

Here we are again, going through another application from the same developers and with unrealistic claims and inaccurate statements.

I start by asking myself why both Chemring (CCM) and Callen-Lenz (CL) need large solar arrays. CCM already has a 2024 approval for a solar array and this application tells us they can be "erected quickly". If solar generated electricity is so vital to CCM, then why have they not progressed this installation in 2 years ?

Why does CL want or need a 2.49Ha solar array? Their proposed building is around 4500 sq.m in size and their site is 3.54Ha. The first question is why they don't look to place solar panels on this vast roof space ? The application states that it is "not possible to place solar panels on curved roof surfaces". This is simply not true.

- The past 4 planning applications from the same developer shows all the buildings with curved roofs and all (except the intended Wiltshire Police building that lacked details of its design) with solar panels on them.
- The defined Principal Contractor (Section 1.2 of the BREEAM Statement) for the intended building of this application is Nationwide Engineering whose website shows their time lapsed construction of the Birchall Tea building at the Bluestone Centre. It has a curved roof covered by a large solar panel array! The conclusion is that solar panels must be possible on curved roofs.

If green energy heat supplies are sought, then why is CL looking to AIR sourced heat pumps that are considered to be less efficient than GROUND sourced heat pumps ? The CL site is 3.54Ha and surely large enough to install a ground sourced network under and use PV generate electricity to drive the pumps.

It makes little sense that CL claim they need this extra land for solar panels that they could locate on their extensive roof space. I do not understand why CL would look to purchase this extra 2.49Ha for a solar array.

CL state that they cannot locate to alternative sites because these sites are not big enough. The obvious one at Fugglestone Red is 8Ha, zoned for B2 and B8 use and is available to buy wholly or partly. Surely it is for the applicant to demonstrate that they have engaged with the vendors of this site?

It is preposterous for the applicant to argue that the total required land they define is bigger than that available at Fugglestone Red.

In effect, CCM are suggesting that they cannot relocate to Fugglestone Red, but it is hard to understand why they would anyway. To deny a completely impractical possibility is not a sound planning argument. If the CCM land requirement is removed, this leaves CL wanting just over 6Ha of land. They could opt for Fugglestone Red WITH their solar array or save the purchase cost of 2.49Ha there and place solar panels on their roof space and install ground source heat pumps

and only have to purchase 3.54Ha. Electricity may be expensive but so too is development land.

We are being presented with feeble excuses to justify the impossibility of developing anywhere else simply because the developers and land owners are set upon developing High Post as they already control the land.

#### CP34

The crux of this application is CP34 - additional employment land. Yet again, the claim comes that CL is "essential to the economic development of Wiltshire". This claim was also made in earlier applications for Apsley Precision Engineering, C&O Tractors, Nationwide Engineering, Concretene and even Wiltshire Police! (It was indeed a surprise to the Police and Crime Commissioner when he was told that 225 new police jobs were to be created as the Economic Impact Statement for PL/2022/09262 claimed).

The definition of the word "essential" is for anyone to look up. Water is essential to human life - we cannot live without it. It is very hard to envisage any of the above businesses (and the Police) as essential to the County's economic viability. Honda might have been considered "essential"; they are gone but Wiltshire has survived and a new and even bigger enterprise is taking up that space including a drone manufacturer with a factory 3 times the size of what CL are requesting.

Facts are facts and time and again the High Post site has been defined as remote and this is even a word used by the MD of CCM. Time and again we are presented with fanciful claims on numbers of people who will walk and cycle to work as well as those who will arrive at work by bus or taxi or having taken the train.

This current application sees CL state that 4% of their 250 employees will walk to work. That is 10 people. Where are they walking from? Even the 3 CCM employees I have spoken to who live in Great Durnford tell me that they would not walk to work because the route is unsafe. This clear stance is confirmed from the MD of CCM who referred to walking as unsafe and unsuitable.

At the recent Appeal Hearing for PL/2024/09682 the same Transport Consultants conceded that they did not expect people to walk or cycle. I asked then as I do now, why these walking-to-work numbers are even more heavily promoted in this application?

To compound the ridiculous claims, CL tell us that after 5 years not only will they hope for a workforce of 500 people but the Travel Plan target is for 5% to be walking to work - that is 25 people! Does anyone seriously believe this?

The same unrealistic targets are applied to Cycling and Public Transport.

This proposed new bus stops mean that employees from the High Post Business Park then face a walk either over private property or along the A345 to access the

new ones. The applicant has not considered this. Walking across a petrol station forecourt with 3 entrances should not be encouraged - it is a safety concern.

The very many responses from residents to past applications and the clear testimony of many who cycle that were submitted as Interested Party Comments to the APE Appeal detail that cycling up or down the High Post Road is not anything a responsible employer should encourage. Just because there have so far been no cycling fatalities on this High Post Road does not allow the conclusion that the roads are thus safe for cyclists.

But these figures are not funny - they appear to me to be intended for one purpose only which is to reduce the hypothetical number of employees who will travel by private car. If for any reason this claimed figure of 80% private car journeys to start with (that somehow this would reduce to 75% after 5 years) were accepted, then it lessens the reliance on such car use and enhances their claim to somehow pass CP60, CP61 and thus CP34. I believe the private car journey percentage is well over 90% to adjacent sites today, it is likely to be well over 90% for employees of the proposed site and it is hard to see how this could reduce.

Current businesses at High Post have over 90% of employees travelling by private car. (APE report 92% in their Appeal documents).

I find it hard to accept the proposals of the Travel Plan as I have all the past travel plans and some of the totally fanciful claims made by the same consultants - for example their brightly coloured Isochrone maps of PL/2023/07223 telling us how over 200,000 people could access High Post by a 35 minute bus journey. Anyone able to read a bus timetable will see that a journey from Andover to High Post is over one hour, rather than within 35 minutes.

From a travel perspective, this North Field site is no different from the South Field site: it is remote and employees are highly dependent on private car use. As such the application fails relevant Core Policies and should be refused.

As Strategic Planning has commented, the application needs to satisfy all criteria a.) to e.) of CP34 . They must all be met. But as I and others have set out in all previous applications from the same developers for High Post sites, the site is not supported by adequate infrastructure, has high private car dependency, ignores other available sites already approved for employment use, has seriously limited local amenities, and offers no local benefit. Failing criteria a.), d.) and e.) surely means it fails CP34. This alone is reason for refusal. But there are several more reasons.

### Alternative Sites

Through the Local Plan, Wiltshire Council directs businesses to existing premises, brownfield sites or land already zoned for development. Planning must be plan-led and High Post has been examined and ruled out in the Local Plan process.

In the Joint Parish Councils documents the alternative sites are discussed in greater detail.

Fugglestone Red is an 8Ha site that can easily accommodate the needs of CL and my advice to their owners is to save buying development land for a solar array and put solar panels on the huge roof space. (See comments below on the unsuitability of solar arrays on high grade agricultural land).

There is also a contradiction in the application. The applicant states they could not occupy land at Fugglestone Red because that site is not large enough. But the Chemring solar array component is irrelevant because they (Chemring) could not conceivably operate a solar array over 5km away involving a high voltage cable across all that private land and under the River Avon SSSI and SAC.

As mentioned already, without the 2.23Ha sought by Chemring for a solar array, then CL easily fits within the Fugglestone Red site (even with a 2.49Ha solar array).

As the Joint Parish Councils clearly showed in the Appeal process to PL2024/09682, there is an available site at Solstice Park and surely it is the responsibility of Callen-Lenz to investigate this and all other possibilities before it is claimed that a greenfield site at High Post is the **only** one.

#### Land Use

The updated Agricultural Land Classification is consistent in defining the land of this site as "Best Most Versatile". Part of the CL building site is Grade 2, the remainder Grade 3a.

Existing guidance from Natural England is not to develop such land. In addition, a very recent Government policy document published by DEFRA titled "Land Use Framework" sets out the Government guidance on future land use. The key points it makes relevant to this application are:

- a. Planning should be Plan-Led.
- b. High grade agricultural land should not be developed.
- c. Solar panels should go on roofs, and never on high grade agricultural land.

This application is for 4.72Ha of land for solar and 3.54Ha for the CL site. For these reasons the application should be refused.

#### Local Amenities

Both the Travel Plan and Transport Assessment deliver the same list of local amenities that intend to show what a suitable site it is. Again, the JPC go into every detail of these spurious claims.

There is NOT an ATM at the petrol station. A roadside convenience store (that is Londis and NOT Spar) is not a preferred shopping location - it is just a roadside convenience store; convenience comes at a cost.

The applicant claims its employees can avail themselves of "recreation and leisure facilities" at the Golf Club and classifies the Stones Hotel as a "community facility". It is recognised that there is no nearby postal, pharmacy, doctors or childcare provision.

But to compound concerns, the applicant fails to point out that to access the convenience store at the petrol station and nearby community facilities they will need to either walk across a private car park or along the A345. Worse still, to access the Golf Club, "employees then need to walk through the petrol station forecourt and then cross the A345 which we all know from previous applications is considered dangerous.

The applicant scores the provision of the local amenities highly and within the "Health and Wellbeing" category of the BREEAM assessment to come out with an initial score of "Excellent". I find the whole BREEAM assessment worrying because the very same architect that drew up the building plans has scored the project and if "Health and Wellbeing" scores highly from the local amenities input then I believe all looking at this score should be questioning it.

The appointed preliminary scores should be lower and just applying a sensible re-scoring to Health and Wellbeing would see the preliminary BREEAM assessment below 70 out of 110 and failing to be classed as "excellent".

#### Climate Change

I have said it before and it needs saying again. Wiltshire Council not only declared a Climate Emergency but adopted a Strategy to counter the effects of Climate Change.

In previous related planning applications the comments from the Climate Team have invariably been about welcoming solar panels on roofs and the efficiencies of the buildings.

But the Climate Team have continually failed to focus on the most identifiable and enforceable point of what the Council decided. That is that the single most effective way to counter the effects of climate change is to reduce journeys made by private car. The adopted Strategy documents that the Council can seek to enforce this through planning decisions.

This is a remote site that attracts a huge dependence on private car use. The LPA should put its defined Strategy into effect and refuse this application citing the defined Climate Strategy.

#### Planning should be Plan-Led

This is a clear statement from the Land Use Framework. Whatever the exact status of the Wiltshire Local Plan, the fact remains that this application is mainly with Site 3710 that was put forward for consideration in the Local Plan. This and adjacent proposed site 3714 at High Post were duly examined and excluded from the plan that Wiltshire Council developed over a 9 year period and formally endorsed.

As the Joint Parish Councils have again demonstrated, there is an alternative site at Fugglestone Red and it is surprising that a company looking to find a site for a new premises has not even explored this possibility. This is a very real possibility that local estate agents and planning consultants should all be aware of.

I believe the LPA is entitled to ask the applicants to show firm evidence that they have engaged with Persimmon and Lambert Smith Hampton to prove beyond reasonable means that the sites at Fugglestone Red and Solstice Park definitely do not meet their needs.

### Water Supply

As a keen local fisherman and Chair of the Wiltshire Fishery Association (WFA) I witnessed in 2025 low river flows to the extent that the WFA advice to fishing clubs in Wiltshire was to stop fishing because the water temperature was too high and the levels too low.

It is very well documents how over abstraction of water is a key component in rivers running dry and whole ecosystems being lost.

This is a real fear for many rivers in Wiltshire including the Avon which has protected status.

Sinking new boreholes close to any rivers and abstracting the ground water has a detrimental affect on that river, especially during long dry spells. Wessex Water are currently looking at sites south of Salisbury for new abstraction boreholes to feed their system since they recognise the need to reduce pressure on existing boreholes at Chitterne and Codford simply because of pressure on the River Avon flows. Abstracting water at one location can have an adverse effect on a neighbouring river valley even as much as 20km away.

The JPC has submitted an FOI request to the Environment Agency (EA) to present details of existing boreholes at High Post and will press for details of the discharge permits and a proper review of these permits in light of climate change and the very low level of the chalk aquifer last summer.

I see this initial application as one that would open the door to many more and the prospect of 1000 (or more if the South Field were developed as the land owners wished) as a potential ecological disaster for the quaffer and the River Avon SAC and would petition the EA not to allow ANY borehole without proper modelling of the effect on the aquifer of a borehole(s) to meet the needs of a massive industrial estate. I would ask the Case Officer to seek such modelling from the EA because the evidence is clearly set out that the developers seek a much larger occupancy.

It is noted that the EA has objected to this application: I believe they need more information to allow them to refine their objection.

It is wrong to take for granted that a precious resource like water will easily be available.

There are also no details of required water hydrants and how the required pressure for these would be achieved.

There is no doubt that the sinking of a suitable borehole of suitable depth with associated well structure and pumping will cost a significant amount of money, So too would a high grade sewage treatment system. If the Fugglestone Red site were examined then it is likely to have a mains water supply and connection to the mains drainage.

### Lighting

Has anyone looked at any analysis of existing light pollution at High Post ? A good starting point is the CPRE interactive map of Light Pollution of the Night Skies. This shows that the "signature" from High Post is already the same as Wilton and greater than places like Shrewton or even Stockbridge. Light pollution not only affects nocturnal wildlife, it impacts the Dark Skies policy of the WHS.

The applicants claim that their intended car park and security lighting (remember that "security" is a big issue and more security presumably means more lighting) will not add to the spill of light to the night sky. I find it hard to believe that such lighting will not add to the existing signature.

If these proposed lights are so wonderful then perhaps Chemring should take note of them, install them across their whole site and return the skies above High Post to darkness ??

### Ecology

I have also long sought the Ecology Officers to take note of the results of the first bat survey accompanying PL/2021/11914. If a person from the Wiltshire Bat Group reports that certain species recorded are **"vulnerable to extinction"** then I had hoped the Ecology Officer would be jumping up and down.

This new application carries a "Preliminary Ecological Appraisal" that is mainly desk based with a single day's field check. This is very limited science. The report on bats is lacking the initial study from PL/2021/11914 and hence bats are not a concern even though the North Field site is just tens of metres away from the South Field.

It should be noted that the applicant's superficial appraisal failed to access the earlier, readily available report.

It is perhaps not surprising that I have never seen a Stone Curlew: they are rare. They are also a protected species. In this application it is conceded that up to 3 breeding pairs may be present in the overall 60 acre field but these are to be "mitigated". How do the Stone Curlews know this? What legally acceptable proposal is there that the same area of land will be set aside for the lifetime of the

site, not used to generate any further income and correctly monitored to be out of production and specifically assigned and managed for use by Stone Curlews ?

There is no consideration of other birds, especially Skylarks, nor mammals.

#### Piecemeal Development of a Greenfield Site

This suggestion is reality. Not only does the developer express their desire for a wider industrial park on the North Field, the various documents disclosed in the APE appeal also showed details of pre-application discussions with the Council where 4 other parties (Nationwide, Apsley, Concretene and Wiltshire Police) have expressed their interest in occupying this site.

It is easy to check past applications for these entities to see how many employees they propose and to apply a conservative rate of just 90% private car use.

My figure (as given in the past application PL/2022/09262) is 475 for the above 4, plus the intended 500 for CL plus 120 for the EV Naish employees. That totals 1095 and my checking of the required land for each of the above plus this application still leaves space in the North Field for more industrial buildings. Again, being conservative it would be over 900 additional daily private car journeys.

This is the figure that modelling of the road network should be based upon. This is the figure that should be thought of when addressing CP60, CP61 and the adverse impact on the already stressed A345. This is the figure that should be considered with respect to the already identified Climate Emergency. Such transport modelling should be independent if it is to be credible.

I would very much welcome the Climate Team bringing this prime factor into consideration rather than commenting on far less important points.

#### Solar Arrays

I see these simply as a distraction added to the application to make it appear that the land required is so large as to eliminate the other available sites. As mentioned, I fail to see why CCM are keen on more solar power when they have not progressed an existing approval or looked to install further solar panels within their very open 40Ha site. Why buy more land when they already own plenty?

I cannot see why CL demand a solar array when they don't even seek to place such panels on their vast roof space or install ground sourced heat pumps (apparently more efficient than air sourced options) underneath their large car parking and ground areas.

Despite what Strategic Planning have stated, I cannot see any past or meaningful relationship between Chemring and Callen-Lenz.

I fear that if this application were to be approved then these climate mitigation details would morph into yet more applications to build more industrial units.

There are documented cases of fires from battery storage units and reports show the numbers are increasing. There was a recent fire at a solar array near Cirencester and cases are increasing. It is a concern that a known fire source should be located next to the CCM facilities - a licensed explosives site. It would be nice to get Dorset and Wiltshire Fire Service to comment on this.

But above all it is high grade agricultural land that the Government states is required for food security and production. The Land Use Framework makes it clear that BMV land is not for development and definitely not for solar arrays.

The Council's own policy (albeit aimed at housing) states solar panels should be located on roofs.

### Summary

This application may well offer a solution to the pedestrian access to bus stops and a more acceptable road junction serving the site than the dangerous High Post junction. BUT it appears to me ONLY for intended employees of this site. It actually creates danger for pedestrians from High Post Business Park looking to get to the proposed new bus stops and for employees trying to access the promoted leisure facilities and the other "local amenities".

In all other issues described (and possibly more) it remains as failing relevant core policies.

It remains in a remote location, outside any development boundary, rejected in the Emerging Local Plan, with limited public transport options, unsupported by sufficient walking and cycling access and heavily dependent on private car journeys. It fails CP60, CP61, the Climate Change Strategy. It fails defined Criteria of CP34 and thus it fails CP34.

Callen-Lenz cannot be considered as yet another business intent upon High Post that claims to be essential to the economic development of Wiltshire. The Joint Parish Councils have demonstrated that there are viable alternative sites and I reject the often repeated claim that the chosen site is the only site.

Clear Government policy is that the Best Most Versatile agricultural land should not be developed but retained for food security reasons.

Despite a new roundabout, the C292 High Post road remains a concern - not just that it is unsafe and unrealistic for walking along but it presented danger to cyclists. It is narrow, unlit and with poor road surfaces. In short, it is as the Council have described it; substandard. Knowing this, the application targets up to 5% of employee's as looking to walk to the site! I find this an unsafe, unviable and irresponsible target.

A huge increase in vehicle numbers associated with this and the clearly intended further developments will bring several hundred additional daily car journeys and all the related HGV and delivery van traffic associated with a large industrial park. The A345 is already at capacity at peak times and traffic on the lanes of the Woodford Valley is already a problem for residents.

Local amenities are simply not as the applicant has described. In addition, access to them is problematic and, in the case of the proposed leisure facilities, access is as dangerous for the employees as the Council defined in Reason 3 for their refusal of PL/2024/09682.

Please refuse this application. And after 4 years of this, please put an end to the onslaught of applications by refusing to register further similar applications.