

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



