of a new dual carriageway worth of additional traffic capacity. The proposals cannot deliver such infrastructure, which are unlikely to be viable or environmentally justified.

The Velocity technical note is clear and unequivocal. The inclusion of the High Post sites would compromise the delivery of the Local Plan.

Summary & Conclusion

There are four inappropriate development sites being promoted for Amesbury by the respective landowners.

1. High Post North – a site of 59 hectares with a proposal that this will accommodate 47,750 square metres built footprint of employment space
2. High Post South - a site of 144 hectares with a proposal that this will be suitable for 500 homes and 117,000 square meters of employment space
3. Viney's Farm – a site of 74 hectares with a proposal that this will be suitable for 1,200 homes.
4. Solstice Park Extension – a site of 64 hectares with a proposal that this will be suitable for 204,000 square metres of employment space

The sites are neither allocated in the adopted Plan, nor proposed in the emerging Local Plan. Nonetheless, in the absence of the next stage of the Local Plan being released re-iterating this position, a consortium of residents has sought to commission independent analysis of the sites in question.

The analysis is compelling. At a strategic level, there is no evidence to support increasing the housing target for Amesbury, indeed, the evidence suggests the current draft target may be

⁶ Paragraph 2.1.2

⁷ Paragraph 2.2.2

overstated. Consequently, there is no justification for the release of greenfield land above that already proposed.

Moreover, looking at the sites on an individual basis, the site specific constraints are such that the impacts of development would weigh heavily against their development. Heritage, Landscape, Transport and Ecological harm to Amesbury would be substantial.

It is hoped that the included information provides further support to the Council's current position.

Should you have any queries, please do not hesitate to contact me on the number below.

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