



**South West of England**  
Regional Development Agency

Mr A Bidwell  
Development Services  
Salisbury District Council  
61 Wyndham Road  
Salisbury  
Wiltshire SP1 3AH

14 January 2008

Your ref: S/2007/2518  
Our ref: JP08/1401/SD/Sol

Dear Mr Bidwell,

**Proposed Development:**      **Proposed construction of Regional Distribution Centre and associated infrastructure works including roads**

**At:**                                **Solstice Park, Boscombe Down, Amesbury, Salisbury SP4 7LJ**

**Application Number:**        **S/2007/2518**

I am writing in response to your formal consultation on the above planning application dated 19 December 2007. Thank you for consulting the South West of England Regional Development Agency (South West RDA) with regard to this development.

Overview

**The South West RDA supports the proposed development subject to:**

- **The District Council being satisfied that the proposed development will not have a deleterious effect on the range and choice of employment space available in the district to meet the needs of business.**

Salisbury district has seen relatively strong economic growth in recent years. 'Spatial Implications – Place Matters'<sup>1</sup>, an annex to the Regional Economic Strategy (RES) 2006–2015, identifies that the economy of Salisbury and its surrounding Travel To Work Area (TTWA) has the potential to grow by 13,600 jobs and £1.5Bn GVA between 2006 and 2026. This jobs potential has recently been reinforced and found to be "achievable" by the independent Panel who conducted the Examination in Public of the Regional Spatial Strategy<sup>2</sup>.

Central to achieving the successful and competitive businesses that will drive the Salisbury area's economy will be the provision of an appropriate supply of employment sites and premises to assist the district in meeting its full economic potential. The Spatial Annex to the RES recognises that Salisbury and its TTWA (which includes Amesbury) have a shortage of appropriate and deliverable

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<sup>1</sup> Available at:

[http://download.southwestrda.org.uk/file.asp?File=/res/general/spatial\\_annex.pdf](http://download.southwestrda.org.uk/file.asp?File=/res/general/spatial_annex.pdf)

<sup>2</sup> Draft Regional Spatial Strategy Examination in Public Panel Report (December 2007) para 4.11.14

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employment space. Furthermore, evidence<sup>3</sup> suggests that this is likely to continue over the coming twenty years. As such, the proposed regional distribution centre has the potential to help to deliver a key Strategic Objective identified in the RES, that being to promote successful and competitive businesses.

Notwithstanding this, the evidence from regional and local sources suggests that around 10ha of land will be required for B8 storage and distribution uses in the Salisbury TTWA over the period 2006-2026. The proposed development clearly exceeds this quantum considerably, proposing around 22 ha (net). It also departs significantly from the approved Development Brief and Masterplan for the site as set out in the applicant's Planning Statement. The District Council will need to be satisfied that this will not have a deleterious effect on the range and choice of employment land (B1, B2, B8 and non-B employment generating uses) required within the district to support the continued strong growth of its economy.

## Background

The South West RDA's response is set in the context of a strong planning policy framework identified in PPG4, draft PPS4, the Regional Spatial Strategy, Wiltshire and Swindon Structure Plan, the Salisbury Local Plan and emerging Local Development Framework and the South West RDA makes no further comment about this. However the application has been assessed on the ability of the proposals to help deliver the Regional Economic Strategy (RES) and it is within this context that our response should be considered.

## Delivery of the Region's Economic Strategy (RES) 2006-2015

<u>Strategic Objective SO1:</u>	<u>Successful and Competitive Businesses</u>
Regional Priority 1A:	Support Business Productivity
Delivery Activity 1A.7:	Deliver sustainable sites and premises for business growth
<b>Confirmed activity:</b>	<b>Deliver a suitable supply of employment land and business premises to meet the needs of new or growing businesses at the market rate.</b>

The RES Delivery Framework 2006-09 identifies the provision of a suitable supply of employment space to meet the needs of new or growing businesses as central to the achievement of more competitive and successful businesses in the South West. Furthermore, 'Spatial Implications – Place Matters', an annex to the RES, indicates that a lack of employment land could pose a challenge to Salisbury meeting its full economic potential in the future.

Research by Roger Tym and Partners<sup>4</sup> states that in the Salisbury Travel To Work Area (TTWA); 'Both in terms of inward investment and retention of existing businesses the lack of available employment land is a key issue'. The South West RDA therefore supports measures to address the recognised shortfall in employment land supply relative to forecast demand. As such, the proposed regional distribution centre will contribute significantly to the provision of employment space in the Salisbury TTWA and the region.

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<sup>3</sup> DTZ (Jan 2007) 'The Demand and Supply of Employment Land, Sites and Premises in South West England.

<sup>4</sup> 'The Spatial Implications of Economic Potential in the South West' (May 2006)

In this vein, the South West RDA welcomes the inclusion within the applicant's environmental statement of an analysis of the socio-economic issues related to the proposed regional distribution centre at Solstice Park. This includes, for example, estimates that the proposals will generate some 1,200 direct jobs together with a potential additional 400 jobs due to multiplier effects on local employment. It also reflects the significant job growth potential in the Salisbury TTWA identified in the RES (at least 13,600 jobs by 2026) and recently endorsed as achievable by the independent Panel scrutinising the Regional Spatial Strategy<sup>2</sup>.

Research undertaken at the regional level<sup>3</sup> translates these job growth forecasts into employment land requirements, and usefully disaggregates land requirements into broad type of space under the categories of office, other business space, warehouse and 'non-B' uses. This identifies that for Salisbury TTWA, 10 hectares of land are likely to be required for warehouse uses between 2006 and 2026. These findings are reinforced by the Salisbury District Employment Land Review (April 2007) which finds that 9 – 10 ha of land will be required for B8 storage and distribution uses in the Salisbury District in the period to 2026. This translates to a total of around 39,000sqm. Notably, it also finds that over half of the total employment land supply in the district will be required for B1 office uses to support the growth in service sectors.

The proposed regional distribution centre, in providing around 22 ha net of land (around 88,000 sqm) for warehousing, considerably exceeds these forecast requirements. Moreover it represents a significant proportion of the overall Solstice Park scheme (over one third of the land area) and as such departs considerably from the approved Development Brief and Masterplan for the site. The District Council needs to fully understand the implications of this and will need to be satisfied that it will not have a deleterious effect on the range and choice of employment land (B1, B2, B8 and non-B employment generating uses) required within the district to support the continued strong growth of the local economy.

Should you wish to discuss this matter further please do not hesitate to contact me or Pat Steward, Head of Planning and Transport.

Yours sincerely,

**Jessica Potter**  
**Planning Adviser**

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Our Ref SA/SU14SE/ 51  
Your Ref S/2009/794

Planning Office  
61 Wyndham Road  
Salisbury  
Wilts SP1 3AH

Planning Department

Rec. 18 JUN 2009

Acknowledged

Copy to

Action

17 June 2009

Dear Sir/Madam

**RE: Proposed construction of a regional distribution centre and associated infrastructure works at Solstice Park, Amesbury.**

I refer to the recent planning application submitted in respect of the above and can confirm our engineers comments on the proposals as follows:

**Foul Drainage**

- There are public foul sewers in the vicinity of the site.
- There are private foul sewers serving the overall site which are under agreement for adoption into private Road due course by Wessex Water.
- The foul sewerage system does have adequate capacity to serve the proposals.

**Surface Water Drainage**

- There are no public surface water sewers in the vicinity of the site.
- The planning application indicates the use of soakaways.

**Sewage Treatment**

- There is sewage treatment capacity available.
- There is adequate capacity at the terminal pumping station.

**Water Supply**

- There are water mains in the vicinity of the site which have the capacity to serve this development.

Yours faithfully,

*GCSanders*

Gillian Sanders  
Planning Liaison  
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**Salisbury Campaign for Better Transport**

3 Hadrians Close

Salisbury

SP2 9NN

Judy Howles  
Area Development Manager  
Development Services  
Wiltshire Council  
61 Wyndham Road  
Salisbury  
SP1 3AH

July 6<sup>th</sup> 2009

Dear Ms Howles

**Re: Solstice Park Planning Application, Ref: S/2009/0794**

Salisbury Campaign for Better Transport (formerly Salisbury Transport 2000) wish to **object** to the above planning application for a Regional Distribution Centre (RDC) at Solstice Park Amesbury. We submitted an objection to the previous planning application – S/2007/2518 – and there is nothing in this revised planning application which causes us to alter our views.

**Summary reasons for objection**

Our objection is on the following grounds:

**Traffic**

- Following the cancellation of the Highways Agency A303 Stonehenge scheme the emerging South West Regional Spatial Strategy (RSS) no longer supports dualling of the A303 and this is a material consideration in the determination of this planning application.
- The traffic modelling used for the outline planning permission assumed that dualling of the A303 would occur. The situation where Solstice Park was fully operational with no improvements at Countess roundabout and westwards was never modelled. With hindsight A303 improvements should have been a condition of the original outline consent, but this did not happen.
- The Highways Agency should be taking the cancellation of A303 improvements into account in their response, however they do not appear to be considering the impact on the strategic road network without dualling in place.
- Predicted queue length at Countess and Longbarrow roundabouts has not been supplied (noting that the Highways Agency identified in 2003 that queue length could be up to 60 vehicles at Longbarrow, 70 at Countess, in the summer peak).
- Traffic modelling has failed to give a full picture of the situation with the latest proposals e.g. Andover Airport RDC, Stonehenge Visitor Centre and closure of A344/A303 junction.
- No consideration has been given to where HGVs might be able to park up on the A303 (noting that supplier vehicles may need to arrive at the RDC during a specific time window).
- There would be additional traffic, especially HGV traffic, on other unsuitable roads locally and around the district including Porton Road.
- There are no strategic lorry routes running south from the A303 in Wiltshire so HGVs would inevitably be using routes which are not suitable.
- There would be further congestion in and around Salisbury and elsewhere in Wiltshire.
- There is no detail of how the 'routing agreement' proposed will work, or be enforced, including such fundamental points as whether it can be applied to supplier vehicles. Given the congested nature of the A303 at certain times this agreement would not in any case prevent other non-RDC traffic diverting along local roads when the A303 is congested or blocked.

- This location for a RDC would be bringing a very large number of HGVs onto the A303 which would not otherwise be there.
- Comparisons with a 'reference case' which would generate more traffic (though only about 1/3<sup>rd</sup> of the volume of HGVs), does not mention that other business types would be able to make much more use of green travel planning to minimise vehicle use & road congestion. A business whose raison d'être is the generation of lorry movements clearly has much more limited scope to reduce transport impacts.

#### **Development Plan Policy**

- This development is not in accordance with the Development Plan currently in force and this level of B8 (Storage & Distribution) usage is far in excess of that which the district is deemed to need. The Robert Wiseman Dairy distribution centre now being built at Solstice Park (planning application S/2008/1113) – will provide sufficient employment of this type for Amesbury.
- The development is contrary to the Stonehenge Management Plan since it increases the impact of traffic in the World Heritage site, with an estimated additional 655 HGVs a day crossing the WHS from this development alone.
- The policy in the structure plan to dual the A303 no longer applies following the cancellation of the Stonehenge scheme and the updates in the RSS.

#### **Government Guidance**

- This development is contrary to PPG4 since it would add unacceptably to congestion.

#### **In combination assessment of impact on River Avon SAC**

- Both construction and operation phases of the proposed RDC require an assessment of the impact on the River Avon SAC to take account of the in combination effects with other developments. There is no evidence that this has been undertaken.

We conclude that there are numerous reasons why this planning application should be refused, the prime points being that there is already sufficient B8 development taking place at Solstice Park and the scale of the RDC development proposed in S/2009/0794 is totally unacceptable given the cancellation of plans to dual/improve the A303 and the need to protect the Stonehenge World Heritage site from the impact of traffic.

#### **Detailed grounds for objection**

The details of our concerns are given below:

#### **1. Traffic**

##### **1.1 A303**

##### **Background and current situation**

Historically, one of the factors which led to the siting of Solstice Park on the A303 was the expectation that this road corridor to the South West would be upgraded to dual carriageway.

When SWARMMS (the London to South West and South Wales Multi-Modal Study) reported in May 2002 one of its recommendations was for "a significantly upgraded A303 road corridor (to dual carriageway standard from M3 to Cornwall...)"<sup>1</sup>. Dualling at Stonehenge was accepted as a premise by this Study - "... Government has previously decided to progress the section between Amesbury and Wyllye (including Stonehenge) to dual carriageway standard."<sup>2</sup>

However following years of development and a public inquiry, in the light of cost estimates which had risen to £540 million and after a review of the options, the decision was taken in December 2007 to cancel the A303 improvement scheme at Stonehenge. This had implications further down the corridor where work on the A303/A358 South Petherton to M5 Taunton scheme was put on hold "while the implications of the decision to cancel the A303 Stonehenge Improvement Scheme are considered by the Department for Transport

<sup>1</sup> SWARMMS Corridor Plan: London – Exeter Final Report, May 2002, GOSW/Halcrow, para 2.4.1

<sup>2</sup> SWARMMS Corridor Plan: London – Exeter Final Report, May 2002, GOSW/Halcrow, para 5.3.3

and the South West Region in the context of the wider strategy for improving the A303/A358 route corridor".<sup>3</sup>

In effect the strategy proposed for the SW Corridor in SWARMMS is now unachievable, a conclusion which is underlined by the report into the Examination in Public of the SW Regional Spatial Strategy (RSS). This has recommended that the reference to the achievement of dual carriageway standard for the whole A303 route be deleted.<sup>4</sup>

### **Traffic assumptions for the outline planning consent**

In the Traffic Impact Assessment carried out in 1999 for the proposed development at what was then called 'Folly Bottom, Amesbury' it was made clear that the traffic model prepared by Mott MacDonald had assumed that improvements would be made to the A303 west of Countess roundabout, and that Countess roundabout itself would be fully grade separated as part of this scheme.<sup>5</sup>

The Highways Agency in 1999 noted that Salisbury District Council had expressed concerns that the 'Folly Bottom' (now Solstice Park) junction would be in place before improvements had occurred at Countess roundabout. As a consequence the Highways Agency carried out some further analysis of what they termed the 'interim position' where the Folly Bottom junction was operational and the Countess junction improvement was not.<sup>6</sup> This modelling only modelled Countess Roundabout delays with 50% development at Solstice Park, the comment being made that "Hence the progression of employment development at Folly Bottom within the timescales assumed it is unlikely to cause capacity difficulty at Countess Roundabout junction **prior to programmed grade-separation.**" (our highlighting). The Highways Agency's all-ways Solstice Park junction was progressed with a £10 million investment by the Solstice Park developers and was completed in summer 2004.<sup>7</sup>

With the benefit of hindsight, the dependency on A303 improvements should have been built into the outline planning permission. However it can only be assumed that such was the degree of confidence in the A303 Stonehenge Improvement Project at the time this was not considered necessary.

### **Highways Agency's position**

The Highways Agency's response to the previous planning application (S/2007/2518) said that they were 'content that the proposed development will have no adverse impact on the Strategic Road network'.<sup>8</sup> However officers in Development Control will be aware that, when pressed on this point, the Highways Agency revised their position to state rather that "... the Transport Assessment submitted in support of this application did not consider the effect on the Countess and Longbarrow roundabouts. This was not considered necessary and the Highways Agency has not undertaken this work ....Whilst the Highways Agency would wish to minimise the impact of traffic on the Stonehenge World Heritage site it cannot frustrate development that has been through the planning process".<sup>9</sup>

The Highways Agency response to this current planning application similarly states that 'the proposed B8 usage will have no material impact on the A303 at Countess' and that 'the proposed development will have no material impact on the safe and effective

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<sup>3</sup> see <http://www.highways.gov.uk/roads/projects/14075.aspx>

<sup>4</sup> Draft Regional Spatial Strategy for the South West, Examination in Public, Report of the Panel December 2007, para 5.52

<sup>5</sup> Addendum to Transportation Impact Assessment for Land at Folly Bottom, Amesbury, Sept 1999, Peter Finlayson Associates PLC, para 2.3

<sup>6</sup> Letter from Highways Agency to Salisbury District Council 17 Nov 1999, HA Ref: U 167/442

<sup>7</sup> [http://www.solsticepark.com/park/background\\_info.html](http://www.solsticepark.com/park/background_info.html)

<sup>8</sup> Letter from Highways Agency to Salisbury District Council 7/1/2008

<sup>9</sup> Letter from Highways Agency to Salisbury Campaign for Better Transport 17/3/2008, copied to SDC Development Control and available on the website for planning application S/2007/2518

operation of the Strategic Road Network'<sup>10</sup>. It is difficult to see on what logical grounds this conclusion is based since, as has been pointed out above, the Traffic Impact Assessment which underpins the outline consent was based on road improvements which have now been cancelled.

The Highways Agency have previously expressed concerns about the capacity of the A303 on the single carriageway section past Stonehenge and at Countess and Longbarrow roundabouts. See for example the following:

*"In the summer, principally at weekends, traffic builds up along this section of the A303 and is often at a standstill. Residents of Winterbourne Stoke suffer from the A303 running through the village. On average, between 22,000 and 33,000 vehicles, many of which are large lorries, travel along the road each day. This is more than a single carriageway road can cope with satisfactorily, so queues are a regular and predictable sight. Congestion is inconvenient, but traffic accidents are the other inevitable outcome of roads under stress. There are accident blackspots on the approaches to Winterbourne Stoke and at the junction with the A344 at Stonehenge Bottom."*<sup>11</sup>

At the Stonehenge A303 public inquiry in 2004 the traffic and economics evidence presented by the Highways Agency stated that *'During surveys undertaken in August 2003, queues of up to 60 vehicles were observed for westbound traffic approaching Longbarrow Crossroads, whilst at Countess Roundabout, queues in excess of 70 vehicles for westbound traffic were observed at peak times.'*<sup>12</sup>

A more recent report from the Highways Agency specifically refers to *"two particular junctions on the A303 (Longbarrow Crossroads and Countess Roundabout) where congestion is a material factor"* and refers to *"the congestion problems that will arise along this section of the A303 as a result of the general growth in traffic"*.<sup>13</sup>

Our understanding of Circular DfT 2/07 'Planning and the Strategic Road Network' is that the Highways Agency should have undertaken a full assessment process on this proposal since, due to the cancellation of the Stonehenge improvement scheme, there has been a material change from what is proposed in the current Development Plan. The Highways Agency do not seem to have done this, they seem instead prepared to rubber-stamp this development, without requiring an up to date traffic assessment, as if their plans for dualling the A303 were still in place.

### **New information in the Transport Assessment**

The information provided in the Transport Assessment which purports to show the potential impact of the RDC on the A303/A345 Countess and A303/A360 Longbarrow roundabouts in fact does nothing of the sort. An exercise has been undertaken whereby a traffic turning count was undertaken in a Friday pm peak in Feb 2009 and this is then used to predict the percentage impact of the RDC (Transport Assessment paras 3.19 – 3.20, 7.6 – 7.10 and Appendix B).

However the value of this is somewhat limited as (i) a February count (even factored up by 1.05) is not likely to be representative of the volumes of traffic on this road at other times of the year given that this road is a seasonal tourist route and (ii) the exercise has taken no account of consented and committed development at Solstice Park or at Boscombe Down which would increase background flows and reduce the percentage impact of the RDC. This is allegedly 'to take the worst case' (!) since this gives a higher percentage figure for the influence of the RDC. What of course it does **not** do is give any

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<sup>10</sup> Letter from Highways Agency to Wiltshire Council 29.6.2009, HA Ref: 004/001/004015

<sup>11</sup> A303 Stonehenge Improvement Explanation of the Scheme and Non-Technical Summary of the Environmental Statement, Highways Agency, June 2003.

<sup>12</sup> Highways Agency, A303 Stonehenge Improvement, Public Inquiries, Traffic & Economics Summary, presented on behalf of the Highways Agency by TWA Arnold, para 2.4

<sup>13</sup> A303 Stonehenge Improvement – Scheme Review Partial Solutions – A303/A344 Junction Clouse, Highways Agency, September 2007



indication of the queue lengths which might result at Countess or Longbarrow roundabouts, noting (see above) that the Highways Agency identified in 2003 that queue length could be up to 60 vehicles at Longbarrow, 70 at Countess, in the summer peak. Clearly the predicted queue length at peak hours with all committed developments factored in would be a rather more meaningful statistic than the 'worst case' % increase which the developers have proffered.

#### **Requirement for traffic modelling to take account of latest development proposals**

The traffic modelling which should be undertaken needs to consider the combined impact of all the developments which will affect the A303. This will include:

- Latest proposals for Stonehenge Visitor Centre at Airmans Corner and closure of A344 junction (which will add to traffic on the Longbarrow roundabout).
- The proposals for a Regional Distribution Centre at Andover Airfield, some 10 miles to the east of Solstice Park, which will also add to traffic on the A303.

**HGV parking areas** – there seems to have been no consideration given as to where HGVs destined for the proposed RDC may park up for driver's rest breaks. It is understood that the usual procedure at a distribution centre is that suppliers have a narrow time window in which to deliver and supplier parking may not be allowed on the distribution centre premises outside their delivery window,

Members of the "STOP" Alliance in Andover conducted a survey of parking along the A303 in 2008 and a summary of their results was as follows:

*"The A303 from the end of the M3 (J8) to Stonehenge (approximately 60 miles) was examined both eastbound and westbound. There are 15 lay-bys in each direction. The eastbound carriageway provides approximately 52 HGV spaces, and the westbound carriageway approximately 48 spaces for HGVs.*

*The survey was carried out during March 2008 between 1900 hrs and 2100 hrs by two teams. At this period the Countess Service station near Amesbury had 10 HGVs tightly packed in. Solstice Park, Amesbury, had approximately 36 HGVs parked around the incomplete development. The teams carrying out the survey live around Andover and are regular users of the A303 and it is a matter of their common observation that the lay-bys are very often filled with HGV."* [Supplied by STOP Alliance].

Parking alongside the A303 is limited and many of the existing lay-bys are not separated from the carriageway. Some are on hills which makes the exit speed onto the carriageway very slow for HGVs. There appear to be no facilities for drivers such as lavatories or even basic information on the area and the parking is not secured or lit. If HGVs turn off the A303 to find somewhere to pull over for a rest they are likely to be on totally unsuitable narrow roads.

No consideration seems to have been given to the additional HGV parking which would be needed in the area should this proposal go ahead, and a shortfall on parking spaces will result in lorries parking in inappropriate locations.

## **1.2 Other traffic impacts**

### **Porton Road**

The potential impact on Porton Road is most concerning, since this is an unsuitable road for HGV movements given its narrow width and going as it does through residential areas. HGV usage of this road would rise considerably even if the proposed routing agreement restricts numbers of HGVs going to/from the proposed RDC which would use this road (see concerns re routing agreement in 1.3 below). Even if there could be enforcement such that only 10 HGVs from the RDC were allowed to use this route between 11p.m. and

7 a.m. Table 7.2 in the Transport Assessment shows that this would more than double the overnight HGVs on the road, based on the observed overnight HGV count in Feb 2009.

The quote from the developers that Figure 7.1 of Manual for Streets shows that two HGVs with a width of 2.55 metres can pass within a carriageway 5.5 metres wide is misleading – the caption to Figure 7.1 states that the widths shown “are not necessarily recommendations”<sup>14</sup>. Also the maximum width for refrigerated vehicles increased to 2.6 metres in 1986<sup>15</sup>, and the width quoted does not take account of wing mirrors.

### **Other routes**

The Wiltshire HGV route network supplied as Appendix E of the Transport Assessment shows that there are no strategic lorry routes south of the A303 within Wiltshire (both the A350 and A36 south of the A303 being marked as local lorry routes). It seems unlikely that a recommendation for HGV drivers to use the A34/M3/M27 in journeys to/from the south coast would be followed - a journey between Solstice Park and Bournemouth via A303/A34/M3/M27 would double mileage and fuel costs compared to the journey via A345/A36/A338. Going via A303/A350 would add perhaps 60% to mileage, and this option would add to traffic on Countess Roundabout and on the single carriageway stretch of the A303 past Stonehenge and through Winterbourne Stoke. The A303/A350 option to the south would also have traffic implications for the A350 e.g. on the villages between Shaftesbury & Blandford.

### **Impact on Salisbury**

HGV traffic heading south from this development by the shortest route would join the A345 and enter Salisbury on Castle Road. Presumably the majority of this traffic would then head for the A338 Downton Road or the A354 Blandford Road. The consequences of further traffic on the approach to Castle Road roundabout, Salisbury Ring Road and Harnham Gyratory need to be assessed. Additional traffic would lead to increases in queues and delays on the Ring Road, encouraging more traffic to cut through the city centre. HGVs in particular will add to the levels of noise and air pollution, making the roads more unpleasant and causing additional safety problems for pedestrians and cyclists. There is no way of knowing whether the developer’s traffic predictions, or their reassurances about the willingness of HGV drivers to take longer routes than they have to, will be proved correct. Both the rising cost of fuel and increasing congestion on the A303 at Countess Roundabout and Stonehenge are likely to lead to more, not less, traffic taking the shortest route south. Traffic impacts could very well be significantly worse than stated and the developer has not even begun to consider the impacts across the wider area.

## **1.3 Routing Agreement**

The previous planning application suggested that 15% of HGVs accessing the site – an estimated 218 in a 24 hour period – would use Porton Road. We are now being told that this will be restricted to 80 (TA para 6.32), because of a ‘routing agreement’. However this does raise the issue that more traffic may travel down the A360 to Salisbury, coming through town on the Devizes Road. This will cause significant noise, safety and pollution problems to those who live in this part of Salisbury.

There is not enough detail provided about the routing agreement in paragraph 5.19 and 6.30 – 6.32 to answer the following questions:

- How is the routing agreement to be enforced?
- Who will pay for whatever technology is required?

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<sup>14</sup> Department for Transport Manual for Streets, 2007, p.79

<sup>15</sup> See response to House of Commons written answer for 11.2.1997 (pt 11) available at <http://www.publications.parliament.uk/pa/cm199697/cmhansrd/vo970211/text/70211w11.htm>

- What will the penalties be for infringement?
- In the absence of a named end user what guarantees are there that any routing agreement will remain in place once a specific user comes forward?
- Will controls apply to all HGVs going to and from the RDC, or only to those which are under the control of the site occupant? (i.e. will supplier vehicles be exempt). The following communication from Tesco's Corporate Affairs Manager to Test Valley Borough Councillors in relation the planning application for a Tesco's distribution centre at Andover Airfield explains the problem:

*"The issue: Tesco have explained previously that we have no explicit control over the routing of our third party suppliers' vehicles, the majority of the vehicles which will be making deliveries to (not from) the proposed Distribution Centre. Approximately 300 different hauliers and/or local suppliers will supply a facility such as that proposed.*

*Our contracts with suppliers do not and cannot govern the routing of their preferred hauliers to the proposed site. The issue is often that these suppliers or hauliers are en route between different customers located throughout the country. i.e. a local supplier or haulier may deliver to us, then to another company's distribution centre such as Morrisons or ASDA that is quickest to get to on barred routes. How would this be controlled, what would we do, who is responsible?*

*Our suggested solution: We can use our reasonable endeavours to guide, recommend and propose the routing that supplier vehicles take to the proposed site, which will work in most instances. But we cannot dictate routing. Should Tesco or any other business be held responsible for another company's actions?"<sup>16</sup>*

Even if HGVs going to/from the RDC can be persuaded to adhere to a routing agreement there will be others caught in the likely congestion on the A303 who may be persuaded to take alternative routes. Satellite navigation systems will doubtless suggest routes along Porton Road and others in the district, something which local residents already perceive to be a problem.

#### 1.4 Existing or additional traffic?

The Transport Assessment says that "...few of these HGVs will be new trips to/from new markets in the south west. Rather, it gives the opportunity to rationalise and improve the efficiency of businesses taking advantage of the location of Solstice Park adjacent to the strategic road network, and to capture HGV movements which are already on the strategic highway network." (Transport Assessment, para 7.4, underlining in original text). A note on traffic modelling from PFA Consulting (who are responsible for the Transport Assessment) put it even more strongly "...the nature of the RDC is that the majority of HGVs are likely to be already on the highway network in the vicinity of the site ...."<sup>17</sup>.

However HGVs for one particular supermarket/store will **not** be on the A303 as even a cursory check of any possible users would show. For example, Asda currently has distribution centres in the South of England at Dartford, Erith, Bedford, Bristol, Chepstow and Didcot<sup>18</sup>. The South West and South Coast markets which might potentially be served by a distribution centre at Amesbury would currently presumably be served by Bristol (located close to the M5) and Didcot (close to the A34). Only those lorries which were coming from or serving locations on the A303 would chose to use the A303. Any hints that the HGV traffic which would come with a distribution centre is already on the A303 is plainly nonsense.

<sup>16</sup> Extract from letter from Tesco Corporate Affairs Manager to Test Valley Borough Councillors Reproduced on Sir George Young MP's website 18.10.08 <http://www.sirgeorgeyoung.org.uk/news/Cnewsitem.cfm?newsid=3364>

<sup>17</sup> Notes on HGVs associated with 'Reference Case', PFA Consulting, 5.3.2008

<sup>18</sup> See [http://www.asda.jobs/all-about/locations/distribution\\_locations.html](http://www.asda.jobs/all-about/locations/distribution_locations.html)



## 1.5 Reference Case

The Planning statement and Transport Assessment make much of the point that a hypothetical 'reference case' would generate more traffic than the scenario where this RDC development goes ahead. This argument does not stand up to scrutiny for the following reasons:

- New residential developments and non-B8 business usages are amenable to green travel planning measures to minimise vehicle usage. A distribution centre which is not located near a railway line is inevitably going to be dependent on road transport.
- The emphasis is on comparing peak hour flows (the same data being repeated in Tables 6.2, 7.1 and 9.3). This is an area where an RDC comes off relatively well, since there is less of a peak for HGV flows than there is for other business types.
- Whilst the hypothetical reference case results in more traffic overall, there would be less predicted HGVs than for the RDC. The net effect of the RDC, according to Table 6.8, is that there will be 3160 fewer car journeys per 24 hour day, and 909 more HGV movements. Even if this is accurate (see the point above re green travel planning) it is still debatable whether 3.5 cars are preferable to 1 HGV or vice versa. In terms of factors such as weight and fuel emissions one HGV has a considerably greater impact than 3.5 cars.

## 2. Development Plan Policy

### 2.1 Scale and type of development

This development would be contrary to the Development Plan currently in force, because of its size. The Forward Planning department of Salisbury District Council therefore raised a policy objection to the previous application S/2007/2518. The development of such a large warehousing/distribution facility on Zone D of the site – which was originally zoned for 'Major User and Headquarter facilities' – is also contrary to the Solstice Park Masterplan.

The South West Regional Development Agency commented in its response to the previous planning application S/2007/2518 that '*the District Council will need to be satisfied that this will not have a deleterious effect on the range and choice of employment land (B1, B2, B8 and non-B employment generating uses) required within the district to support the continued strong growth of its economy*'<sup>19</sup>. SWRDA also note that it is predicted that around 10 hectares of land will be required for B8 storage & distribution uses in the Salisbury TTWA over the period 2006-2026 and that the proposed development exceeds this quantum considerably at around 22 ha (net), as well as significantly departing from the approved Development Plan and Masterplan for the site.

The approval of the Robert Wiseman Dairy distribution centre in Solstice Park on 19.9.2008 will of course strengthen the grounds which the SWRDA have suggested for refusal in relation to the previous planning application S/2007/2518. Planning application S/2008/1113 covers the details of a distribution centre which, according to the Design and Access statement, would occupy 3.8 hectares of the overall 65 hectare Solstice park site<sup>20</sup>. This allocation – in Zone A of Solstice Park which is the area furthest from housing which was intended for Industrial/Distribution uses – is predicted to provide some 264 jobs including drivers<sup>21</sup>. This is sufficient for this type of employment use in Solstice Park, and is in accordance with the Masterplan for the site.

<sup>19</sup> Letter from Jessica Potter, Planning Advisor, South West RDA to Development Control SDC, 14.1.2008

<sup>20</sup> Regional Dairy Distribution Centre, Design and Access statement, see documents for planning application S/2008/1113. The figure given is 9.4 hectares, but this is clearly wrong for a portion of the 20 acre (8 ha) Zone A – it is presumed the land area is 9.4 acres.

<sup>21</sup> Solstice Park Planning Statement, Appendix 2, Tables showing progress of development at Solstice Park

## **2.2 Impact on the Stonehenge World Heritage Site**

A revised Stonehenge Management Plan was published in January 2009. The previous Management Plan was adopted by Salisbury District Council as Supplementary Planning Guidance and it is anticipated that the relevant parts of this Management Plan may be similarly adopted by the local authority as a Supplementary Planning Document. The latest Stonehenge Management Plan has an aim (Aim 5) to reduce the impacts of roads and traffic on the Outstanding Universal Value of the WHS and to improve sustainable access to the Site.

This current planning application predicts more traffic on the A303 west of Amesbury than the previous application due to the routing arrangements which try to restrict HGV numbers on more unsuitable roads. It is now predicted that 45.5% of HGVs, some 655 HGVs per day, will cross the WHS compared to 545 HGVs per day in the previous application. This is a significant increase in the noisiest, damaging and most polluting type of vehicle within the World Heritage Site and we consider that the application should be refused on these grounds.

## **2.3 Removal of Stonehenge A303 scheme from development plan**

The Stonehenge A303 improvement has been a longstanding aspiration in the District and this forms part of the current Development Plan. Policy T12 of the adopted Wiltshire Structure Plan states that:

“Improvement to enhance the strategic network will be progressed to support other policies in the structure plan and the local transport plans.

(1) the following trunk road schemes are proposed for construction: A303 Stonehenge (to include the Winterbourne Stoke Bypass and a flyover at Countess Roundabout)...”<sup>22</sup>

The cancellation of the Stonehenge A303 improvement in effect removes this policy from the development plan. The correct response by the planning authorities is to consider what other policies within the development plan might need to be reviewed, with some urgency, in the light of this change. The suitability of Solstice Park for usage such as B8 (Storage/Distribution) which puts a high volume of HGVs onto the road network would be one item for immediate consideration.

## **3. Government Guidance**

PPG4 (Industrial, Commercial Development and Small Firms) advises local authorities to discourage new development “where it would be likely to add unacceptably to congestion”. In the light of the cancellation of the Stonehenge A303 scheme we would dispute the applicant’s statement that the application complies with PPG4 in this respect. No transport assessment has been provided which shows the extent of congestion which would occur on the strategic road network.

## **4. In combination assessment of impact on River Avon SAC**

It has been recognised that the considerable development which is planned around Amesbury will require ‘a demanding and complex appropriate assessment of the plans alone and in combination with each other’<sup>23</sup>. Both construction and operation phases of the proposed RDC require an assessment of the impact on the River Avon SAC to take account of the in combination effects with other developments, noting that the traffic and run-off from the A303 will be one of the aspects to be considered.

## **Conclusions**

We ask Wiltshire Council to take note of the wholly exceptional circumstances in which we now find ourselves following cancellation in December 2007 of the A303 improvements which had

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<sup>22</sup> Wiltshire & Swindon Structure Plan 2016 <http://www.wiltshire.gov.uk/structureplan2016.pdf>

<sup>23</sup> English Nature 2003 River Avon SAC Conservation Strategy (e.g. Appendix G Development Schemes), available from <http://www.english-nature.org.uk/lifeinukrivers/strategies/Avon/avon.html>

been planned for Stonehenge and the subsequent removal of the aspiration to dual the A303 from the emerging Regional Spatial Strategy. It would be both irresponsible and inappropriate to grant permission for further B8-type usage alongside the A303 at this point in time.

With the approval of the Robert Wiseman Distribution Centre at Solstice Park an appropriate level of Storage and Distribution usage for the site is now secured. Amesbury deserves a better and more highly skilled range of job opportunities than this further RDC could supply, and the proximity to housing and the constraints of the current road network make this a totally inappropriate site for such a large-scale development.

We trust that Wiltshire Council will take these views into account when determining this planning application.

Yours sincerely

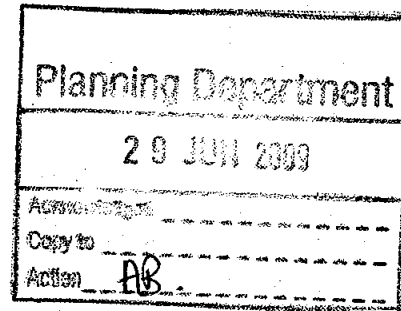
Margaret Willmot  
Salisbury Campaign for Better Transport





Mr. A. Bidwell  
Development Control  
Planning Office  
61 Wyndham Road  
Salisbury  
SP1 3AH

25<sup>th</sup> June 2009



Dear Mr. Bidwell,

**Re; S/2009/794/FULL – RDC at Solstice Park, Amesbury**

I am writing to reiterate my objections to this application, which I see as seriously blighting the employment prospects of the district's people, as well as the economic development of the area. There are five main issues:

- Overall employment density on this valuable large site
- Diversity of employment
- Sustainability of employment
- Traffic congestion
- Environmental impact from noise

The Draft Core Strategy document for the district of South Wiltshire calls for housing and associated employment growth over the next 20 years. The housing growth prediction is controversial but even if it is only half the level predicated of 12,400 homes, we can expect to see local employment growth needs of at least 5,000 new jobs in the area over the next 20 years. If these additional jobs are not provided locally, then the district will become a 'dormitory zone', with all the associated adverse environmental and social impact. So, local good quality employment land and its appropriate use is a key strategic requirement for the district, to make sure that there is no limit to local prosperity and economic development.

This application at best suits a very short term employment requirement – and then only for a very limited range of employment opportunities. Its main drawback is the lack of employment density, the lack of employment sustainability, and also the lack of employment diversity.

The application also fails on local environmental grounds, due the noise and light pollution that will inevitably ensue for local residents. It also fails to address the key issue of A303 congestion.



Q852

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0630

My original objections to this application still stand, and now that the application has been resubmitted, the substantive issues remain unchanged:

a) **Low employment density** - the RDC will not deliver the originally promised employment density for this site, as the same amount of land could accommodate well over double the number of jobs promised in the application. The application (p35 of Environmental Statement – 3.3.6 & 3.3.7) assumes 80 square metres per worker, equal to 1212 jobs, but crucially it admits that employment density could be as low as 149 square metres per worker, which would translate for this RDC into **only 650 jobs**. But these calculations of employment per square metre are based on existing knowledge of currently operating RDCs. There is an inexorable trend to robotics in RDC-type operations, so the numbers employed will decline in the next 5 to 10 years, possibly by as much as 50%. The planning application itself points to this need for continuous cost reduction (p.17, para 5.2). Research has shown ( see references below) that robotics will replace much employment in RDCs as there is little technically now standing in the way of the fine motor control necessary to replace a human hand. A Japanese robot can now solve Rubik's cube 'manually' in seconds. The nature of the work in an RDC, mainly low skilled find/pick/pack operations, often directed by a computer through head-sets, lends itself to adoption of robotics to replace humans. Therefore, in the absence of any large alternative employment land sites of similar scale in South Wilts, this low employment density development will blight the long term strategic employment needs of the area.

The application points to employment multiplier effects on other jobs in the area, claiming that another 400 jobs could be created depending on the type of activity in the RDC (p35 – 3.3.9 of Env Statement). The Scottish research<sup>1</sup> is the most up to date on employment multipliers in the local economy and this shows that retail distribution has a very low employment multiplier of 1.14. On this basis only 170 jobs should be expected to be additionally created in the local area. Contrast this with construction which has an employment multiplier of 1.55, or beer brewing with a multiplier of 1.95, dairy products with 1.88, or pharmaceuticals with 1.48.

If 2,500 jobs were accommodated on the same site with a mix of different businesses, the multiplier would be at least 800 jobs using the *applicant's own calculations*, so the application seriously sub-optimises the full employment potential of this site.

b) **Lack of employment diversity and innovation** is also a major issue - this development will *not* employ manufacturing or assembly workers, design engineers, software development personnel, graphic designers, research and development staff, sales and marketing personnel, legal and financial service personnel, engineering contractors, building contractors etc. etc. There will be very little innovation associated with the RDC, so this important aspect of economic development will be diminished by the proposal. So, if the project is approved, long term employment in the area will be heavily biased to low skill warehousing staff, pending their eventual elimination through the introduction of robotics. Over 2,500 skilled, well paid and

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<sup>1</sup> <http://www.scotland.gov.uk/Topics/Statistics/Browse/Economy/Input-Output/Multipliers>

diverse employment opportunities could be resident on this major site, in place of 1200 relatively low skilled and vulnerable jobs in the RDC.

c) **Over reliance on one large employer and sustainability** - recently Amesbury has lost two large employers in the vicinity - firstly the NAAFI operation with around 400 jobs, and latterly Mahle Filters at Highpost, again with job losses measured in the hundreds. An RDC could well close, as has happened in other areas (ref: the Tesco distribution centre in Weybridge which is rumoured for closure with 700 jobs at risk, and the recent closures at Maltby, Skelton on Teesside, Middleton, and Milton Keynes, all with many job losses). It would be strategically imprudent for South Wilts once again to place so much reliance on one large local employer, as the adverse impact to the local economy would be considerable if the RDC were to close. In place of an RDC, several diverse and unrelated businesses would be a much better strategic option, would ensure that the local economy was protected from large redundancies, and would enable the economy to easily absorb any lesser job losses in the future.

d) **Economic impact through pay rates** are shown in the application - these are difficult to challenge as the applicants carefully avoid attributing them to any region, but they could well be citing London pay rates that would not apply locally. They appear to be unrealistic as they show day working rota staff, semi-skilled warehouse operators, earning a *minimum* of 70% above the national minimum wage. A more realistic local level of pay for this category of worker would be around 1.5 times national minimum wage, at £16,670 instead of the £19,245 in the proposal. Even so, the latest statistics for the whole of the South West region (source South West Observatory - What's Changed Document 2009) shows South West regional **average** pay is £23,160. With the majority of RDC staff in lower paid occupations, this RDC will not be meeting the average pay levels for the region as a whole. Local average pay levels in South Wilts will be nearer £25,000 due to the greater proximity to London compared with lower than average pay rates that apply in Cornwall, so this development will therefore limit pay and consequent contribution to the local economy. A mix of diverse businesses will contribute more to the local economy by achieving at or above regional average pay levels.

e) **Short term thinking is not the answer to long term strategic economic issues.** The application now emphasises the impact of the 'credit crunch' and how it will assist the area with employment opportunities at a time of need. The recession is a problem, but it is a temporary phenomenon, and it will be long past by the time the RDC construction is even begun in two years time, let alone commencement of operations which could be as much as five years away. The applicants emphasise that there is no occupant for the facility, so even if planning consent is granted, it could well be some years before an occupant is found for the site.

No decision of this strategic importance should be taken on the basis of a short term employment need within the next five years. This land is too valuable to the local economy for such short term thinking. The latest claimant count statistics (source: ONS - May 14th 2009) for Salisbury District show that there are 1,465



people in search of work. This is well up on the average figure for the 12 months to Sept 2008, when it stood at 540. But at 2.1% of the local workforce it is still well below the South West average of 3.1%, and even further below national average of 4.1%. So, while unemployment in the local area will continue to rise over the next two years as the after-effects of the recession work through, perhaps double the current level to as high as 3,000 on the claimant count, even then it will still only be 4% of local employment. The point is that the local area is not so affected by the credit crunch as other areas, and therefore there is not the pressure to make short term decisions in favour of a second best employment option such as an RDC.

f) **Traffic Congestion** - it is not sufficient to claim that the A303 is a major trunk route, so therefore it is suited to this type of development. In fact the A303 at Amesbury is the first pinch point on the route from the outskirts of London and Southampton to the far western areas of the region. It qualifies as a trunk route in name only because it does not meet modern standards for a trunk route from Solstice Park westwards. To locate such a facility on Solstice Park will only add to an existing serious local congestion problem. Furthermore, massive disruption to local traffic will result from inevitable breakdowns in the RDC systems, with long queues of HGV forming on all approach roads. Queuing is a well known phenomenon associated with such large and tightly controlled operations – when they work smoothly, vehicles flow in and out well. When the systems fail, as they inevitably do, the results are felt over a very wide area.

‘A common problem for hauliers servicing RDCs relates to the amount of time spent queuing to be offloaded either on or off site. Many complain about the limited entrance capacity at RDC sites and often the need to queue on the public road outside.’ *Freight Best Practice Guide – Dept for Transport – June 2007 page 9.*

The application is trying to squeeze too much into too small a site, and so inevitably the entrance capacity will be limited. The approach to the site on Equinox Drive is only going to have capacity for 16 HGV to queue in the event of an RDC system failure. With over 40 HGV movements per hour this will mean that any delay over 30 minutes in unloading will cause HGV to queue on the A303. With *any* queue forming on Equinox Drive, it will mean severe congestion and disruption for other road users. Although this problem is well-known in Government and RDC circles, ***the planning application makes no mention of this***, and the impact of such system delays needs to be modelled by independent traffic consultants so that this can be properly assessed.

It is disingenuous to claim that existing planning consents for Solstice Park have already taken into account such traffic movements, so therefore traffic will not be a problem. An RDC is an unusual and very specialised operation, completely un-typical of a normal mixed business industrial estate. It operates 24/7, and it contributes many more HGV movements than would be expected for a normal mixed industrial estate. Also a large, slow moving HGV is much more likely to create congestion than a light van or car, so merely to count vehicle movements (Env Statement p145 – table 5.9) does not show the real impact of the RDC on the local roads.

Hauliers are given time slots for their arrival at an RDC, and so will take any short cut or unsuitable local road in order to avoid congestion and make sure that they arrive on time. This will inevitably mean HGV approaching the RDC from many different compass points, along narrow, winding, unsuitable roads. The application states (p149 – 5.9.25 of Env Statement) that it will place limits on vehicle movements along certain local roads. This is complete window dressing, and it is absurd to pretend that these controls can be enforced, let alone monitored. Vehicle weight limits do not work, unless they are policed 24/7. The evidence from Downton, where there is a weight restriction, shows HGV regularly flouting the regulations, because the police do not have the resources to enforce the limits.

Unless there is a solution to the Countess roundabout and Stonehenge problem, this application must not be allowed to proceed. Also, adequate HGV holding areas must be included within the plan to ensure that HGV do not queue on the local public roads such as Equinox Drive, and that local road users do not suffer congestion and attendant increased costs as a result of RDC system failures.

g) **Environmental impact** – the traffic flows will draw warehousing staff from a very wide area, as the long term local demand for such work will not be high. So, far from encouraging ‘sustainable transport choices’ (Env Statement – p143 – 5.8.7) the RDC will actively encourage long distance car commuting by the staff, especially as many of the staff will be working unsocial hours when the very limited local public transport service will not be operating. A mixed development of businesses, working normal hours, will be much more likely to encourage employment among local residents, who will in turn be more likely to make use of sustainable transport.

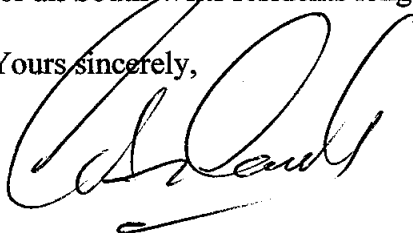
Regarding noise impact the application asserts that this will be at worst of ‘Minor Adverse Significance’ (p164 – 6.1.14 of Env Statement). Even though baseline noise levels have been measured (Tables 6.4 to 6.6 of the Env Statement), the assumptions for operational noise levels are drawn from a computer model, and on this basis the applicants confidently predict that noise levels will be below the relevant limits in ISO, BS and WHO standards for health. The assessment should have included an actual noise trial, including HGV movements and refrigeration units, measured at the point of impact inside local houses, not in their gardens, and also at 2 a.m. in the morning when background noise is at the lowest level. No conclusion should be reached until the noise assessment is validated in this way. If the application should unfortunately be approved, then a condition of night-time operations should be no breach to any of the relevant health standards, failing which night time operations should be shut down pending remedial work. Noise monitors should be placed permanently alongside local residents houses and local environmental health officers should have the power to act to enforce a suspension should any breaches of standards occur.

**Conclusion:** In the light of all the above points, I would urge you to refuse this development as being unsuited to the area, and not in accordance with the long term strategic economic needs of South Wiltshire. Valuable employment land such as

Solstice Park is needed to provide sustainable, diverse and well paid jobs to match Core Strategy predictions and the demanding house building requirements in the South Wilts area. It should not be squandered on an RDC which makes such a poor long term contribution to the area's economic development.

Finally, an RDC in this area presents a vision of Chinese made fridges or Egyptian potatoes, moved around by Japanese or US made robots, minimally staffed by a majority of transient workers. This is surely not the vision we should have for Solstice Park, where we could be offering a valuable mix of good employment opportunities for all South Wilts residents long into the future.

Yours sincerely,



Chris Counsell  
Managing Director

#### **References:**

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(S) ✓

## THE STONEHENGE ALLIANCE

Chairman, George McDonic, MBE

From the Hon Secretary, Kate Fielden  
1 The Old Smithy, Alton Priors  
Marlborough, Wiltshire SN8 4JX.

2 July 2009

Mr A Bidwell  
Development Control  
Wiltshire Council  
61 Wyndham Road  
Salisbury SP1 3AH

Planning Department

Rec.	03 JUL 2009
Acknowledged	.....
Copy to	.....
Action	AB

Dear Mr Bidwell

**Solstice Park Planning Application: S/2009/0794**

The member organisations of the Stonehenge Alliance were opposed to the damaging tunnel proposals for the A303 through the World Heritage Site at Stonehenge. Following cancellation of the Highways Agency's scheme we remain opposed to any developments which would adversely impact upon the World Heritage Site and wish to work with others to ensure the environment of Stonehenge is protected and improved.

We submitted an objection to the previous application for a Regional Distribution Centre (S/2007/2518) and do not consider that the changes in the current application address the concerns which we raised. We therefore wish to object to the above planning application on the grounds of the unacceptable additional traffic which it would bring through the World Heritage Site. We also have concerns about the potential visual impact of the development on the World Heritage Site.

We note that no Appropriate Assessments have been submitted in relation to the River Avon and Salisbury Plain Special Areas of Conservation. In view of the additional traffic that the development would bring, and its impact in combination with increases in traffic movement in relation to a new visitor centre for Stonehenge, we believe that such assessments ought to be carried out. We also believe that the application will need to take account of the implementation of the EU Water Framework Directive (2000/60/EC) and the South West River Basin Management Plan to be issued in December 2009.

With regard to traffic issues, we note that dualling of the A303 at Stonehenge has been a long-held aspiration, incorporated into local and regional planning policy. Following the cancellation of that scheme in December 2007 it will now be necessary to reconsider all those policies which had been based on this assumption and to review the content of detailed policy documents, including the Stonehenge Management Plan which had, in its earlier version, assumed the A303 would be both dualled and removed from the vicinity of Stonehenge.

The cancellation of the A303 Stonehenge scheme must be a material consideration that we would ask you to take into account when determining this planning

application. There is now a revised Stonehenge Management Plan published in January 2009. The previous Management Plan was adopted by Salisbury District Council as Supplementary Planning Guidance and it is expected that the new Plan will be similarly adopted by Wiltshire Council. New Management Plan (Aim 5) aims to reduce the impact of roads and traffic on the Outstanding Universal Value of the World Heritage Site and to improve sustainable access to the Site. This planning application would lead to an increase in traffic, including a high percentage of HGVs, across the World Heritage Site and we consider that the application should be refused on these grounds.

We note that there has been an announcement to the effect that English Heritage is planning to construct a new visitor-centre for Stonehenge on the west side of the WHS. The scheme would include closure of the A303/A344 junction and improvements to Longbarrow Roundabout. The current proposals for Solstice Park do not appear to take these potential changes into account. We believe, however, that the Council should take them into account in determining the application, not least because of the implications for traffic movement during and after any changes to Longbarrow Roundabout and the impact the concomitant increase in traffic on the A303 through the WHS would have on its setting.

With respect to visual impact, we are concerned to note that the scale of the proposed buildings makes them visible from within the World Heritage Site. (See: ES, para 4.6.30.) We also note that only photographs taken in the summer months with maximum screening from vegetation are being used – consideration of the views at other times of the year would be appropriate in view of the international importance of Stonehenge. (See: ES, para 4.3.31.) One of the obligations under the World Heritage Convention is to rehabilitate the cultural heritage and this must include views within the setting of the Site.

Furthermore, we believe there are serious concerns about light pollution. We are not convinced that the type of lighting proposed will be light-pollution free and consider that it, together with light pollution from other developments at Solstice Park, is likely to have a significant impact on the WHSite landscape at night which is known to be associated with viewing astronomical features and events. (See: ES, paras 4.6.31 – 33.) In our view, there is a strong case for reviewing the lighting provisions at permitted developments in Solstice Park and for making some attempt to reduce the amount of light emitted.

We hope that Wiltshire Council will take account of the views of the Stonehenge Alliance when considering this application.

Yours sincerely,

Kate Fielden  
Hon Secretary



**THE STONEHENGE ALLIANCE IS SUPPORTED BY:**  
Ancient Sacred Landscape Network; Campaign for Better Transport;  
Campaign to Protect Rural England; Friends of the Earth; and  
RESCUE: The British Archaeological Trust



**Green Party**

Development Control  
Planning Office  
61 Wyndham Road  
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SP1 3AH

10 July 2009

Planning Application **S/2009/0794**

I apologise for the lateness of this objection but hope it may still be able to be taken into account.

We object to the above application, as we did to the previous application for a regional distribution centre on this site.

We make the following observations.

- The Salisbury Campaign for Better Transport has provided an excellent analysis of the reasons why this application should be refused on traffic grounds.
- The managing director of The Tintometer Ltd has made some interesting comments regarding the balance of employment needs and provision in Amesbury and South Wiltshire.
- We would add that the scale and massing of the proposed development will blight Solstice Park and (in addition to occupying space that could be used for higher quality employment opportunities) is likely to have the further effect of discouraging from locating at Solstice Park those types of businesses which provide higher quality employment opportunities.

Sue Wright  
On behalf of Salisbury Green Party

## **Salisbury Green Party**

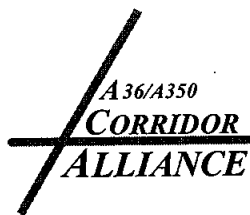
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[s.i.wright@btinternet.com](mailto:s.i.wright@btinternet.com)

Planning Department

Rec 13 JUL 2009

AB



ACA was formed in 1993 to bring together groups opposed to the creation of a strategic highway from the M4 to the South Coast. It now includes the following groups:

- ☐ Friends of the Earth South West:  
Bath, Bristol, Somer Valley, West Wilts, North Wilts, Salisbury
- ☐ Friends of the Earth South East:  
New Forest, Test Valley, Southampton, Hampshire Network
- ☐ Council for the Protection of Rural England:  
Wiltshire Branch and West Wilts and South Wilts local groups; Dorset Branch
- ☐ CIBT:  
Wiltshire, Salisbury, SW Network
- ☐ Westbury Bypass Alliance

Please reply to: **Bramfield, Slab Lane, West Wellow, Romsey, Hants SO51 6BY**  
Tel: 01794 322505 E-mail: [patrick@patkinnersly.plus.com](mailto:patrick@patkinnersly.plus.com)

Judy Howles  
Area Development Manager  
Development Services  
Wiltshire Council  
61 Wyndham Road  
Salisbury  
SP1 3AH  
[submitted by e-mail]

Planning Department

Rec.	13 JUL 2009
Action/Response	
Copy to	AB
Action	

10<sup>th</sup> July 2009

Dear Ms Howles

**Solstice Park Planning Application, Ref: S/2009/0794**

We wish to register an objection to this revised planning application. This is largely on the same grounds as our objection to the application last year - the traffic implications, particularly for the A36 corridor. In our previous objection we argued that there could be significant movements of HGVs from this development on to the A36 in the direction of Salisbury and Southampton. We see no reason to change that view and ask that all our arguments from the previous objection be taken into account.

Again we note the scale of the documentation and again we deplore the absence of meaningful content in the transport analysis.

Our previous objection focused principally on the effects of HGVs on local roads and we expressed our profound reservations that, without a stated end-user it was impossible to predict what the effects on the local network would be. We note that nothing has changed in this regard - an extensive elaboration of a traffic model is of no technical worth if there is no underlying knowledge of the trip ends other than the RDC itself, and there can be no underlying knowledge so long as no end-user can be specified.

Previously the argument put forward to counter fears that HGVs would follow the cheapest routes, which in the absence of a credible traffic analysis, could be anywhere on the network, was that undesirable trips would not be made because lorry drivers would voluntarily follow the recommended route of the A303 and A34/M3. This view appears now to have been formalised into a routeing agreement which it is claimed will be placed on the user when one is finally found.

This assurance is no more plausible than the previous assertion of good behaviour. How is the agreement to be monitored? How are its strictures to be enforced? How will Wiltshire Council monitor the developer's agreement and enforce it, for how many years and who will pay for that activity?

We are also very concerned that a development is being contemplated that puts several hundred HGVs on

the A303 past Stonehenge. It is very clear now that no road improvements will take place in the vicinity of Stonehenge that can have any effect on improving the total traffic burden at the site (the possible closure of the A344 merely diverts some of the traffic on to the A303 past the monument). The level of traffic is already described by the Government as a '*national disgrace*' so that any additional traffic burden cannot logically be contemplated.

This was clear enough last year, but the pretence then that the A303 was still going to be improved elsewhere as the Second Strategic Route (in spite of the inevitable result of such improvement bringing additional traffic to the scene of national disgrace) can no longer be maintained.

Last year the draft RSS certainly contained reference to the intra-regional route as the Second Strategic Route and repeated the SWARMMS recommendation that the A303 be improved. Certainly also the Region has put forward a package for improvements to the road in the RFA process, as stated in this application. But this is seemingly in defiance of the changes to the draft RSS proposed by the Secretary of State last year. In these changes the whole section on inter-regional routes is deleted and the only mention of the Second Strategic Route is that it is a rail and road corridor. There is nothing now from central government to indicate that the A303 is favoured for improvement and indeed if there were it would contradict their position on Stonehenge and would possibly compromise the World Heritage Status of the site.<sup>1</sup>

As you will no doubt be aware the publication of the final RSS has been delayed pending consideration of the judgement in a recent legal case involving the East of England region. We believe that the issue in that case was whether development proposals in the RSS would place unlawful impacts on the integrity of the region's European sites (SACs and SPAs). The Habitats Regulations Assessment of the RSS for the SW highlighted the impacts of road pollution on European sites including Salisbury Plain and the River Avon. The A303 was mentioned specifically as a potential threat to Salisbury Plain. It seems likely that DCLG is now considering whether transport and development proposals in the SW RSS would breach the Habitats Directive. The Directive's requirement to carry out an appropriate assessment (AA) of in-combination effects of proposed developments would therefore seem to apply to this proposal at local and regional level. An AA might also need to assess the traffic increases and resulting pollution burdens imposed by the similar RDC at Andover.

We would suggest that this application cannot be determined until traffic impacts have been properly modelled and quantified, questions over compliance with European biodiversity law have been resolved and the proposal has been tested for conformity with the final RSS when published by the Secretary of State for Communities.

Yours sincerely

*P.T.Kinnersly*

**Patrick Kinnersly**  
**For ACA**

---

<sup>1</sup> There has already been a suggestion that ICOMOS will consider withdrawing World Heritage Status from the Stonehenge site if nothing is done to make things better – what will it do if it learns that government is encouraging things to get worse?





MINISTRY OF DEFENCE

**Defence Estates Safeguarding  
Statutory & Offshore**

Defence Estates, Kingston Road,  
Sutton Coldfield, West Midlands, B75 7RL

Telephone (MOD): +44 (0)121 311 2010  
Facsimile (MOD): +44 (0)121 311 2218  
E-mail: [safeguarding@de.mod.uk](mailto:safeguarding@de.mod.uk)

Mr A Bidwell  
Wiltshire Council  
Development Services  
61 Wyndham Road  
Salisbury  
Wiltshire  
SP1 3AH

Your Reference: **S/2009/794/FULL**  
Our Reference: D/DE/43/2/14 (09/866)

Date: 05/08/2009

Dear Mr A Bidwell

**MOD SAFEGUARDING – BOSCOMBE DOWN**

**Proposal:** Proposed Construction of Regional Distribution Centre and Associated Infrastructure Works including Roads, Parking Area, Drainage and Landscaping

**Location:** Solistice Park, Porton Road, Amesbury, Salisbury, SP4 7LJ

**Grid Ref:** 417440, 141843

**Planning Ref:** **S/2009/794/FULL**

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 12/06/2009.

This site falls within the statutory height and technical safeguarding zone surrounding Boscombe Down Aerodrome. The MOD's principle concern is to ensure new developments do not infringe or inhibit operations on site.

In relations to the above proposed development, I can confirm that the Ministry of Defence has no safeguarding objections to this proposal providing that the heights of the buildings and any other structures, including superstructures (i.e. chimneys, TV aerials, etc) are to be no higher than 20 metres Above Ground Level (AGL).

On reading the Architectural Design and Access Statement at '08 Appendix'- Appendix 1 (Page 34) it was mentioned the use of small to medium scale turbines. If this is to be implemented the MOD will need to be consulted on this.



**DEFENCE ESTATES**  
*Delivering Estate Solutions to Defence Needs*

The developer and Wiltshire County Council once in Planning should be made aware of the considerable noise from the aircraft and the airfield itself, throughout the year, day and night, may impact on staff, businesses, and visitors to the development. Developers (and Wiltshire County Council) should impress upon any co-developers, and all potential visitors, and businesses etc; and in the future, any successor in title, that MOD (and QinetiQ) will not alter flying routines or entertain any claims for damages in respect of noise from the airfield.

I hope the above points are clear, if you require any further information please do not hesitate to contact this office.

Yours sincerely

R. S. Harper

**Rachel Harper**  
**DE OPS NORTH**  
**Defence Estates Safeguarding**

**Safeguarding Solutions to Defence Needs**



Mrs J Howles  
Development Control  
Planning Office  
61 Wyndham Road  
Salisbury  
Wiltshire  
SP1 3AH

29 July 2009

Dear Mrs Howles

**RE: S/2009/0794- Regional Distribution Centre, Solstice Park**

Following on from our letter dated the 28 February 2008, expressing our support for the last planning application for the Regional Distribution Centre (S/2007/2518), the partnership would like to renew its support for the above application.

On various consultations with residents and other key partners, the developers have taken steps to ensure that their considerations have been met, e.g. noise reduction, which is very encouraging.

As per our previous letter, it was highlighted that the development could also stimulate further interest in the site and also the local community whilst ensuring that its use remains fit for the purpose of the business park.

We hope that you will take the above into consideration, when making your recommendation.

Yours sincerely,



**Jack Wills**  
Chairman  
South Wiltshire Economic Partnership

Cc: Cliff Whitely, Solstice Park Project Office





ENGLISH HERITAGE  
SOUTH WEST REGION

Planning Department

Rec. 08 JUL 2009

Acknowledged .....

Copy to .....

Action AB .....

Mr Shane Molloy  
Wiltshire Council  
Development Control, Planning Office  
61 Wyndham Road  
Salisbury  
Wilts  
SP1 3AH

Direct Dial: 0117 9750670  
Direct Fax: 0117 9750684

Our ref: P00075329

6 July 2009

Dear Mr Molloy

**Notifications under Circular 01/2001 & GDPO 1995  
SOLSTICE PARK, AMESBURY, SALISBURY, WILTSHIRE  
Application No S/2009/0794**

Thank you for your letter of 12 June 2009 notifying English Heritage of the scheme for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

**Recommendation**

**The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.**

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

Yours sincerely

**Stephanie Allen**  
Casework Officer  
E-mail: [stephanie.allen@english-heritage.org.uk](mailto:stephanie.allen@english-heritage.org.uk)



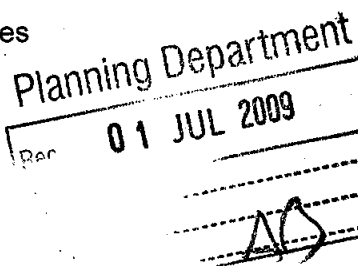
29 QUEEN SQUARE BRISTOL BS1 4ND  
Telephone 0117 975 0700 Facsimile 0117 975 0701  
[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act. All information held by the organisation will be accessible in response to a Freedom of Information request, unless one of the exemptions in the Act applies.*



Our ref: HA 004/001/004015  
Your ref: S/2009/0794

Head of Development Services  
Wiltshire Council  
The Planning Office  
61 Windham Road  
Salisbury  
SP1 3AH



Mrs Jacqui Ashman  
Network Planning Manager  
2/08K  
Temple Quay House  
2 The Square, Temple Quay  
Bristol BS1 6HA

Direct Line: 0117 372 8756  
Fax: 0117 372 8810

FAO: Andrew Bidwell

29 June 2009

Dear Mr Bidwell

**Solstice Park Zone D: Proposed Regional Distribution Centre- Transport Assessment**

Thank you for providing the Highways Agency with the opportunity to comment on the Transport Assessment for the proposed Regional Distribution Centre on Zone D of Solstice Park, Amesbury. We have reviewed this document and make the following comments which are in line with the DfT Document 'Guidance on Transport Assessment' (March 2007) and the DfT Circular 02/07: Planning and the Strategic Road Network:

**Development Proposal**

The Transport Assessment has been submitted with reference to a revised planning application for a Regional Distribution Centre (RDC). Both the original Salisbury District Council application of December 2007 (ref S/2007/2518) and the current application are for two B8 warehouses with a total gross floor area of 94,144 sq m. Permission for the original application was refused by the Local Planning Authority due to concerns that as the proposed development had no end user, the proposal may generate significant levels of traffic and place an undue burden on the existing services and facilities, contrary to policy G2 of the adopted Salisbury District Local Plan. The Highways Agency had no objection to the proposed development, subject to planning conditions relating to a Travel Plan and Construction Management Plan.

As with the original submission, the Agency accepts that the planned 94,144 sq m of B8 development will have a smaller impact on the Strategic Road Network than the B1/B2/B8 development on a similar scale, for which the land in question is designated, and that the proposed B8 use will have no material impact on the A303 at the Countess Roundabout. Therefore The Agency has no objection to the proposed development, subject to the production of a Construction Management Plan and Travel Plan.

**Conclusion**

The Agency is satisfied that the proposed development will have no material impact on the safe and effective operation of the Strategic Road Network and therefore has no



objection to the proposed development. A TR110 is attached requesting the submission of a Travel Plan and Construction Management Plan.

Should you have any questions or require further information in the meantime, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Ashman', with a stylized flourish at the end.

Mrs Jacqui Ashman  
Network Operations South West Planning  
Email: [jacqui.ashman@highways.gsi.gov.uk](mailto:jacqui.ashman@highways.gsi.gov.uk)



An Executive Agency of  
The Department for Transport

## Developments Affecting Trunk Roads and Special Roads Highways Agency Response to an Application for Planning Permission

From: Divisional Director, Network Operations, South West, Highways Agency.

To: Wiltshire Council


Council's Reference: S/2009/0794

Referring to the notification of a planning application dated 8<sup>th</sup> June 2009, your reference S/2009/0794, in connection with the A303 (T) Amesbury, notice is hereby given under the Town and Country Planning (General Development Procedure) Order 1995 that the Secretary of State for Transport:-

- a) ~~offers no objection;~~
- b) ~~recommends that planning permission should either be refused, or granted only subject to conditions~~
- c) directs conditions to be attached to any planning permission which may be granted;
- d) ~~directs that planning permission is not granted for an indefinite period of time;~~
- e) ~~directs that planning permission not be granted for a specified period (see Annex A).~~

*(delete as appropriate)*

**Signed by authority of the Secretary of State for Transport**

<b>Date:</b> 29 June 2009	<b>Signature:</b> 
<b>Name:</b> Jacquie Ashman	<b>Position:</b> Assistant Network Manager
<b>The Highways Agency:</b> 2/08K Temple Quay House 2 The Square, Temple Quay Bristol, BS1 6HA	

**Annex A**

**Condition(s) to be attached to any grant of planning permission:**

1. Prior to commencing construction of the proposed development the applicant shall provide full details of how they intend to contribute towards the existing Travel Plan for the site. The acceptability of these proposals will need to be agreed in writing by the Local Planning Authority and Local Highway Authority (in consultation with the Highways Agency acting on behalf of the Secretary of State for Transport). In complying with the existing Travel Plan, the applicants will need to address the following issues:

- The identification of targets for trip reduction and modal shift
- The methods to be employed to meet these targets
- The mechanisms for monitoring and review
- The penalties to be applied in the event that targets are not met
- The mechanisms for mitigation
- Implementation of the Travel Plan to an agreed timescale or timetable and its operation thereafter.
- Mechanisms to secure variations to the Travel Plan following monitoring and review.

A review of the targets shall be undertaken within 3 months of the occupation of the development and on an annual basis thereafter, at the time of submission the annual Travel Plan Report.

2. The development hereby permitted shall not commence until a Construction Management Plan has been submitted to and subsequently approved in writing by the Local Planning Authority (in consultation with the Secretary of State for Transport and Wiltshire County Council). The Plan will include construction vehicle movements, construction operation hours, construction vehicle routes to and from the site, construction delivery hours, expected number of construction vehicles per day, car parking for the contractors, specific measures to be adopted to mitigate construction impacts in pursuance of Environment Code of Construction Practise and details of a scheme to encourage contractors to use alternative means of transport to the private motor vehicle. Construction works shall be carried out strictly in accordance with the Construction Management Plan.

**Reason(s) for the direction given at b), c) or d) overleaf and the period of time for a direction at e) when directing that the application is not granted for a specified period:**

1. To ensure that the operation of the Strategic Highway Network is protected and that sustainable travel objectives for the site are met and maintained.

2. In the interests of highway safety and the free flow of traffic on the trunk road network





# The Stonehenge Chamber of Trade

*Representing businesses from Amesbury, Bulford, Durrington, Larkhill, Netheravon & Shrewton*

Mr A Bidwell  
Planning Department  
Salisbury District Council  
61 Wyndham Road  
Salisbury  
SP1 3AH

Our Ref hw/0809

3<sup>rd</sup> August 2009

Dear Mr Bidwell

**Ref: S/2009/0794 – Regional Distribution Centre, Solstice Park**

The Stonehenge Chamber of Trade would like to record its full support for the above numbered planning application.

The chamber members have voted on the matter and the results showed that members were strongly in support of the application. It is the view of the Chamber of Trade that such a scheme would offer much needed employment opportunities in the area and could help to encourage other businesses to locate to the site which would help to strengthen commerce in the area as a whole.

We hope that you will take the above points into consideration when making your recommendation.

Yours sincerely

Miss Helen White  
Chairman  
Stonehenge Chamber of Trade