

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 lmerys 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.