



Wiltshire Local Plan Review

Amesbury Sites

Introduction and Overview

On behalf of our clients, a consortium of residents of Amesbury, Sphere25 have written the following planning note to inform the emerging local plan process.

Sphere25 have been monitoring the Local Plan Review and the sites which came forward through the Amesbury Site Selection Report published as part of the last iteration of public consultation. However, we also note through the committee reports and subsequent consultation reports that additional sites have subsequently been proposed, namely a site known as 'Viney's Farm', a site referenced as 'Land adjacent to High Post Business Park' and a site referenced as 'Land west of A345 at High Post (Fourmile Hill)'.

It is noted that these sites have been put forward after the initial call for sites and did not feature in the Regulation 18 consultation held between the 13th of January and 9th of March 2021.

As such we wish to provide comments on these sites in advance of the next published stage of the Local Plan, which we understand to be the pre-submission consultation which is scheduled to commence in Quarter 4 of 2021.

Quantum of Growth

The consultation undertaken earlier this year considered various levels of growth, potential locations for development and the place-shaping priorities for each of Wiltshire's main settlements. In relation to housing needs, the consultation documents sought to test the upper end of a range of between 40,840 and 45,630 new homes over the plan period of 2016 to 2036.

The lower figure set out above represents the minimum result from using the Government's national standard methodology for new homes. A Local Housing Need Assessment (LHNA) of new homes needed takes account of longer-term migration and economic forecasts and produces the upper range result of 45,630 new homes. This takes into consideration where there is the need to provide homes to support jobs and avoid net in-commuting.

There is therefore a difference of around 5,000 homes between the lower and upper end of the range.

It is understood that in the light of consultation responses and changes in national policy, further work will be undertaken to refresh the Council's evidence on housing need. This includes updating the standard methodology figure to consider new affordability data; updating the employment

projections to inform the jobs / workers balance and understanding the economic implications of COVID-19 and Brexit.

The new affordability ratios published in March 2021¹ altered the scale of the affordability uplift applied to the baseline. For Wiltshire this meant a drop from 1,997 as the previous outcome in early 2021, to the new figure of 1,981. This figure is lower than the existing housing requirement of 2,100 and lower than the 2019/20 figure of 2,042 dwellings per year.

	Existing Local Plan Requirement ²	Standard Method Figure (2018 ratios) ³	Standard Method Figure (2019 ratios)	Standard Method Figure (2020 ratios)
Dwellings per year	2,100	2,042	2,001	1,981
Homes over a 20-year period	42,000	40,840	40,020	39,620

Based on these most up-to-date figures the minimum housing need of 40,840 therefore reduces to 39,620 over a 20-year period.

It is acknowledged that Paragraph 22 of the NPPF introduces a requirement for strategic policies to look ahead over a minimum 15-year period from adoption. In addition, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to consider the likely timescale for delivery. However, the Emerging Spatial Strategy published in January 2021 made it clear that no new settlements were proposed in this Local Plan review.

As stated above the Government requires a local plan to have a 15-year time horizon from the date it is adopted. This means that the end date for the Local Plan Review will need to be at least 2038, given the proposed adoption date of 2023. However, as the Local Plan Review is a 'rolling forward' of the current plan, and not a wholly new plan, there will be an overlap in the time horizons.

In terms of the impact of Covid 19 and Brexit on commuting patterns, the evidence is likely to still be developing, and it may be too early to determine definitively the impact of both on the level of homes required to support jobs growth and limit in-commuting.

Distribution of Growth

The Local Housing Need Assessment (LHNA) 2019 firstly defined Wiltshire's four Housing Market Areas and then distributed the growth at both ends of the range to these. This strategy seeks to address the scale of Wiltshire as an authority, distributing growth by Housing Market Area (HMA) and

¹ Latest data set published by ONS on the 25th March 2021. [Available online here](#)

² Wiltshire Core Strategy, 2015. [Available online here](#)

³ Figures used in the Local Housing Needs Assessment April 2019 [Available online here](#)

ensuring that homes are delivered where they are needed. In summary this concluded the following distribution:

- Chippenham HMA: between 16,900 and 20,400 dwellings overall, equivalent to 845-1,020 dpa on average over the 20-year period.
- Salisbury HMA: between 11,000 and 12,500 dwellings overall, equivalent to 550-625 dpa on average over the 20-year period.
- Swindon HMA: between 24,900 and 26,400 dwellings overall, equivalent to 1,245-1,320 dpa on average over the 20-year period; which includes 3,300-4,800 dwellings (165-240 dpa) in the part of the Swindon HMA within Wiltshire.
- Trowbridge HMA: between 11,000 and 11,500 dwellings overall, equivalent to 550-575 dpa on average over the 20-year period.

Using the upper end of the range for each HMA a distribution of growth was proposed⁴ for the main settlements (the principal settlements of Chippenham, Salisbury and Trowbridge; and market towns⁵) and the rural parts of each HMA within the Emerging Spatial Strategy. In the rural parts of the HMAs, housing numbers were proposed for the Local Service Centres and Large Villages as the most sustainable locations for growth after the market towns.

Amesbury falls within the Salisbury HMA. The April 2019 Development Strategy for Salisbury HMA⁶ summary concluded that for Amesbury, economic forecasts indicated a smaller share of housing growth, although the strategy noted a strong track record of employment and housing delivery. Rolling forward the current strategy involves a lower assessment of overall need sufficient to test a continuation of recent growth rates. The strategy acknowledges heritage and landscape risks at Amesbury and recognizes that education capacity may also be a constraint. The report concludes that it would be sensible to test a period of consolidation within Amesbury that plans for a lower rate of growth.

The settlement strategy promotes Salisbury as a principal settlement and as such will be the primary focus for development within the HMA providing a 'significant level of jobs and homes'.

It is noted that Wiltshire County Council has declared a climate emergency and therefore the pattern of development and how growth is distributed will be an important consideration with regard to opportunities to address climate change. Settlement patterns and urban forms that promote sustainable mobility can play a critical role in reducing emissions from the transport sector, where decarbonisation is urgently needed. The RTPI suggests that this means that new development should be concentrated in a small number of strategic locations, prioritising brownfield sites within large existing settlements or immediately around them, before expanding smaller towns, villages and building in rural areas.

⁴ Wiltshire Local Plan Emerging Spatial Strategy 2021 [Available online here](#)

⁵ Listed as Amesbury, Bradford-on-Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth and Ludgershall, Warminster, Westbury

⁶ Formulating Alternative Development Strategies - Salisbury Housing Market Area January 2021 [Available online here](#)

Growth within Amesbury

The Wiltshire Local Plan Review 'Planning for Amesbury' consultation document proposes a requirement of 1,635 homes at Amesbury for the plan period 2016-2036. From this total estimate of need over the plan period can be deducted homes already built and those already in the pipeline. As such, the Council have estimated that there remains a need for 350 homes at Amesbury in the period 2016-2036.

Requirement	Built between 2016 - 2019	1st April 2019, homes are already in the pipeline in the pipeline.	Requirement	Built between 2016 - 2019
1,635	660	626	(110)	349

At present, the adopted Core Strategy combines the three settlements of Amesbury, Bulford and Durrington because of their associated military operations and close links to one another both geographically and functionally. The Local Plan Review aims to encourage the development of each community by considering each individual settlement's roles rather than taking the collective approach of the adopted Core Strategy. It is proposed that Amesbury is designated a Market Town in the settlement strategy.

The consultations documents suggest that at Amesbury, given the scale of growth to be planned for, there will be a need to allocate further greenfield land. The three sites selected as part of the last round of consultation have been through two stages of the Council's site selection process. These include a high level assessment of the sites' accessibility and wider impacts, and landscape, heritage, flood risk and traffic impacts. There are three potential strategic opportunities that have been identified at Amesbury.

⁷ (i.e. they have planning permission or resolution to grant planning permission).

	Land to the rear of Countess Services	Land North of London Rd	Land at Stock Bottom
Total Area	10ha	4.5ha	60.5ha
Capacity (homes)	257	160	Circa 390 (TBC)
Available	Unknown	Yes	Yes
Suitable	Yes	Yes	No
Deliverable	No	Yes	No
Developable	Medium Term	Short Term	Long Term

Fig 1: Amesbury Site Table

Land North of London Road provides capacity for 160 new homes on a site that is available, suitable, and deliverable in the short term. The site is located in close proximity to existing services and facilities, promoting the opportunity for sustainable modes of travel.

Land to the rear of Countess Services then provides capacity for an additional 257 new homes on a site which provides genuine opportunities for medium term development at Amesbury. The site is earmarked as a contractors' site compound within the Highways England (now National Highways) proposals for the A303 Amesbury to Berwick Down development proposals.

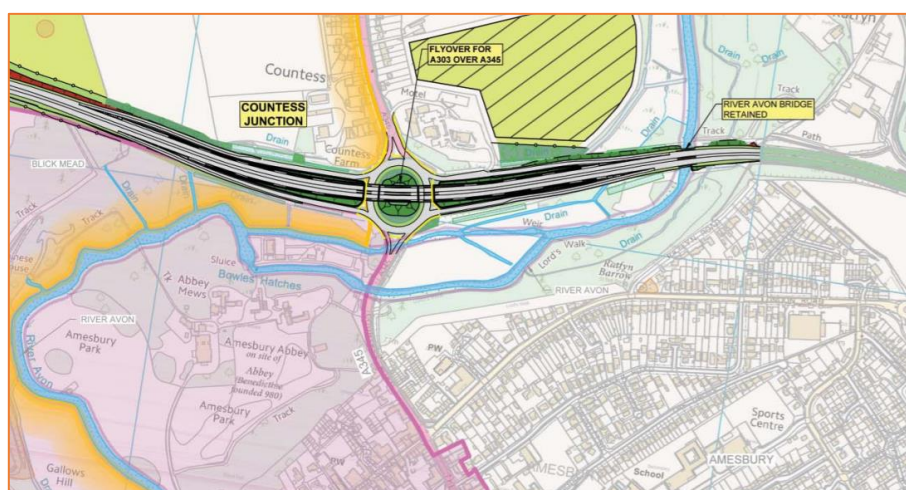


Fig 2: Highways Proposals⁸.

⁸ <https://highwaysengland.co.uk/media/2hod4d0q/a303-stonehenge-a2bd-web-march-2019-vi.pdf>

Proposals for the Countess Roundabout include carrying the flyover over the roundabout on retained embankments with landscaped slopes. In addition, to mitigate traffic noise, the design of the flyover has been developed to include a noise barrier 1.8 metres high on both sides of the road.

This element of the overall scheme seeks to improve local connectivity by removing east-west through traffic from the roundabout and including signalised crossing facilities for non-motorised users. The improvements at Countess will make it easier for local residents and other users of the A345 to move between the northern and southern parts of Amesbury and to access the A303.

The medium-term delivery trajectory is therefore appropriate given the current uncertainty regarding timescales for delivery of the highways project.

These two sites therefore provide potential for 417 new homes in Amesbury, 67 homes over and above the identified need within two locations which both provide movement sustainable locations for growth within Amesbury; this is without expanding Amesbury further south into the Stock Bottom site.

What is also clear as a consistent theme throughout the consultation responses is that there is a need for Wiltshire to carefully consider and prioritise the amount of brownfield land available.

Speculative additional growth within Amesbury

It is clear therefore that growth can be readily accommodated for the purpose of this Local Plan Review within Amesbury without the need for further speculative sites.

Strategic Context

The Council's strategic priorities include

- promoting Amesbury as a self-sufficient town encouraging local employment opportunities and encourage tourism linkages between the town and nearby Stonehenge;
- Developing the town centre to improve the public realm to encourage tourism and spending; and
- improvements to infrastructure and transport particularly in relation to the A303 and A345, both of which currently experience congestion, and improve linkages to and from the town.

The Council also identifies that the settlement has a modest requirement for additional development. Development at the settlement has been deemed most acceptable to the south of the urban centre and to the north-east, between the centre and Solstice Park. This pattern reduces conflicts with significant environmental factors identified by the Council located to the north and west of Amesbury.

The River Avon is a significant constraint restricting growth to the north and west of the town. There are areas of flood risk along the course of the river, and the area has significant ecological value.

The area has rich historic value as Stonehenge World Heritage Site extends to the north and west of the settlement whilst Amesbury Abbey Historic Park and Garden fringes the northwest of the town.

The development required at Amesbury in this new local plan period (2016-2036) is approximately 350 dwellings. As set out above Wiltshire Council has already identified sufficient sites to meet this demand in the most movement sustainable locations.

The following however provides initial information relevant to the additional speculative sites submitted.

Viney's Farm - Landscape and Visual Analysis

A thorough landscape appraisal of the proposal at Viney's Farm has been commissioned. The site occupies 73.7ha and is located on a ridge of rolling agricultural land to the east of the Avon Valley, south of Amesbury. The A345 lies along the eastern boundary with the King's Gate housing development currently under construction to the east.

The site lies within a Special Landscape Area (SLA) and with views of the Stonehenge and Avebury UNESCO World Heritage Site (WHS). No specific evidence has been seen to date which supports the removal of the site from the SLA, and indeed the need to do so would be questionable given that sufficient alternative sites are available.

The majority of the site falls within Wiltshire Council Landscape Character Assessment LCA 3B Salisbury Plain East. The northern edge of the site lies within the Avon Valley and is within LCA 5D Upper Avon Chalk River Valley. The condition of the landscape in both LCA is assessed as good, and the sense of character is strong.

The WHS Management Plan identifies areas that are visually sensitive in consideration of the major monuments within the WHS. The site is partly defined as an area of visual sensitivity, thus requiring a full analysis of visual impacts.

The zone of theoretical visibility of the proposed development tabled by the promoters incorrectly concludes that the proposed development would not be visible from the Avon Valley.

The landscape setting of the site is rural, despite the effect of the A345. The A345 in this location has the effect of reinforcing the association of the Viney's Farm site with the Avon Valley rather than the land to the east. The land to the west is largely undeveloped with views of the WHS from the higher parts of the site.

The proposed development would constitute a significant change to the local landscape. The site has a very limited visual relationship with the centre of Amesbury, with visibility limited to views filtered by intervening woodland or not visible.

Whilst the WHS itself would not be directly affected, the effect on the setting of the WHS and on the SLA would be adverse.

Whilst the proposed development at both 9m and 12m high would not be visible from Stonehenge it would be theoretically visible from the WHS, the Avon Valley and Amesbury Park Registered Park and Garden, including further areas of the WHS to the west of Stonehenge and around Woodhenge to the north. This is in opposition to the need to respect the Outstanding Universal Value of the WHS. This position may be further eroded by the Setting Study for the whole WHS to be produced by Wiltshire Council.

In summary it is evident that the proposed development would be clearly visible in a number of local views, with limited screening effect offered by the recently planted plantations in certain views. The site is within close physical and visual proximity to the Stonehenge World Heritage Site and a number of Scheduled Ancient Monuments.

Ecology

The Viney's Farm site is within close proximity to the River Avon, designated as a Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). 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.

Sustainable Movement

Any sites will need to be considered from a sustainability perspective. Locational sustainability is particularly important both in the form of amount and access to facilities, as well as the opportunities to make journeys in a sustainable way and thereby minimise the need to travel by the private car.

This is important, as according to the National Travel Survey⁹, 80% of all trips under 1 mile (1,600m) were walked journeys. For all other distance bands, the car was the most frequent mode of travel. Regarding journeys to school, for trips under 1 mile (less than 1,600m) the 2019 data set shows walking as the most popular mode, at 80% for primary age and 95% for secondary school age children. For trips between 1 and 5 miles, 79% of primary school trips were by car, and for secondary school trips between 1 and 5 miles, 32% were by car, 31% were by bus, 5% cycled and 29% walked.

⁹ 2018

Put simply, the location of new homes will have a direct impact on behavioural choices future occupants will make. Living within a 10 minute walk of a settlement's centre or primary school means that future occupants are statistically significantly more likely to walk to that route than to drive.

This is important. Wiltshire has declared a Climate Emergency, and therefore needs to consider the sustainability of each and every site and the behavioural opportunities they provide. Landowners and site promoters will inevitably suggest their own site has adequate sustainability credentials. However, the Local Planning Authority as Plan Maker has a responsibility to apply the presumption in favour of sustainable development and undertake a plan making exercise which actively manages patterns of growth to make the fullest use of sustainable travel and improve the health, social and cultural wellbeing for all.

In terms of the sites considered to date, 'Land North of London Rd' is located in the most movement sustainable location, providing genuine opportunities to walk and cycle to the majority of services and facilities.

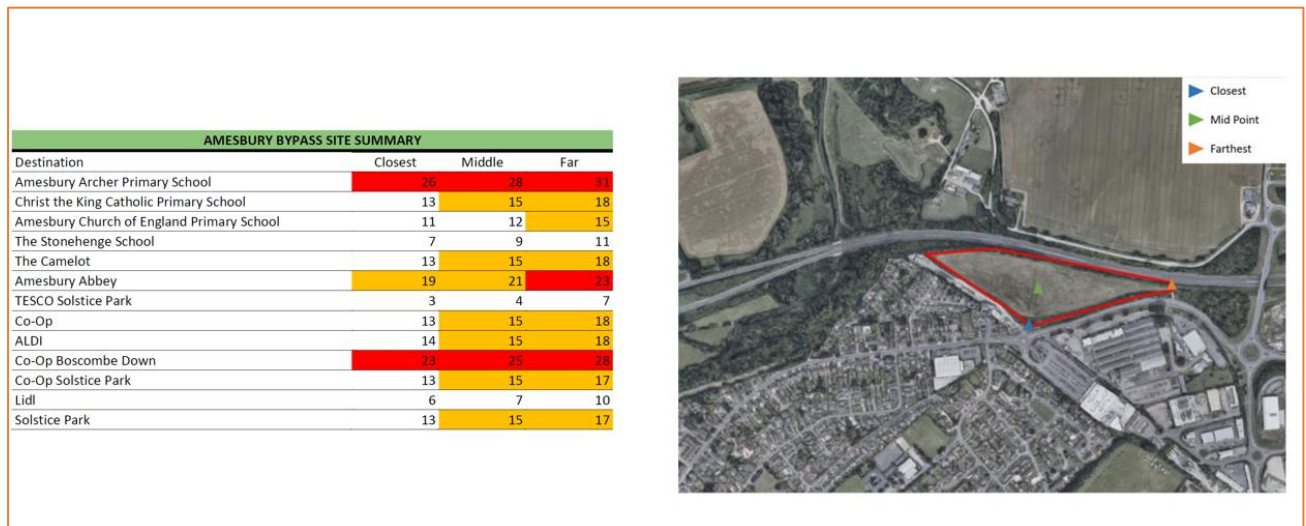


Fig 3: Excerpt from Velocity Analysis

Conversely 'Viney's Farm' is not located within walking distance of any existing services and facilities, a key consideration when considering the climate impact of potential development sites.

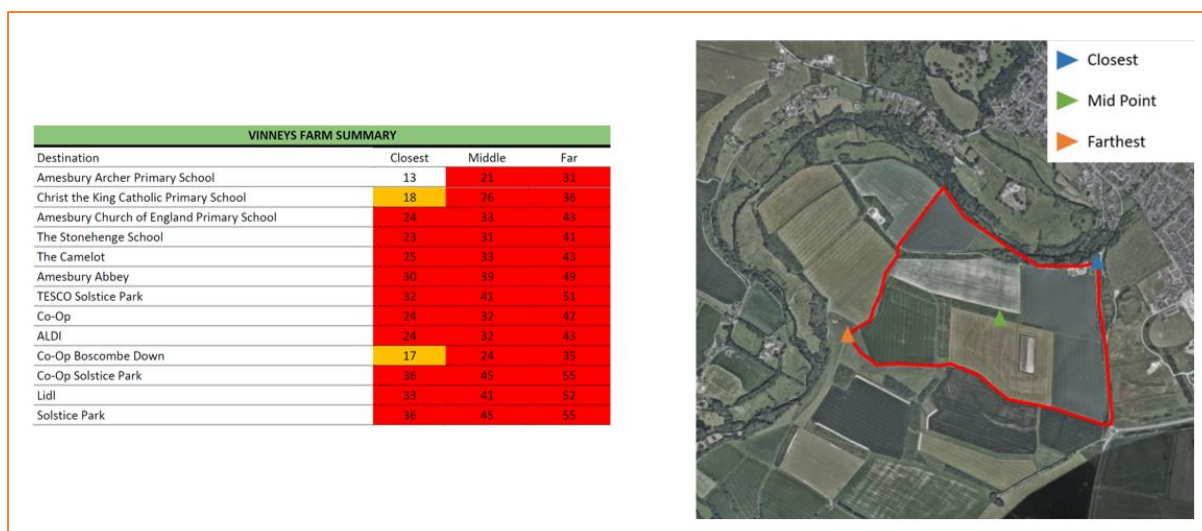


Fig 4: Excerpt from Velocity Analysis

The additional two sites located at High Post form even less sustainable options for development. Walking routes from the High Post site to key amenities have not been calculated due to the sites isolated location, no footways are provided along the A345. And, as the accompanying Velocity analysis makes note, the walking route from the town to the promoted Viney's Farm site is steep.

Neighbourhood Planning

The principle set out within the Emerging Spatial Strategy which for Market Towns provides a set of reasonable alternatives which ultimately may be selected by local communities if they are progressing or reviewing a neighbourhood plan is welcome. It is understood that consideration is being given to a neighbourhood plan.

To Conclude

The Emerging Spatial Strategy as published in January 2021 for consultation set a clear direction for growth within Wiltshire and set a realistic quantum of development for Amesbury as a location newly established within the settlement hierarchy as a proposed Market Town in its own right within the Salisbury HMA.

At Viney's Farm the proposed development would be clearly visible in a number of local views, with limited screening effect offered by the recently planted plantations in certain views. The site is within close physical and visual proximity to the Stonehenge World Heritage Site and a number of Scheduled Ancient Monuments.

The Climate Emergency crystallises the need to ensure the emerging Local Plan provides for growth within movement sustainable locations; maximising brownfield and infill opportunities for growth and limiting low density sprawl.

The quantum of development proposed through the late speculative site promotion of land at Viney's Farm, and of land at High Post, is at odds with the settlement hierarchy and entirely at odds with the aspiration to meet housing needs as far as possible on brownfield sites in order to help minimise the loss of greenfield land.

It is therefore respectfully recommended that the Wiltshire Planning Officers continue to apply the rigor to these new sites as they have done for other unsuitable sites, and discount these at the earliest opportunity.