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Dear Georgina,

Wiltshire Local Plan Regulation 19 Consultation **Representations to “Planning for Amesbury”**

We are writing as advisers to the Sustainable Amesbury campaign. Thank you for the opportunity to make representations on the draft local plan for Wiltshire.

This is broad support for the draft local plan. However, there is a section of the “*Planning for Amesbury*” consultation document regarding the development of High Post which requires deletion for consistency with the rest of the local plan. This is explained below.

Planning For Amesbury (PEA)

As the introduction of the document explains, “*Planning for Amesbury*” is a guide to how the Local Plan Review, which will replace the Wiltshire Core Strategy, will affect the town of Amesbury over the coming years.”.

It is recognised that the document is not a formal element of the draft local plan, but a ‘guide’. Nevertheless, the document holds notable importance in the interpretation of local policy and is considered worthy of direct representation.

The Planning for Amesbury guide was approved for consultation by Cabinet and Full Council in July. On Page 13 of the Cabinet draft “*Planning For Amesbury*”, the position of the Council is unequivocal.

“No sites have been identified for development at Amesbury or High Post over the Local Plan period, due to there being no strategic need to do so. Furthermore, the available

sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.”¹ (Page 13)

The above statement is strongly supported. It reflects the conclusion of significant planning evidence from both the Council and independent consultants. This includes separate Ecological, Archaeological, Landscape, Transport, Planning and Housing Needs & Supply Analyses. This paragraph was in the version approved by Cabinet and Council. It also reflects the exact wording of the Site Selection Appendix (A29), which remains part of the document.

However, the consultation document has removed the statement “**due to there being no strategic need to do so.**” The replacement paragraph now reads:

58. No sites have been identified for development at Amesbury or High Post over the Local Plan period. The available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.

The removal of this sentence is concerning. Particularly in the context of page 22 of the “*Planning for Amesbury*” document which includes an unnecessary contradiction. It states in Paragraph 70 that;

“There may be potential for future modest extension to the site should needs arise, through an extension to the Principal Employment Area, albeit the land is potentially constrained by landscape and heritage factors.”

This statement is at odds with the conclusions of site selection document in A29. The “*insurmountable negative impacts*” conclusion was reached after considering modest extensions. This is clear from the preceding paragraph A27 which looked at modest development at High Post, but declared;

“Smaller, more modest scales of development were also discounted due to potential heritage and landscape impacts, and due to the inability of a smaller scale of development to support sustainable development in an isolated setting.” (Paragraph A27)

Paragraph 70 is therefore inconsistent with the evidence referenced in the document. A “modest extension” is clearly not justifiable. Moreover, it is not representative of the local plan that it is intended to provide guidance for.

Paragraph 70 should therefore be deleted from the document for consistency and to accurately reflect the site selection analysis that the Council has undertaken.

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

Yours Sincerely

Mark Connell

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Appendix 1 : Planning for Amesbury Extract (Page 13)

Cabinet Version (July 2023)

Planning For Amesbury

setting of the Stonehenge World Heritage Site, which renders it inappropriate to consider further for allocation. Parts of the site are close to areas of ecological value, and the site is partially within a safeguarding zone associated with the nearby Boscombe Down site.

Site 5 (East of Solstice Park) is also heavily constrained by significant archaeological potential, which renders it inappropriate to consider further for allocation. The site's location adjoining Solstice Park Business Park, Boscombe Down and the A303 may form a logical extension to the employment use, however heritage constraints are significant. The site is proximate to Boscombe Down which means that preservation of operational capabilities of the aerodrome is a consideration.

High Post Site 1 (Land at High Post) is spatially separate from Amesbury, being located on the A345 between Amesbury and the nearby city of Salisbury. The site is of a significant scale on land that rises from the south towards a high point within the local landscape on the northern part of the site. The open, rolling landscape setting and the Old Sarum scheduled monument have potential to be impacted by significant growth on this site. A reduced, more moderate scale of growth is unlikely to be of a scale which could support a sustainable residential community without heavy reliance on the private car. Land at High Post is a Principal Employment Area which supports a range of locally important economic activities. There may be scope for modest future extension to the employment offer at High Post, should an identified need arise.

The methodology and detailed assessments made in the site selection process are all explained in Appendix 2. The Sustainability Appraisal process and its results are contained in a separate report.²

What development is proposed?

No sites have been identified for development at Amesbury or High Post over the Local Plan period, due to there being no strategic need to do so. Furthermore, the available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.

A neighbourhood plan is being prepared for Amesbury. Neighbourhood planning lends itself to identifying small to medium sized sites for housing and other forms of development. Non-strategic sites in the neighbourhood plan have the potential to supplement the proposals of the Local Plan Review and deliver a small quantum of housing alongside employment land.

The Local Plan Review, however, proposes the central, strategic, development proposals. They are explained below.

Boscombe Down

Boscombe Down is a strategically important employment site for south Wiltshire and has the potential for further inward investment/regeneration to expand its role. The nature of

² Wiltshire Local Plan Review Sustainability Appraisal Report July 2023

Appendix 2 : Planning for Amesbury Extract (Para 58) Consultation Version (September 2023)

Planning For Amesbury

Porton Down continue to be supported. Opportunities for employment expansion at High Post business park are potentially constrained by landscape and heritage factors.

56. Amesbury is a significantly constrained settlement, and scales of growth through the Local Plan are therefore reduced from previous rates. Beyond existing provision for new homes, and the existing stock of employment land, additional allocations are very difficult to identify. It is likely that strategic future housing and employment will need to rely on the possibility of a new community to help meet needs in the longer term.
57. The methodology and detailed assessments made in the site selection process are all explained in Appendix 2. The sustainability appraisal process and its results are contained in a separate report.¹²

What development is proposed?

58. No sites have been identified for development at Amesbury or High Post over the Local Plan period. The available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.
59. A neighbourhood plan is being prepared for Amesbury. Neighbourhood planning lends itself to identifying small to medium sized sites for housing and other forms of development. Non-strategic sites in the neighbourhood plan have the potential to supplement the proposals of the Local Plan Review and deliver a small quantum of housing alongside employment land.
60. The Local Plan Review, however, proposes the central, strategic, development proposals. They are explained below.

Boscombe Down

61. Boscombe Down is a strategically important employment site for south Wiltshire and has the potential for further inward investment/regeneration to expand its role. The nature of potential future uses is currently unclear, but the strategic policy supports opportunities for regeneration as and when they should arise over the coming years, beyond 2026 when the current lease with Qinetiq comes to an end. This enables opportunities for reciprocal business relationships with defence uses while preserving the military operational uses at its core. Land

¹² Wiltshire Local Plan Review Sustainability Appraisal Report (Wiltshire Council, September 2023)

Appendix 4 : Planning for Amesbury Extract (A27 – A29)

Consultation Version Appendix (September 2023)

Stage 4 – Selection of Sites

- A25. Stage 4 enabled the results of the sustainability appraisal outcome to be qualitatively examined by consideration of sites in terms of their capability of supporting the Local Plan's objectives for each community – in particular the identified Place Shaping Priorities. Stage 4 also provides discussion and analysis of the scale of growth that would be required to be drawn from the pool of the most sustainable site options, in or to meet the identified housing and employment needs for the settlement.
- A26. The outcome of Stage 4 refines the results of the Stage 3 sustainability appraisal process to identify sites that are more sustainable and support the Local Plan objectives.
- A27. The outcome of Stage 4 of the site selection process for Amesbury can be summarised under the 'What development is proposed' section earlier in this paper. One site was considered through Stage 4 – High Post Site 1: Land at High Post. It was not appropriate to consider the site in the context of Place Shaping Priorities due to the site's isolation from a main settlement, meaning that it could not realistically contribute towards the achievement of these objectives. The site was however subject to further consideration from a strategic context perspective through Stage 4, and it was concluded that based on the outcomes of assessment through the Stage 3 sustainability appraisal, the site has a very low likelihood of achieving satisfactory mitigation of heritage and landscape constraints to deliver a strategic scale of development. The site is of a significant scale on land that rises from the south towards a high point within the local landscape on the northern part of the site. The open, rolling landscape setting and the Old Sarum scheduled monument have potential to be adversely impacted
- by significant growth on this site. Smaller, more modest scales of development were also discounted due to potential heritage and landscape impacts, and due to the inability of a smaller scale of development to support sustainable development in an isolated setting.
- A28. Existing development at High Post takes the form of a Principal Employment Area which supports a range of locally important economic activities.
- A29. Overall, no sites have been identified for development at Amesbury or High Post over the Local Plan period. There is no strategic need to allocate, and the available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts as identified through the site selection process making them unsuitable for allocation.
- A30. Stage 4 therefore concludes with no site allocations proposed as preferred sites at Amesbury or High Post.
- A31. The maps below illustrate the outcome of the site selection process at Amesbury and High Post.

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Appendix 5 : Planning for Amesbury Extract (Para 70)

Consultation Version (September 2023)

Planning For Amesbury

Principal Employment Area: High Post

70. High Post Principal Employment Area is situated on the A345 roughly equidistant between Amesbury and Salisbury. The site comprises industrial and warehouse buildings, along with a petrol filling station and hotel. The site is reasonably well occupied. The surrounding land is open and agricultural. **There may be potential for future modest extension to the site should needs arise, through an extension to the Principal Employment Area, albeit the land is potentially constrained by landscape and heritage factors.** The site continues to be designated as a Principal Employment Area within the Local Plan.

Supporting the town centre

71. The Local Plan contains a framework that describes how all the different uses found in the central area function together. It provides context and certainty to businesses and services. It indicates how the area will operate over the Local Plan period.
72. Policy 68 (Managing Town Centres) and Appendix 5 of the Local Plan Review defines a hierarchy of town centres and the extent of town centres and primary shopping areas. The role of each centre correlates to the role of the wider settlement within the settlement hierarchy. The town centre hierarchy defines Town Centre Boundaries and Primary Shopping Areas within Principal Settlement, Market Towns and Local Service Centres. Within this hierarchy, Principal Settlements provide strategic centres; Market Towns are large shopping and service focused centres with smaller catchments; and Local Service Centres provide a range of shops and services for the local population, thus serving a village centre function.
73. The Town Centre Boundaries and Primary Shopping Area Boundaries were identified in the 2015 Retail Review. The 2020 Wiltshire Retail and Town Study reviewed these boundaries and found them to be up to date.
74. Amesbury is defined as a Market Town in the town centre hierarchy. The town centre boundary and primary shopping area can be found on the Policies Map. The Local Plan aim is to strengthen the town centre.
75. Amesbury has a relatively small town centre which is arranged around High Street, Salisbury Street, the western part of Earls Court Road, Smithfield Street, The Centre, and part of Salisbury Road. The character of town centre uses is predominantly smaller retail, commercial and hospitality units, mainly falling

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Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19 consultation), September 2023

