

AGENDA

Meeting: Strategic Planning Committee

Place: Council Chamber - County Hall, Trowbridge BA14 8JN

Date: Wednesday 15 January 2020

Time: 10.30 am

Please direct any enquiries on this Agenda to Roger Bishton, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 713035 or email roger.bishton@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Membership:

Cllr Fleur de Rhé-Philippe MBE
(Chairman)
Cllr Derek Brown OBE (Vice-
Chairman)
Cllr Andrew Bryant
Cllr Ernie Clark
Cllr Andrew Davis
Cllr Stewart Dobson

Cllr Sarah Gibson
Cllr Carole King
Cllr Christopher Newbury
Cllr Tony Trotman
Cllr Fred Westmoreland

Substitutes:

Cllr Ian Blair-Pilling
Cllr Clare Cape
Cllr Christopher Devine
Cllr David Halik
Cllr Russell Hawker
Cllr Ruth Hopkinson

Cllr Chris Hurst
Cllr Nick Murry
Cllr Stewart Palmen
Cllr Stuart Wheeler
Cllr Graham Wright

Recording and Broadcasting Information

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request. Our privacy policy can be found [here](#).

Parking

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

County Hall, Trowbridge
Bourne Hill, Salisbury
Monkton Park, Chippenham

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

For assistance on these and other matters please contact the officer named above for details

AGENDA

Part I

Items to be considered when the meeting is open to the public

1 **Apologies**

To receive any apologies or substitutions for the meeting.

2 **Minutes of the Previous Meeting** (*Pages 5 - 22*)

To approve and sign as a correct record the minutes of the meeting held on 11 December 2019. (Copy attached)

3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Chairman's Announcements**

To receive any announcements through the Chair.

5 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

Members of the public who wish to speak either in favour or against an application or any other item on this agenda are asked to register by phone, email or in person no later than 10.20am on the day of the meeting.

The rules on public participation in respect of planning applications are detailed in the Council's Planning Code of Good Practice. The Chairman will allow up to 3 speakers in favour and up to 3 speakers against an application and up to 3 speakers on any other item on this agenda. Each speaker will be given up to 3 minutes and invited to speak immediately prior to the item being considered.

Members of the public will have had the opportunity to make representations on the planning applications and to contact and lobby their local member and any other members of the planning committee prior to the meeting. Lobbying once the debate has started at the meeting is not permitted, including the circulation of new information, written or photographic which have not been verified by planning officers.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution which excludes, in particular, questions on non-determined planning applications.

Those wishing to ask questions are required to give notice of any such

questions in writing to the officer named on the front of this agenda no later than 5pm on **Wednesday 8 January 2020** in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on **Friday 10 January 2020**. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

- 6 **19/10043/FUL: Salt Store and Gritter Garage Netton SP4 6AT - Demolition of the existing salt store building from 1500, and construction of larger salt store of 2500 tonnes capacity. Extend existing 6-bay vehicle store to a 10-bay facility (additional bays to allow for deeper plan for snow plough attachments to vehicles). Welfare building to be extended to provide increased storage space accessed from vehicle bays. (Pages 23 - 44)**

A report by the Case Officer is attached.

- 7 **19/09327/FUL: Land adjacent to Salt Depot at High Post Business Park High Post Durnford Salisbury SP46AT - Erection of two new factory facilities and associated access road, parking, service yard and refuse storage areas, for Naish Felts Ltd and Wallgate Washrooms Ltd. (Pages 45 - 88)**

A report by the Case Officer is attached.

- 8 **Date of Next Meeting**

To note that the next scheduled meeting of the Committee is due to take place on Wednesday 19 February 2020, at County Hall, Trowbridge, starting at 10.30am.

- 9 **Urgent Items**

Any other items of business, which in the opinion of the Chairman, should be taken as a matter of urgency.

Part II

Item during whose consideration it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

None

STRATEGIC PLANNING COMMITTEE

MINUTES OF THE STRATEGIC PLANNING COMMITTEE MEETING HELD ON 11 DECEMBER 2019 AT COUNCIL CHAMBER - COUNTY HALL, TROWBRIDGE BA14 8JN.

Present:

Cllr Fleur de Rhé-Philippe MBE (Chairman), Cllr Derek Brown OBE (Vice-Chairman), Cllr Andrew Bryant, Cllr Ernie Clark, Cllr Andrew Davis, Cllr Stewart Dobson, Cllr Sarah Gibson, Cllr Carole King, Cllr Christopher Newbury, Cllr Tony Trotman and Cllr Fred Westmoreland

Also Present:

Cllr Jose Green, Brian Dalton and Cllr Toby Sturgis

66 Membership of Committee & Apologies

The Chairman welcomed Cllr Carole King on her first attendance at a meeting of the Committee.

There were no apologies for absence.

67 Minutes of the Previous Meeting

Resolved:

To approve and sign as a correct record the minutes of the previous meeting held on 13 November 2019.

68 Declarations of Interest

There were no declarations of interest made at the meeting.

69 Chairman's Announcements

The Chairman announced that in view of the large amount of public interest in the application to be considered at this meeting, special arrangements had been made to webcast the meeting and in addition, to set up a link whereby members of the public could view the proceedings from the City Hall, Salisbury, with a planning officer in attendance.

70 **Public Participation**

Questions were submitted by Ms Nicola Lipscombe on behalf of the Salisbury Area Greenspace Partnership and Ms Margaret Willmot, a local resident for which responses had been prepared and published and to whom copies would be sent.

71 **19/05824/OUT: Land south of Netherhampton Road Salisbury - Mixed use development comprising of residential (Class C3) up to 640 dwellings, local centre (Class A1), primary school (1.8 ha), employment (2 ha) public open space including country park (10 ha), landscaping, 2 vehicular accesses, estate roads including loop road in detail and associated infrastructure and landscaping.**

The Committee received a presentation from the Head of Development Services which set out the main issues in respect of the application. The purpose of the report was to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved.

Reference was made to representations which had been made by Ms Judy Howles and it was confirmed that these had been forwarded to all members of the Committee when received.

Members then had the opportunity to ask technical questions after which they heard statements from members of the public as follows:-

Mr Simon Jackson, a local resident, who spoke against the proposal.

Ms Victoria Sturgeon, a resident of Britford, who spoke against the proposal.

Mr Gregor Condliffe, Vice-Chairman, Harnham Neighbourhood Association, who spoke against the proposal.

Mr Des Dunlop, D2 Planning Ltd, the agent, who spoke in support of the proposal.

Cllr James Craddock, Chairman, Netherhampton Parish Council, who spoke against the proposal.

Ms Claire Churchill, Clerk, Quidhampton Parish Council, who spoke against the proposal.

Members then heard the views of Cllr Jose Green, the local Member, who spoke in opposition to the proposal, endorsing the views of objectors, particularly those residing in Salisbury and also the views of Netherhampton Parish Council. These views set out reasons why the proposal should not go ahead because of the likely severe adverse impact on:

- Strategic and local infrastructure including transport
- The efficient operation of the transport network, highway safety
- Air and water quality, noise pollution, odours, land stability, groundwater and flood risk.

She considered that the planning application should be either refused or deferred until there was a fully thought-through, costed and joined up plan to deal with the severe impact on local transport infrastructure, the efficient operation of the transport network, air quality, noise pollution and groundwater and flood risk.

Cllr Brian Dalton, councillor for an adjoining Division, expressed his views in opposition to the development which were similar to those expressed by Cllr Jose Green. He considered that with regard to the transport network, both the Park Wall Junction with Trunk Road A36 and the Harnham Gyratory were already operating at close to capacity and there was no reasonable basis for assuming that the measures mentioned in the Transport Strategy would provide useful mitigation of the severe impact of the proposed development on road traffic.

The Committee was informed that, although not formally adopted, the Wiltshire Housing Site Allocations Plan was significantly advanced having been the subject of a Public Local Inquiry into objections to the proposal earlier in the year. Although the Inspector's final report was still awaited, he had indicated that he had no objection in principle to the allocation of this site for development.

The Environment Agency had been consulted and had raised no concerns regarding flooding. The Council's Drainage Engineer supported the outline application subject to conditions.

It was noted that the amount of additional traffic that the development would generate had been one of the main concerns of the objectors to the proposal. Both Highways England and the Council's Highways Engineer had examined the full transport assessment provided by the applicant which accompanied the planning application and had concluded that whilst traffic would increase as a result of the development, provided the proposed mitigation was implemented, there would be no grounds for objection to the proposal on this basis.

Some concern was expressed that the Section 106 legal agreement included a requirement that £566,300 be provided for the provision of a new surgery in central Salisbury. It was suggested that what was required were new health facilities somewhere within the Salisbury area and not necessarily in central Salisbury.

After further discussion, on the proposal of Cllr Fred Westmoreland, which was seconded by Cllr Tony Trotman,

Resolved:

To defer and delegate to the Head of Development Management to grant planning permission –

(A) Subject to an appropriate assessment being carried out and agreed with Natural England that concludes that this application would not lead to adverse effects in combination with other plans and projects to the River Avon SAC

(B) Subject to the prior completion of the Section 106 legal agreement by all relevant parties to provide: -

- 1) £750,000 contribution towards extending the R5 bus service**
- 2) £1,551,363 towards the Salisbury Transport Strategy**
- 3) 40% affordable housing provision to include shared ownership and rented.**
- 4) £2,844,560 Secondary school contribution subject to 2019/20 indexation**
- 5) site for the provision of a new primary school of 1.8ha**
- 6) £2,869,974 for primary school places subject to indexation for 2019/20**
- 7) £657,075.00 towards early years provision subject to indexation for 2019/20**
- 8) An agreement to set up a management company to oversee the LEMP.**
- 9) £253,200 public Arts contribution.**
- 10) Potential bus route to Harnham business Park residential development**
- 11) £289,152 towards adult open space at Sarum Academy**
- 12) £7248.00 towards local air quality projects.**
- 13) £566,300 towards the provision of additional health facilities in the Salisbury area.**
- 14) A monetary provision for the provision of bins on the site in line with the Wiltshire council waste collection guidance for new developments.**

And subject to the following conditions -

1) No development shall commence on site until details of the following matters (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

- (a) The scale of the development;**
- (b) The layout of the development;**
- (c) The external appearance of the development;**
- (d) The landscaping of the site;**

The development shall be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 5 (1) of

the Town and Country Planning (Development Management Procedure) (England) Order 2015.

2) The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

3) An application for the approval of all of the reserved matters shall be made to the Local Planning Authority before the expiration of four years from the date of this permission.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

4) The development hereby approved shall accord with the design principles set out within the Design and Access Statement submitted with the application.

REASON: To ensure that a development of this scale appropriately reflects the traditional scale, design and appearance of its landscape context in the interests of landscape and visual amenity.

5) Prior to the submission of the first reserved matters applications the applicant shall submit to and have approved in writing by the Local Planning authority a phasing plan for the overall development approved in principle by this planning permission which shall include details of the number of dwellings in each phase and the phasing shall subsequently accord with the approved scheme unless subsequently agreed in writing by the Local Planning Authority.

REASON: To ensure that a comprehensive approach is taken to the coordination of the overall development.

6) The details of all lighting proposed including street lighting, lighting for footpaths, communal parking areas and the employment land including the intensity of the lighting and design for light column shall be submitted to and approved in writing by the Local Planning Authority prior to the development of each phase of development, and the works shall subsequently accord with the approved scheme.

REASON: To ensure that the lighting scheme respects the overall design qualities from the development and to minimise impact of

the lighting scheme upon the surrounding landscape on the edge of Salisbury

7) Prior to the commencement of development in each phase, a schedule of external facing materials relating to that reserved matters application shall be submitted and where so required by the Local Planning Authority, sample panels of the external finishes shall be constructed on site and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: To secure a harmonious form of development.

8) No development shall take place in any phase of the development until there has been submitted to and approved in writing by the Local Planning Authority a plan indicating the positions, design, materials and type of boundary treatment to be erected for the phase (as referred to in the programme of phasing (condition 5)). The approved boundary treatments for each phase shall be completed in accordance with the plan prior to the first occupation of the first building in that phase.

REASON: To ensure proper planning of the development in the interests of amenity.

9) No development shall commence within the area indicated (proposed development site) until:

- A written programme of archaeological investigation and mitigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and**
- The approved programme of archaeological work has been carried out in accordance with the approved details.**

REASON: To enable the safeguarding and recording of any matters of archaeological interest.

10) No development within each subsequent reserved matters submission shall take place until full details of the requirements of that reserved matters submission site in terms of both hard and soft landscape works, to include the phasing of implementation, have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved prior to the first use of the development hereby permitted. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle or pedestrian access and circulation areas; hard surfacing materials;

minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units signs, lighting etc); proposed and existing functional services above and below ground (eg.Drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc) retained historic landscape features and proposals for restoration where relevant).

REASON: To enable the Local Planning Authority to secure a satisfactory standard of design and implementation for the landscaping of the proposed development, in the interests of visual amenity.

11) No development within each subsequent reserved matters submission shall take place until details of the requirements of that reserved matters submission site in terms of earthworks have been submitted to and approved in writing by the Local Planning Authority.

These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed showing the relationship of proposed mounding to existing vegetation and surrounding landform. Development shall be carried out in accordance with the approved details.

REASON: To enable the Local Planning Authority to ensure that the proposed earthworks will relate satisfactorily to existing features within the site and its surroundings in the interests of visual amenity.

12) No works or development within each subsequent reserved matters submission shall take place until full details of the requirements of that reserved matters submission in terms of all proposed tree planting and the proposed times of planting, have been approved in writing by the Local Planning Authority and all tree planting shall be carried out in accordance with those details and at those times.

REASON: To ensure the satisfactory establishment of the approved scheme for the landscaping of the site.

13) Before any development commences on site including site works of any description, all the existing trees to be retained shall be protected by a fence of a type and in a position to be approved by the Local Planning Authority, erected around each tree or group of trees. Within the areas so fenced, the existing ground level shall be neither raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored thereon. If any trenches for services are required within the fenced areas, they shall be excavated and backfilled by hand and any tree roots encountered with a diameter of 2 inches (60mm) or more shall be left unsevered.

REASON: In the interest of the amenity and the environment of the development.

INFORMATIVE

Retention of native trees on site is strongly advised particularly for the higher value specimens. Where removal of trees and scrub is necessary the replanting of replacement native species in appropriate places should be included in the plans. This will maintain, and potentially increase (if additional trees are planted) the biodiversity of the site.

14) The development shall strictly accord with the Approved Code of Construction management. Additional details will be submitted to and approved in writing prior to the commencement of each reserved matter application setting out the provision for staff car parking away from adopted roads, together with precise location of stored materials, the provision of noise attenuation measures, dust management and wheel washing facilities where necessary and the construction process shall subsequently accord with the approved working practices.

REASON: In order to protect the residential amenity of future and adjoining residents.

15) No construction work (excluding the internal fitting out of dwellings) nor the movement of spoil from the site shall take place outside the hours of 0700 – 2000 Monday to Thursday, 0700 – 1800 on Friday, 0800 – 1300 on Saturday and at no time on Sundays and Bank holidays.

REASON: In order to protect the residential amenity of future and adjoining residents.

16) Prior to the commencement of development of any of the dwellings in any one of the proposed phases hereby approved a scheme to demonstrate how biodiversity loss from the site will be offset by specific biodiversity gains shall be submitted to and approved by the Local Planning Authority. Such a scheme as is approved shall be implemented prior to first occupation of the dwellings.

Reason: The development is likely to result in the loss of some biodiversity from the site such as farmland birds and such biodiversity loss needs to be compensated for through biodiversity gains.

INFORMATIVE

With respect to specific measures for biodiversity gains, these may include but should not be limited to measures such as –

- All casual open space to be seeded with a low maintenance species rich grass mix that is suited to the chalk geology. In suitable locations this should also be rich in wildflowers to encourage a diversity of pollinating species.

- Bat roosting and bird nesting features incorporated into the built environment (integral to the buildings).

17) No development shall commence on any phase of the development until full detailed engineering drawings for the internal road layout and construction specification have been submitted and approved in writing by the LPA; and the internal road layout shall be constructed in accordance with the approved details within one year of completion of housing within each phase of the development.

REASON: to ensure that the development is served by a safe and adequate road, footway and cycle network in the interests of highway safety.

18) The internal road layout shall be constructed so as to ensure that, before it is occupied, each dwelling has been provided with a properly consolidated and surfaced footway and carriageway to at least binder course level between the dwelling and the existing public highway.

REASON: to ensure that the development is served by a safe and adequate road, footway and cycle network in the interests of highway safety.

19) No building hereby permitted shall be first occupied until the access, turning area and parking spaces serving that building have been completed in accordance with the details shown on the approved plans. The access turning area and parking spaces shall be retained for those purposes thereafter.

REASON: In the interests of highway safety.

20) Notwithstanding the submitted details, the access strategy, including both primary and emergency accesses shall be subject of a full design audit and Road Safety Audit, with any changes to design agreed in writing by the LPA and implemented prior to first use.

Reason: To ensure a safe and efficient access strategy is delivered in the interests of highway safety and in accordance with Core Strategy Policy 60, 61, 62 and 64.

21) Notwithstanding the submitted details, revised details of Primary School and Employment parking accommodation shall be submitted with the relevant reserved matters application and approved in writing by the LPA. The parking accommodation shall thereafter be implemented in all respects in accordance with approved details and maintained as such thereafter.

Reason: To ensure appropriate levels of parking are provided in the interests of highway safety and in accordance with Core Policy 60, 61, 62 and 64.

22) If during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved.

REASON: To protect controlled waters from pollution by the mobilisation of unidentified ground contaminants.

23) No development approved by this permission shall be commenced until a Construction Environmental Management Plan for proposed development, incorporating pollution prevention measures, has been submitted to and approved by the Local Planning Authority.

The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

REASON: To prevent pollution of the water environment.

INFORMATIVE

Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

The applicant should refer to the Environment Agency's Pollution Prevention Guidelines at: <http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>.

INFORMATIVE

In England, it is a legal requirement to have a site waste management plan (SWMP) for all new construction projects worth more than £300,000. The level of detail that a SWMP should contain

depends on the estimated build cost, excluding VAT. The duty of care for waste must also be complied with. Because all waste movements need to be recorded in one document, having a SWMP will help to ensure compliance with the duty of care. Further information can be found at <http://www.netregs.co.uk>.

24) The development shall not be commenced until; a foul water drainage strategy is submitted and approved in writing by the local Planning Authority and Wessex Water. The drainage scheme shall be completed in accordance with the approved details and to a timetable agreed with the local planning authority.

REASON: To ensure that proper provision is made for sewerage of the site and that the development does not increase the risk of sewer flooding to downstream property.

25) The development hereby approved shall make provision for the following:

1. At least 2 ha of Employment Land (Class B1 and B2 uses);
2. A Local Centre supporting:
 - (i) a convenience/food shop (Class A1 use) of up to 400 sq. m;
 - (ii) further shops and services (Class A1-A5 uses) totalling no more than 600 sq. m;
 - (iii) A proportion of residential units amounting to no more than 40% of the overall floor space of the other Local Centre uses approved in this condition;
- At least 21.3 ha of open space as set out on page 28 of the design and access statement (comprising at least 1 NEAP and 2 LEAP's), and to include Natural and semi-natural open space, including a 10 Ha Country Park.
3. Up to 640 residential units.

REASON: To clarify the terms of the planning permission.

26) The employment area hereby approved shall consist only of B1 and B2 uses. Where the employment area abuts neighbouring residential properties, the uses shall only be those falling within the B1 use class order.

REASON: In the interests of the amenity of neighbouring residential properties.

27) The development hereby approved shall be carried out in accordance with the following plans and documents

Utilities Appraisal report by Peter Brett.

Transport planning assessment by transport planning associates dated April 2019

Statement of community involvement by D2 planning dated April 2019
 Phase 1 desk study report by Hydrok dated February 2019
 Planning statement by D2 Planning dated April 2019
 Noise report by Hydrok date March 2019
 Landscape and Visual impact assessment by EDP dated April 2019
 Heritage assessment prepared by EDP dated April 2019
 Flood risk assessment by Peter Brett dated May 2019
 Ecological appraisal by EDP associates dated May 2019
 Design and Access statement by Bovis Homes
 Archaeological evaluation by Headland Archaeology dated May 2019
 Archaeological assessment by EDP dated March 2019
 Arboricultural Impact assessment by EDP dated April 2019
 Application form dated 12th June 2019
 Air Quality assessment by Hydrok dated March 2019
 Additional infiltration testing by Hydrok dated March 2019
 Site Location Plan Plan No. CB_44_154_S_000_13
 Parameters Land Use Plan No.
 CB_44_154_S_PARAMETERS_001 Rev B
 Primary Access Plan No. 1504-96-SK11 Rev A
 Proposed Emergency Access Arrangement Plan No. 1504-96-SK13 Rev B
 Constraints Plan Plan No. CB_44_154_S_902
 Illustrative Landscape Strategy Plan No. edp2810_d093e
 General Arrangement Plan No. 4553/2005/101 Rev A
 General Arrangement Plan No. 4553/2005/102 Rev A
 Swept Path Analysis Plan No. 4553/2005/121
 Swept Path Analysis Plan No. 4553/2005/122
 Swept Path Analysis Plan No. 4553/2005/123
 Swept Path Analysis Plan No. 4553/2005/124
 Swept Path Analysis Plan No. 4553/2005/125
 Highway Long Sections Plan No. 4553-2005-161
 Highway Long Sections Plan No. 4553-2005-162
 Highway Long Sections Plan No. 4553-2005-163
 Drainage Strategy 1 of 5 Plan No. 4553-2005-500
 Drainage Strategy 2 of 5 Plan No. 4553-2005-501
 Drainage Strategy 3 of 5 Plan No. 4553-2005-502
 Drainage Strategy 4 of 5 Plan No. 4553-2005-503
 Drainage Strategy 5 of 5 Plan No. 4553-2005-504

REASON: For the avoidance of doubt and in accordance with national guidance in the interests of proper planning.

28) No development shall commence on site in any particular phase of the development as referred to in the approved programme of phasing of the development until details of the proposed ground floor slab levels of all buildings within that phase have been submitted to and approved in writing by the Local Planning

Authority. The development shall be carried out in accordance with the approved levels details.

REASON: In the interests of visual amenity.

29) Prior to first occupation of the development hereby approved a programme for the phasing of the development shall be submitted to the local planning authority for approval in writing. In particular, the programme shall state that the Employment Land will be fully serviced, fully accessible and fully available prior to the occupation of the 300th dwelling on the site; and the local Centre shall be completed and ready for occupation prior to the occupation of the 400th dwelling on the site. The development shall be carried out strictly in accordance with the approved programme for the phasing of the development.

REASON: To ensure the proper planning and phasing of the development in accordance with an appropriate scheme.

30) Prior to the commencement of development an updated ecological assessment shall be submitted which updates the biodiversity impact calculator in the assessment submitted with this application to take account of any potential ecological impact from the development from walkers on Harnham Slope and the assessment shall also include maps showing the before and after of habitat categories as used in appendix EdP14 of the EA.

REASON: In order to clarify the assumptions made in the ecological assessment.

31) No development approved by this permission shall commence until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details.

REASON: In the interests of sustainable development and prudent use of natural resources.

INFORMATIVE

The development should include water efficient systems and fittings. These should include dual-flush toilets, water butts, water-saving taps, showers and baths, and appliances with the highest water efficiency rating (as a minimum). Greywater recycling and rainwater harvesting should be considered. Any submitted scheme should include detailed information (capacities, consumption rates etc) on proposed water saving measures. Manufacturer's specifications

should not be submitted. Applicants are advised to refer to the following for further guidance

<http://www.environment->

[agency.gov.uk/homeandleisure/drought/31755.aspx](http://www.environment-agency.gov.uk/homeandleisure/drought/31755.aspx)

<http://www.savewatersavemoney.co.uk>

32) No development shall commence on site until a scheme of Ultra Low Energy Vehicle infrastructure has been submitted to the LPA. The scheme must be approved by the LPA prior to implementation and thereafter be permanently retained.

Reason: Core Policy55; Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.

Air quality betterment achieved through mitigation must be demonstrated quantitatively or qualitatively within 6 months of the development's completion.

Reason: Core Policy55; Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.

33) No works shall commence until details of a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall include, but not necessarily be limited to, the following information:

- 1) Details of the body (e.g. Management Company) responsible for implementing the plan**
- 2) Obligations of the management company**
- 3) Details of all communal ecological and landscape features to be managed (e.g. SuDs and Wild River Zone) marked up on a scaled plan**
- 4) Aims of management for each feature**
- 5) Management prescriptions for each feature including timescales, equipment and manpower requirements**
- 6) 5-year work schedule capable of being rolled forward**
- 7) Mechanism for reviewing the plan**

The LEMP shall be implemented in full and in perpetuity in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local

Planning Authority to ensure the long-term management of riparian habitat in the Wild River Zone and other landscape and ecological features, and to maintain and enhance these habitats and features in perpetuity.

34) Prior to commencement an assessment of the acoustic impact arising from the operation of external and internal plant shall be undertaken in accordance with BS 4142: 2014 and BS8233. The assessment shall be submitted to the Local Planning Authority together with a scheme of attenuation measures to ensure the rating level of noise emitted from the proposed ventilation shall be less than background and is protective of local amenity. The scheme shall be submitted to and approved in writing by the Local Planning Authority. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. The details as approved shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

35) Prior to the commencement of development an acoustic report shall be submitted to the LPA that demonstrates the internal and external amenity standards in accordance with BS 8233: 2014 Guidance on sound insulation and noise reduction for buildings and WHO Guidelines for Community Noise (1999) can be met within the proposed development; this must include details of any scheme of mitigation required to achieve this. Any scheme of mitigation applied to this development must be approved by the LPA prior to implementation and followed by verification prior to first occupation of the development and thereafter be permanently retained.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

36) Notwithstanding the plans hereby approved. The Odour impact assessment dated the 4th October 2019 by Hydrok identifies that there may be a slight adverse impact on residential property from the adjacent livestock market based on its current operation of two days a week. If the livestock markets operation intensifies, this may intensify any potential odour nuisance. A more detailed odour assessment would be required in order to delineate the extents of a region which would effectively be an odour buffer to development around the market to prevent odour nuisance occurring to any new residential. As such prior to the commencement of development a further odour assessment shall be submitted setting out an appropriate distance that development shall be set back from the livestock market as a buffer Zone.

REASON: To prevent Odour nuisance and in the interests of amenity.

37) Prior to first occupation of relevant land use, an appropriate Travel Plan shall be submitted to and approved in writing by the LPA. The Travel Plans shall be constructed in broad compliance with the Framework Travel Plan and include all measures therein in compliance with Core Strategy Policy 60 and 64.

REASON: In order to encourage the use of sustainable transport at each stage of the development.

38) Prior to the commencement of development an updated ecological assessment shall be submitted which updates the biodiversity impact calculator in the assessment submitted with this application to take account of any potential ecological impact from the development from walkers on Harnham Slope and the assessment shall also include maps showing the before and after of habitat categories as used in appendix EdP14 of the EA.

REASON: In order to clarify the assumptions made in the ecological assessment.

39) No development shall commence on site until a scheme for the discharge of surface water from the site /phase, including SuDS (sustainable drainage systems) and all third party approvals, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority and the sewerage undertaker where the surface water connection is proposed. Scheme details shall include any required off-site capacity improvements needed to allow the site/phase to be served, and to include a programme allowing sufficient time for the delivery of any required improvements.

REASON: To comply with Core Policy 67: Flood Risk within the Wiltshire Core Strategy (adopted January 2015) and to ensure that the development can be adequately drained without increasing flood risk to others.

INFORMATIVES:

1) In order to discharge condition 39, the developer must provide the following information:

Drainage strategy

- **A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.**

- A plan showing the cross sections and design of any attenuation pond and its components.
- A manhole / inspection chamber schedule to include cover and invert levels.
- Pre and post development surface water discharge rates.
- Measures to prevent pollution of the receiving groundwater and/or surface waters.

Third party agreements

- Where a connection to a surface water sewer is proposed, confirmation and acceptance of an agreed connection point and discharge rate for surface water disposal from the sewerage undertaker.

Detailed drainage calculations

- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year rainfall event;
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development;
- Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property;

Maintenance and Ownership

- The proposed ownership details of the drainage infrastructure;
- The maintenance programme and ongoing maintenance responsibilities of the drainage infrastructure.

Construction plan

- The construction phasing plan.

2) Low Carbon Energy Strategy

The Council is committed to seeking to make the County of Wiltshire carbon neutral by 2030 and would wish to see the reserved matters for this development incorporate a low carbon energy strategy to help achieve this aim.

72 Date of Next Meeting

Resolved:

To note that the next scheduled meeting of the Committee was due to take place on Wednesday 15 January 2020 at County Hall, Trowbridge, starting at 10.30am.

73 **Urgent Items**

There were no urgent items of business.

(Duration of meeting: 10.30 am - 1.20 pm)

The Officer who has produced these minutes is Roger Bishton of Democratic Services, direct line 01225 713035, e-mail roger.bishton@wiltshire.gov.uk

Press enquiries to Communications, direct line (01225) 713114/713115

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	15 TH January 2020
Application Number	19/10043/FUL
Site Address	Salt Store and Gritter Garage Netton SP4 6AT
Proposal	Demolition of the existing salt store building from 1500, and construction of larger salt store of 2500 tonnes capacity. Extend existing 6-bay vehicle store to a 10-bay facility (additional bays to allow for deeper plan for snow plough attachments to vehicles). Welfare building to be extended to provide increased storage space accessed from vehicle bays.
Applicant	Wiltshire Council
Town/Parish Council	DURNFORD
Electoral Division	Bourne and Woodford Valley Cllr M Hewitt
Grid Ref	415158 136427
Type of application	Full Planning
Case Officer	Lynda King

Reason for the application being considered by Committee

This application comes to the Strategic Committee at the request of Cllr Hewitt to enable it to be considered alongside Application 19/09327/FUL (Erection of two new factory facilities and associated access road, parking, service yard and refuse storage areas, for Naish Felts and Wallgate Washrooms, land adj Salt Depot, High Post) elsewhere on this agenda. The proposal is deemed appropriate for consideration by the Strategic Planning Committee as the provision of this facility is part of a county wide approach.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved.

2. Report Summary

This application proposes the expansion of facilities and buildings on the Wiltshire Council Salt Depot at High Post, to the south of Amesbury. The reason for the development is to facilitate the expanded fleet of gritting vehicles operated by Wiltshire Council from this site in times of adverse weather conditions by way of providing additional parking bays for the vehicles and an enlarged Salt Barn to store the salt needed to grit the County's highways. A small extension to the administrative building on the site is also proposed.

The expansion of the parking bay building increases the capacity of the site from 6 vehicles to 10 and allows the capacity for snow plough attachments to be made to vehicles.

The new Salt Barn is significantly larger than the existing and has a different orientation on the site to allow for ease of access and protection from the prevailing weather.

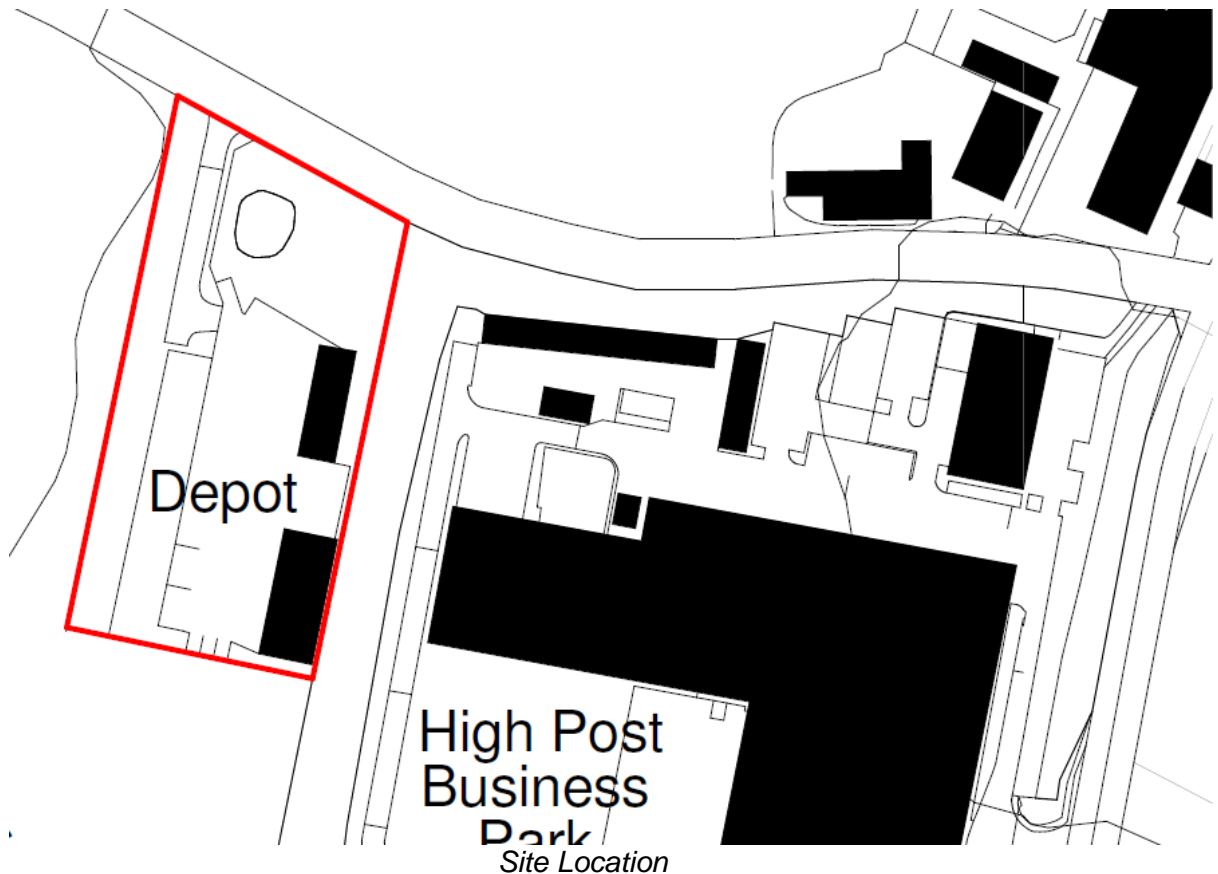
No expansion of the site boundary is proposed, and the site will remain in seasonal use only. The proposal provides the opportunity to further landscape the site to enable it to be assimilated into the wider landscape more satisfactorily, and to improve the lighting of the site to reduce the level of illumination in the future.

This application needs to be viewed with application 19/09327/FUL which proposes the construction of new factory premises on land to the south as the access to the proposed new site uses the existing private access off the highway serving the Salt Depot. There is a public Weighbridge that is affected by the adjacent proposal that needs to be considered.

3. Site Description

The site lies to the west of High Post, to the south of Amesbury. It is accessed off the minor road that serves the Woodford Valley, close to the traffic light-controlled junction with the A345 Salisbury to Amesbury road.

The application site lies adjacent to the High Post Business Park, which has a very substantial planted bund around it screening the site from the east and south. To the north and west is open farmland. There are other commercial developments in the vicinity, mainly to the north.



The site currently accommodates the following elements related to the operational requirements:

- Welfare and offices within a single storey building attached to the vehicle store.
- A single storey dual pitch building structure accommodating vehicular garaging space.
- A single storey mono pitch building structure accommodating salt storage.
- Fuel pumps and associated underground and surface tanks,
- A vehicle washdown area.
- Gulley emptying bays.
- A weighbridge.
- Drainage filtration system, including reed beds to the northern end of the site.
- 8no staff parking bays.

The majority of the site is covered in hardstanding, with some grassed area, and with relatively recent hedging to the along the western boundary.

4. Planning History

S/2008/8002 - Erection of new Salt Store Depot – approved with conditions

5. The Proposal

Wiltshire Council owns a number of Highway Depots across the county containing a salt store activity. Currently the council is well provided for in the east of the county whereas historic infrastructure exists in the west. The Council has identified a potential need for more efficient locations and distribution of its 34 gritter vehicle fleet along with the salt storage capacity. Therefore, new and re-configured sites are required at various geographical locations with the ability to better deliver gritting services across the county.

The council has reviewed its assets and has determined that it needs to concentrate facilities in three of its sites, namely Warminster, Royal Wootton Bassett and High Post. Three of the council's salt stores, Semington, Mere & Warminster are under review by the Environment Agency (EA) because they do not comply with current requirements as they are not roofed and are sited on permeable surfaces and the run-off is entering water courses. Therefore the storage of salt on these sites is currently being reduced with a view to looking forward to new appropriate facilities.

The decision has been made to use the identified sites at Warminster, High Post and Royal Wootton Bassett. In this context, the depot at High Post forms part of a wider strategy, with a current planning application under consideration for the extension of the Royal Wootton Bassett capacity from 1000 to 2000 tonnes capacity (19/10042/FUL).

The application proposes: -

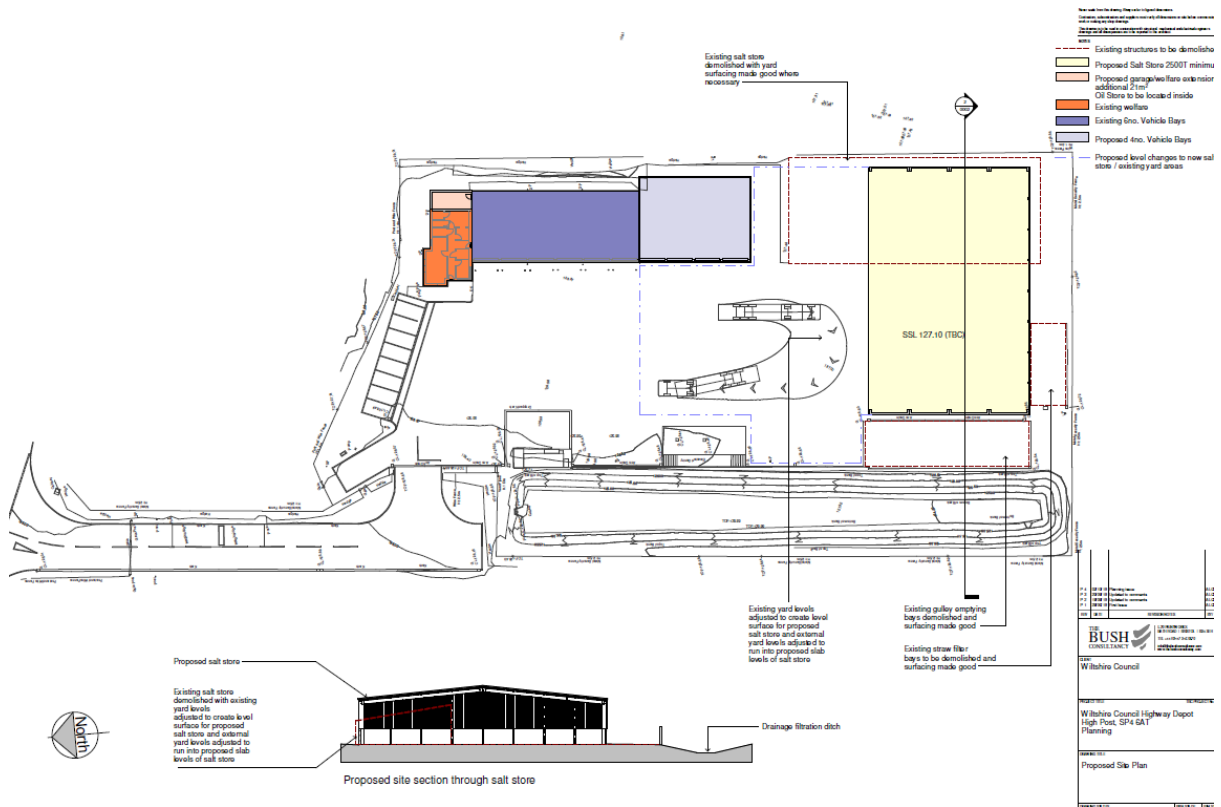
- (a) a small extension to the existing welfare and office building to provide a store room accessed from the vehicle store.
- (b) demolition of the existing salt store building of 1500 tonnes capacity, and construction of a new salt store building of 2500 tonnes capacity.
- (c) extend existing 6 bay vehicle store to a 10 bay facility (additional bays to allow for deeper plan for snow plough attachments to vehicles).

The development also involves works to the site as a whole, including removing the gully emptying bays and straw filter bays which are now not operationally required at this site.

The extension to the welfare building is to the rear of the existing single storey building and is 21sqm in extent with a flat roof to match the existing.

The additional 4 vehicle parking bays are an extension to the existing garage block and the main elevation matches the design, materials and height of the existing building. It is deeper to the rear to allow for snow ploughs to be attached to the gritter lorries if necessary.

The replaced Salt Store building is in the same location as the existing but is turned through 90 degrees so that the open side is away from the prevailing weather. It is a larger footprint than the existing building, at 36.5m x 25.8m and 10.1m high, compared to the existing at approx. 30m x 12m and 6.3m high. The ridge height of the new building has been kept to a minimum, with it's height being dictated by the need to achieve a certain eaves level to enable the barn to be accessed by the vehicles.



Proposed Layout

Materials to the proposed buildings have been selected that match the existing palette of finishes to the current buildings:

- Timber cladding to the walls of the welfare accommodation.
- Flat roof membrane finish to the roof of the extended welfare accommodation.
- Timber cladding to the walls of the garage building extension.
- Profiled metal cladding to the roof of the garage building extension with translucent rooflights.
- Timber cladding to the walls of the new salt storage building.

- Profiled metal cladding to the roof of the new salt storage building with translucent rooflights.
- External materials to the yard will be concrete slab construction to any areas of the amended yard.

No alterations to the access to the site from the highway are proposed, although there are internal circulation amendments due to the access arrangements with the proposed development of the adjacent site for Naish Felts and Wallgate Washrooms new factory units. This application (19/09327/FUL) is considered elsewhere on this agenda.

The proposal also includes alterations to the external lighting of the site to significantly reduce the amount of external glare and light pollution from the premises when in operation. The lighting strategy proposed to replace a number of the existing lighting columns which have non-directional lights and to replace them with LED directional lighting to illuminate the working areas only, and not the surrounding area. A number of existing security lights will remain, but other lighting on the new buildings will now all be directed only at the working area and will be kept switched off when the site is not in operation.

6. Local Planning Policy

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan for an area, except where material considerations indicate otherwise. The development plan in this case comprises the Wiltshire Core Strategy (2015) and saved policies from the Salisbury Local Plan (2003).

Wiltshire Core Strategy –

CP1 – Settlement Strategy

CP2 – Delivery Strategy

CP3 – Infrastructure Requirements

CP4 – Amesbury Area Strategy

CP51 - Landscape

CP57 – Ensuring high quality design and place shaping

CP58- Heritage

Salisbury Local Plan-

C6 – Special Landscape Area

PS1 Community Facilities and Services

NPPF - Paragraph 11 sets out the presumption in favour of sustainable development.

Development plan proposals that accord with the development plan should be approved without delay. Where the development plan is absent, silent or relevant policies are out-

of-date then permission should be granted unless any adverse impacts of approval would significantly and demonstrably outweigh the benefits when assessed against the NPPF or specific policies in the NPPF indicate development should be restricted. Where development is found to be wholly or partially inconsistent with the provisions of the Development Plan, then the decision maker must determine whether there are other material considerations that should influence the decision.

7. Summary of consultation responses

Durnford Parish Council - The Parish object to the application on the following grounds:-

- 1) Impact of additional traffic on the Woodford Valley, coupled with the impact of traffic generated by the proposed adjacent development 19/09327/FUL, would be unacceptable
- 2) The proposed new buildings will not fit well into the landscape and will be clearly visible from the surrounding area and the salt store is utilitarian and ugly. The landscaping around the existing development is poor and much more needs to be provided to screen this proposal as well as the existing.
- 3) Light Pollution. The existing Salt Depot is a source of light pollution and the Parish can see nothing in the current proposal that will significantly improve on this situation.

In conclusion the Parish states that: - *This area of Wiltshire is under constant pressure for inappropriate development, the Energy Storage Facility (luckily refused by Planning Committee and Planning Inspector), Naish's twin factories and this scheme are all submitted with little or no real consideration for the quality of the countryside and those who live or come to enjoy the peace and tranquility that exists here. It is ironic that there is much quoting of the quality of the landscape and its character whilst attempting to justify imposing a "larger mass and height of building" on to it. We again request that you do not consider this application in isolation and that you do not allow the increase in industrial development in a rural environment.*

The detailed comments from the Parish Council can be viewed in full at Appendix A

Woodford Parish Council – the Parish's general objections are as follows:

- 1)The proposal will contribute to increasing traffic within an already overstretched road system in the Woodford Valley.
- 2) Some of the proposed replacement buildings are substantially larger and higher than the existing, the screening for which is completely inadequate.
- 3) The existing Industrial developments at High Post generate substantial light pollution as does the existing Salt Store. The proposed development will make this situation worse.

In conclusion the Parish comment that: -

We believe that the Salt Store redevelopment could be acceptable on its own provided that adequate screening is installed and potential additional light pollution properly addressed and as increased traffic will not be as substantial as would be caused by

19/09327/FUL on the neighbouring site. The Salt Store development might be acceptable in these circumstances, but not if allowed in conjunction with the two factory developments adjacent.

The detailed comments from the Parish Council can be viewed in full at appendix B

Wiltshire Highways - The swept path drawing submitted confirms that there will continue to be adequate space for the large highway vehicles to turn within the site and the vehicle access is not proposed to be altered as part of this application. Therefore, I wish to raise no highway objection.

Wiltshire Council Landscape Officer – Support subject to conditions. Please include standard landscape conditions. The applicant should maximise the opportunity for onsite planting by including hedgerow trees within the new hedgerow.

Wiltshire Council Drainage – Supports the proposal subject to conditions.

8. Publicity

A site notice was erected on the site with the expiry date for comments of 28th November. Neighbour notification letters were sent to adjacent commercial units.

Three letters of objection have been received in respect of this proposal and the comments raised are summarised below:

- The original scheme was approved despite the development being contrary to existing Local Plan policies, and the study that justified the development must be flawed as the new stores are unsuitable or inadequate for purpose.
- The new buildings are much more prominent and intrusive in the Special Landscape Area due to their increased height and bulk.
- The existing landscaping scheme is inadequate, and the new scheme makes no proposals to improve it. The landscaping around the site should be significantly improved and should include trees that will quickly grow to a substantial height.
- There is significant light pollution from the existing use.
- There is no proper traffic plan, and this development would lead to in excess of 40% more traffic using the Woodford Valley.
- No benefit to local communities.
- This application must be considered with 19/09327/FUL (the development proposed on the adjacent site)

9. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

a. Principle of development

The initial grant of planning permission for the Salt Depot, under application number S/2008/8002 in 2008, considered the strategic need for a salt and gritting depot to be located in this sensitive landscape location outside of any site allocated for development. It was considered that the need for such a facility in this location, coupled with the low impact design of the buildings and the landscaping to screen the site was sufficient justification to grant consent, subject to suitable conditions.

Whilst the site remains outside of the defined limits of development (Core Policies 1 and 2), saved policy PS1 from the Salisbury Local Plan permits proposals which redevelop or enlarge existing facilities which are located outside settlements where the proposed development would take place within the existing boundaries of the site. As such, the principle of the proposed works is considered acceptable.

The Parish Councils and local objectors have commented that this application should be considered in tandem with the proposed erection of 2 factory units on adjoining land (application 19/09327/FUL) which is reported elsewhere on this agenda, and that the cumulative impacts of both proposals warrant the refusal of planning permission. However, it is accepted planning practice that each application is considered on its individual merits, and unless the impacts of the two applications combined would be so severe, then each will be considered as free-standing proposals. It should also be noted that the two schemes are not dependent on each other for their development. Both are free-standing applications which can be carried out independently of each other, and as Members are aware, the grant of planning permission is no guarantee that the development will actually take place. This strengthens the argument to consider each on its individual merits.

It is also a relevant material consideration that the works will enable the Council to deliver the necessary precautionary service to seek to keep roads open and safe during the winter period, and that it will help rectify the unacceptable environmental impacts of the current methods of salt storage across the county.

b. Site specific considerations

As has been set out above, the site is located in a Special Landscape Area and due consideration needs to be given to the impact of this proposal on the landscape quality of the area. However it should be noted that this is a local non-statutory designation Saved from the Salisbury Local Plan, not a national designation.

The impact of the proposed extension to the welfare building, which is set to the rear of the existing flat roofed building, will have no impact on the landscape and is acceptable. The extension to the vehicle parking bays will be a continuation of the existing low-level structure and is seen against the backdrop of the substantial screening around the High Post Business Park and again will have little visual impact in the wider area.

The new Salt Store, however, is a bulkier and higher building than the one it replaces and will project closer to the open western boundary than the existing structure. It is

designed to be agricultural in appearance and the materials to be used are timber cladding for the walls and profile metal sheeting for the roofs, to match the existing buildings on the site. The building has a low profile, with the highest point of the ridge closer to the landscaped belt to the east around High Post. It is considered that due to the form of this building and materials to be used, it will not be prominent in the wider landscape and therefore is not contrary to the provisions of Policy CP 51.

This application looks to address the existing, inadequate, lighting arrangements at the site which significantly add to the visual impact of the depot in the landscape, and which is raised by objectors to the scheme. At present there are a series of lamp columns around the site which do not have directional lighting fitted to them, and the lights therefore illuminate the night sky as well as the working areas of the depot. It is proposed to remove these columns and replace them with directional lights attached to the buildings, which are therefore lower than at present, and that these lights will only be operational when the depot is in use and will be turned off at other times. There are existing security lights around the welfare building, and it is proposed that only those immediately outside the entrance to that building will remain on at all times, and others will be operated by motion sensors. All other lights on the site will only be switched on when the site is in operation and the light conditions require it. The estimate is that the lights will be switched off for about 80% of the year.

Objectors to the development have raised the fact that the existing landscaping around the site is not very effective, and the Landscape Officer has requested that a landscaping condition be attached to any permission, which also requires that suitable trees be planted in the hedgerows to minimise the impact of the development on the wider landscape. It is considered that this condition is necessary.

There is no objection to the proposal on road safety grounds from Highways Officers. The proposal increases the number of gritter lorries that can operate from the site from 6 to 10, although the application form does not indicate that there will be an increase in the number of staff working from the premises. This site is not in use all year round, it is only operated when the weather conditions are such that the County's roads need to be gritted and cleared for public safety reasons, and this is no more than 5 months of the year on average. It is not envisaged, therefore, that the development will lead to a significant increase in traffic movements in the area, and that the impact on vehicles passing through the Woodford Valley will be slight. This level of usage would not warrant the refusal of planning permission for the development.

10. Conclusion (The Planning Balance)

This application proposes the construction of new facilities at an existing Salt and Gritting Depot to enable this necessary function serving the County's roads and keeping them safe for users to operate at an optimal level and therefore there is a strategic need for this development.

The proposal is for the expansion of facilities on an existing site, and it does not expand beyond the existing site boundaries. It will have a greater impact on the wider landscape than the existing operation due to the increase in scale and bulk of the buildings, but

with a more substantial landscaping scheme, and an improved lighting strategy the impact of the development will be mitigated. The buildings and materials to be used have also been chosen to minimise the visual impact of the development.

The additional traffic generated by the development can be accommodated with the existing access arrangements, and there is sufficient space within the site to accommodate all the vehicles likely to be using the area. There is no objection from the Highways Officers to the proposal.

It is therefore concluded that this proposal is acceptable and is not contrary to any national or local policies that would prevent the granting of planning permission.

RECOMMENDATION

Grant – subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004

2. The development hereby permitted shall be carried out in accordance with the following approved plans: Those contained in Appendix B Section 6.2 of the Design and Access Statement dated October 2019 submitted with the planning application.

REASON: For the avoidance of doubt and in the interests of proper planning.

3. The materials to be used in the construction of the external surfaces of the development hereby permitted shall accord with those set out in the application form.

REASON: In the interests of visual amenity and the character and appearance of the area.

4. No development shall commence on site until a scheme of landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include the provision of suitable hedgerow trees.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development.

5. The lighting strategy shall be carried out in accordance with the details shown on plan no. 7642/E/200 P1 dated Oct 2019 and shall be implemented within 12 months of the salt store being first brought into use.

REASON: To protect the character and appearance of the area and to minimise pollution of the night skies.

6. No development shall commence on site until a scheme for the discharge of surface water from the site including SuDS (sustainable drainage systems) and all third-party approvals, has been submitted to and approved in writing by the Local Planning Authority. Scheme details shall include any required off-site capacity improvements needed to allow the site to be served, and to include a programme allowing sufficient time for the delivery of any required improvements.

REASON: To comply with Core Policy 67: Flood Risk within the Wiltshire Core Strategy (adopted January 2015) and to ensure that the development can be adequately drained without increasing flood risk to others.

7. The salt store shall not be first brought into use until surface water drainage, including any required off-site capacity improvements to allow the site to be served, have been constructed in accordance with the approved scheme.

REASON: To comply with Core Policy 67: Flood Risk within the Wiltshire Core Strategy (adopted January 2015) and to ensure that the development can be adequately drained without increasing flood risk to others.

This page is intentionally left blank

	Online Comments
Application No:	19/10043/FUL
	<p>PLANNING APPLICATION 19/10043/FUL – SALT STORE AT HIGH POST</p> <p>We would respectfully request that when considering this application, you also take into account Planning Application 18/09327/FUL which seeks permission to build two factory units immediately adjacent to and sharing road access with the Salt Store. We consider that the effect of the two applications will, when taken together, have a far greater impact on the surrounding area than that they would if considered individually.</p> <p>Durnford Parish Council wishes to object to the above application on the following grounds.</p> <p>This site was originally developed on a greenfield site despite being contrary to existing Wiltshire County and Salisbury District Council policies and in the face of refusal by Salisbury District Council and objections from local parishes and residents. It was conceived as part of a strategic review and proposed rationalisation of Wiltshire Council salt storage facilities in about 2006/7. It seems that that review was seriously flawed as two of the new sites are already deemed unsuitable for use thereby requiring the extensive increase in the size and operations of the High Post Depot.</p> <p>Traffic.</p> <p>There is no Traffic Plan with the submitted plan so we have to utilise that submitted with the original proposals and extrapolate. It is concerning that the Design and Access Statement highlights “Increased intensity of use of the site”. There is some confusion as to how many vehicles operate out of the site as the initial proposal states seven vehicles but there is only garaging for six. As their calculations were based on seven, we will use that figure. Calculations used in the original application are flawed and seriously underestimated the flow of traffic in and out of the site (the plan averaged 0.8 movements per day whilst also stating that there would be a minimum of 1 visit to the site per day which is 2 movements...). Using the applicants own figures in para 4.4.2 of the Planning Policy Statement there would be nearly 2200 traffic movements in and out of the site annually – or 6 per day, every day of the year. If the site is expanded to house 10 vehicles (an increase of approximately 40%) with additional staff and the amount of salt rising from 1500 to 2500 tonnes (an increase of approximately 66%) there will obviously be a similar increase in vehicle movements – potentially an extra 1000+ movements per year. This is obviously not the whole case as the majority of vehicle movements will be condensed onto the 5 winter months when conditions are at their worst. The previous application had a condition that a Traffic Management Plan be written which was to include the statement “to ensure that Heavy Goods Vehicles do not use the Woodford Valley.” This condition does not appear to be quoted or recognised in the current plan. Study of the Risk Analysis plan considers site access to be “high risk” which does not give locals much confidence. It also identifies lack of parking on the site as an Amber Risk.</p> <p>Buildings, Planting and shielding.</p> <p>The site is within the 132 Salisbury Plain and West Wiltshire Downs but the Landscape and Visual Assessment whilst stating that “The special character of the landscape in this area is worthy of being preserved” it does not consider it “appropriate” to carry out an assessment for this development due to its scale. In addition, the Assessment quotes building heights that seem to be at variance with those on the Design and Access Statement. Further, in the reports Landscape</p>

Character Type Sensitivity section it states under Landscape Quality that there is “the presence of new housing development” which is in fact well over a mile to the south. It also states the presence of “long, open views to the south and west”. Logic dictates that where there are views out there are equal views in!

The new Salt Storage Building is utilitarian and ugly. The planting scheme for the original development is inadequate and currently fails to shield the store in any way. In para 4.4 of the new Design Access Statement it states that “Other than the alterations to the yard hardstanding, no other external or soft landscaping works are proposed.” This despite the new salt store building coming forwards almost to the front of the site thereby losing the blending effect of the trees to the east and becoming more conspicuous. Nothing short of the planting of a belt of mature trees and bushes would begin to provide sufficient cover to conceal the bulk of the existing buildings and even then, would fail to conceal the factory style lighting. The original Design Access stated “The siting of the buildings within the site context will be an important element in achieving planning approval. Their scale and massing has been kept to a minimum to reduce their impact against the local distant environment.” It also states that “larger mass and height of building on site becoming more prominent in the local landscape”. The new proposals go against ethos of merging into the background completely. The Theoretical Visibility map is inaccurate as it allows for a building up to 8 metres high whereas the main Salt Storage building is in excess of 9 metres high. It also fails to take into account the sites visibility from local footpaths Durn20, Durn22, WFor8, WFor9 and others.

Light Pollution.

Currently the lights in the Store seem to be on every night irrespective of the time of year or weather conditions. The industrial units in the High Post Business Park are well shielded by high fir trees on their western boundary so there is little direct light pollution. However, the Depot is not shielded so the lights are visible from all across the Woodford Valley and beyond the A360 to the west. There is nothing in the application to suggest that there would be any improvement in that situation. The lighting plan is contradictory as it says in Note 3 that lights will only “operate when the facility is not in use” but in Note 9 it states that “For the majority of the year only the security lights be on, these are Photo cell and time clock controlled and provide illumination for the security cameras”. There are also more lights on the new buildings than the old.

General Points.

This proposal does little to benefit the local area as none of the local network of small roads is gritted.

There is no evidence of any financial benefit to the local area.

The A345 and other local roads were impassable during the last major snowfalls. How do the gritter drivers get to work in bad weather conditions?

The junction of High Post Road and the A345 has a record of road traffic collisions, what improvements will be made to reduce or at least contain this?

If the proposed adjacent factory units are built will both sites be able to properly dispose of surface water etc?

The Risk Assessment plan key does not fully match the symbols on the plan itself. For example, see Amber 03 on the plan which is Red 03 on the key and Amber 07 which is Green 07 on the key etc.

	<p>CONCLUSION.</p> <p>This area of Wiltshire is under constant pressure for inappropriate development, the Energy Storage Facility (luckily refused by Planning Committee and Planning Inspector), Naish's twin factories and this scheme are all submitted with little or no real consideration for the quality of the countryside and those who live or come to enjoy the peace and tranquillity that exists here. It is ironic that there is much quoting of the quality of the landscape and its character whilst attempting to justify imposing a "larger mass and height of building" on to it. We again request that you do not consider this application in isolation and that you do not allow the increase in industrial development in a rural environment.</p>
Name:	Robert Foster Durnford Parish Council
Address:	Club Cottage Middle Woodford Salisbury SP46NR
Date:	28 November 2019

This page is intentionally left blank

Planning application: 19/10043/FUL

Registration Date: 18th October 2019

Comments required by: 16th December 2019

Location: Salt Store at High Post Business Park, High Post, Salisbury SP46AT

Proposal: Demolition of the existing salt store 1500 tonne building, and construction of larger salt store of 2500 tonnes capacity. Extend existing 6 bay vehicle store to a 10 bay facility.

Woodford Parish Council (WPC) wish to comment as follows on this proposal:

General:

WPC is concerned that this proposal is running concurrently with Planning Application 18/09327/FUL which seeks permission to build two factory units immediately adjacent to and sharing road access with the Salt Store.

WPC has already commented and objected to 18/09327/FUL as we feel strongly that the Woodford Valley road network is likely to be very adversely affected by this proposal.

We ask that in considering the Salt Store redevelopment that the planners take into account the adjacent factory proposals at the same time as the two are not only interlinked from an access point of view, but as the Salt Store proposal will also increase the number of traffic movements (because of the 2/3rds increase in gritter vehicle numbers from 6 to 10), there will be a very substantial combined increase in traffic passing through the Woodford Valley which is already under serious pressure.

WPC's specific objections are as follows:

- 1)** The proposal will contribute to increasing traffic within an already overstretched road system in the Woodford Valley.
- 2)** Some of the proposed replacement buildings are substantially larger and higher than the existing, the screening for which is completely inadequate.
- 3)** The existing Industrial developments at High Post generate substantial light pollution as does the existing Salt Store. The proposed development will make this situation worse.

1
Traffic issues

1 A traffic survey carried out by Wiltshire Council outside Middle Woodford Village Hall between 13/08/2015 and 19/08/2015 showed that an average of just under 2000 vehicles per day passed this site. The hourly data indicates that the proposed factory development (under 18/09327/FUL) adjacent to the Salt Store at High Post may increase traffic volumes by up to 50 cars in each direction morning and evening as two of the possible three routes to High Post from Wilton pass this way. If this is the case then volumes going North in the

morning could increase by 20% and South in the evening by 14%

It also seems reasonable to assume that a 2/3rds increase in the number of gritting vehicles at the Salt Store will result in a similar proportionate increase in these vehicles travelling in all directions including through the Woodford Valley. Wiltshire Council has leased 24 new gritters to cover the County and as many of these (possibly 10) will be located at High Post one can assume that they will need to cross the Woodford Valley to service roads to the West of this valley and will each make multiple journeys per day.

While WPC recognise that an effective gritting service is an essential requirement for the County we strongly feel that the Wiltshire Planning office needs to consider the negative combined effects of these two proposed developments as it seems that to permit both to proceed would be seriously disruptive to traffic flow in the Woodford Valley villages.

2

The existing Screening is completely inadequate for the increased size of buildings

The site is located in a prominent position at a high point in the landscape and is clearly visible from as far away as the A360 Devizes Road, Old Sarum and Fugglestone Red.

In 2008 (S/08/8002 dated 29/01/2009) Planning Permission was granted for the existing salt store at this site. A condition of approval was that an extensive and very comprehensive planting scheme was to be put in place to conceal the site. A 5m wide woodland strip of various native species was proposed for the Southern/Western boundary together with hedging on the Western side.

As can be seen from the attached photographs in Appendix 1, eleven years later the planted scheme does not even properly conceal the perimeter fence let alone the site itself which continues to be a significant eyesore in the landscape.

While the new vehicle bays remain at the same height as the existing, the height of the new Salt Store at over 10 metres will be substantially more prominent and unless adequately screened will be an even greater eyesore at this location.

WPC strongly urge that this development should not be considered for approval unless a satisfactory scheme of planting is included that will quickly disguise the buildings on the site.

This can only be achieved by a much denser planting scheme of mature trees and bushes than that which is currently in place.

3

The proposed lighting scheme will increase light pollution

This lack of adequate screening would also mean that the site will continue not to be screened for light pollution during the winter months and will be visible from as far away as the A360 Devizes Road, Old Sarum and Fugglestone Red.

The lighting plan shows replacements of the existing lights but also shows additional new floodlights in particular building mounted lights on the tallest building, the new salt store.

While the new layout describes new lighting as being LED and therefore energy efficient it also claims the new lighting will have *'much better pollution control measures to illuminate*

the working areas'. There is absolutely no indication as to how these new lights will give better pollution control. LED lights consume less energy, but generally in order to provide sufficient illumination for working areas will need to generate equivalent levels of light output which in itself is likely to produce equivalent levels of light pollution. As there will be more lights in total than in the existing layout it is reasonable to assume that the total level of light pollution will increase.

CONCLUSION

Woodford Parish Council believe if allowed in its present form this Development would result in an increase in traffic through the Woodford Valley, it does not provide adequate screening of the proposed site in the landscape and will increase already substantial light pollution in the vicinity.

We believe that the Salt Store redevelopment could be acceptable on its own provided that adequate screening is installed and potential additional light pollution properly addressed and as increased traffic will not be as substantial as would be caused by 18/09327/FUL on the neighbouring site. The Salt Store development might be acceptable in these circumstances, but not if allowed in conjunction with the two factory developments adjacent.

Woodford Parish Council urge the Planners to reject this application unless these issues are addressed and fully conditioned.

Woodford Parish Council / December 2019

Appendix 1







This page is intentionally left blank

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	15 th January 2020
Application Number	19/09327/FUL
Site Address	Land adjacent to Salt Depot at High Post Business Park High Post Durnford Salisbury SP46AT
Proposal	Erection of two new factory facilities and associated access road, parking, service yard and refuse storage areas, for Naish Felts Ltd and Wallgate Washrooms Ltd.
Applicant	Mr Geoff Naish
Town/Parish Council	DURNFORD
Electoral Division	Bourne and Woodford Valley
Grid Ref	415158 136427
Type of application	Full Planning
Case Officer	Lynda King

Reason for the application being considered by Committee

This application comes before Committee due to the provisions of paragraph 6.13 of the Wiltshire Core Strategy which requires that proposals for strategic employment development on land outside of existing settlements and not allocated for employment use, that are to be assessed against the criteria in Policy CP 34 (Additional Employment Land) should be considered by the relevant planning committee.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved with conditions.

2. Report Summary

The application has been subject to two periods of formal consultation and has resulted in 35 representations of objection and 5 comments at the time of compiling this report (17th December). Any further representations received will be reported to Members at the meeting.

The Key Issues for consideration in respect of this proposal are:

- The Principle of Development
- Impact on Highways, with reference to the Woodford Valley
- Impact on Amenity of neighbouring Units
- Impact on Heritage Assets
- Impact to the Character, Appearance & Visual Amenity of the Locality
- Impact on Ecology

3. Site Description

The application site covers 1.3ha and is currently the corner of a larger agricultural field outside the defined employment site of High Post, south of Amesbury. It is generally flat, with a very slight fall to the south and west.

The site lies to the west of the larger High Post Business Park, and immediately to the south of the Wiltshire Council Salt Barn depot (See planning application 19/10043/Ful elsewhere on this agenda). It lies in open countryside and has a substantial hedge along the southern boundary, and backs onto the substantial landscape belt around High Post to the east. To the north is the Council's Salt Barn depot which has minimal landscaping around it. There is no defined western boundary as the site is part of a much larger arable field.

Access to the site is proposed off the existing access serving the Salt Barn depot, which in turn is accessed from the road serving the Woodford Valley. This access lies close to the traffic light controlled junction with the A345 Salisbury to Amesbury road.



Site Location Plan

4. Planning History

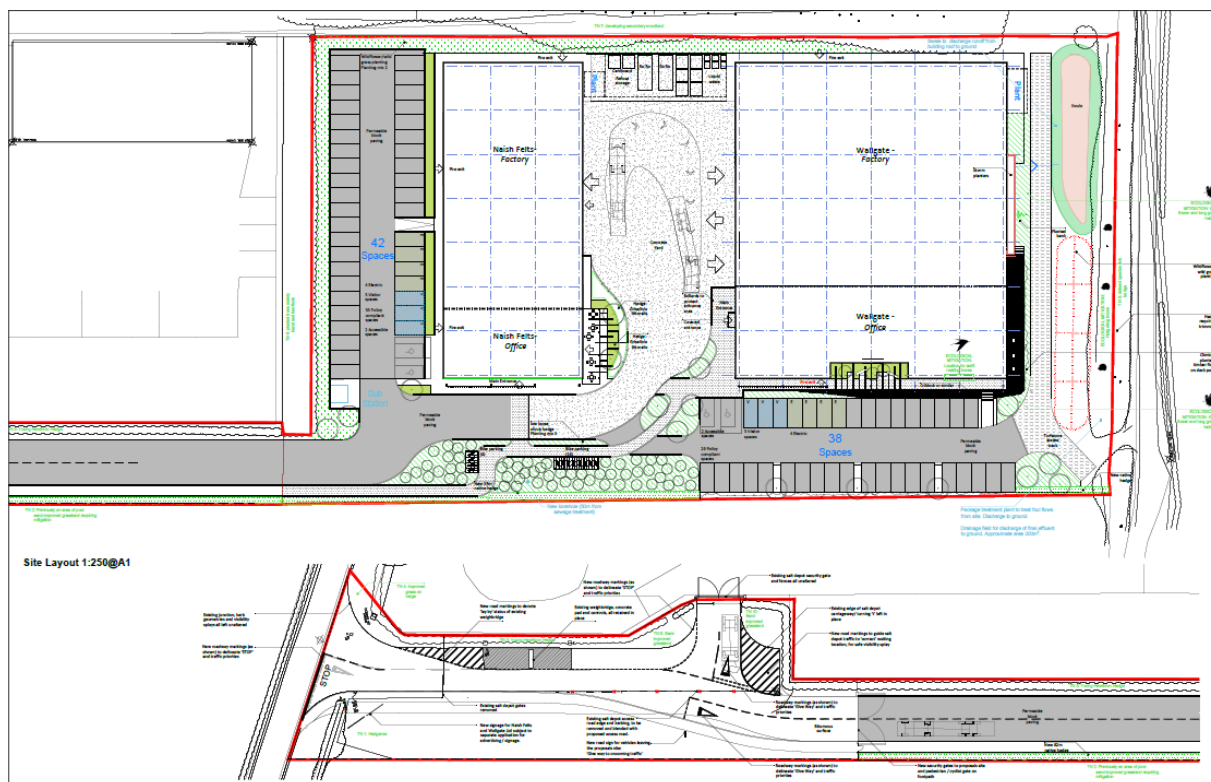
19/10043/FUL Demolition of the existing salt store building from 1500, and construction of larger salt store of 2500 tonnes capacity. Extend existing 6no bay vehicle store to a 10 bay facility (additional bays to allow for deeper plan for snow plough attachments to vehicles). Welfare building to be extended to provide increased storage space accessed from vehicle bays. (Adjacent site – application to be determined)

5. The Proposal

The application proposes the erection of two new factory units, associated access road, parking, service yard and refuse storage areas for Naish Felts Ltd and Wallgate Washrooms Ltd. The buildings would be used for a mix of B1 Business and B2 General Industrial uses. The total gross floor area of the buildings would be 5105sqm, with 1866sqm being B1 and 3239sqm being B2. Landscaping around and within the site is also proposed.

The Naish Felt building measures approximately 7.05m to the eaves, and 9.15m to the ridge. It is more than 53m long and nearly 23m wide.

The Wallgate building has eaves heights of between 5.05m and 6.65m and a ridge height of 9.58m. This building is about 53m x 45m in area.



Site Layout

The external appearance and detailing will be of a simple industrial design, finished in profiled metal cladding coloured to blend with the landscaped backcloth and minimise

the visual presence within the landscape. Both buildings have low profile roofs to further minimise the impact of the buildings. The servicing area for vehicle manoeuvring is shown to be between the two buildings to again reduce the visual impact of the development on the surrounding area. Vehicle parking for staff and visitors is shown adjacent to the Salt Barn boundary to serve the Naish Felts building, and along the western boundary to serve the Wallgate building. Both parking areas have spaces dedicated for electric vehicles with charging points, and provision has been made for cycle storage, including electric charging points for cycles.



View from the West

Access to the site is proposed as an extension to the current access used by the adjacent Salt Barn. Plans have been submitted which indicate an appropriate form of access to the site which does not conflict with the use of the Salt Barn depot.

The proposal indicates that the buildings will be constructed with high levels of energy efficiency and that there will be a significant number of solar panels on the roofs of both to assist in the development's sustainable performance.

The businesses currently operate from a scatter of buildings within the town of Wilton within a cramped site where there are issues with traffic movements along narrow streets and has operated in the town for about 150 years. A number of the buildings on that site are old and have reached the end of their useful life and others are in need of replacement as they do not meet current business requirements. Planning permission to redevelop the site was obtained in March 2018 following an appeal (planning ref. S/2003/1016 and 16/07192/FUL). The permission is outline consent for the mixed-use redevelopment of land at Crow Lane to provide 61 residential units, two commercial units of B1 use, one retail unit, and associated car parking, and to allow for the demolition of the existing buildings on the site. This development will finance the replacement factory units, the subject of this application.

6. Local Planning Policy

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan for an area, except where material considerations indicate otherwise. The development plan in this case comprises the Wiltshire Core Strategy (2015) and saved policies from the Salisbury Local Plan (2003).

Wiltshire Core Strategy –

- CP1 – Settlement Strategy
- CP2 – Delivery Strategy
- CP3 – Infrastructure Requirements
- CP4 – Amesbury Area Strategy
- CP34 - Additional Employment Land

CP35 – Existing Employment Land
CP36 – Economic Regeneration
CP50 – Biodiversity and Geodiversity
CP51 - Landscape
CP57 – Ensuring high quality design and place shaping
CP60 - Sustainable Transport
CP61 – Transport and Development
CP62 - Development Impacts on the Transport Network

NPPF - Paragraph 11 sets out the presumption in favour of sustainable development.

Development plan proposals that accord with the development plan should be approved without delay. Where the development plan is absent, silent or relevant policies are out-of-date then permission should be granted unless any adverse impacts of approval would significantly and demonstrably outweigh the benefits when assessed against the NPPF or specific policies in the NPPF indicate development should be restricted. Where development is found to be wholly or partially inconsistent with the provisions of the Development Plan, then the decision maker must determine whether there are other material considerations that should influence the decision.

Relevant NPPF sections include:

Section 2 – Achieving Sustainable Development. Para 8 states that the planning system has 3 overarching objectives which are interdependent (a) an economic objective, (b) a social objective and (c) an environmental objective.

Section 6 – Building a Strong, Competitive Economy. Para 80 comments that decisions should help to create the conditions in which businesses can invest, expand and adapt. Para 81 comments that the local strategy should encourage sustainable economic growth.

Section 9 – Promoting Sustainable Transport. Para 103 comments that significant development should be focused at locations which are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Section 12 – Achieving Well-Designed Places. Para 127 requires development to be sympathetic to local character, including landscape setting.

7. Summary of consultation responses

Durnford Parish Council – Object on the grounds of the traffic impact on the Woodford Valley; the site is not allocated for employment use and is in the open countryside; alternative sites have been too easily dismissed by the agents; and the proposed screening of the site is inadequate and there is little scope to improve this.

Full details of the Parish Council's comments are set out in appendix A to this report.

Woodford Parish Council – 5 specific objections, all of which are explored in more detail in the response set out in appendix 1 to this report.

- 1) The proposal will generate increased traffic within an already over-stretched road system in the Woodford Valley;
- 2) The proposed site is in an area designated as open countryside and is in conflict with WCS policies 34, 60, 61 and 62;
- 3) There has been unsatisfactory consideration of alternative sites, and no evidence is shown of consideration of separating the two businesses which are unrelated apart from common ownership;
- 4) The applicant dismisses evidence that unexplored archaeological remains are likely to be found at the site;
- 5) The proposed screening at the site is completely inadequate.

Full details of the Parish Council's comments are set out in appendix B to this report.

Shortly before completion of this report, Durnford and Woodford Parish Councils submitted a joint submission adding further comments. This is attached as Appendix C to this report.

Wiltshire Council Spatial Planning – The proposal is to relocate 2 businesses from their existing facilities in Wilton that no longer meet either company's long-term needs. To retain their existing employees both companies need to re-locate within a commutable distance of the existing facilities. Whilst other sites are available and have been considered, the land at High Post Business Park is felt to be the most appropriate site for the requirements of both companies.

The site is not within the boundary of the existing employment site (CP35) and therefore is identified as being within open countryside.

Planning for job growth and meeting the needs of business are central to the aims of the Wiltshire Core Strategy – Strategic Objective 1.

As this is an area of open land outside the existing Business Park in open countryside, Policy CP34 "Additional Employment Land" is most relevant. This policy allows new employment opportunities to come forward outside, but adjacent to, employment land allocated by the Core Strategy where such proposals are considered to be essential to the economic development of Wiltshire. There are 5 main criteria that need to be met, relating to:

- (a) Meeting sustainable development objectives,
- (b) Proposals are consistent in scale with their location and do not adversely affect nearby buildings or dwellings.
- (c) Supported by evidence that they are required to benefit the local economy
- (d) Would not undermine the delivery of strategic employment allocations
- (e) Are supported by adequate infrastructure.

Having assessed the submitted information it is considered that sufficient evidence has been provided to prove that the proposal meets the requirements of the WCS and in particular CP34. Therefore, the principle of development is considered acceptable

unless there are other material considerations (design, landscape, access etc) that suggest otherwise.

Wiltshire County Archaeology – Support, subject to conditions.

Wiltshire Council Economic Development – From an economic regeneration perspective the investment in two new factories is welcome.

Independently of the company and its agents we conducted an extensive search of other sites in the South Wiltshire area and have been unable to find another suitable location within a reasonable travel to work area for the existing skilled workforce.

The development will safeguard over 110 jobs in the local economy, deliver modern, sustainable and energy efficient buildings and allow the companies to fulfil their potential. By contrast the loss of these long-established manufacturing businesses will have a severe negative effect on the local economy.

These plans contribute to, or are aligned with, a number of policies and strategies supporting economic growth in the area, including the Swindon and Wiltshire Strategic Economic Plan which includes a strategic objective that is focused on supporting business development.

Wiltshire Highways - the proposal is contrary to Core Policies 60 and 61 and the key aims of reducing the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. Whilst additional detail has been provided showing where existing staff live and their current / preferred travel options, this represents the present situation and staffing may change. Furthermore, as the application is for the use rather than the end-user, should the owner change the use will remain and the future travel arrangements would be unclear.

The site is located in a remote area with no pedestrian links to the nearest settlements. This is reflected in the submitted schedule of responses from staff which indicates that no one would walk from home to the site. There are bus stops located on the A345 close to the signalised junction which serve the High Post Business Park. However, there are no pedestrian links shown between High Post Business Park and the site meaning that those travelling by bus would have no option but to walk along the side of the road or on the verge to reach the factory site. With no separate pedestrian facilities and no street lighting this would not be a desirable option and would be exacerbated in poor weather and dark mornings and evenings of the winter months. Consideration should be given to the hierarchy of transport users (CP61) where the use of all alternative modes must be explored before the private car. It is acknowledged that some car sharing is likely to occur, and this could be further encouraged through a Travel Plan.

On the basis of the submitted supporting statements I have not been convinced to change my view in respect of the wider sustainable issues and I am therefore bound to recommend a refusal reason on this ground.

On the matter of capacity of the surrounding road network, I note that it is anticipated that the majority of drivers would access the site from the east via the A345 and the High Post crossroads. I am aware that the signalised junction at the crossroads already experiences queuing traffic at peak times. An analysis of this junction is necessary to understand the potential impact that the proposed development will have on the functioning of the junction.

Wiltshire Council Drainage – No objection subject to conditions

Wiltshire Council Ecology – No comment

Wiltshire Council Landscape – no objection.

Wiltshire Council Public Protection – No objection to matters of noise, odour and dust, subject to conditions

8. Publicity

The application was publicised by way of a site notice and neighbour notifications. A total of 35 letters of objection were received, and 5 letters of comment.

The Salisbury and Wilton Swift group endorse the Design and Access Statement regarding the inclusion of swift nesting boxes.

The objections can be summarised as follows:

- Concerns about employees using the Woodford Valley as a rat run to and from work with the consequent increase in traffic.
- Lorries using the same route, and with no pavements and narrow roads the dangers to pedestrians will increase.
- The Woodford Valley is an AONB and vehicles are slowly destroying it.
- The site is zoned as open countryside, not allocated in the Wiltshire Core Strategy as employment land, therefore the development is contrary to CP 34, 60, 61 and 62.
- Development should be directed to development sites around Salisbury/Wilton.
- Do not believe all the commercial vehicles will use only the A345
- Noise impact on nearby dwellings
- Land is Green Belt and development should be elsewhere
- Light pollution exists at the moment from the Salt Store and it will increase due to this development.
- The visual impact of the scheme should be mitigated by sufficient planting, to result in a screen like the one around the existing High Post site.
- Why must the two factories be together?
- The application appears to dismiss the archaeological research
- No sufficient justification for not finding an alternative site

- Linked to the objections relating to increased traffic through the Woodford Valley are concerns as to whether the road infrastructure and bridge can cope with the increased traffic.
- The development should take place on existing brownfield land
- The site is in a prominent location and visually will dominate the skyline
- High Post has a record of traffic accidents and the increase in traffic will heighten this danger.

9. Planning Considerations

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF (2019) makes it clear that where development is found to be wholly or partially inconsistent with the provisions of the Development Plan, then the decision maker must determine whether there are other material considerations that should influence the decision.

9.1 Principle of development

Core Policy 2 (Delivery Strategy) states that

“Within the defined limits of development

Within the limits of development, as defined on the policies maps accompanying the Core Strategy, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns (including Westbury), Local Service Centres and Large Villages.

Outside the defined limits of development

Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25 (of the adopted Wiltshire Core Strategy), development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans”.

The exceptions policies referred to in paragraph 4.25 are as follows:

- **Additional employment land (Core Policy 34)**
- Military establishments (Core Policy 37)
- Development related to tourism (Core Policies 39 and 40)
- Rural exception sites (Core Policy 44)
- Specialist accommodation provision (Core Policies 46 and 47)
- Supporting rural life (Core Policy 48)

The site the subject of this application lies in open countryside and is not allocated for additional employment development in Policy CP 35. It therefore has to be considered against the provisions of Policy CP 34, which are as follows:

Additional employment land

Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, where applicable. Proposals for office development outside town centres, in excess of 2,500sq metres, must be accompanied by an impact assessment which meets the requirement of national guidance and established best practice, and demonstrate that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.

Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:

- i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or*
- ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or*
- iii. are for new and existing rural based businesses within or adjacent to Large and Small Villages; or*
- iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.*

Where they:

- a. meet sustainable development objectives as set out in the policies of this Core Strategy and*
- b. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and*
- c. are supported by evidence that they are required to benefit the local economic and social needs and*
- d. would not undermine the delivery of strategic employment allocations and*
- e. are supported by adequate infrastructure.*

As has been set out in Section 5 of this Report, the applicants operate two long-established businesses from within the town of Wilton in cramped premises that do not meet their current needs. There are also environmental issues associated with the continued operation of this site, in particular access to the premises by large commercial vehicles in conflict with the surrounding area.

The businesses currently employ about 120 full time equivalents and are important contributors to the local economy.

The Company has considered three options for the businesses:

- Re-develop the existing site with modern buildings.
- Re-locate to a suitable site and construct purpose-built premises to meet their needs in the future.
- Cease trading.

The latter option (closure of the businesses) is a highly undesirable proposition as this would have a significant negative economic effect and lead to the direct loss of circa 120 full time equivalent local jobs, along with further indirect losses.

The option to redevelop the current site with new higher intensity industrial operations has also been determined to be inappropriate by the applicants for the following reasons. The site is predominantly surrounded by residential uses, and community uses such as the recreation ground, and contains parts of the River Avon, which are subject to highly sensitive ecological designations (Special Area of Conservation and Site of Special Scientific Interest). If the site were to be redeveloped for increased industrial uses, these disturbances are also likely to increase. As stated above, the access to the site is not suitable for the commercial vehicles that should be serving the operations. The existing site accesses would therefore make redevelopment for industrial uses unsuitable and would limit the growth potential that the factories could achieve, whilst potentially further damaging the physical and heritage aspects of the Conservation Area.

Therefore, in order for Naish Felts and Wallgate to continue trading the applicants concluded that the most suitable option was the relocation of the business to alternative premises, ideally in the local area to enable the existing workforce to be retained.

Local Land agents were appointed to search for a suitable site which would allow for the construction of purpose-build premises to meet the specific needs of each business, and to allow for future expansion of the operations. The area of search was confined to a 10-mile radius of Wilton on the justification that such a distance would allow for the retention of the majority of the existing workforce.

The following sites were considered:

- Land at Wilton Hill, The Avenue, Wilton (Redrow Homes)
- Land at The Avenue, Wilton (Wilton Estates)
- Harnham Business Park, Netherhampton Road
- Employment Land at Old Sarum
- Sarum Point Business Park, Old Sarum
- Solstice Park, Amesbury

The very specific requirements of the applicants, largely relating to the desire to retain the existing workforce by not re-locating very far from the existing premises, limited the choice of suitable alternative locations. The local land agents concluded that the only suitable site meeting the applicants' needs was the current application site as more distant premises were to be discounted.

(The most recent joint submission from the two parish councils makes reference to the planning permission granted in 2017 at the Imerys Quarry land off the A36 and suggests that this would be suitable as an alternative site – however, it should be pointed out that the permission granted in 2017 was specifically not for any employment use per se, but for an alternative restoration scheme. The permission will expire in February 2020 if not implemented).

An assessment therefore has to be made as to whether the justification submitted by the applicants is sufficient to meet the tests of Policy CP 34, and to allow this development to take place on land in the open countryside outside of any employment allocation.

It is acknowledged that the applicants are major employers in Wilton, and the loss of these businesses from the local economy would have a negative impact on the viability of the area. It is considered that the applicant's arguments for not re-developing on the existing site are credible due to the environmental constraints in the vicinity of the premises, and if they are to avoid closure, then re-location is the only option. It is understandable that the companies wish to retain as many of their skilled workforce as possible, and that this has consequently restricted the location of any possible sites for re-location of the premises.

Durnford Parish Council and Woodford Parish Council, as well as a number of objectors, have asked why the businesses have to re-located together as they appear to operate as separate entities, and why they could not therefore find two smaller sites for each business. The applicant's agent was asked for clarification of this matter and the justification is set out below:

The objections assume that, other than ownership, the businesses operate independently. However, the businesses which are indeed under the same ownership, operate collaboratively in the following ways and these are important for the efficiency and viability of each: The businesses share transport and distribution services, including vehicles and fork lift trucks, reducing the amount of vehicles on the road; they share storage capacity between the buildings; distribution and servicing areas within the site; groundsman and cleaning services; and management efficiencies. The clear preference and commercial imperative is that the two business locate together, so the ability of one to move without the other would not be sufficient to sustain the operational/commercial decision to move.

Having regard to the need identified above for both companies to be able to move at the same time to be able to make the commercial decision to leave the current site, both of the 'assumed' recipient sites would need to be available and ready for occupation, with the appropriate consents and facilities in place at a reasonable cost, at the same time and the deals secured simultaneously to justify the move and sale of the current site.

However, the agent looking for sites was asked to look for smaller, single sites as well, but concluded that: "The smaller site we did consider was at Wilton Hill, The Avenue, Wilton. It comprises 1.45 acres and would not be suitable for B2 use due to the proximity of the new housing development. In discussions with the agents it was clear

that there would be restrictions on hours of operation particularly with regards to HGV traffic which would make the site very difficult to operate for our clients.”

In conclusion notwithstanding the clear operational preference for and benefit of the firms to the continue to coexist on a single site, there are not in any case two suitable sites in the locality that would enable the businesses to relocate simultaneously.

The Council's Economic Generation team have carried out their own assessment of the availability of suitable sites and have concluded that there is no-where that meets the applicant's needs better than the application site.

The Spatial Planning team, as set out in section 7 above, conclude that the development meets the requirements of Policy CP 34, unless there are other material considerations such as access, landscape, ecology etc to the contrary.

In these circumstances, it is considered that the need for the development can be justified, and that the loss of these businesses would have an adverse impact on the local economy and would result in the loss of employment, which is contrary to the Objectives of the Core Strategy.

The development has then to be assessed against the criteria of Policy CP34 a-e.

9.2 Assessment of proposal against criteria a-e of policy CP34:

a. Sustainability objectives.

The application proposes the re-location of two long-established manufacturing businesses from the town of Wilton, which are located in unsatisfactory premises, to modern purpose-built premises within travelling distance of the majority of the existing workforce. The justification for the re-location has been set out above.

The Council's Highway team object to the proposal on the grounds of the comparatively remote nature of the location. Their comments are set out in more detail in Section 7 above. It is argued that as the site lies in a remote location where no employee could walk to work, and although there is a bus stop at the High Post cross roads, access to the site itself is along an unlit country road with no pavements. Therefore, the vast majority of staff would be presumed to access the site using private cars. This form of development is contrary to the aims of policies CP 60 and 61 which seek to reduce the need to travel using the private car.

The comments of the Highways officers are noted, and it is acknowledged that every effort needs to be made to reduce private car usage on developments. However, this site is adjacent to land identified as an Existing Employment Site (High Post Business Park) where the sustainability considerations have deemed it an acceptable location for further business growth and it lies immediately adjacent to the Council's own Salt gritting depot. The agents have submitted information about the travel patterns of the existing employees of the Wilton site, some of whom travel significant distances to work. A number of employees live in the Amesbury area, and will therefore have a shorter travel

to work distance than their existing commute to Wilton. The company have canvassed staff and have received expressions of interest in providing electric bike charging points at the premises and have included electric car charging points for staff as part of the proposed development. A number of the employees (27) already car-share and it is anticipated that this could increase and efforts will be made to achieve this aim via a Travel Plan. It is accepted that there will be a small increase in commuter traffic via the Woodford Valley, but due to the location of the existing employees, the fears of the local residents and the two Parish Councils that this increase will be significant does not appear to be borne out by the information supplied by the applicants.

Para 109 of the NPPF states that:-

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

It is considered that the scale of vehicle travel is not materially different between the existing site and the proposed site, and on balance the benefit in retaining the two businesses in the area outweigh the objections raised on Highway sustainability grounds.

The existing premises occupied by the businesses are largely at the end of their useful life and are not fit for purpose. They are not energy efficient and are located in an environmentally sensitive location close to protected water courses, residential properties and a Conservation Area. The operation of the existing site can cause problems in the locality, especially around large vehicle movements. The aim of the current application is to deliver two purpose built factory units that meet the current and future needs of the operators, that are built to the highest sustainable standards, including solar panels on the 'green' roof, efficient use of water, re-cycling of products from the factory operations and high building standards to the internationally recognised BREEAM standards (BREEAM is an international scheme that provides independent third party certification of the assessment of the sustainability performance of individual buildings).

On balance, therefore, it is concluded that the proposed development does meet the sustainability standards required by the Core Strategy and the NPPF in that it provides the opportunity for two long-established businesses to remain and expand in the locality, in purpose built efficient premises, which will also facilitate the removal of an inappropriate use in an urban area and the re-development of that site by much-needed housing.

b. Site specific considerations

The application site is currently part of a much larger arable field which abuts the High Post Business Park. Two of its boundaries adjoin existing employment uses, and the remainder are formed by a mature hedge and an open field. It is not allocated for development and therefore stands in open countryside. The landscape is designated as being in a Special Landscape Area, which is a non-statutory landscape designation saved as a policy from the Salisbury Local Plan.

The site is not visible in the landscape when viewed from the south due to the neighbouring hedge line, nor from the east due to the location of the High Post Business Park. This development has a substantial mature planting screen around it which totally obscures the buildings within it from the outside. The application site is screened from the north by the existing Salt Depot. Therefore it is only visible in the landscape when viewed from the west, with glimpses from the road serving the Woodford Valley to High Post crossroads. Due to the contained nature of the site it is not highly visible in the wider landscape of the surrounding area, and a proposed planting scheme has been amended following comments from the Council's Landscape team to minimise its impact on the locality. It will be largely seen against the back drop of the planting belt around the High Post development.

The design of the proposed buildings is rather utilitarian, with low profiles and simple forms, and with a limited pallet of materials. It will appear agricultural in form and will sit in the landscape comfortably against the backdrop of the strong planting scheme around High Post.

There are no residential properties in the vicinity of the site. The buildings in the area are all commercial, namely the High Post employment site, the adjacent Petrol Filling station and associated shop, and The Stones hotel. Further to the west is the substantial Chemring Counter Measures commercial premises. The Council's Public Protection Officers have assessed the information submitted in support of the application in terms of noise, odour and dust and have concluded that the measured proposed will not give rise to any environmental concerns.

It is therefore considered that the proposal meets criterion (b) of policy CP 34 set out above in that it will not significantly detract from the appearance of the area or any residential amenity.

The site lies in an area of archaeological sensitivity, and a study has been carried out in to the preliminary likelihood of features of importance on the land. The County Archaeologist has raised no objection to the development, subject to the applicants first carrying out an agreed archaeological appraisal and investigation on the site, and any finds recorded in an agreed manner.

The application site is currently a corner of an arable field which is largely devoid of any biodiversity interest. It is proposed to enhance the biodiversity of the site as part of the development by planting native species that are rich in berries and nectar for the benefit of wildlife, along with wild flower species. Hedgehog boxes and swift nesting boxes are included in the biodiversity mitigation strategy, as is a green roof on the buildings. The roofs will also have extensive solar panels for energy production and add towards the sustainability of the development.

c. Benefit to the local economy and social needs

As has been identified above, the proposal is not speculative, but will facilitate the relocation of existing businesses in a more suitable location, thus benefiting the local economy and in maintaining local jobs, assisting to meet social needs.

d. Not undermining the delivery of Strategic employment allocations

The proposal does not undermine the delivery of strategic employment allocations as there are no suitable allocated sites available in the locality that meet the combined needs of these businesses.

e. Supported by adequate infrastructure

There are no infrastructure constraints that give rise to any objection to the development of this site for the purposes proposed.

10. Conclusion (The Planning Balance)

This application proposes the development of land for employment purposes outside of any allocated site, on land classified as open countryside. To meet the requirements of Policy CP2 (Delivery Strategy) and CP34 (Additional Employment Land) the application needs to be considered against a number of criteria, the most applicable in this instance being: *'are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.'*

If it is deemed that the development meets this criterion, then it has to be further considered against the detailed provisions of policy CP34, including that the development is sustainable and does not adversely impact on the surrounding area.

Evidence has been provided by the applicants to indicate that they need to re-locate from their existing premises in Wilton which are no longer fit for purpose, and that the application site is the most suitable as it meets one of the applicants' main objectives of being able to retain the existing skilled workforce by staying in the vicinity of the existing operation. Support for this application has been provided by the Council's Economic Generation and Spatial Planning Officers on the grounds that it retains a major employer in Wiltshire and that the application site is the most suitable to meet this requirement.

Objection to the development on the grounds of sustainability has been received from the Council's Highways Officers due to its relatively remote location and the consideration that the employees are likely to access the site via the private car. This view has also been expressed by a number of local residents and the two local Parish Councils, concerned about the impact of additional traffic using the sensitive Woodford Valley.

An assessment has been undertaken as to whether the highways objection on sustainability grounds is sufficient to warrant the refusal of planning permission. The conclusion is that due to the advantages of retaining a major employer in the area, in

buildings that will enable the businesses to expand and which are designed to be more sustainable in their construction and operation than the existing premises, coupled with the ability of the existing site to be re-developed for housing, then the test in the NPPF at para 109 that the impacts on the highway network would be severe have not been met and the application should be granted.

This position is further supported by the requirements of para 80 of the NPPF which states that: - *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*

In sum, it is considered that the proposal is in accordance with the provisions of policy CP34 of the development plan and in line with the guidance in the NPPF. Accordingly, it is recommended that planning permission be granted, subject to the conditions set out below.

RECOMMENDATION

That planning permission be granted, subject to the following conditions.

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004

2. The development hereby permitted shall be carried out in accordance with the approved plans:

REASON: For the avoidance of doubt and in the interests of proper planning.

3. No development shall commence on site until the exact details and samples of the materials to be used for the external walls and roofs have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of visual amenity and the character and appearance of the area.

4. No development shall commence on site above slab level until a scheme of landscaping and ecological mitigation has been submitted to and approved in writing by the Local Planning Authority, the details of which shall follow the principles set out in Drawing P004 and the recommendations set out in paragraph 4.2 of the ecological appraisal, but which shall make provision for a hedgerow along the new western boundary of the site with the remainder of the field.

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is

required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development.

5. All soft landscaping and ecological mitigation measures comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the buildings or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development.

6. No development shall commence within the area indicated (proposed development site) until:
 - A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
 - The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

- 7 No development shall commence on site until a scheme for the discharge of surface water from the site including SuDS (sustainable drainage systems) and all third-party approvals, has been submitted to and approved in writing by the Local Planning Authority. Scheme details shall include any required off-site capacity improvements needed to allow the site to be served, and to include a programme allowing sufficient time for the delivery of any required improvements.

REASON: To comply with Core Policy 67: Flood Risk within the Wiltshire Core Strategy (adopted January 2015) and to ensure that the development can be adequately drained without increasing flood risk to others.

- 8 No building shall be first occupied until surface water drainage, including any required off-site capacity improvements to allow the site to be served, have been constructed in accordance with the approved scheme.

REASON: To comply with Core Policy 67: Flood Risk within the Wiltshire Core Strategy (adopted January 2015) and to ensure that the development can be adequately drained without increasing flood risk to others.

- 9 The parking, cycling and turning facilities for the respective units shall be provided in accordance with the approved plans before that unit is first occupied, and these facilities shall thereafter be retained.

REASON: To ensure the provision of adequate parking and turning facilities, in the interests of road safety.

- 10 No external lighting shall be installed prior to the submission of and approval in writing by the local planning authority of a lighting strategy. Any external lights shall be installed in accordance with this approved strategy.

REASON: To protect the character and appearance of the area.

Informatives:

Archaeological evaluation excavation should be undertaken that may then highlight the need for further archaeological mitigation. The work should be conducted by a suitably experienced, professionally recognised archaeological contractor, in accordance with a Written Scheme of Investigation approved by this office and in line with the Standards and Guidance of the Chartered Institute for Archaeologists. There will be a financial implication for the applicant.

This page is intentionally left blank

Key Points of the Durnford Parish Council Objection

1. Traffic
2. Land Zoning
3. Core policies
4. Alternative Sites
5. Archaeology

This proposal has been under consideration for over a year but there has been no consultation with Parishes until a letter from Savills ONLY to Durnford Parish Council dated 25 September 2019.

Durnford and Woodford parishes are very much related and it is a greater concern on the matter of traffic that the applicant deliberately chose not to inform Woodford Parish Council at all.

Having now received notice of the application and seeing the application in full on-line, then both Parish Councils are in a position to respond and we thank Mr Madge for extending the time available for us to compile our objections to this application.

1 TRAFFIC

We are in agreement with the statement from Wiltshire Council in their pre application advice of 11 Jan 2019 that :

The site is located outside of any policy boundary raising concerns with regards to the sustainability of the site for the proposed commercial development due to the likely reliance upon the private car for any employees and visitors. The proposal is therefore, in my opinion, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy.

Our main concern is TRAFFIC. Yes, the Applicant has engaged a transport consultant and done a Traffic Statement, but this The Transport Statement ONLY looks at the site entrance and access to the High Post Road and the junction with the A345. The Statement looks at existing van and lorry traffic ; their figures give an average daily movement of 12 vans and 5 HGVs . The diagram shown on their plans for the intended transport area shows 40ft articulated lorries turning and hence we assume these 5 HGVs to be 40ft articulated lorries.

But the claim that concerns us is on Page 21 of the Design and Access Statement where it states :

"All vehicles arriving and leaving the proposed factories would be moving to and from the A345 via the existing traffic light-controlled cross roads, so would not impact upon the villages in the Woodford Valley."

We can only take "All vehicles" to mean all vehicles which must include the workers arriving in their cars. There are between 110 and 120 staff and 80 allocated car parking spaces. The application claims that cars coming from Wilton, up The Avenue and down Camp Hill ("Snakey") will turn RIGHT at the bottom of Camp Hill, going down to the bridge at Stratford and then up Phillips Lane around Old Sarum monument to the A345 at the Beehive roundabout and then north on the A345.

Please consider this option from the point of view of a worker keen to be at work on time or a delivery van driver (who must often follow a pre-determined route defined by their employer to minimise time and fuel costs) . Facts are facts and the distance from the bottom of Camp Hill to the proposed site via the Woodford Valley is approximately 6.60 km with no road junctions to consider. The distance from the bottom of Camp Hill to the proposed site via Stratford sub Castle, Phillips Lane and the A345 is approximately 6.75 km, BUT there is one junction to join the A345 , plus 2 roundabouts and 1 set of traffic lights to give way at.

The same workers have an even easier decision to make on their journey home. Do they turn right out of the factory to join traffic from Chemring already queuing at the High Post traffic lights and make the longer journey or do they turn left, down the High Post road Netton and through the Woodford Valley ?

We believe this is a false claim intended to divert Planners from the actuality and to avoid any objections from Woodford Valley residents to increased traffic. Those travelling from Wilton and generally from the west of Salisbury will always take the nicer, less congested, shorter and quicker route through The Woodford Valley.

Contrary to what is stated, we believe there would be significant traffic impact upon the villages in the Woodford Valley.

This proposal is heavily reliant on the use of private cars and as such is contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy.

In addition and as an important note on safety. Any claims that significant numbers of workers would use the bus or would cycle need scrutiny. Firstly there is no foot-path from the High Post junction to the proposed site and any pedestrian place themselves in danger. Some pedestrians choose to walk on the high and uneven embankment (even more dangerous in the dark) . Secondly , only the most confident and competent cyclists would consider using the A345 from Salisbury to High Post on a daily basis - any serious cyclist avoids this road.

The analysis of traffic movement (Fig 2.2 of the economic Impact Statement) offered by the applicant is incomplete (the numbers simply do not add up), the indicated route is deliberately misleading and the stated conclusion on vehicle access made is false.

Based on the green and orange dots on the map included in the Application, we estimate between perhaps 50 to 60 workers cars will access the site. In addition to this there will be significant construction traffic and then the prospect of daily delivery vans and HGV's using the Woodford Valley as the simplest route to the site.

In this respect it is also noted that Wiltshire Council have very recently applied for Planning (19/10043/FUL) for a complete redevelopment of the Salt Store site to increase storage capacity and increase vehicle bay numbers from 6 to 10. This itself will no doubt increase traffic volumes at the High Post traffic lights in winter months as well.

A traffic survey carried out by Wiltshire Council between 13/08/2015 and 19/08/2015 (for which detailed supporting data is available) showed that:

The 85th percentile speed for this survey was 38.7mph - a very high average speed in a 30mph restricted zone and very close to Woodford Valley C.E Primary Academy. One vehicle was recorded travelling at 71mph.

On weekdays between 7.00am and 10.00am an average of 248 vehicles per day passed Woodford Village Hall travelling North.

On weekdays between between 4.00pm and 7.00pm an average of 361 vehicles per day passed Woodford Village Hall travelling South.

It is reasonable to assume that the proposed development at High Post may increase traffic volumes by up to 60 cars in each direction morning and evening as two of the possible three routes to High Post from Wilton pass this way. If this is the case then volumes going North in the morning could increase by 20% and South in the evening by 14% . We should all recognise this as a significant increase.

Simple checking of readily available accident data from "Crashmap" shows a very obvious increase in the numbers of accidents at key traffic junctions that traffic to this proposed site would involve. We have opted to avoid detailed statistical analysis because the data points to such an obvious trend of increasing accidents in more recent times.

The proposal also ignores those workers at the existing site who are currently able to walk or cycle to work . These workers will now be forced to use a vehicle to get to work and thereby add to the current congestion both in and around Wilton across the A360 and through the Woodford Valley.

2 LAND ZONING

The proposed site is zoned as agricultural land. The very clear reply given by Wiltshire Council to the pre-planning enquiry stated

“ The site is located outside of any policy boundary raising concerns with regards to the sustainability of the site for the proposed commercial development due to the likely reliance upon the private car for any employees and visitors. The proposal is therefore, in my opinion, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy “.

Wiltshire Council also states :

“Proposals for new development located in open countryside are not considered appropriate unless they adjoin an ‘Existing Employment Site’.

We believe it is hard to argue that the Salt Store is an existing working site. It is a storage facility with the exception of those times of the year that our roads need gritting and when planning approval was sought it was stated that the site would be “normally operational for max of 20 days a year”, somewhat more than full time use for in excess of fourteen hours a day for an unspecified number of days per week.

“Whilst the site adjoins the area identified as an ‘Existing Employment Site’ the proposal would not actually extend this area and therefore is considered to be a proposal for new employment land. Therefore, Core Policy 34 (CP34) ‘Additional Employment Land’ is most relevant to this application.”

Lets us look at Core Policy 34 . It states that **“These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (settlement strategy) and in any community-led plans, including neighbourhood plans”**. Furthermore **“All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available”**. And that they **“are supported by adequate infrastructure”**.

Taking these three very well defined points:

1. These proposed buildings are not in any community-led or neighbourhood plans
2. The proposed development is not on the most central site available.
3. The infrastructure is only adequate if the totally false claim that “all vehicles” will access the site from the A345. Facts are facts and a large proportion of workers cars and delivery vehicles will look to use the very inadequate infrastructure of narrow, congested village roads.

The application thus fails to meet defined criteria of Core Policy 34

3. ALTERNATIVE SITES

A Key Planning Consideration offered by Wiltshire Council is that

“The accompanying evidence base would need to prove that all sites available on allocated employment land and within or close to settlements are unsuitable and that the only option available would be to create new employment land at this particular site”.

The Application concedes that in the Council’s pre-application response, the Spatial Planning Officer stated:

The ‘Wiltshire Employment Land Review’ (2017) explains that in this particular area of the county there is sufficient employment land supply for the first five years.

Alternative sites are too easily dismissed. The Applicant claims to have :

“tested all other employment land sites in the Wiltshire area and the only option available is to create new employment land on this site”.

Looking particularly at the Report from Woolly & Wallis, they reported that

“The brief was to look for sites of between 1.5 acres and 3.0 acres, ideally to relocate both businesses on to the same site but also to consider separate sites for each business. Alternatively to find a suitable building or buildings with a requirement for Naish Felts Ltd at between 15,000 – 20,000 ft² and for Wallgate Ltd at between 20,000 – 25,000 ft². Both the sites and the buildings would need to allow some room for expansion.” It is difficult to see how the proposed site can allow space for expansion when there is already insufficient space for a proper planting scheme as parking takes up all the space not utilised by the buildings - see Para 5 below.

This is the first and only mention of the option to consider separate sites. Apart from common ownership by a parent company, these 2 business do not share workforces, operating times, suppliers or markets. The search for 2 buildings - one now set at just over 20,000 ft² and the other now increased to just under 35,000 ft² would likely be much easier if they were on separate sites. Why was this never considered ?

However, the search was hardly exhaustive. Please look at some of the sites cited:

One very obvious option is land at the north end of The Avenue on the Fugglestone Red development that is owned by the Wilton Estate. This was dismissed because there was no access. There is now. Has the Applicant seriously engaged with the Wilton Estate ?

Development land at Old Sarum is dismissed . If the land is zoned for Development Land then why cannot Wiltshire Council enforce its own policies and make this clear to Persimmon Homes. This land is within an established employment land area and has ready vehicular access.

The Woolley and Wallis letter of 05/02/2019 also make mention that most of the alternative sites were “inappropriate” or “unsuitable” for B2 use due to proximity to residential housing, this is somewhat difficult to defend when the land is designated for that category of usage. The letter also states “Since my last report one of the sites has been granted planning permission for change of use from employment to residential”. This change of use at the Harnham Business Business Park, an ideal brown field site that had previously rejected for housing (on the Netherhampton Road not the Southampton Road as stated in the report), was seemingly granted despite Naish expressing an interest in the site. As late as April 2018 the Wiltshire Employment Land Review stated categorically that “the site should be retained for employment use” and not developed for non-employment use. There seems to be a trend whereby planning applications are granted on the basis of mixed usage and then subsequently changed to sole residential usage. This seems to be the case with the Fugglestone Red site, again granted for mixed use despite being a green-field site, but now the owner is attempting to withhold the land from business use until residential use is applied for. Both these sites are far closer to the existing facility but little seems to have been done to strenuously pursue them and we hope that this will be taken into account when considering the case for a green field site being used instead.

4. ARCHAEOLOGY REPORT

The Applicant contracted Wessex Archaeology to undertake a magnetic gradiometer survey (Note: NOT a ground radar survey as incorrectly stated in the Design and Access Statement).

There are various ditches and trenches and possible dwellings on the site. Wessex Archaeology summarised :

The geophysical survey was undertaken on 3 April 2019 and has demonstrated the presence of a number of anomalies of potential archaeological interest throughout the site. The anomalies that are tentatively identified as being archaeological in origin are thought to indicate primarily pit- and ditch-like features. Two curving, weakly positive linear anomalies have been identified surrounded by several pit-like anomalies. These may relate to archaeological features dating to the prehistoric period, given the presence of early prehistoric worked flint identified directly east of the site. They may also relate to cropmark features pertaining to prehistoric and/or Romano- British ditches and enclosures to the north-east and south-east of the site. However, further investigation would be required to confirm this.

Further pits interpreted as possible archaeology have been identified. It is unclear from the geophysical results alone whether these features are anthropogenic or reflect natural undulations in the bedrock.

Yet the summary report in the Design and Access Statement (on Page 16) states that "no findings of interest arose". Please contrast the 5 word summary of the applicant with the actual summary from Wessex Archaeology.

This is a further example of how the application has scant regard for the facts and although they concede that further work may be required, how would this requirement ever be enforced ?

Yet again, developers are keen to bulldoze things through with little concern for the impact they will have on the local surrounds. But all those living near the valley roads will not wish more fast cars as workers dash to and from work and we all know that sooner or later their supply vans and lorries as well as possible construction traffic will be using the valley as a short cut. They may state things in their proposals, but these fine words are only intended to get their application through planning.

5. PROPOSED SCREENING OF THE SITE

In 2008 Wiltshire Council applied for (S/08/8002 dated 29/01/2009) and received Planning Permission for a salt/grit store at High Post. Interestingly, the then Salisbury District Council (SDC) objected to this application, citing the exiting Wiltshire Strategic Plan and 8 defined policies it contravened. The SDC objection stated :

“ The site is located within open countryside designated as a Special Landscape Area. ”

This objection was turned down with Wiltshire Council stating that ;

“ the proposal would not have an adverse visual impact on the countryside or the SLA designation”.

We would invite anyone to travel from the west , up High Post road and look over towards the Salt Store and make their own judgement on its visual impact.

A condition of the approval for the Salt Store was that a comprehensive planting scheme was put in place to conceal the site.

The landscape plan of this current application consists of one page and helpfully identifies the plant species to be used. There is little or no planting in front of the

biggest (Wallgate) building : it comprises just three Italian Alder trees and climbers on the wire mesh fencing. This is the same western facing boundary as the Salt Store. There is no space for substantial screening as the car park is right up against the fence line. The plans rely on the factory units blending into the tree-line behind.

The lack of screening will also mean that the factories, which are operation from 06.00 to 19.00 hrs , will not be screened for light pollution and will be visible from as far away as the A360 Devizes Road, Old Sarum and Fugglestone Red.

Not only is the proposed screening inadequate, what evidence is there that any proposed screening would actually be put in place.

In effect, firstly Wiltshire Council in 2008 and now this application are saying that open countryside and Special Landscape Areas are open for industrial development. If this is the case then why is the applicant not seeing to build on open land around the outskirts of Wilton ??

SUMMARY

This application not only fails to address the significant increase in traffic , it deliberately misleads readers and makes unrealistic claims. It would lead to much increased traffic through already busy village roads.

This application seeks to take open agricultural land and then grasp whatever Core Policies it can to try to build its case around.

We are told this need to relocate has been known for several years. In that time many opportunities have been lost to take on existing industrial buildings. The reported search for alternative sites is very weak.

The accompanying studies carried out by paid professionals are in some cases very limited and in other cases the clear conclusions are brushed aside to suit the application.

This application makes a mockery of trying to retain open countryside should be rejected.

Planning application: 19/09327/FUL

Registration Date: 27th September 2019

Comments required by: 30th November 2019

Location: Land adjacent to Salt Depot at High Post Business Park High Post Salisbury SP46AT

Proposal: Erection of 2 new factory facilities and associated access road, parking, service yard and refuse storage areas, for Naish Felts Ltd and Wallgate Washrooms Ltd.

Woodford Parish Council (WPC) wish to register their strong objection to this Application on the following grounds.

General:

WPC is extremely concerned that there has been a complete lack of consultation with local stakeholders and Woodford Valley Residents whose road network is likely to be very adversely affected by these proposals.

The first WPC heard about this proposal was in late September 2019 and then only indirectly through sight of a copy of a letter submitted by Savills to Durnford Parish Council (DPC) dated 25th September 2019. The formal planning Application was registered on 27th September a matter of only two days later. It is also noted that neither WPC nor DPC have yet to be consulted formally on this matter.

This very short notice is despite the fact that the applicant apparently submitted pre-application proposals to Wilts Council Planning Authority in December of 2018; 11 January, Ref: 18/11443/PREAPP some nine months previously about which we were not aware.

We are grateful that following consultation with the Planning Office that the deadline for comments has now been extended to 30th November.

WPC's specific objections are as follows:

- 1) The proposal will generate increased traffic within an already overstretched road system in the Woodford Valley.
- 2) The proposed site is in an area designated as Open Countryside and is in conflict with Wiltshire Core Policies 34,60,61 and 62.
- 3) There has been unsatisfactory consideration of alternative sites, and no evidence is shown of consideration of separating the two businesses which are unrelated apart from common ownership.
- 4) The Applicant dismisses evidence that unexplored archaeological remains are likely to be found at the site
- 5) The proposed screening at the site is completely inadequate.

1 Traffic issues

1a) Quote from the Applicant's Design and Access Statement (DAS): *'In order to retain their respective existing employees, many of whom are highly-skilled specialists who have been trained in-house over many years, it is also critical that the new location for both companies is within a reasonably 'commutable' distance from their existing facilities in Wilton.'* - We do not understand why this site has been chosen as other sites much nearer Wilton meet this criterion better. This site in fact is the furthest from 'their existing facilities in Wilton' of any considered and the most difficult for employees to access from Wilton and the West (with the exception of Solstice Park which is a little further away but much more easily accessed via the A360/A303).

1b) The Economic Impact Study shows some employee locations identified by coloured dots on a map - this map identifies the location of approximately 74 employees whereas it is stated that there are currently 113 employees. The map has a large Blue Diamond identifying the existing factory which hides much of Wilton where it can be assumed many employees are located. It is therefore reasonable to assume that the balance of 39 employees are resident in Wilton itself. A further 27 green or yellow dots identify employees in locations West of the Woodford Valley who are likely to have to access the new site across this Valley. This means that up to 66 employees, nearly 60% of employees, will need to travel from West to North East to access the new site and the only routes available **all cross the Woodford Valley** at some point.

1c) The DAS states **completely erroneously**: *"All vehicles arriving and leaving the proposed factories would be moving to and from the A345 via the existing traffic light-controlled cross roads, so will not impact upon the villages in the Woodford Valley"* In support of this statement the DAS map at P11 also **completely erroneously** indicates the only route to the new site to be via The Avenue, down Camp Hill, turning right at the bottom and then travelling up Phillips Lane, via the Beehive Roundabout at Old Sarum and along the A345.

This may be convenient for the Applicant's argument that the Woodford Valley will not be impacted, but this is clearly incorrect.

1d) Looking at the likely access routes for the 66 employees referred to in 1b) there are initially **two** options from Wilton. One is to travel North via Stoford, the other is to travel East via The Avenue.

The Stoford route will have attraction for many employees in and around Wilton as it avoids the roundabout at the bottom (West end) of The Avenue in Wilton - which is regularly very congested at rush hour times - and to cross the A360 and travel down the Wishford Road through Middle and Upper Woodford and up to High Post. This is the longest but can be argued is one of the quickest routes to the new site and will impact traffic volumes in the Woodford Valley.

The Avenue route via Camp Hill gives the option of turning left or right at the bottom of this 'Snakey' hill. As turning left is the shortest route from here to High Post and is more easily achieved than turning right, this will be the most likely chosen route and also impacts traffic volumes in the Woodford Valley through all the three villages of Lower, Middle and Upper Woodford.

It is reasonable to assume that all of these three routes will be used to some degree or other and not just the route via Old Sarum as stated in the DAS.

Furthermore, it is also likely that different routes may be chosen by employees for arrival and

departure from the site. It is in fact most likely that at the end of their working day or shifts employees travelling West towards Wilton will turn left at the exit from the site down into the Woodford Valley rather than turn right to the High Post traffic lights where they are likely to be delayed by the lights and/or build up of traffic.

In this respect it is also noted that Wiltshire Council have very recently applied for Planning (19/10043/FUL) for a complete redevelopment of the Salt Store site to increase storage capacity and increase vehicle bay numbers from 6 to 10. This itself will no doubt increase traffic volumes at the High Post traffic lights in winter months as well.

1e) A traffic survey carried out by Wiltshire Council between 13/08/2015 and 19/08/2015 (for which detailed supporting data is available) showed that:

The 85th percentile speed for this survey was 38.7mph - a very high average speed in a 30mph restricted zone and very close to Woodford Valley C.S Primary Academy. One vehicle was recorded travelling at 71mph.

- on weekdays between 7.00am and 10.00am an average of 248 vehicles per day passed Woodford Village Hall travelling North.

- on weekdays between between 4.00pm and 7.00pm an average of 361 vehicles per day passed Woodford Village Hall travelling South.

It is reasonable to assume that the proposed development at High Post may increase traffic volumes by up to 50 cars in each direction morning and evening as two of the possible three routes to High Post from Wilton pass this way. If this is the case then volumes going North in the morning could increase by 20% and South in the evening by 14%

A Crash Map website examination of all the major junctions that will need to be crossed by employees travelling from the Wilton area to the new site shows significantly increasing accident numbers at all these junctions over the last few years. Details are available on request.

WPC believes that Applicant's Transport Statement and Economic Impact Study submitted do not address this likely impact of employees vehicles and delivery traffic on the surrounding road network and in particular in relation to those needing to cross the Woodford Valley from Wilton. The Transport Statement is completely inadequate in that it concentrates merely on road geometry and parking provision.

WPC feel that a full and detailed Assessment including a Travel Plan survey of all employee locations, including those within Wilton itself and their likely means of transport to work, is essential before any consideration is given to this Application.

2

The proposed site is in an area designated as Open Countryside and WPC believe that development at this site is contrary to CP34, CP60, CP61 & CP62 :

Response by Wiltshire Council at the pre-application stage stated :

*"The application would also be required to provide a strong case for allocating new employment land in this open countryside location whilst also meeting the other requirements of **CP34** and to prove that the possibility of development is essential to the wider strategic interest of the economic development of Wiltshire both currently and in the long term."*

"The site is located outside of any policy boundary raising concerns with regards to the sustainability of the site for the proposed commercial development due to the likely reliance upon the private car for

any employees and visitors. The proposal in my opinion is therefore contrary to **Core Policies 60 and 61** of the Wiltshire Core Strategy."

Core Policy 34

Additional employment land

Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (settlement strategy) and in any future community-led plans, including neighbourhood plans, where applicable.

CP34 permits development 'Outside the Principal Settlements, Market Towns and Local Service Centres' in certain circumstances outlined in CP34 i,ii,iii and iv. WPC believes that all these criteria are not met including the requirement of the fourth that development should be 'considered essential to the wider strategic interest of the economic development of Wiltshire'. We appreciate that this latter point is for the Council to determine, but WPC do not believe development at this specific site can be considered of strategic value, particularly when there are other sites closer to the existing factories and employment base that may not have been fully explored.

Core Policy 60

Sustainable Transport

The council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire.

Core Policy 61

Transport and New Development

New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.

Core Policy 62

Development Impacts on the Transport Network

Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.

Re: CP60,CP61: WPC believe that it is self evident that a development at this site does nothing to reduce the need to travel particularly by private car, in fact quite the opposite is the case. There are a number of employees we believe living in Wilton who currently either walk or cycle to work and who will be obliged to find alternative means of transport which because of the remote location of the proposed site will most likely be by private car. All those living to the West of the Woodford Valley who currently travel to work by car will inevitably be required to travel further than they do at present.

Re: CP62 : Similarly there is no evidence of any mitigating measures in the proposal to "offset any adverse impacts on the local transport network". This is hardly surprising as the proposal does not even recognise that there will be adverse impacts on the transport network at all.

These adverse impacts are clear to see and are demonstrated above.

3

Consideration of alternative sites:

In the response by Wiltshire Council at the pre-application stage it was stated :

"The accompanying evidence base would need to prove that all sites available on allocated employment land and within or close to settlements are unsuitable and that the only option available would be to create new employment land at this particular site. An objective assessment must be made of the site's potential contribution to the economy, in line with other sites in the area."

and further:

"the Spatial Planning Officer stated: The 'Wiltshire Employment Land Review' (2017) explains that in this particular area of the county there is sufficient employment land supply for the first five years. After this time there is likely to be a shortfall. As a consequence, proving a case to demonstrate that development of greenfield land is the only option would be especially difficult during these first five years but this is something the applicant would have to do should they wish to proceed with their application proposing such a development."

WPC have worked together with Durnford Parish Council (DPC) in the examination of this Application and to avoid duplication confirm that we fully support the report and conclusions included in their (DPC's) submission to the Planning Office regarding the alternative sites that the Applicant claims have been dismissed from consideration for a variety of reasons.

We also support the view that too little has been done to examine the possibility of separating the two factories onto different sites. It is clearly convenient from the Applicant's point of view to have them on the same site, but apart from common ownership the two businesses are unrelated and there are no common employees that would require adjacent premises.

WPC find it particularly hard to understand why the considerable area of Council approved and allocated employment land at the new Fugglestone Red development has not been pursued for one or both businesses as the location clearly meets all of the Applicant's search criteria far better than any of the other sites considered. The excuse that the roundabout was not constructed at the time and the site was dismissed "*due the fact that a significant amount of infrastructure is required before the land would be available and the timing for the construction of the roundabout was unknown*" seems both weak and now irrelevant as the roundabout is currently under construction.

A further but very important point is that the proposed site is simply an area of Agricultural land in the 'open countryside' of which there is a vast amount in Wiltshire and of course in the Wilton surrounds. Apart from the fact that this particular piece of land is close to an existing small industrial development there appears to be nothing at all to recommend it and we do not feel that the Applicant has met the Council's requirement of showing this site was "the only option available"....." to create new employment land at this particular site".

There is no evidence at all to show that any other plots of agricultural land that could be re-designated as employment land have been explored.

4 Archaeology

WPC believe that the conclusions drawn by the Applicant in their DAS following the Wessex Archaeology gradiometer survey that "*No findings of interest arose from that survey, other than a 'modern anomaly', which the archaeological consultants believed to be a C20 buried pipe.*" are simply incorrect.

The site is located at a high point in the landscape and apart from the adjacent modern screen planting would in the past have afforded line of sight views of many other known local prehistoric sites. Many sites in similar strategic locations in the County such as this have

been shown to have been inhabited in both prehistoric and Roman times.

Wessex Archaeology themselves in their report say:

"The anomalies that are tentatively identified as being archaeological in origin are thought to indicate primarily pit- and ditch-like features. Two curving, weakly positive linear anomalies have been identified surrounded by several pit-like anomalies. These may relate to archaeological features dating to the prehistoric period, given the presence of early prehistoric worked flint identified directly east of the site. They may also relate to cropmark features pertaining to prehistoric and/or Romano-British ditches and enclosures to the north-east and south-east of the site. However, further investigation would be required to confirm this."

At the point of preparing this response we have not seen a report from the County Archaeologists, but we assume they have been or will be consulted and will advise.

WPC believe that in the light of this evidence, if the Planners decide that this Application should be considered, there needs to be a condition imposed for detailed pre-decision survey work to be undertaken.

5

The proposed Landscaping and Screening is completely inadequate

The Applicant's DAS states: *'a Landscape Visual Impact Assessment (LVIA) is not appropriate for this planning application'*.

WPC completely disagree and believe that before this Application is allowed to proceed any further a full LVIA should be undertaken. Due to its height and prominent position the site is visible in the landscape from many viewpoints in particular to the West and South.

In 2008 (S/08/8002 dated 29/01/2009) Planning Permission was granted for the salt/grit store adjacent to the proposed site. A condition of approval was that an extensive and very comprehensive planting scheme was to be put in place to conceal the site. A 5m wide woodland strip of various native species was proposed for the Southern/Western boundary together with hedging on the Western side.

As can be seen from the attached photographs in Appendix 1, eleven years later the planted scheme does not even properly conceal the perimeter fence let alone the site itself which continues to be a significant eyesore in the landscape.

The lack of adequate screening would also mean that the factories, which are operational from 06.00 to 19.00 hrs, will not be screened for light pollution during the winter months and will be visible from as far away as the A360 Devizes Road, Old Sarum and Fugglestone Red. Furthermore outside operating hours the use of movement sensors will mean that lights will be regularly triggered by mammals such as deer and badgers which are extremely difficult to eliminate from such sensors.

It is clear therefore that the Applicant's much less intensive planting scheme will achieve even less than the Salt Store screening and is therefore completely inadequate.

CONCLUSION

Woodford Parish Council believe if allowed this Development would result in an unacceptable increase in traffic through the Woodford Valley, also that it is in conflict with Policies CP34, CP60, CP61 and CP62 of the Wiltshire Core Strategy, has failed to fully examine opportunities for location on alternative sites, dismissed evidence of likely Archaeological remains and does not provide adequate screening of the proposed site in the landscape.

Woodford Parish Council urge the Planners to reject this application.

Woodford Parish Council / November 2019

Appendix 1





Joint submission from Durnford and Woodford Parish Councils

Given that additional consultee documents have appeared concerning this application since both Parish Councils first raised their objections, plus more recent planning applications that shed further light on this application, we have consulted together and wish to make the following further comments.

1. Comments from the Wiltshire Council Economic Development Officer.

It is no surprise at all if the officer concerned, when asked if it makes economic sense for the 2 businesses to continue, of course answers “yes” and thus indicates support for this application.

All of us would wish to see any good local business prosper as we do both Wallgate and Naish Felts - we just believe they should be located to a site or 2 separate sites that are already zoned for employment land in accordance with defined Wiltshire Council strategies.

We are very surprised that the officer concerned agrees that the appointed agents carried out an extensive search for alternative sites but we do not agree that their search was either exhaustive or actually followed the stated instructions (namely to consider either a single or separate sites) and to consider existing buildings. We believe the recommendation of “support” takes zero account of all the other factors involved.

2. Archaeology

The report from the County Archeological unit supports building over features already clearly identified by a magnetic gradiometer surgery (note, NOT a Ground Radar survey as incorrectly stated in the actual Design and Access Statement.)

The notion of this consultee response is to support the application as long as some further work is done and all findings properly logged and reported.

Again, we are surprised that the County Archaeologist have not set a precondition that planning should not be approved until further groundwork has been correctly undertaken and then only approved if nothing of significance is found.

3. Spatial Planning Team

For specialists in this area, we are surprised that their report does not once mention that the site was designated by planners as a Special Landscape Area (SLA) which is defined as a non-statutory designation protected through County Structure Plan and Local Plan policy. Doubtless at some stage and cost in the past, teams have identified such areas. What is the point of having done this and then just ignoring it? It seems that the status of SLA has zero meaning and that all open farmland is fair game for industrial development as long as certain core policies are interpreted in certain ways.

But to the actual comments from the Spatial Planning Team.

The land concerned is referred to as “a parcel of undeveloped land” but then more accurately stated “as being within open countryside”. The comments then describe background policies and read very much like the case made by the applicant! The argument made seems to centre on the key words “new employment” whereas it is not at all. The development is unlikely to provide any new employment at all. The author also finds the proposal acceptable unless there are other material considerations such as design, landscape and access.

We suggest there are serious objections to the unsightly views the design will inflict to the only real view (from the west) that people will have of it, that it is not only open countryside but is designated Special Landscape Area, that the applicant has put forward inaccurate information on the access details and the increased traffic to be inflicted on the villages of the Woodford Valley.

Added to this are concerns over light pollution, archaeology, the dismissal of alternative sites and the combined affect of application 19/10043/FUL (existing Salt Store re-development) to the visual impact of the combined sites then we believe this should be a serious concern for the Spatial Planning team.

4. Alternative Sites

Both Parish Councils have already criticised the presented details of alternative sites. Some have commented how weak the initial report was and there are probably many hundreds of residents objecting to the plans to build a high density housing development off the Netherhampton Road on land that was intended for industrial use who might find it hard to understand why Naish Felts and Wallgate did not fully explore this site.

Land at the former Imerys chalk quarry off the A36

We have noted with interest planning application 19/05443/FUL to site a battery storage facility next to the existing substation. This application was registered in early August 2019. It is very interesting to note an objection to this application lodged on behalf of the owners of the nearby old quarry works by Mr. R. Henderson of Savills in a letter dated 25/10/2019. In this letter Mr. Henderson is acting for his clients who own the adjacent Old Quarry workings and who are seeking (via Planning Application 16/05957/FUL) to develop this former chalk quarry.

One facet of the objection from Mr. Henderson concerns Landscape and Visual Impact and he states:

The plan is “Unwarranted development in the countryside” and that the “Visual/landscape impact (including inability to control retention of established boundary screening). The latter point is of note as the Naish scheme relies in no small part upon the screening effect of the trees on the eastern boundary which are owned by the industrial estate.

He further states “The site is situated in the countryside” and goes on to describe this and the proposed battery storage plan “would erode the rural character of the site and result in harm to the character and appearance of the area”.

The visual impact of a fence to secure and screen the site and this is similarly described as an “urbanising feature”. It should be noted that there is a mature screen of trees between the quarry and the proposed Battery Storage site (albeit out with the development – see above) which will conceal it from the Quarry, this is not the case with the Naish site where, due to compact nature of the site there is insufficient space or capacity to provide adequate screening.

It is clear to us that building on open country side is objected to when it is deemed harmful to the clients’ interests but not when it is in the interest of a paying client.

But the background to all this is far more relevant to application 19/09327/FUL when we look at the proposed development of the old chalk quarry. This application was registered on 17/06/16 and the agent extolls the virtues of this application that, in accordance with Wiltshire Core Strategy allocated 4.0 ha of land - a brownfield site if ever there was one - for employment land with B1 and B2 use.

As far as we can judge the actual planning application approved allowed for 3.4ha of employment land situated on the former processing plant areas. Just to be clear:

- A. This site is just 1.33 miles from the existing Naish Felts and Wallgate factories.
- B. This site has ready and proven HGV and other vehicular access straight off the A36.
- C. This site has been unused since 2009 and it would be hard to think any commercial property agents in the area were not aware of it.
- D. This site is clearly known to Mr. Henderson since he acted for the owners.

Yet despite all this, the agent again clearly states to Planners in his letter of 06/12/19 concerning the High Post application that:

“I would, at this juncture, like too reassert that a comprehensive site search exercise has identified this site as the only realistic and best opportunity.”

One very clear message he put out by John Prescott around the year 2000 when Deputy Prime Minister was that new developments should first consider brownfield sites. Why has this site (old chalk quarry) not been considered? We urge those considering the High Post application to reject it on the clear lack of exhaustive consideration of alternative sites and in particular consideration of this brownfield site alone.

However, one final factor that is ignored in this process is clearly stated in the instructions cited in the Woolley & Wallis report that is given in Appendix A to the original Planning Statement. It states their (W & W) brief was not just to look at potential new LAND but also - “Alternatively to find a suitable building or buildings “. There is no mention at all of any engagement in this process and there are plenty of examples of suitable warehouse and factory premises that have been on the commercial property market in recent years.

Land at Fugglestone Red

We are told that the reason this development that specifically includes employment land is unacceptable because there is no suitable vehicle access. Clearly there is now with the new round-about in place. We urge those considering this application to ask the applicants why they cannot speak with the Wilton Estate about this.

On this same general subject if Council policy is now to allow industrial development on any open land as long as the application sufficiently massages the wording and intent of defined policies, then the obvious place to look for such land is around Wilton itself and the obvious land owner to engage with is the Wilton Estate. Why not do this?

5. Added impact of planning application 19/05443/FUL for new Salt Store buildings.

Durnford and Woodford PCs have submitted their objections to the revised Salt Store buildings. Perhaps there should be serious enquiries into why this and other WC salt stores are defective after such a short time? This proposed re-development will increase traffic and increase light pollution, but our biggest concern is over the impact of new buildings on the western perimeter that will replace existing 6m high units with new units over 10m in height and the combined detrimental visual effect of both sites.

As the Woodford PC objection of application 19/09327/FUL so clearly shows, the only real view that most people would see of these 2 sites is from the West while driving or walking eastwards up the High Post Road. Sadly, this is the only boundary that the Salt Store development has failed to screen and if it has failed to screen 6m high buildings, what will 10m high ones look like? The lack of screening also contributes to the light pollution emanating from the site which would in turn be added to by the factory proposals.

The applications for the Naish and Wallgate factories may have revised landscape plans, but there is very little room for substantial improvement and indeed, based on past experience, will these actually be implemented? How long would it take for trees to reach maturity and screen the views from the west and if the Salt Store re-development takes place, just how ugly will this all look?

6. Addendum to the Transport Statement and the Transport Survey Summary

We have looked at this very inadequate submission.

The various documents submitted in support of the application cite 113 full time employees. In light of the serious concerns raised about increased traffic, the applicant has provided additional details including a Travel Survey Summary. This survey only reports on 94 employees of which 2 are clearly part time. So, there are maybe 21 employees missing. Hardly a comprehensive survey.

We too have plotted out all the post codes and analysed distances and shortest road routes using Batchgeo, Mapometer and AA Route Planner. Yet again, the results and conclusions presented by the applicant and heartily endorsed by Mr. Henderson in his covering letter are far from convincing and lacking either knowledge or clarity.

The question put to workers in this so-called poll should not have asked if the employee would travel via "Middle Woodford" but via "the Woodford Valley" as Mr. Henderson recognises in his covering letter. If it is the case that the Transport Consultant deliberately limited the traffic use to just Middle Woodford then it is totally misleading. The survey makes much of the car share element of employee travel but fails to note that this is not guaranteed and can change very easily.

The car parking spaces on the proposed site are barely adequate if all employees stick to cycle/bus/car share arrangements. If there is even a small change there will certainly be a lack of parking capacity and absolutely no possibility of providing extra without acquiring additional greenbelt land.

Walking to work

Of the 8 who currently walk, the intentions are for 1 to cycle (or drive), 2 to take the bus, 4 to drive and 1 has no indications noted.

Bus

Have all those who intend taking the bus looked carefully at the timetables and against the varied operating hours? We have checked the relevant timetables and believe the bus times are not exactly supportive of travel to this site, especially for the earliest starts and the latest work finishing. We also urge planners to consider the fast road from the traffic lights past the Salt Store entrance and that there is no available footpath or street lighting and presents a clear element of danger.

Yes, the number of intended bus users increases from 9 to 11, but we suspect that once they have experienced the deficiencies of the bus service and braved the walk along to work that some will revert to the car.

Cycling

The application makes much of increased cycling. We fully support cycling; but the survey results provided are at best optimistic. 2 workers living in the Amesbury area indicate they will cycle to work and avoid the Woodford Valley. Any experienced cyclist will avoid the A345 - it is NOT a nice or safe road to cycle along. We would actually encourage and welcome cyclist on the valley roads because they do have a calming effect on traffic. The other 4 intended cyclist (2 from Wilton, 1 from Great Wishford and one from the west side of Salisbury) all tick to say they will not be going up the Woodford Valley. We believe this to be inaccurate and to simply serve the purpose of the survey. No cyclist in their right mind would choose to use the A345 when there is a shorter, safer, quicker and more pleasant route through the Woodford Valley. Much the same mind set would rapidly apply to those travelling by car.

Car use.

Analysis of individual post codes and potential routes to High Post make it implausible to suggest that many of those travelling from the west of the intended site and west of the Woodford Valley will magically avoid the Woodford Valley. The analysis provided is simply inaccurate and misleading.

Cars travelling from Wylie (1), Mere (1), Devizes (2), Wilton (4), possibly 6 living on the Devizes Road through to Wilton Road areas of Salisbury, Tisbury (3), Dinton (1), Compton Chamberlain (1), and Chilmark(1) all are declared as intending to travel to High Post without using the Woodford Valley route. The simple question is to ask why anyone paying their own fuel costs and wanting the shortest, quickest and easiest journey would chose to travel via the A345?

Perhaps the best example of the inaccuracy of this is the person living in Shrewton who is declared to travel to the proposed site without using the obvious route of the A360, cutting down to Middle Woodford and thence via Upper Woodford and Netton. Has the person actually looked at the route options and chosen to travel by the longer routes with additional traffic junctions and delays that will cost them more in time and fuel

HGV and Delivery Vans

Conveniently the applicants have made no comments on the already declared service engineers, daily delivery / collection vans and HGVs. They will have no control over these vehicle movements as most couriers work to pre-defined shortest routes.

The application claims only 9 cars will use the Woodford Valley route. This is very hard to believe. We estimate it is nearer to 30 from this analysis, not allowing for the 25 or so missing staff members, plus delivery vans and HGVs and the picture is very different to the one painted in this application.

Anyone living locally will be fully aware that the A303 around Amesbury is regularly congested and those claiming to use the A303 as a route from the west to High Post are ignoring the fact that this congestion regularly drives traffic through the Woodford Valley as an alternative route. Should the proposed Stonehenge Tunnel proceed this effect will clearly become even more exaggerated for some time to come.

In short, this added Transport Statement, Travel Survey and supporting letter from Savills is lacking substance, lacking nearly 20% of the declared work force and denies the fact that any driver will chose what to them is the shortest, easiest route that gets them to and from work as quickly as possible and with the least cost.

SUMMARY

We can only state again that this application seeks to destroy open farmland on the perhaps misinformed view that there is no alternative single site while zero application has been given to the possibility of 2 separate sites for 2 distinct businesses. The applicant's agent objects to open countryside being developed in one location, but fully supports it in this application.

The application is disingenuous in its claims over the traffic implications that so many resident of Woodford Valley villages object to. The main justification of the application is that there is nowhere else to go and thus CP 34 is invoked and every point of this is then argued. But it is clear to us that the application fails to meet key points of CP34 and that this, taken with the above and previously made submissions from both Parish Councils and concerned residents, means the application should be declined. Please direct the applicants to seriously engage in finding one alternative site or 2 separate alternative sites or existing factories buildings closer to their current location.

This page is intentionally left blank



This page is intentionally left blank