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21 October 2021

Georgina Clampitt-Dix  
Spatial Planning  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

Dear Sirs

### **Local Plan Review - Amesbury**

We act for a consortium of local Amesbury residents.

#### **1. INTRODUCTION**

- 1.1 As you are aware, the Council has started its local plan review process and a consultation was held between Jan and March 2021 ("the Consultation"). As part of the Consultation, the Council sought views on the possible allocation of one or more of 3 chosen sites within Amesbury (land north of London Road, land at Stock Bottom and land to the rear of Countess Services). A need for Amesbury to accommodate 350 new homes in the plan period has been identified. Our client is broadly supportive of the general principles set out in the Consultation and did not respond to the Consultation.
- 1.2 Our client has become aware through FOI requests and the Council's release of the responses to the Consultation that the following sites 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.
- 1.3 We understand that the next stage in the local plan review process is that the Council intends to publish a pre-submission plan for consultation and this will take place in 2022. We also understand that the Council's LDS is currently under review.
- 1.4 The purpose of this letter is to make the Council aware of our client's strong opposition to any inclusion of the 3 sites set out in 1.3 ("the Speculative Sites") in the local plan going forward.

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## 2. **TIMING**

- 2.1 Our client is of course aware that it will have an opportunity to respond to the next formal consultation on the publication of the plan. However, as the Speculative Sites did not feature as part of the Consultation and our client only became aware of them after the Consultation, our client has not yet had the opportunity to make its views known.
- 2.2 Equally, as the Council is still at the stage of considering the responses to the Consultation, formulating its policies and collating the evidence base to support its policies, it is in our view opportune for our client to submit representations now to the Council during the plan's formative stage drawing the Council's attention to certain facts which should dissuade the Council from including the Speculative Sites in the draft plan.

## 3. **OBJECTION TO THE SPECULATIVE SITES**

- 3.1 Our client has instructed legal, planning, landscaping and highways consultants to review the submissions put forward in support of the Speculative Sites. We attach in the Appendix to this letter reports from Sphere25 (planning), David Jarvis Associates (landscaping impacts) and Velocity (accessibility assessment). We have summarised below the main reasons why we consider that each of the Speculative Sites should not be taken forward in the plan process.
- 3.2 We endorse the Council's policy that the development of brownfield sites should be prioritised, which conforms with national planning policy. All three of the Speculative Sites are large greenfield sites and in the case of the High Post sites, are in a rural, open countryside setting remote from existing settlements.
- 3.3 The identified need can be met within Amesbury without encroaching onto open greenfield land. The site north of London Road represents an opportunity to enhance housing provision within the existing settlement boundary. Land to the rear of Countess Services would be the next logical site in sustainability terms and would benefit from improved accessibility. Such sites featured in the Council's SHELAA and have been through two stages of the Council's site selection process and have therefore been subject to a degree of analysis and sustainability testing. The land north of London Road and to the rear of Countess Services would, combined, provide in excess of 400 homes, above the identified need.
- 3.4 The promoter of Viney's Farm submits that four additional years should be added to the plan period (although it is noted that only two additional years to the plan period overall are suggested by the promoter) and as such the overall housing requirement figure should increase from 45,530 homes to 50,204 with the requirement for Amesbury increasing from 350 homes to 1,500 homes. An increase of nearly 330% above the identified need is not necessary or justified. It is certainly not justified on a greenfield site and there is no cogent reason why such an uplift in housing numbers should be located in Amesbury. Focussing such growth on Amesbury as a market town also conflicts with the proposed settlement hierarchy.
- 3.5 None of the Speculative Sites are in a sustainable and accessible location. The sites at High Post in particular are in an isolated rural location without adequate access to amenities by a footpath and cycleway network or public transport services. Similarly, Viney's Farm is not within walking distance of existing services and amenities. This is borne out by Velocity's evaluation of the connectivity of each of the site's to key local amenities which concludes:
- (a) The site at London Road is in the best location in relation to pedestrian accessibility to local amenities. This is followed by land to the rear of Countess Services;
  - (b) The High Post site performs the worst in terms of remoteness to local amenities;

- (c) The site at Stock Bottom would require some off-site pedestrian and cycle improvements whereas development at Viney's Farm would require the most significant improvements of all of the sites to facilitate any meaningful level of connectivity to Amesbury.

3.6 Importantly, the report concludes that Viney's Farm and High Post (and Stock Bottom) are not suitable for significant development in transport terms.

3.7 Further, the development of each of the Speculative Sites, as greenfield sites in a rural setting, will inevitably have a significant landscaping impact. In relation to Viney's Farm, as evidenced by the report prepared by David Jarvis Associates:

- The site lies in a Special Landscape Area (SLA) with views of Stonehenge and Avebury World Heritage Site (WHS).
- The Council's Landscape Character Assessment concludes that the condition of the landscape is good and the sense of character is strong.
- The site falls within an area of visual sensitivity to the major monuments in the WHS. The site is visible from the WHS (although not from Stonehenge itself), the Avon Valley and Amesbury Park Registered Park and Garden.
- Whilst the WHS would not be directly affected, the effect on the setting of the WHS and on the SLA would be adverse.

3.8 Our client has not, at this stage, instructed archaeological consultants but would be prepared to do so if the Speculative Sites are taken forward in the draft plan. Initial soundings of archaeology experts have confirmed that Viney's Farm and its surrounds is rich in archaeology. Viney's Farm occupies a large tranche of previously undeveloped chalk downland. The County's Historic Environment Record indicates the presence of a bronze age round barrow. In addition, experts consider that the records indicate a possible Roman religious site, a pit alignment which may be iron age, extensive ancient field systems, a cropmark complex indicative of a Late Iron Age settlement and part of a scheduled linear earthwork – all within what would be the red line planning application boundary of Viney's Farm. Further, such archaeology is likely to run up to the A345, where the proposed access to the development would be located.

3.9 Similarly, our client has not instructed ecology experts but would be prepared to do so if necessary. As referred to in Sphere 25's report, the River Avon is a significant constraint to growth. The River Avon is designated as a Special Area of Conservation (SAC) and a Site of Special Scientific Interest. The River Avon SAC has already been screened into the Council's Habitat Regulation Assessment in relation to the plan's impact on water quality and quantity. Surface water runoff and percolation from the Viney's Farm site will undoubtedly end up in the River Avon, which has been recorded as having elevated phosphate levels. The Council will be aware of the position of Natural England in relation to other SACs within the country on the need to reach phosphate and nitrate neutrality.

#### 4. **SUMMARY**

4.1 The unnecessary allocation of these large greenfield sites in inaccessible locations by a Council which has recently declared a climate emergency would clearly not satisfy the test of legal test of soundness or the national policy requirement to achieve the objective of contributing to the achievement of sustainable development (NPPF 2021, para 16). We urge the Council to dismiss each of the Speculative Sites.

4.2 If any of the Speculative Sites are taken forward in the draft plan our client has instructed us that they will continue to pursue vociferously an objection.

Yours faithfully

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