

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.