

## **PLANNING APPLICATION PL/2026/01867**

**THIS IS A JOINT OBJECTION SUBMITTED BY DURNFORD PARISH COUNCIL, WOODFORD PARISH COUNCIL AND THE LAKE MEETING.**

The Joint Parish Councils (JPC) represent residents of the villages and hamlets between Little Durnford, Salterton, Netton and Great Durnford on the East side of the River Avon and Lower Woodford, Middle Woodford, Upper Woodford, Lake and West Amesbury on the West side of the River Avon.

**We summarise our Principal Planning Reasons for objection. These are based on the Local Plan, Emerging Local Plan and defined Core Policies (CP), emerging Policies from the new Local Plan and National Planning Policy Framework (NPPF).**

1. LACK OF JUSTIFICATION FOR ECONOMIC DEVELOPMENT (CP 34 and emerging Policy 64): We believe that the Application does not pass the tests of either CP34 particularly in respect of CP34 criteria a.) to e.) to emerging Policy 64. This is a core pillar of the Applicant's case and it fails to correctly satisfy the policy.
2. SEVERE TRANSPORT IMPACT (CP60 & CP61 and emerging Policy 70 and NPPF): INADEQUATE TRAVEL PLAN: Poor accessibility and vehicle impact on already busy rural roads. The Application complies with neither existing nor intended policies: it would increase travel by private car.
3. SERIOUSLY FLAWED TRANSPORT ASSESSMENT (CP60, CP61, CP 62 , emerging Policy 70 and NPPF ): The proposal is not capable of being served by safe access to the highway network, without significant highway improvements, including road widening and junction modifications, which would have a significantly urbanising impact for this sensitive rural location. Highway safety concerns with traffic passing through rural communities. NPPF 112(c) requires developers to '*create places that....minimise the scope for conflicts between pedestrians cyclists and vehicles*'.
4. HARMFUL PRECEDENT (CP1 and Emerging Policy 1). Cumulative impact of piecemeal ("foot in the door") development of a greenfield site and precedent for future development in this sensitive rural location. This appears to be just a first step towards the land owner's ambition to deliver a much larger development.

5. **FLAWED SOLAR ARRAY CONCEPT.** The proposed solar arrays should not be placed on highly productive agricultural land, but instead on the vast roof space. The arrays involve BESS that are known fire hazards.
6. **EMERGING LOCAL - LOCAL PLAN REVIEW.** The most recent version of the Local Plan (2016 - 2038) rules out this and other submitted land at High Post for development for employment land.
7. **CLIMATE EMERGENCY.** Conflict with adopted Council Strategy to address climate change, notably a reduction in private car travel, the main contributor to pollution in the county.
8. **SIGNIFICANT HARM TO ELEVATED AND OPEN LANDSCAPE (CP51, CP58, emerging Policy 91 and NPPF).** Adverse visual impact. We believe that the application compromises the landscape and setting of the surroundings of the ancient city of Salisbury, the setting of the Ancient Monument of Old Sarum, the Monarch's Way and the Woodford Valley.
9. **UNSUSTAINABLE LOCATION SETTLEMENT HIERARCHY (CP1, Emerging Policy 1 and NPPF).** Not a site allocated for development, and not a location in accordance with the adopted settlement strategy. Major development in this area is not supported in either the new Local Plan.
10. **LOSS OF GREENFIELD AND PRODUCTIVE AGRICULTURAL LAND (CP2, Emerging Policy 2 and NPPF and March 2026 Land Use Framework).** This is not previously developed land so fails the priority of this policy and conflicts with protections of productive agricultural land. The Land Use Framework defines planning should be "Plan - Led" and that land like this that is BMV should not be developed.
11. **UNSUSTAINABLE LOCATION – LACK OF LOCAL SERVICES (CP1, CP60 and CP61, Emerging Policies 1 and 70 and NPPF).** Lack of supporting services in locality to serve the significant number of potential employees, inevitably leading to more car travel on a daily basis.
12. **HARM TO LOCAL AMENITY (CP57 and Emerging Policy 98).** Harmful impacts from traffic using local rural roads, through rural communities and very popular National Cycle Routes. Significant adverse impact on landscape character, urbanization of rural landscape.
13. **COMMUNITY ENGAGEMENT (NPPF AND CORE STRATEGY).** Lack of any community consultation. Significant levels of public objection.

14. LAND USE FRAMEWORK of March 2026. This application fails to comply with clear policy guidance offered by the Government.

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## **1. INTRODUCTION**

With one exception, the reasons for the refusal of previous applications at High Post involving members of Spitfire Enterprises Ltd apply equally to this new application.

The Joint Parish Councils note that this application has attempted to overcome a couple of previous concerns with the provision of a roundabout and two new bus stops in the hope that pedestrians could cross the busy A345 at peak traffic times using new “islands”. However, the application will inevitably have a considerable reliance on private car journeys and fails in regards to the requirement to reduce such journeys in order to be regarded as a sustainable application.

Many other points of failure are detailed in our objection. We will point out the many flaws and false claims in an application which does not stand up to scrutiny. We will demonstrate that alternative and more suitable sites for Callen-Lenz exist, despite claims to the opposite in the application. We believe that these sites should properly be examined, rather than the cursory dismissal the application gives them.

Furthermore, we contend that this application should not be determined in isolation, since the developers concerned have already discussed, in a pre-application meeting with the Council, further potential occupants of the overall site and openly declared their intent to have a complete industrial park; as evidenced by their web site promoting this application as being part of an “Innovation Park”.

As such, the provision of a small, and potentially inadequate, roundabout on the A345 needs to be examined in the light of a fully occupied site and the inevitable far larger number of employees and subsequent private car journeys the site will generate than those indicated by the application. We contend the resultant impact on the A345 at this remote location will not be acceptable in sustainable terms and will cause increased congestion, not alleviate traffic conditions at High Post, as the applicant wants to imply by the provision of the roundabout. This is an application which creates problems rather than solves them.

We contend that the application should be refused

## **2. CORE POLICY 34**

One of the three Key Principles of the Wiltshire Core Strategy is :

"Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport."

It is concerning to see yet another attempt by the same consortium of landowners and developers, who promoted earlier Applications in the High Post vicinity, attempting once again to open up the High Post countryside to substantial

incremental industrial development this time described both as a "Defence Cluster" in the Planning Statement and separately as an "Innovation Park" on the developer's website.

The Joint Parish Councils (JPC) objection addresses three related matters: first, the policy context governing development on this open countryside site, second the economic justification advanced by the applicants in their supporting documentation, which the JPC considers to be materially misleading and unsupported by evidence, and third, the apparent likelihood of subsequent incremental development applications at this site

### 2.1 Point 1: A Remote Location

This is a remote site in open countryside - development is not permitted in principle.

This remote site increases dependence on private car use. This is contrary to CP60, CP61 and to the Council's declared Strategy on Climate Change where the prime factor to implement is a reduction in private car use. Failing these Policies and Strategy means the application fails CP34.

The High Post site lies outside any defined settlement boundary and constitutes open countryside for the purposes of the Wiltshire Core Strategy (adopted January 2015). Under Core Policies 1 and 2 of the Core Strategy, development in the countryside is not permitted other than in circumstances permitted by other policies within the plan, as identified in paragraph 4.25 of the Core Strategy.

The JPC submits that the proposed development does not fall within any of those exceptional circumstances. The starting point for assessment must therefore be that development at this location is fundamentally contrary to the Core Strategy, which directs growth to defined settlements and is designed to protect the open countryside from inappropriate and unsustainable development.

As established by Wiltshire Council's planning committee in comparable cases, Core Policy 34 supports the provision of additional employment land, but a proposal must fall within criteria (i) to (iv) of the policy and additionally satisfy ALL criteria (a) to (e). Where it does not meet all those criteria, it fails to comply with the policy. The JPC is sure the planning officer will assess rigorously whether the CL proposals genuinely satisfy any of those criteria and if not, to give this policy appropriate weight as a reason for refusal.

In respect to PL/2024/09682 for the APE application within the 30 acre South Field, the Case Officer wrote :

*"it is therefore that the proposals fail criteria a, d and e of Wiltshire Core Strategy policy CP34 (Additional Employment Land) and there is also doubt about how it satisfies criteria b and c. It is not therefore considered that the proposals are justified in terms of provisions of this policy or that the previous concerns have been*

*addressed in full. The application is therefore recommended for refusal accordingly."*

The JPC consider that this current application similarly fails criteria a.) to e.) of CP34 because:

- a. It is NOT sustainable development since it relies on increased private car use
- b. It does affect the location and takes away BMV agricultural land
- c. It offers no local economic benefit
- d. It is not planned development and takes away from land already consented employment land
- e. There is insufficient local infrastructure

## 2.2 Point 2 : Being "essential" to Wiltshire's Economy

Specifically the JPC believe the proposal fails to comply with Core Policy 34 in that the Applicants' claim that the development proposed is '*essential to the wider strategic interest of the economic development of Wiltshire, as determined by the Council*', is not supported by evidence and that it is being used as a means to circumvent CP34 planning protection for this open countryside site.

In PL/2022/09262 the same developer described as "essential" Nationwide Engineering, Concretene, Apsley Precision Engineering and even Wiltshire Police. This same claim was made in the subsequent applications PL/2023/07223, and then again for Apsley Precision Engineering in PL/2024/09682.

We do of course fully support the existing businesses at High Post and recognise their contribution to the Wiltshire economy and too the importance and necessity of current and future development of the UK's defence industry. Similarly, we accept the contribution that CL makes and understand their ambition to move to a new and larger site in the current circumstances when the nature of warfare is rapidly changing and the development of drone manufacture and technology is advancing at pace. We do not however accept that this requirement justifies the granting of planning permission at High Post.

The JPC disputes this on the following grounds:

Swindon has rapidly established itself as one of the most significant drone and unmanned aerial systems (UAS) manufacturing centres in the United Kingdom. The scale of development is considerable:

- Defence technology company STARK has opened a new 40,000 sq.ft. drone manufacturing factory in Swindon — its first production plant outside Germany — creating more than 100 jobs in software, electronics and aerospace engineering in its first year.
- TEKEVER, the European leader in unmanned aerial systems, has announced a major new drone production factory in Swindon spanning 254,000 sq.ft., expected to create 1,000 high-skilled jobs, described by the Defence Secretary

John Healey in September 2025 as positioning Swindon as “a centre for UK drone manufacturing.”

- Flyby Technology have taken on a 260,000 sq.ft. new factory on the former Honda site.
- Neros Technologies has announced an investment of up to £10 million in a new north Swindon facility, manufacturing drones for the Ministry of Defence and UK armed forces.
- iCOMAT has opened a second manufacturing facility in an existing building. They intend to develop next-generation autonomous defence platforms.
- Munin Dynamic is a small start up within the industry.

Swindon Borough Council's leader has confirmed that five drone firms are already established or have announced their arrival, with a further four having signed Heads of Terms, and that it is “undeniable that Swindon is now a major player in drone manufacturing.”

It is also a fact that Swindon's unemployment rate is higher than Salisbury's and that the available workforce is substantially greater.

It should also be noted that the rapid rise in drone warfare has spawned thousands of drone companies across the world and more than a hundred involved in the industry in the UK. Counter drone technology is also advancing extremely fast and there is of course no guarantee that drone warfare may not become redundant in the future. It is also noted that the though last year's Strategic Defence Review indicated the requirement to construct more drones, there is no funding allocated to the MoD to achieve this. Therefore, only some of these many companies will succeed and in an increasingly competitive market many will fail.

We are also sure that the Case Officer will take into account the fact that, unless conditioned, should planning permission be granted at this site, it will be for the building and not associated with the nature of the occupants' business. Therefore, should the circumstances of the occupant or their business change then the property could become occupied by any business with no relevance to a "defence cluster" at all.

Against this backdrop, the claim that the CL development at High Post is "essential" to Wiltshire's economic future in this sector is an overstatement cannot be sustained. Swindon has been described as having a “large drone cluster,” a reputation now being significantly strengthened, with the town set to host the UK's largest drone factory. The county's aerospace and UAS economy is already well anchored with government backing, MOD investment, and substantial private capital in Swindon. The Swindon cluster might well be considered "essential" to the future of Wiltshire's economy, the High Post proposal in this context could not.

The economic benefit the applicant claims is clearly not contingent on development at High Post and any attempt the applicant makes to demonstrate why this location is "essential" is weak and belies the fact that it is merely a convenient opportunity.

### 2.3 Point 3: Clearly stated expansion plans

The JPC believes that the Proposed Masterplan Overview and the website published by the developer ([www.spitfireinnovationpark.co.uk](http://www.spitfireinnovationpark.co.uk)) raise serious concerns about the likelihood of incremental and speculative development. We are sure that it will not have escaped the Case Officer's attention that the Masterplan shows the central roadway of the site flanked on both the northern and southern sides by arable fields and that while they fall outside the red line they are otherwise indicated as forming part of the wider site context.

The JPC are gravely concerned that this application constitutes a deliberate "foot in the door" strategy. By securing planning consent for development at the entrance to the site the applicant would establish a precedent of development in this open countryside location. The inclusion of the fields on the Masterplan, even if not the subject of this immediate application, signals an intention on the part of the applicant and other interested parties to seek further planning permission on the basis that the principle of development at High Post has already been accepted.

This is clear too from the developers' website, referred to above, which describes the proposed development as an "Innovation Park" – *"a future facing development, creating a dynamic hub of like-minded organisations embracing emerging technologies, innovation, research and development, precision engineering and science – providing premium business space."* We fail to see that this does anything but strongly indicate future development intentions which would have serious consequences for many planning matters in the vicinity.

We note in this respect additionally that in an email chain included within supplementary documents submitted under application PL/2024/09682 reference is made (email dated May 1<sup>st</sup> 2025) to a pre-application for the 'Northern Field' with defined interested parties other than the Applicant for this current application. We suggest that this also indicates development ambitions for others at this location which gives us serious cause for concern.

We suggest the masterplan as drawn and the developers' website should be given significant weight as a clear indication of wider development ambitions for this greenfield site, far beyond what is formally applied for at this stage.

The JPC submits that the cumulative development that we believe is implied by the masterplan and the developers website, taken as a whole with the current Application, would represent a wholly unacceptable and unsustainable incursion into open countryside in direct conflict with Core Policies CP1, CP2 and CP34 of the Wiltshire Core Strategy, it is remote and dependent on private car use thus also failing CP60 and CP61 and that these conflicts and the wider context of the total

Masterplan site must be taken into account in assessing the current application which we believe should be refused.

### **3. PIECEMEAL DEVELOPMENT OF A GREENFIELD SITE**

The planning application PL/2024/09682 from Apsley Precision Engineering Ltd (APE) was the fourth for one involving APE the nearby field to the SOUTH of the C292. The three previous applications on this same site are for approximately half of that 30acre field owned by Spitfire Enterprises Ltd.

This scaled down application for just APE application has already been described by many as a **"foot in the door"** application intended to present an overall lesser impact on almost all previous reasons for refusal. It is in fact better termed for what it is - a piecemeal development of a much larger greenfield site.

This new application (PL/2026/01867) is clearly a similar approach. This is obvious not just from the clear size and remaining open space of the approximate 60 acres of this North Field, but confirmed by details revealed about the pre-application meeting from April 2025. In these documents posted in connection to the Appeal made by APE against refusal of PL/2024/09682, the clear intent of Nationwide Engineering, Concretene, Apsley Precision Engineering AND the Police Hub to locate to this field are confirmed.

We are unsure why Wiltshire Police were involved with this last April and May, but if they have since found an alternative site then it is reasonable to assume that another business or speculative units will be forthcoming.

To further show this obvious intent, the Planning Statement carries the following declaration of creating:

*"A future facing development, creating a dynamic hub of like minded organisations embracing emerging technologies, innovation, research & development, precision engineering and science."*

Given this clear evidence, it is correct to consider the wider implications of what additional employee numbers are to be expected from these businesses (Nationwide, Concretene, Apsley & the Police) and we know from PL/2023/07223 that these involved 475 employees.

These 4 entities defined a requirement for around 13.4 acres of land. The North Field is approximately 60 acres. This current application is for 27.9 acres. This leaves 30 acres to fill. If the defined 4 users take the same 13.4 acres then there are around 15 acres remaining for yet more users.

In employee numbers we are told 250 from the current application, then 475 for the other intended occupiers. There is still around 15 acres to fill. It is easy to envisage

the North Field accommodating buildings housing over 1000 employees and thus over 900 cars.

We contend that all submitted Transport Assessments and all consideration of this application in relation to policies concerning travel by private car should be based on a figure of at least 900 cars. In addition, the likely related HGV and delivery van journeys that would result should the whole of the land under the ownership of the developer should also be taken into account.

If the North Field becomes fully developed, the South Field is also there under the same ownership.

This application needs to take into account far reaching impacts on traffic in the Salisbury & Amesbury areas as well as all related infrastructure and social issues. The Council is already aware of its own commissioned reports that the A345 is already at capacity at peak times.

More industrial developments call for more housing. The growth around Salisbury and particularly Amesbury in recent years has been astonishing: lots of new houses but no infrastructure that people really need. No new doctors or dentists, no directly proportional expansion of our hospital, senior schools, ambulance, social care, police or fire services.

In part or in total this remains unplanned development of a greenfield site in a remote location that consistently fails defined National and Core Policies.

#### **4. TRAVEL PLAN**

The first comment that the JPC wish to make on this and any other Travel Plan is that they are aspirational and unenforceable guidance. The presented plan introduces "a primary objective of the strategy" to "increase awareness" and "help facilitate" alternative modes of transport to the private car. It may sound interesting but it is still aspirational. The secondary objectives are similarly aspirational, but highly unlikely to be achieved. We wonder what showing a commitment to improving traffic conditions in the local area means against a backdrop of several hundred additional cars travelling to the proposed site each day. All nine bullet points of Section 1.6.2 are seriously questionable or just plain wrong.

Objective: Minimise the impact on the local community of traffic associated with the site by minimising noise and pollution.

JPC Comment : How can adding several hundred cars to the local road network be somehow "minimised" by minimising the noise and pollution this inflicts ?

Objective: Show a commitment to improving traffic conditions within the local area.

JPC Comment: What exact traffic improvements will result from hundreds of additional cars and delivery vans and HGV's ?

Objective: Reduce the adverse effects on health associated with increased car use.  
JPC Comment: Sounds good but why inflict the additional car journeys in the first place ?

Objective: Reduce air pollution and the consumption of fossil fuels.  
JPC Comment: Surely increasing private car use increases these factors

Objective: Increase the attractiveness and hence the proportion of journeys made to and from the site by sustainable modes of transport such as walking, cycling and public transport.

JPC Comment: As established for the High Post site, walking is unsafe and the claimed numbers totally unrealistic and cycling presents serious dangers as well.

Objective: Promote walking and cycling as a health benefit to employees.  
JPC Comment: It would be irresponsible for an employer to promote modes of transport that are stated by established businesses at High Post to be unsafe.

Objective: Promote social inclusion by widening the travel options available for non-car-owning employees.

JPC Comment: If this means some employees offering lifts to those who do not have a car, then we accept this as a good idea. But it is only an idea.

Objective: Reduce the cost to employees of their journeys by promoting alternatives that are both cheaper and more environmentally friendly.

JPC Comment: Not sure what is being suggested here.

Objective: Reduce the perceived safety risk associated with the alternatives of walking and cycling.

JPC Comment: Is the applicant admitting there is a "risk" associated with walking and cycling ? The MD of Chemring has previously questioned the reality of these alternatives to car use. No Chemring employees walk to work and only a very few cycle as their daily commute. Four previous planning applications have confirmed that cycling the C292 is a challenge on this narrow, steep, unlit and substandard road. It is seriously concerning that professional consultants and responsible employers should still be promoting walking and cycling.

The Workplace Travel Plan of this application draws very much on previous such plans and this version unfortunately brings back suggestions of combined rail and bus options as well as the suggestion that employees will use taxis to get to work.

The same Travel Plan contents are submitted within the Transport Assessment and the Planning Statement.

#### 4.1 Walking

In past applications the prospect of walking to work had been promoted, discussed and largely abandoned. The nearest housing that could reasonably support employees taking up a suggestion in a Travel Plan that they should walk to work are in Netton and Great Durnford. The obvious routes from both these

settlements are up steep hills along narrow, unlit roads where the national speed limit applies and recorded data shows vehicles typically travelling just under 60mph.

These roads are not safe for pedestrians. This conclusion has been reached 4 times already and even the MD of Chemring Countermeasures (CCM) has expressed this view. It is backed up by the fact that CCM employees living in Great Durnford choose not to walk to work. They state plainly that they consider it dangerous.

The Travel Plan actually admits in 2.3.8 that few future employees will live within walking distance of the proposed development. But despite this statement and all that the same Consultants have learnt on this in the past 4 years, we are presented in Table 2.3 that there is a target of 4% of the initial 250 employees to walk to work which will somehow increase to 5% after 5 years!

Just to be clear, 4% of 250 is 10 employees and 5% of 500 is 25 employees. The claimed figures for private car use are thus falsely reduced. This is clearly wrong and we believe the intent of this is simply to reduce the percentage of employees reliant on private car use. Clearly this approach fails.

#### 4.2 Cycling

The Travel Plan still describes the C292 as a "lightly trafficked lane". Realistic analysis of the numbers of employees who choose to cycle to work at existing business at High Post as their prime method of transport are around 1% .

Numerous past comments have described the dangers of cycling not just on the designated cycle routes of the Woodford Valley but especially the use of the C292 High Post Road. The Council repeatedly describes the C292 as "substandard" in terms of it being narrow, unlit and steep.

In February and March 2026 the Joint Parish Council checked the condition of the road surface of the C292 from Netton to just east of its junction with Jubilee Hill and reported the defective parts that would cause harm to a cyclist. Over 40 cases were reported through the MyWilts App. (Appendix E of the JPC Appeal Statement)

The applicants state that because there have not been recorded fatalities that the routes must be safe. This is incorrect: there has been a fatality in the past and earlier this year a cyclist was found injured near Salterton and taken to Southampton General Hospital.

There are numerous comments from residents - many of whom are or were keen cyclists on the challenges and dangers that cycling along our narrow lanes poses.

Section 2.3.19 brings back a suggestion that there is a viable cycle route from Amesbury. In the Case Officer's Report to PL/2022/09262 this suggestion was commented on as follows;

*"The suggested use of the off-road cycling facilities between High Post crossroads and Amesbury is not lit and would require surfacing but, in any event, would not enhance the sustainability of the site to a significant degree compared to an alternative site within close proximity to an urban area."*

The same report went on to say *"The proposed development is therefore not supported by sufficient cycling infrastructure required to maximise this sustainable mode share."*

#### 4.3 Bus Travel

As much as a new roundabout with new bus stops, footpaths and "half way" crossing points will be a huge improvement on the current unsafe bus stop arrangements at the High Post junction, the fact remains that bus travel is fundamentally unattractive to the over 500 workers at existing businesses.

As much as the applicant claims the site is served by adequate bus services, it should be noted that there is a further admission in the Planning Appeal Statement against the refusal of PL/2024/09682 at paragraph 5.13. The Appellant does not consider that bus travel to the appeal site will be suitable given the shift patterns of the workers (with work times ranging from 6 am to midnight).

Both the X4 and X5 services have documented punctuality failings (Section 4.7). Conscientious employees do not like to be late for work and an unreliable bus service does not encourage bus travel.

As has been presented in previous applications for developments at High Post, the bus services to the site are limited and various reports (Atkins) have highlighted the unreliability of bus services in the Salisbury area.

#### 4.4 Trains, Taxis and Car Share

The suggestion that employees will travel to Salisbury by train and then onto High Post by bike or taxi or bus or car share was first promoted in 3 past Travel Plans from the same Consultant. This possibility was not included in PL/2024/09682.

Train fares are expensive and typical workers do not qualify for any discounted rates. On top of this, a one-way taxi fare from the rails station to High Post costs around £20. It is noted that Taxis can park at the CL site but there is no drop off area for them.

It is suggested employees arriving by train can take the bus. There is indeed the X4 service from the rail station but it is 23 minutes to High Post. (the employee could walk to the Market Square and get on an X5 but this walk takes around 14 minutes and the subsequent bus journey 13 minutes)

These suggestions are failed arguments intended to again lower the number of actual car users.

The targets presented in Table 2.3 suggest 5% of the 250 employees will use public transport and that this will increase to 6% after 5 years.

We find these claims unrealistic.

#### 4.5 Access to the Local Highways Network

We recognise that a new roundabout will solve the problems associated with pedestrian access to proposed new bus stops, but would the developer fund this in full?

But access and connectivity relating to the application impose serious traffic numbers on the north-south A345 that two reports commissioned by the Council have stated to be already at capacity.

This statement also fails to address the additional east-west traffic that will be imposed upon both the Bourne and Woodford Valleys.

#### 4.6 Accessible Amenities

Section 2.4 offers insight into the flawed BREEAM estimates. We discuss BREEAM separately.

We wish to point out some simple errors: the "food outlet" is a small Londis unit within the petrol station. It does not sell any fresh products like fruit and vegetables; it is a convenience store where prices are at a premium and it is hard to see how this contributes to the "Health and Wellbeing" of any employees.

Furthermore, access by foot to the Petrol Station involves an approximate 200m walk either across the private car park of the Stones Hotel or along an uneven verge elevated above the busy A345 or on the actual A345 itself. It is NOT a safe route and hard to see how this would also contribute to "Health and Wellbeing".

On the subject of "access to cash", the Londis store and the filling station premises as a whole does NOT have an ATM. The claim is false.

It is claimed that the High Post Golf Club offers "access to a recreation or leisure facility for fitness or sports." The only sport on offer at the Golf Club is golf. It is a private members club. Not only is this claim fanciful, the actual connectivity is worse than accessing the convenience store because the intended employees are expected to cross the A345 at a junction already noted and conceded to be unsafe.

So far it is hard to accept that any amenities in Table 2.2 other than the open spaces within the proposed CL site are relevant.

Postal, Pharmacy, GP and Child Care facilities are between 2.6km and 5.2km car journey away.

This leaves just the Stones Hotel which is described as a "community facility". It is not a community facility, it is a commercial hotel enterprise.

There appears to be a serious further flaw to these claimed amenities; they are not readily accessible. Looking at the detailed plans and the artistic images there appear to be no obvious, safe route from the site to these facilities. The route from the northbound bus stop to the Stones Hotel car park is uneven ground, sloped towards the A345 and evaluated above it. Even if an employee ventured this way they must walk across the hotel car park and petrol station forecourt. Should they choose to use the footpath along the side of Solar Field A then they join the C292 but must then walk along this equally or more unsafe route.

In summary, the suggested amenities are unconvincing and it is difficult to see how a positive BREEAM target score has been assigned to "Health and Wellbeing".

We contend these suggestions are detrimental to the wellbeing of employees.

#### 4.7 Public Transport Accessibility Index

Section 2.6 of the Travel Plan score the site with a PTAI of 4.64 out of 40. This is 12%. The BREEAM PA scores "Transport" as achieving 10 out of a possible 12 credits.

We doubt if this score factored in the punctuality statistics of the bus services. According to data on the Salisbury Reds web site the average punctuality of both the X4 and X5 services over the past 12 months is just 80%.

We find these claims hard to believe and it underscores our scepticism on the BREEAM Statement.

We note the suggested 28 spaces for bikes but suggest that cycling to the site remains a highly unattractive option.

We do not consider the bus services to be frequent but accept that the proposed new road layout offers safer provision for bus users to cross the A345 than the current, dangerous High Post Junction.

We strongly disagree with Sections 2.8.4 to 2.8.8 . The site is not user friendly to any cyclists and the prospect of employees travelling by train and onwards from there is unrealistic.

The site is very much private car dependent and thus fails contrary to WCS Policy 60, WCS Policy 61 and the NPPF, paragraphs 110, 117.

#### 4.8 Census Review and Targets

It is hard to see why the Census 2011 data is presented and even harder to accept it. Time and again, it has been shown that NO employees of existing businesses at High Post walk to work and only a very few are regular cyclists.

As the Joint Parish Councils have stated previously, the MD of Chemring describes the site as "remote", walking as "unsafe and unsuitable" and reports between 1% and 2% of a large workforce choosing to cycle to work.

Planning Application PL/2024/09682 demonstrated that just 1 employee cycled to work regularly and none walked.

The Census figures have no bearing to this current application and the Initial and 5 Years Target figures presented in Table 2.3 are totally flawed.

Walking to work is likely to stay at 0%. Cycling may realistically entice 1%. Bus Travel may attract a few more.

Despite the claims made in the Travel Plan, it remains an aspirational and unenforceable document. It is intended to reduce the very obvious dependence on private car use. But the site IS remote and employee travel is dependent on private car use. This contrary to Core Policies 60 and 61 and thus the application fails Core Policy 34.

## **5. TRANSPORT ASSESSMENT**

### **5.1 General Points**

The CL initial workforce is 250 employees. Chemring (CCM) has approximately 400 employees. The application declares a further 250 employees. Existing documents declare the intent of at least 4 other occupiers that may involve up to 500 more employees and permitted development traffic of 120 employees exists.

The Joint Parish Councils contend that the TOTAL of all these intended business should be factored into any meaningful Transport Assessment.

The proximity of the existing junction traffic lights and the roundabout do not seem very logical on an "A" class road in the countryside. At peak travel times the passenger vehicles accessing and egressing from the site will be moving on an already busy road with many vehicle movements around the new roundabout. If a realistic model of at least 1000 cars was applied then the prospect is for the High Post route for north or south bound traffic to become seriously congested and this will only promote rat running through the roads of the Woodford and Winterbourne valleys.

If the 60 acres site was fully occupied (as the Applicant favours) then the total number of vehicles, plus those of the 400 CCM employees would have a severe impact on the intended roundabout. We envisage a huge back up of traffic on the A345 entering the site in the morning and even more so within the site when existing at the end of the working day.

As we read the demand data on traffic numbers the A345 already has close to 2000 vehicles per hour southbound and northbound at peak times. How will several hundred cars exist the site at these same times without hold ups, frustration and possible accidents? We ask the Council to fully investigate all the claims made and to extrapolate a figure for ALL potential traffic linked to this overall scheme for High Post that the developers have clearly stated.

It would be totally wrong to analyse the Traffic claims of this application in isolation.

The plans of the roundabout appear to have it as very small - presumably to incur the least cost in its construction. As alluded to in Clause 3.2.6, the proposed round about is very close to the existing signalled junction and interaction between the two is not "potential" but real.

We ask if this were approved, then would the existing bus stops be taken out of use? If so, how would any existing bus users employed at the High Post Business Park or from the Golf Club be expected to access the intense new bus stops without either trespassing over private property or placing themselves in danger of walking through the forecourt of the filling station, or the car park of the Stones Hotel or along the A345? It simply does not work.

#### 5.2 Comments on specific clauses of the Transport Assessment

Clause 1.2.4. This is wrong. The fact that the Council has refused 3 previous planning applications for land owned by the same developer and are defending their refusal decision for PL/2024/09628 at an Appeal clearly shows they do not consider the location suitable for development. This site was considered and refused when proposed for employment use in the Emerging Local Plan.

Clause 1.4.4. The NPPF points made have already been shown to not be suitably satisfactory. As in previous applications the Developer is re-iterating the same arguments that were incorrect previously which is one reason why the previous applications failed.

Point a.) Apart from one visit to Apsley Engineering, there has been no other engagement with affected local communities over a four year period.

Point c.) There is no wider consideration of the impact on existing transport systems.

Point d.) There is no evidence of this.

Point e.) All claims made on this alternative are unfounded and incorrect.

Point f.) There is no evidence of any such measures.

Clause 1.4.5. The NPPF Paragraphs 115 to 118 and all the details presented with the Transport Assessment on these may presume in favour of sustainable

development but only in the right place which this clearly is not. All as previously stated in the APE Planning submission which has been shown to be inadequate and not fulfilling the NPPF required parameters.

Yet again, this is a remote site and our analysis of the Travel Plan coupled with clear Reasons of Refusal for past applications, coupled with clear statements from hundreds of local residents, coupled with comments from existing employers at High Post all confirm that claimed walking, cycling, taxis, bus and train travel modes are all unrealistic. The proposal is heavily dependent on private car use.

Point a.) Sustainable travel options are highly limited. Private car dependence will be well over 90%.

Point b.) Walking and cycling are unsafe.

Clause 1.4.5 NPPF Paragraph 116. This application presents a piecemeal approach to the development of a greenfield site. Further planned expansion would bring several hundred more cars. This known to all and any application should surely consider the TOTAL impact of possibly 1000 daily car journeys to the site.

Clause 1.4.5 . NPPF Paragraph 117. The requirements of this paragraph are clearly not met. All the points a.) to e.) are either unmet or unanswered by the application.

Clause 1.4.6 relating to CP60. This application fails CP60 because the location is admitted to be remote and there is a huge reliance on private car use. Adding hundreds of daily car journeys and related delivery vehicles adversely affects an already strained road system.

Clause 1.4.7 relating to CP61. This application fails CP61. The applicant reproduces the conditions of this policy. The first requirement is *"to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives."*

It very clearly does not. Hence it fails.

Clause 1.4.8 relating to CP62. We thank the applicant for pointing out that under this policy :

*"Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, "*

Clearly the access IS from the primary route and is outside a built up area. The application fails CP62.

Clauses 1.4.10 to 1.4.12

The applicant is again ignoring results of the Council's own traffic consultants - Atkins (2021) and the 2024 update from Atkins-Relais. The A345 is at capacity at its

Amesbury and Salisbury ends at peak times and most road users recognise the congestion as getting worse.

As hundreds of Woodford Valley resident have stated many times, the valley roads are narrow, unlit lanes with poor road surfaces. The words of Clause 1.4.12 are totally unenforceable.

Section 1.6 BREEAM. The JPC have discussed this subject elsewhere in this Objection.

Clause 1.7.1 Proposed Development Vision in line with para 119 of the NPPF. The JPC dispute this. The open field of the site is not an established employment location. Walking and cycling are not safe options.

The application attract hundreds of private cars and related traffic. It is a "foot in the door" to further declared occupants and the traffic generated will have a significant adverse impact on the local and wider road network.

Section 2.2 sets out the parameters for walking to work.

Given that clause 2.2.7 states that there is a limited number of residences within commuting walk catchment area and given clear evidence already provided by both the JPC and the MD of Chemring that no employees (even the Chemring ones living in Great Durnford) choose to walk to work, then this consideration is pointless. Walking to work is not a viable option. The claims of any significant numbers of employees walking work as made in the Travel Plan are totally unrealistic.

Section 2.3 promotes access by cycling.

This is a repeat of the claims made in the Travel Plan and the JPC have again demonstrated in our response to the Travel Plan that the cycling option is very limited and remains an unsafe option.

Section 2.4 promotes access by bus.

Again, this is a repeat of the applicant's Travel Plan claims. The bus service is less frequent at earlier and later hours of the day and existing businesses at High Post have stated it is incompatible with late or early shift working. Current evidence of bus users to existing businesses shows a limited number of employees using the bus service.

Section 2.5 promotes travel by train and an onward journey by bus or taxi or bike. The JPC believe this ridiculous concept was long ago seen as a highly unlikely option.

Section 2.6 on vehicular access.

There is no mention of "west to east" car journeys. This is testament to the unwillingness to recognise that there must be a huge number of existing CL employees living west of Salisbury who would access High Post via the roads of the Woodford Valley. There is no consideration of the several hundred extra

vehicles that would result from the clearly intended expansion of this field should this application succeed.

#### Section 2.7 on Accessible Amenities

Please refer to the full rejection of some of the false, ridiculous and dangerous claims made in this section within the JPC comments on the Travel Plan.

#### Section 2.8 on existing traffic.

This suggests a vehicle travelling each way every 6 seconds and that 85% are travelling on average around 43mph just 300m from what most recognise as a dangerous junction with 15% in excess of 50mph.

The JPC dispute the selection criteria used to judge safety at the High Post junction. The time frame is limited. Surely sufficient testimonies from local residents and, if checked, from workers in the Filling Station and at the Golf Club, the number of accidents not involving injury to persons. Having a car damaged or written off or simply being involved in a collision or near miss is a distressing event that cannot simply be ignored. There such cases were reported in the Interested Party comments to the Appeal concerning PL/2024/09682.

Clause 3.2.7 The new roundabout appears to be quite tight which will be awkward for two vehicles or a large delivery lorry or the traffic using the A345. Surely with so much traffic a larger roundabout should be proposed?

#### Section 3.3 Road Safety Audit.

We ask why this has not been carried out before the time of application?

*“Stage 1 Road Safety Audits are undertaken at the completion of preliminary design and normally before planning consent is granted, as this is usually the last occasion at which land requirements may be increased and the basic design principles can be altered. At the Road Safety Audit Stage 1 all team members shall visit site together and examine the existing highway layout or features and where the new highway improvement scheme ties into the existing highway”.* Extract from <https://www.road-safety-audit.co.uk/audit-stages.htm>

Clause 3.5.6 Contrary to what is claimed, the application creates huge dependence on private car use for a remote, site that is unallocated for development. It is contrary to Core Policies 60, 61 and 62 and consequently fails CP34.

#### Section 4.0 Traffic Assessment.

The JPC are not experts in this field and we have neither the time or the funds to engage professionals to counter the various claims made.

We have a degree of suspicion over any facts and figures presented by Connect Consultants since previous claims on people easily walking to the site or the ridiculous isochrone maps claiming how many thousands of people were with a 35 minute bus journey to High Post.

In Clause 4.3.3 the traffic flows projected for 5 years are mentioned. But what additional traffic is included ? Have the additional 250 CL employees plus those of the 4 other businesses already identified been factored in? Unless they have been, the JPC contend the analysis is meaningless.

Clause 4.4.4 to 4.4.9 Why is the applicant again presenting the false numbers for the 2 Naish factories? For the past 4 planning applications it has been clearly stated that E.V. Naish involves 120 employees. In choosing to ignore simple facts the conclusions of the analysis involving these numbers is invalid.

Further clauses rely on the incorrect figures provided to 19/09327. Connect Consultants could start by please suggesting how an employee driving from Shrewton might arrive at High Post without using the roads of the Woodford Valley. It is possible, but how many would choose to drive further, longer and at greater cost ?

#### Section 4.5 Trip Rate Information Computer System

This is a theoretical database and means of estimating / calculating traffic flows. Clause 4.5.4 states that the site is located in a *“geographically more remote location than some of the TRICS site”*. Reflecting their use of the technique beyond its designed limits. The applicant concedes that their projections may be incorrect.

The JPC leave it to the Council's Highways Team to analyse the various input factors, projections and claims.

Clause 4.6.2. Yet again the old mantra is wheeled out, but the developer has no legal power to force traffic to come to use designated roads. It simply is an unenforceable suggestion offered with no sanctions.

Clause 4.6.4. Table 4.5 There are no figures shown for the C292 "West" side.

Clause 4.6.6. The figures in Appendix 9 do not seem to show the volume of traffic passing through the High Post junction in peak periods. All figures used are extremely small numbers when compared with Table 4.1

Clause 4.7.1 to 4.7.4. The numbers used do not to correlate with the volume of traffic shown in table 4.1. This table is existing traffic and not proposed with all vehicles coming / going from the site and using the new roundabout access. Looking at the figures in Table 4.6, how is the High Post junction going to cope with the volumes shown here? Currently in Table 2.3 there are 7476 northbound and 7223 southbound vehicles daily but with the proposed development it will increase this considerably. The High Post junction has 591 northbound and say 559/598 southbound vehicles at am and pm peak times. Add the total numbers from the proposed development and it will be significantly more: perhaps an additional 250 vehicles during the peak hour.

Clause 4.8 Multimodal trip assessment. The figures include those walking to work. Who are these 16 employees of Table 4.10? Current employers at High Post

appear to have no employees walking work. We also ask where there are reliable figures for those arriving/leaving by shared cars? This whole analysis is highly dubious. The assessment appears to be selective in the information used and displayed to present what may not be an accurate picture of the resulting traffic flows and peaks.

#### Section 5.0 Junction Capacity Assessment .

If the analysis is projecting forward then is it reasonable to suggest that the declared intent to bring further occupiers to the site should be included in these figures. Without these significant additional figures the projections are meaningless.

#### Section 5.4 Road Safety

There is no mention of the obvious road safety measure of reducing the speed limit. It is clear the applicant does not consider the High Post junction and the related roads at all dangerous.

An obvious road safety measure would be to seek a 30mph limit from well south of the High Post junction to appropriately north of the suggested roundabout.

Increased occupancy of the site would bring additional rail van deliveries and HGV's. Despite anything the applicant may claim, a proportion of all additional traffic will use the C292 and related roads of the Woodford Valley. There is still not Swept Path Analysis to show the problems of passing HGV's on the C292.

Clause 5.4.5 This clause is wrong. The applicant has chosen to ignore the fact that CL is currently located west of Salisbury. The applicant again cites erroneous figures from E.V. Naish. The developer cannot legally or otherwise enforce employees to use some roads and not others.

#### Section 5.5 Conclusions

These are flawed. The capacity assessment cannot be correct unless correct figures are used. The proposed development fails relevant NPPF and Core Policies. The conclusions are wrong and the proposed development is not acceptable.

As we have detailed above there are numerous points from the applicant that we find to be erroneous. All contribute to the application failing Highways issues and the refusal of this application.

## **6. ALTERNATIVE SITES**

Regarding other suitable sites to which CL might relocate: there appears to be a paucity of imagination and an unwillingness to truly look at the potential of other sites' suitability. The proposal prefers to settle on the easy answer of using a greenfield site. There is no doubt that a large open greenfield site can provide whatever the applicant wants. However the planning system is a structured process to produce results which are better for the community at large not the individual's requirements. There are a number of sites which the applicant has

dismissed which could suit the purpose of CL's primary objective of a large consolidated site in which they could expand.

### 6.1 Solstice Park

Clauses 4.56 to 4.63 of the Planning Statement looks at Helix 2 in Solstice Park, a Principal Employment Site in the current Core Strategy. The outline planning permissions at Solstice lapsed and a new full planning application is currently being determined. Firstly, that the original outline permission lapsed without occupants of the site coming forward goes towards disproving the claim that there is a paucity of employment land for businesses in the area. Secondly, the current planning application at Solstice Park, like the outline consents, does not have to be what is built there. It is to establish a principle. The site has been marketed as design and build, something the Planning Statement seems to ignore when it claims the buildings proposed are unsuitable for the purpose of CL. Other buildings more suitable can be designed for the site. Please see Appendix D of the JPC Interested Party Statement in the Appeal documents relating to PL/2024/096282 regarding exchanges between the Joint Parish Councils and one of the Agents for the site indicating flexibility on use and layout of the site. This Appendix is added to the end of this document.

Building 15 at Solstice for instance at 130m x 54m has a footprint of 7020 sq.m and is three stories high. The CL building is approximately 140m x 32m (scaled from supplied drawings) giving a footprint of 4,480 sq.m, far less than the proposed unit 15 which it can be seen is geared towards being a distribution centre, like others at Solstice Park. But it does not have to be built for such use. The sales brochure for Helix shows parking for numerous lorries, removing those, and making the building smaller would free up a lot of space for parking, more than the 235 spaces of the application for CL.

Claiming Solstice Park is unsuitable because there is no space for a 2.23Ha solar array is an invalid statement. There is no necessity for a 2.23Ha solar array for a building to acquire a BREEAM excellent standard, as the Planning Statement claims. And there is no need for the array to get planning permission. It is merely a desire, not a requirement. There is sufficient area on a building the size CL proposes to generate close to 500 kW, areas of the car parking could have further solar panels over it if more solar is desired.

The agents for Helix 2 at Solstice park have said the site would be for sale freehold as well as leasehold. There is no valid reason to reject Helix 2 at Solstice Park as a suitable location. This is confirmed in our Appendix D.

### 6.2 Hiflex House, Churchfields

In Clause 4.66 of the Planning Statement it states: "Hiflex House, at Telford Road, is a single unit of over 11,400 sq.m which is significantly larger than the floorspace that Callen-Lenz require. Due to the requirements of Callen-Lenz to operate a secure site, it also would not be possible to subdivide the building and lease or sell the other units to other occupiers. Therefore, it is not suitable for Callen-Lenz." This

rejection of a site out of hand shows the same lack of vision which rejected Helix 2 at Solstice Park.

Hiflex House is a perfect example of a brownfield site in an industrial setting which should be chosen in preference over a greenfield site which not allocated for development. The site comprises a number of buildings which could easily be demolished leaving a reduced footprint with the main workshop area of Hiflex House remaining. This could then be split internally into office and workshop/storage areas upgrading the facilities within the shell and putting solar panels on the roof. The cleared buildings would leave space for additional parking. The site lends itself to a single entrance allowing the security desired by the applicant.

It is to be noted that the increase in employees from 250 to 500 over the next five years is entirely speculative. To reject sites which do not fit the precise requirements of 500 employees when there is no way of knowing if there will be 500 employees is not logical. There is no valid reason to reject Hiflex House as a suitable location.

### 6.3 Fugglestone Red

In Clause 4.46 of the Planning Statement it states: "Firstly, the application area amounts to over 11ha, which is 3Ha more than the area allocated at Fugglestone Red. Therefore, the proposal could not be located at this site." However nearly 2.5Ha of the application is for Chemring which cannot be relocated to Fugglestone Red and does not need to be co-located with CL. The co-location is for convenience, not necessity. As already said there is no absolute need for a solar array but it could be placed next to CL at Fugglestone red if so desired and considered appropriate by planning. There is no valid reason to reject Fugglestone Red as a suitable location.

In Clause 4.48 of the Planning Statement regarding solar panels it states: "These cannot be roof mounted solar panels due to the curved roof and the quantity required". Firstly, regarding the curved roof preventing fitting solar panels, this simply is not true. It is clear that one of the developers involved has already installed solar panels on a substantial curved roof surface for Birchall Tea at Solstice Park (<https://nationwideengineering.co.uk/case-studies/birchall-tea-factory/>)

Secondly, regarding the number of panels. To achieve BREEAM excellent standard does not require so much power from solar panels as proposed. How would any industrial building without an adjacent field for a solar array be built for a start? Furthermore the footprint of the proposed CL building is approximately 4,500 sq.m. It is to be noted that the nLighten data centre in Milton Keynes completed a 4,500 sq.m solar rooftop installation in 2023. This project involved over 1,000 panels and has a capacity of 478 kW, capable of covering the entire building's power needs during specific summer periods. Close to half a MW of power from the roof alone means rejecting other sites because they cannot accommodate a solar array is an invalid argument.

In Clause 4.54 of the Planning Statement it states: *“Furthermore, the emerging Local Plan listed High Post as a Principal Employment Area prior to its pause at Examination”* High Post Business Park is a Principal Employment Area, the land around it is NOT. The field where this application is location was considered and rejected by the emerging Local Plan. Meaning it is not accurate to state High Post in general is a Principle Employment Area. The site location is not even adjacent to High Post Business Park with a road, a petrol station and the Stones Hotel between the two. It should not take precedent over sites in locations more suitable and allocated for employment use.

#### 6.4 Porton Science Park

In Clause 4.21 of the Planning Statement it states that Porton Science Park has restricted uses. What it does not add is that those restricted uses includes businesses in the defence technology sector.

The document Wiltshire Local Plan: Planning for Amesbury dated September 2023 paragraph 67 states: *“The council will continue to strongly support and promote the principle of the continued development of the Porton Science Park for research and development purposes, to be delivered in accordance with the Porton Down Masterplan, or a subsequent iteration of the masterplan. The council will continue to work with the principal site stakeholders to enable the continued evolution of the site to secure the long-term future of Porton Down as an internationally important site for Health and Life Sciences, and Defence and Security Technologies.”*

In paragraph 64 Planning for Amesbury says: *“Roughly half of the 10Ha site has been completed and the remainder of the site is expected to be delivered within the Local Plan period”*. It is to be questioned why Porton Science park was dismissed out of hand without evidence of further investigation.

A more curious omission from the Planning Statement is Boscombe Down. Planning for Amesbury in paragraph 61 says: *“Boscombe Down is a strategically important employment site for south Wiltshire and has the potential for further inward investment/regeneration to expand its role. The nature of potential future uses is currently unclear, but the strategic policy supports opportunities for regeneration as and when they should arise over the coming years, beyond 2026 when the current lease with Qinetiq comes to an end. This enables opportunities for reciprocal business relationships with defence uses while preserving the military operational uses at its core. Land within the site has been previously identified redevelopment and this remains a possibility (up to 12ha). This land parcel should be considered for future as part of a comprehensive master planning approach to the site”*

Furthermore in Paragraph 62 Planning for Amesbury says: *“The following policy will apply: Boscombe Down Airfield has the potential for inward investment to expand its role that will involve redevelopment, re-use of buildings, and land in the north of the airfield close to Amesbury. Development within and around the airfield should:*

preserve the use of Boscombe airfield and its runways for operational military uses; support a complementary range of defence and aerospace related business”.

CL was recently taken over by BAE Systems, a major company in the defence industry. BAE Systems has a strong connection with both Boscombe Down and QinetiQ. A news item on QinetiQ’s web site from September 2023 states: “BAE Systems and QinetiQ have signed a framework agreement which will see both parties collaborate in the area of autonomous uncrewed air systems (UAS)”.

The application site at High Post is a little over a mile from the end of the Boscombe Down main runway and directly in line with that runway. It lies within the Boscombe Down Flight Restriction Zone. The Civil Aviation authority says: “The Flight Restriction Zone (FRZ) at MOD Boscombe Down (EGDM) is a protected area, usually spanning a 2 nautical mile radius around the runway and extending up to 2,000 feet, which requires strict compliance for drone and aircraft operators to prevent unauthorised entry. It is managed by military ATC (126.700 MHz) with operations often involving high-risk trials and rapid, non-standard flight patterns”.

It hardly needs pointing out that it is incongruous to place a drone company at the end of a military runway, where any use of drones for R&D purposes would be highly restricted. Operating within the secure site at Boscombe Down under the auspices of BEA with their connection to QinetiQ does appear to be a highly preferable situation. Yet the Planning Statement makes no mention of Boscombe Down at all.

The application site at High Post, as part of a parcel of some 500 acres, was offered up by Atlas Planning for submission to the local plan for development. Planning for Amesbury paragraph 58 says: “No sites have been identified for development at Amesbury or High Post over the Local Plan period. The available sites identified at Amesbury and High Post were found to be subject to insurmountable negative impacts making them unsuitable for allocation.”

It is clear that Solstice Park, Hiflex House, Fugglestone Red, Porton Science Park and Boscombe Down are all sites which are on land either allocated for employment use or currently have employment use. Each offering differing aspects which could realistically suit CL. For all these sites the Applicant has given little or no evidence that they have had any engagement with the owners or agents to establish whether they might offer flexibility to accommodate their proposed development. And yet we are expected to believe the only location in south Wiltshire capable of supporting their growth is a singular greenfield site in an unsustainable location which has been rejected by the planning process as suitable for development as employment land. Surely planning should be a plan-led process, not one of opportunism.

## 6.6 Swindon

In Section 2.2 of this document the JPC highlight the fact that a "defence cluster" of drone related business is already established in Wiltshire. If this desire for such

innovation and clustering is so important, then CL should seriously consider Swindon.

### 6.7 Chilmark Estate

Since CL are already located in Chilmark then we bring the LPA's attention to the fact that this large estate is for sale. It has many existing buildings and is clearly capable of being a secure site given its past use.

## **7. LANDSCAPE and LAND USE FRAMEWORK - March 2026**

National Planning Policy Framework (NPPF) advice to LPA's is that they should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

The ALC Map for the South West clearly shows part of the site chosen by CL to be



Grade 2 soil which is "Best Most Versatile". The clear advice from Natural England on this subject is to not allow development on such land.

The recently published **Land Use Framework** (March 2026) makes several most relevant comments concerning the retention of agricultural land of the Best Most Versatile quality. The relevant part of this is shown above. The A345 and buildings around the High Post site are discernible enough to allow the superimposition of the proposed development site. Much of the CL building is sited on Grade 2 land while the remainder of the site is on Grade 3a. Both grades are classified as Best Most Versatile.

Other points made in the Land Use Framework include that :

*"...we need to strategically conserve the agricultural land with the greatest long-term potential for food production, avoid development on nature reserves, introduce habitats for wildlife within farming landscapes, and expand the area of semi- natural habitat."*

Furthermore:

*"England's landscapes differ in their potential for development, agricultural production and ecosystem enhancement. Considering these strengths can help to optimise benefits and reduce potential trade-offs between different outcomes."*

*One of the opportunities supported through consultation responses was prioritising land use change in areas that are less suitable for high-value sustainable agriculture. This allows other benefits, such as environmental improvement, to be maximised while keeping more of the Best and Most Versatile (BMV) agricultural land producing food."*

And concerning planning decisions, that these should "joined up" be "plan-led" :  
*"This government is undertaking significant reforms to move to a streamlined planning system that is plan-led, pro-growth, accessible and understandable to all, and offers greater certainty."*

And on the subject of retaining productive farmland:  
*"Government is clear that food security is national security. We agree with consultation respondents who called for the strategic safeguarding of the best farmland from permanent land use changes, and for improving the resilience of our agricultural land to the impacts of climate change."*

And at a local level the Government is saying:  
*"In both urban and rural areas, communities want to have a greater say over land use change in their neighbourhoods. We heard the need to empower communities to act in the areas that matter to them, making their spaces work better for people and nature."*

The Government is seeking growth BUT the locations must be suitable and the environmental technologies applicable :

*"We are also proposing a 'default yes' to suitable planning applications for developments within a reasonable walking distance of well-connected stations, supporting the intensification of urban and suburban locations, and setting clear expectations for minimum densities in locations with good transport connectivity. These areas, which have the highest demands on our energy system, need to be powered locally and sustainably. By deploying technologies such as rooftop solar, we can make use of existing built land for electricity generation, reducing pressures for land for renewables in other areas."*

This site is not within any reasonable distance of well-connected stations.

The 2026 Land Use Framework has a clear bearing on this application.

1. Best Most Versatile agricultural land should not be built over; it should be retained for food production.
2. Planning decision should be plan-led
3. Food security is a national security concern.
4. The concerns of local communities are important and should be considered
5. Developments should be well connected, within reasonable walking distances of stations. (presumably rail and bus)
6. Rooftop solar is clearly a preferred option.

In respect to the setting, we ask that the views of the Council as expressed in the 2025 Supplementary Planning Document on the Setting of the Stonehenge, Avebury and Associated Sites World Heritage Site be considered.

This is a 157 page highly illustrated and high quality document that was formally adopted in October 2025.

The Council Leader wrote :

*"Wiltshire Council has developed this Setting Study to help guide development in and around the WHS, ensuring that the monuments and their wider landscape are safeguarded from harm".*

In relation to the current application and for High Post in general, ridge lines are deemed important features. The position of these ridge lines is shown in Fig 2.17 where that of which High Post is the highest part is the first and most prominent ridge line to the East of the Stonehenge WHS.

The reports states in Section 5.2.3

*"These ridge lines and elevated areas play an important role in providing backdrops to views across the WHS. They also provide a sense of being within a wider rural landscape. Future research may also identify clear relationships between these*

*more distant ridge lines and elevated areas and some monuments within the WHS. These ridge lines and elevated areas are particularly sensitive to change".*

We contend that since the Council has produced this detailed and presumably very costly advice then it should be taken into account as an adverse visual impact on this ridge line and clearly contrary to the Council's own guidance.

## **8. CLIMATE EMERGENCY**

In 2019 Wiltshire Council declared "Climate Emergency". This must be considered in all decisions of the Council.

We also refer to Wiltshire Council Climate Strategy (2021) and Green & Blue Infrastructure Strategy for Wiltshire and Wiltshire Climate Strategy 2022 - 2027 and has since announced its adoption in the shape of a formal Wiltshire Climate Strategy. This very clear document outlines the challenges faced, the issues to be overcome and the steps Wiltshire Council can take to achieve its stated objective of fighting climate change and achieving carbon net zero.

The Climate Strategy document details that 45% of the County's CO2 emissions relate to transport and the obvious need to reduce this. The same document shows that the Council's own Sphere of Influence signifies how it should not only show Leadership but can Regulate in matters of Planning and Licensing to help reduce CO2 emissions.

The February 2022 Green & Blue Infrastructure Strategy for Wiltshire defines deliverable themes concerning protecting the natural environment and that these themes will be *"instrumental in setting the framework for improving the natural environment"* with the common objectives of improving the Environment and fighting Global Warming. All very clear and the report cited the high percentage approvals gained from public consultation. Wiltshire Council states clearly what its policies are, it also states what the problems are and how it is very much in a position to tackle them by methods including Planning.

Some of the very clearly stated points of this Strategy are :

In respect to Transport: The Council will look to *"Locating and designing new developments to reduce the need to travel"*. It will also *"use planning powers .... to create places that enable local living"* and will *"reduce transport emissions through planning policy"*.

It is fully appreciated that there is a need to increase walking, cycling, use of public transport and ultimately for all vehicles being electric. BUT this location fails to attract walkers or cyclist and will simply result in massive private car use.

In respect to the Natural Environment, Food and Farming : One key objective is to *“protect and extend our network of green spaces and land and water habitats”*.

Another involves the *“efficient and environmentally sensitive use of land”* and the need to *“absorb carbon by plants and well-managed soils”*.

The JPC hope these above declarations are not just considered but firmly put into practice when it comes to applications to develop over open farmland in remote sites.

## **9. WATER SUPPLY**

There are no details provided on water supply, merely an assumption that it will be provided by a borehole.

It is indicated that on average a person in a workplace will consume around 50 litres of water per day. The current permitted abstraction levels would require a development of this intended size to have a permitted borehole.

However, defined policies from Wessex Water include a desire to reduce abstraction from our chalk aquifer of up to 82 million litres of water per day. There are defined objectives within their Water Industry National Environment Programme (WINEP).

This programme has the stated intents of :

- **Substantial Reductions in Existing Licences:** By 2035, Wessex Water commits to reducing abstraction licences to protect chalk streams, specifically the Hampshire Avon, which will result in an 82Ml/d reduction in available water supply during drought conditions.
- **No Increased Abstraction for Growth:** Their policy aims not to meet new development growth in the Hampshire Avon catchment through increased abstraction.
- **Environmental Protection over Expansion:** The company works with the Environment Agency to ensure that if new licences are needed, they comply with strict environmental standards. They are committed to preventing deterioration of water bodies and will only pursue new sources if they do not negatively impact ecological status.

As our climate changes, so too do the extremes recorded in the borehole data where high winter rainfall is needed to replenish the aquifer. Recent long, dry summers endanger water levels in the River Avon and threaten its rare and protected ecology.

The proposed site would abstract water from the chalk aquifer less than 2km from the protected River Avon SAC and SSSI. Further abstraction for intended industrial consumption on the scale intended for High Post is not welcome. The Joint Parish Councils have raised these concerns with the Environment Agency via and FOI and would have asked them to examine all existing abstraction permits in the High Post area and oppose any further significant abstraction.

In addition to these concerns, we note that the Environment Agency (EA) has stated further issues in its OBJECTION to this application. The EA point out the significance of the chalk aquifer and the risks of contamination. We trust that after receiving the JPC concerns that the EA would place serious constraints on possible new borehole abstraction to serve over 1000 employees.

## **10. ECOLOGY**

We find various failings in the submitted Ecological Appraisal.

As much as it is stated that the assessment was only preliminary, it is clearly a limited, desk based study with a one day field check.

### **10.1 Bats**

The assessment fails to pick up on previous Ecological Studies from the same developer starting in that accompanying PL/2021/11914.

For clarity, the Joint Parish Councils forwarded the report details of Ecology Solutions to the Wiltshire Bat Group and submitted the following text as part of our Objection.

*"The assessment of Bats is concerning; it states that the 2 hour hand held survey recorded 2 species of Bats but that the automated device recorded 7 species. This same report conceded that the one mature copse may offer roosting and resting sites to bats but since none was actually seen roosting during the short observation time, then there may not be bats in any of those trees ! The recommendation is for soft felling and to immediately stop work and call an ecologist if any are bats found.*

*The report fails to state just how rare the Barbastelle, Leisler and Nathusius' pipistrelle bats really are. We have had a very good look at the various reports on Bats. It is worth noting that each of the bat species may have a different "encounter rate" which reflects their population density, their foraging strategy and how they use the wider landscape, as well as their echolocation characteristics. For example, species such as the horseshoe bats, brown long-eared bat and Barbastelle have a relatively quiet echolocation which reduces the frequency with which they are recorded. Conversely, pipistrelle bats and Noctule bats are common and widespread, but also have very loud echolocation, producing a higher encounter rate. It is therefore necessary being cautious when comparing activity levels of different bat species – pipistrelle bat passes will always dominate the activity*

*recorded, and even small numbers of passes of horseshoe bats and Barbastelle bats are highly significant.*

*With this in mind, the relatively low numbers of passes of Barbastelle bat and Serotine bat, understate the importance of these species. Each of these species is formally listed as vulnerable to extinction.*

*Likewise, the Greater horseshoe bat and Lesser horseshoe bat also have very quiet echolocation, and the low numbers of passes recorded understate their importance at this location. According to available records, the nearest Barbastelle breeding colonies are in Grovely Wood and possibly Porton Down which are a considerable distance away and the presence of these bats around this single copse of trees should at the very least raise concerns with Wiltshire Ecologists and cause them to reject this application."*

## 10.2 Birds

The Stone Curlew is a protected species. The JPC finds it shocking that it is acceptable to "mitigate" against a protected species and even more so that the RSPB actually supports this initiative.

No details are given on the ownership of the 2 plots that are suggested to be offered up for the "lifetime of the development". Surely the Applicant (at their cost) needs to present the LPA with a legally acceptable documents detailing these suggestions and how the equal amount of land would be set aside for the duration of the development.

There is no consideration of Skylarks and other birds.

The JPC believe that a Habitats Regulation Assessment of this situation is required.

## 11. BREEAM

The submitted BREEAM AP Statement does not go into great detail of the scoring process but it is assumed that the scores were self-assigned by the developer's consultants. This is acknowledged in the Statement where it is written that "*the credits currently targeted have had to include some assumptions*".

In a January 2024 discussion paper on building certifications such as BREEAM, The University of the Built Environment commented that :

*"Sustainability sells. Once seen as purely a 'nice-to-have' aspiration to satisfy fringe stakeholders, consumer pressure and government legislation have placed it at the forefront of the business agenda. More significantly, however, is how sustainability is transitioning from an environmental movement to a commercial one."*

The article goes on to make several criticism of the actual scoring method and points out that the BREEAM concept is nothing new.

#### 11.1 Points of concern

*"There is too much focus on operational carbon emissions – in other words, the emissions produced from a building's usage. This focus excludes the embodied carbon emissions produced in the construction process, and subsequently fails to reflect the 'true' sustainability credentials of a building .*

*Many also believe these certifications don't go far enough. While they focus on environmental factors (with others like the WELL BEING Standard incorporating physical and mental health), their breadth is confined to structures themselves, and an asset's impact to society, business performance and the behaviour of individuals isn't considered.*

*It can be misleading (and difficult to maintain). While green certifications look good and can support brand reputation, they can also be misleading and fail to reflect the true environmental credentials of a property or business.*

*They're easy to manipulate (and can't be 100% accurate). Some green certifications don't represent a wholistic view of sustainability, which can lead to irregularities that dramatically impact the end rating a building receives. For instance, it's more difficult for a naturally ventilated building to receive a BREEAM "excellent" rating than a mechanically-cooled one, which, ironically, means air conditioning appears to be favoured over windows.*

*Similarly, these certifications are also open to manipulation, as buildings can be overly rewarded for shiny new sustainability features and innovations, rather than the true sustainability performance and credentials of the project itself. "*

#### 11.2 BREEAM Score of "Excellent"

We apologise if we have got this wrong but it appears the Pre-Assessment scoring was undertaken by the very same architects who have designed the buildings. The preliminary scores is simply an estimate. The threshold for "excellent" is 70.00%

It appears there are 9 Issue Categories bearing a total of 100% "Issue Weighting" but that there is a 10th Category (Innovation) that adds a possible additional 10% meaning that the Total BREEAM Score of 70.79% presented in Section 3.3 of the BREEAM AP Statement is out of 110. In simple terms surely 70.79 out of 110 is 64.35% - which defines a score of "Very Good".

Our observations are that the preliminary score assigned for Health and Wellbeing is clearly flawed and if this alone was correctly revised downwards then the total would be below 70. This fails "Excellent" and thus fails CP41 requiring non-residential developments to be at this standard.

### 11.2 Issue Categories

The BREEAM Statement offers no details of how each "targeted credit" is arrived at. This lack of clarity only fuels concerns.

However, there are a few of these Categories where it is possible to offer comments that would surely reduce the appointed scores.

The one we have the most details on is Health and Wellbeing since the Travel Plan cites the various amenities within 500m of the proposed development. For this Category the assessors issue a score of 8 out of 11 to gain a weighted score of 7.27% out of a possible 10% (Is this score "excellent"?).

However, we ask the Case Officer to look carefully at some of the details presented as local amenities in Table 2.2 of the Travel Plan that the applicant claims as supporting the Health and Wellbeing score:

A. It is a Lonsis store (nor Spar) within the filling station. There is no pedestrian access other than across private land of the Stones Hotel car park or an approximately 200m walk along the A345. This is a dangerous route. The store itself offers a limited choice of items and is of course expensive compared to the nearest supermarkets in Amesbury.

#### B. ATM

There is **no** ATM in the Lonsis store or associated with the filling station.

#### C. Recreation and Leisure facility for fitness or sports

This is the High Post Golf Club. It is a private club with substantial membership fees and only offers GOLF. In addition to a 200m walk along the A345, the employee needs to cross the A345 which has been stated time and again to be a dangerous undertaking

#### D. Community Facility

It is another deception to classify the Stones Hotel as a "community facility".

E. The nearest pharmacy is 5.2km away, the nearest Post Office is 2.6km away and the nearest GP surgery 5.2km away.

Given all these failings, how can Health and Wellbeing score so highly? The JPC contend that the initial score should be very much lower than 8 out of 11 .

This liberal use of "alternative facts" leads us to question the validity of other scored categories.

We immediately question some of these.

- In the case of "Transport", the Travel Plan has totally unrealistic claims on the numbers of employees who would walk or cycle to work, yet the Statement scores 10 out of 12 for this.
- For the "Water" category we see a score of 7 out of 12 but it is envisaged that a borehole will be sunk to abstract from a precious aquifer that impacts the River Avon SAC.
- We fail to see how a high score for Land Use and Ecology has been assigned when the proposal takes Best Most Versatile soil out of production in a Special Landscape Area and where the Ecology Assessment fails to have noted the presence of bat species described as "vulnerable to extinction" and displaces protected bird species.

It is hard not to find resonance with the comments of the University of the Built Environment. This self-scoring assessment appears seriously flawed.

### 11.3 BREEAM Score of "Excellent"

We apologise if we have got this wrong but it appears the Pre-Assessment scoring was undertaken by the very same architects who also designed the buildings. There appears to be both a conflict of interest and opportunity for bias when marking their own homework. The preliminary score is simply an estimate. The threshold for "excellent" is 70.00%

It appears there are 9 Issue Categories bearing a total of 100% "Issue Weighting" but that there is a 10th Category (Innovation) that add a possible additional 10% meaning that the Total BREEAM Score of 70.79% presented in Section 3.3 of the BREEAM AP Statement is out of 110. In simple terms surely 70.79 out of 110 is 64.35% - which defines a score of "Very Good".

In 11.2 above we raise questions over some other scored categories. Our observations are that the preliminary score assigned for Health and Wellbeing is clearly flawed. When this alone is correctly revised downwards that the total would be below 70.00. This fails "Excellent", and thus fails CP41 requiring non-residential developments to be at this standard.

We simply do not believe the conclusions of the preliminary BREEAM scoring.

## **12. SOLAR ARRAYS**

These should not be part of this application. The Land Use Framework is clear that the BMV agricultural land should neither be developed or used for solar arrays.

### 12.1 Chemring Solar Array

CCM already have planning consent for 2.9 Ha of their land for a solar array. This was applied for in 2023 and gained in 2024. If this provision is considered so urgent then why has CCM not even started on the installation of the already

approved site ? Clause 4.101 of the Planning Statement says that "*solar fields can be erected quickly*"

The CCM site is around 40Ha. Simple viewing of it on satellite imagery shows large unused areas. It is appreciated that space is required between buildings and that the site is covered by certain licences. However, there appears to be sufficient spaces for additional solar arrays on their site without needing to take away valuable farmland.

### 12.2 Callen-Lenz Solar Array

In respect to the proposed CL building, if harnessing their own electrical supply is so vital, why are solar panels not proposed for their very extensive roof space ?

#### 12.2.1 Previous Building Designs

All 8 buildings of PL/2021/11914 had curved roofs and all with small numbers of solar panels.

All 5 buildings of PL/2022/09262 had curved roofs. 4 of the 5 show solar panels. The one not detailed is the Police building

All 5 buildings of PL/2023/07223 had curved roofs. 4 of the 5 show solar panels. The one not detailed is the Police building

Both APE buildings of 2024/09682 have curved roofs and limited solar panels.

In all the above buildings where solar panels are shown they are typically just 10% to 15% of the roof space. Why so few solar panels on each roof ??? Probably because that gives sufficient electricity.

#### 12.2.2 "Solar Panels cannot be mounted on Curved Roofs"

Clause 4.48 of the Planning Statement states that in the case of solar panels:

*"These cannot be roof mounted solar panels **due to the curved roof** and the quantity required."*

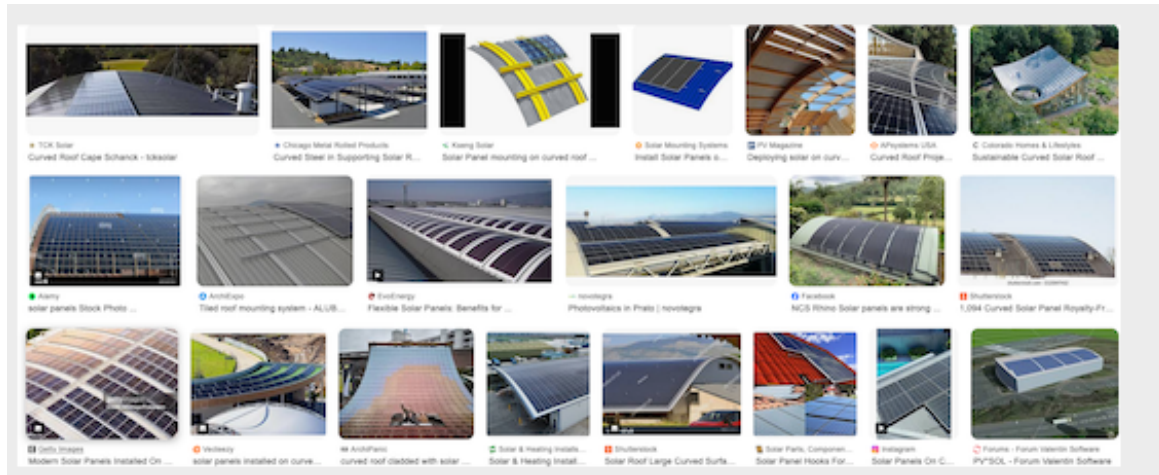
(bold and underlined emphasis added by the JPC)

This claim is clearly incorrect for a number of reasons. As already stated above, all previous planning applications from the same developers and architect for High Post have show buildings with curved roofs and solar panels.

Secondly, simple searching on the internet for images of industrial building with curved roofs and solar panels throws up numerous examples.

In respect to the proposed CL building, IF harnessing their own electrical supply is so vital, then why are solar panels not proposed for their very extensive roof space? Why would CL look to purchase 2.23Ha of expensive development land for a solar array instead of installing them on its intended roof?

Below is an image taken from a simple search for images of curved roofs with solar panels.



A detailed debunking of this claim is given in the description of solar panels on the curved roof of the Birchall Team building at Solstice Park. This construction is the subject of a proud video presentation by Nationwide Engineering. It is bizarre that this claim is made when Nationwide Engineering is stated to be the Principal Contractor to the intended CL building.

This is a link to the relevant page of Nationwide Engineering's website:

<https://nationwideengineering.co.uk/case-studies/birchall-tea-factory/>

Looking further into the claims about solar arrays made by the applicant, Core Policy 42 is cited as a supporting reason. However, simple reading of CP42 reveals firstly that the text supporting solar is totally for HOUSES and HOMES. Secondly, Criteria viii.) of CP42 states that satisfactory assessment is needed to ensure that Best Most Versatile agricultural land is not impacted.

This application is contrary to the principles of CP42.

The applicant states that some excess electricity generated by the solar arrays will be fed to the grid. We refer the Case Officer to Appendix F of the JPC Comments on the Appeal Ref 6004352 against refusal of PL/2024/09682. This showed that the electricity grid locally is at capacity and cannot take any further power inputted to it.

The JPC questions if these solar arrays are either necessary or even a true intention .

### 12.3 Solar Panels and BREEAM

Clause 4.48 of the Planning Statement Clause also states:

*"to achieve BREEAM Excellent standards, in compliance with the requirements of the Core Strategy (Policy 41), the proposed Callen-Lenz building will be supported by a large area of solar field to ensure it utilises renewable energy.*

As much as the LPA and all concerned recognise and strive for BREEAM excellence. It should be noted that solar is not implicitly needed for BREEAM but helps.

An 0.5Mw of power from a roof array would be enough to make a significant difference for BREEAM. There is no need for the solar array at all. It can all be on the roof. If CL wanted more, there could be panels over parts of their car park.

This practice is becoming more common, doubles the use of the land and reduces the need to put solar arrays over green spaces. Again there is no valid reason to have the big 2.23Ha solar array feeding CL.

This is a spurious reason for not looking to locate elsewhere.

As the JPC reported in Appendix F of their Appeal document, on the generation side, none of the SSE substations have any headroom. That is, the system cannot take any more new sources of electricity (wind farms, solar farms etc). This applies to both substations feeding High Post and the Bulk Supply Points.

As far as the JPC can ascertain solar panels are not essential to achieve BREEAM Excellent standards. However, because solar panels (Photovoltaics - PV) are one of the most efficient, widely available, and cost-effective ways to earn credits in the Energy category (which is heavily weighted), they are considered a "go-to" technology for achieving this rating.

**How to Achieve BREEAM Excellent Without Solar Panels** BREEAM is a flexible, holistic assessment method, meaning you can achieve the required 70%+ score (for Excellent) through other methods or a combination of measures:

- **Focus on Energy Demand Reduction:** Instead of creating energy, you can avoid using it by designing a building with superior airtightness, high performance insulation, and natural ventilation.
- **Alternative Low/Zero Carbon (LZC) Technologies:** You can use ground source heat pumps, air-source heat pumps, wind turbines, or biomass systems.
- **Energy-Efficient Lighting/HVAC:** Installing state-of-the-art energy-efficient lighting systems and Building Management Systems (BMS) for HVAC can gather significant credits.

- Maximise Other Categories: BREEAM Excellent is a total score. You can excel in other areas, such as Materials (recycled/low-carbon), Ecology (enhancing site biodiversity), Transport (near public transport), and Water Efficiency.

Why Solar Panels are Common for "Excellent" Solar PV directly addresses the Ene01 (Energy/Carbon performance) credit, which is crucial for high scores. Whilst they can be substituted with other energy-efficient technologies, solar panels often provide the best return on investment for the required credits, particularly in industrial or commercial developments.

In summary, to achieve BREEAM Excellent without solar, an assessment must significantly over-perform in energy efficiency, water, materials, or ecological categories, or utilise other renewable technologies.

#### 12.4 Fire Risks

The solar array approved under PL/2023/04203 was a simple array which fed into a transformer unit and thence via a high voltage cable to a distribution point with the CCM site. No Battery Energy Storage Systems (BESS) were proposed.

But this new application involves BESS in each proposed solar array.

Simple searching reveals that such battery units are not infrequently associated with fires. This is an extract from the findings of the fire at the Court Farm Solar Array near Cirencester in March 2025.

*"While the use of batteries is nothing new, what is new is the size, complexity, energy density of the systems and the Li-ion battery chemistry involved – which can lead to significant fire risks.*

*These risks are exacerbated by the fact that many of the new users of BESS's are not energy specialists. Previously, these systems would have been used by companies that had an in-depth understanding of their uses and potential dangers. Today, a buyer of a BESS is just as likely to be a property developer, council or university, with limited understanding of the inherent hazards".*

This is a link to the report

<https://eticaag.com/a-fire-at-the-cirencester-hybrid-solar-farm/>

The fire risks are not just the toxic fumes that affect people but also the very nature of what CCM produce and store. In short - why place a fire hazard in close proximity to a licensed explosives site ?

Please can the Case Officer make Dorset and Wiltshire Fire Service aware of this risk and seek their definitive comments. This comes at a time when there is talk of closing the nearest fire station in Amesbury.

For all the many reasons stated above the notion of solar panel arrays on this site should be soundly rejected and the application refused.

An April 2026 report from Thornhill Security looking at all different battery related fires in the South West reported :

*Solar battery incidents recorded by Avon Fire & Rescue rose from 3 in 2023 to 14 in 2025 – an increase of over 360%*

*As more businesses and commercial premises install rooftop solar alongside battery storage systems, this category is becoming more of a commercial concern.*

### **13. PLANNING APPLICATION 16\0507\FUL**

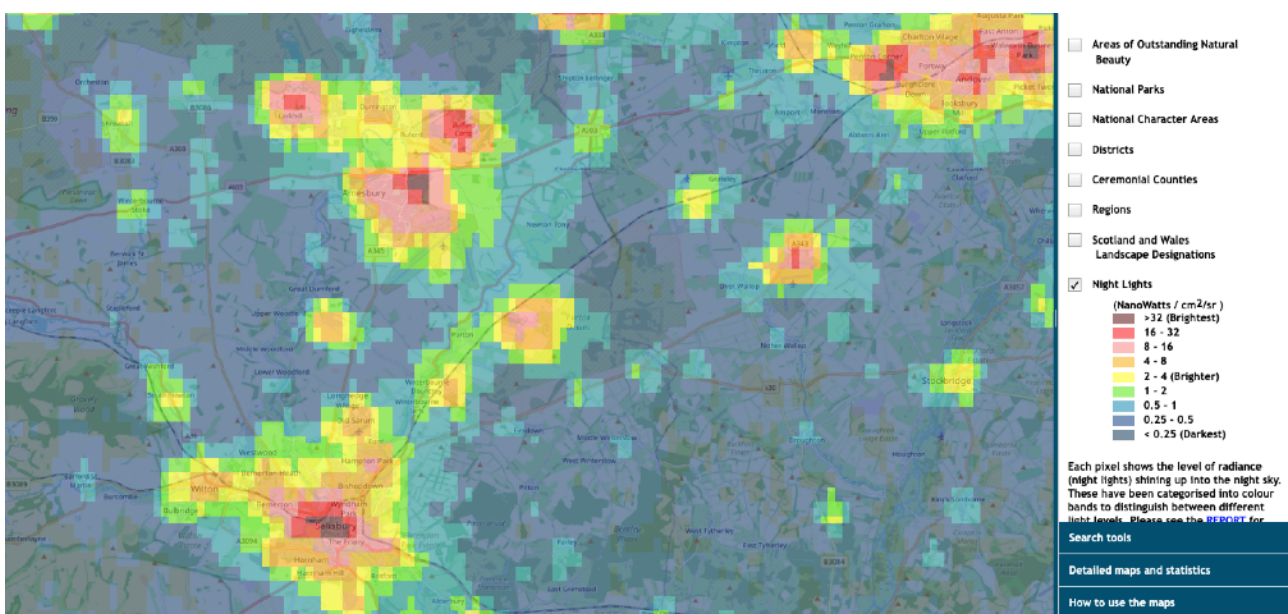
We ask that the Case Officer examine carefully the claims and undertakings made in respect to Planning Application 16\05072\FUL. This application approved the construction of a single house at the High Post farm site.

There are specific be conditions attached to this above application that may need to be correctly considered and applied.

### **14. LIGHT POLLUTION**

As in previous application, particularly PL/2024/09682, we are told that there will be no light pollution.

We draw attention to the existing situation at High post as shown on the CPRE site on Light Pollution of the Night Skies.



In this above image the light cluster around Salisbury is in the lower left side with Andover top right. High Post brightness is clearly to be seen between Salisbury and Amesbury. Its night time light signature is the same as Wilton and larger than those of either Stockbridge or Shrewton.

Clearly there is an existing problem and simply adding to this is not a good option. The JPC find it hard to believe that significant lighting that would be required for the car park area and for the high security that the applicant requires will NOT add further light spill.

We do not accept this. We invite the Case Officer to visit the Woodford Valley on a dark night and witness the existing light spill. Additional security and car park lighting would only add to this pollution.

## **15. ARCHAEOLOGY**

As in previous applications we are told that a site that is widely recognised as having archaeological significance, actually has none. Previous applications reveal archaeological investigation that detail the richness of this area.

The JPC trust in the judgement of the County Archaeologist.

## **16. OUTCOME OF APPEAL HEARING FOR REFUSAL OF PL/2024/09682**

There are serious points that will be determined in Appeal Ref 6004352 against the Refusal of PL/2024/09682 that have a direct bearing on this new application PL/2026/01867.

These are specifically, Refusal Reasons 1, 2 and 3.

Refusal Reason 1 included the facts that the High Post location is remote, outside any development boundary, was not supported by adequate walking and cycling infrastructure and is considered a car dependent location.

This reason of Refusal goes on to cite inadequate footways along the C292 that require a pedestrian to either walk on an often wet and uneven verge or in the narrow carriageway itself.

We note the Council's own statement that current private car use for Apsley Precision Engineering (APE) is 92%. We also recognise that a key part of Refusal Reason 1 is the danger posed to walkers and cyclists using the High Post Junction, especially those seeking to cross the A345.

However, the other key factors of Refusal Reason 1 highlight the dangers still existing within the new application.

Refusal Reason 2 centres upon the safety issues of the C292 High Post Road and clearly states concerns of the width of the road and the dangers that traffic poses

to any pedestrians or cyclists. No matter what the outcome of the appeal is, this very real danger remains in place for the initial and projected numbers of employees who will walk or cycle to work.

Refusal Reason 3 focuses on pedestrian safety mainly concerning access to existing bus stops. While we recognise that a proposed new road about and proposed new bus stops with "half way" pedestrian "island" across the A345, the real concerns detailed in this earlier Refusal still very much apply to this new application.

The new application makes claims on the provision of local amenities as a method to increase their BREEAM score. However, to access the facilities of the filling station and employees will be expected to walk along an approximately 200m stretch of the A345 with no footpath and to cross the A345 in the vicinity of the filling station to access the suggested leisure and recreation facilities of the Golf Club.

## **17. EMERGING LOCAL PLAN**

The Council will understand the status of the Local Plan far better than the JPC. We believe that even when now withdrawn, the Council's response to the Inspectors is that they very much believe in the 9 years of hard work that went into this plan.

As the Land Use Framework makes clear, planning should be plan-led.

The site of this application is within Site 3710 that was duly examined and excluded for consideration as employment land with the Council adopted Local Plan. Other employment land in South Wiltshire was clearly identified.

## **18. CONCLUSION**

This application fails so many planning criteria.

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 and CP34.

Callen-Lenz cannot be considered as essential to the economic development of Wiltshire. The Joint Parish Councils have demonstrated that there are viable alternative sites and we reject the often repeated claim that the chosen site is the only site. There is no material planning need for CL and CCM to be co-located.

Government policy is that the Best Most Versatile agricultural land should be retained for food security reasons rather than developed.

Government policy as stated in the Land Use Framework his that planning should be plan-led.

Despite a proposed roundabout, the C292 High Post road remains a concern - not just that it is unsafe and unrealistic for walking along and presents a danger to cyclists. It is narrow, unlit and with poor road surfaces. In short it is as the Council have described, substandard. 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.

Local amenities are simply not as described by the applicant. In addition, access to the limited amenities that do exist 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.

We urge that this application is refused.

## **APPENDICES**

We attach Appendix D from the Interested Party Comment made by the Joint Parish Councils to the Apsley Precision Engineering's appeal against the refusal of PL/2024/09682

### **Joint Durnford & Woodford Parishes email exchanges with Lambert Smith Hampton, one of the agents for Helix II site at Solstice Park, Amesbury in February 2026 and June/July 2025:**

*25<sup>th</sup> February 2026 - 4.11pm - To: Dan Rawlings / Lambert Smith Hampton*

Dear Dan

Further to our recent conversation I attach a proposed site plan as it appears in the planning application documents for a site at High Post between Salisbury and Amesbury to which I referred and which I think you have seen before. Planning on this site has been refused for a number of reasons and is now the subject of an Appeal. The local Parish Councils are opposing the appeal.

One point made by the Appellant is that there are no suitable buildings available in the locality either leasehold or freehold.

I am aware that there is currently a revision of planning application PL2023/04997 for Helix phase II at Amesbury in progress, and I understand from you that your client would be flexible about the layout or a revision of the layout to accommodate an industrial user. I also understand from our conversation last year that there should be sufficient space at the Helix II site to accommodate buildings of the size on the attached plan. From the building sizes shown on the Helix application this would certainly seem to be the case. I also see that there is an acoustic report by Hann Tucker describing mitigating actions to protect surrounding buildings from noise pollution during construction and occupation.

I think you said that on site three phase power would be available and your client would be happy to discuss requirements for specific usage levels. I assume you have not been approached in this respect at this stage. I further understand from you that your client would be open to negotiation on a freehold sale of units on this site.

We should like to be in a position to evidence the availability of this site to the Appeal's Inspector and would be pleased to have your confirmation of all these points and your confirmation that we can use the information as above in support of our arguments.

Please could you therefore let me have confirmation of the position as soon as you are able.

Many thanks

XXXXXXX

Reply: 25<sup>th</sup> February 2026 – 5.03 pm – From : Dan Rawlings / Lambert Smith Hampton

Hi XXXXXXX

I can confirm we previously held and marketing (*sic*) on a freehold or leasehold basis, employment space on phase II of Helix Park, Amesbury. This consisted of up to 137,295 sq ft of B1/B2/B8 uses, being able to accommodate on a design a

**Dan Rawlings**

Director - Co-Head of South East Industrial & Logistics  
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Mob: 07702 809192  
Email: [DRawlings@lsh.co.uk](mailto:DRawlings@lsh.co.uk)

nd build basis from 15,000 sq ft up to 85,000 sq ft on a single build.  
This permission lapsed and so we have been engaging with the local authority on a revised application as you have detailed in your email below.

Three phase power will be available for each property and we would welcome the opportunity to discuss occupier requirements on a leasehold or freehold basis (subject to planning) for Helix Park.

Kind regards

Dan Rawlings

Reply: 25<sup>th</sup> February 2026 – 5.08pm - To: Dan Rawlings / Lambert Smith Hampton

Thanks Dan, is it OK for us to quote this to the Inspector ?

XXXXXXXXXX

Reply: 26<sup>th</sup> February 2026 – 7.58am – From : Dan Rawlings / Lambert Smith Hampton

Morning XXXXXXX,

Welcome to.

Kind regards

Dan Rawlings

**Further Durnford & Woodford Parishes exchanges with Lambert Smith Hampton, one of the agents for Helix II site at Solstice Park, Amesbury in June 2025 :**

*27<sup>th</sup> June 2025 – 3.49pm - To: Dan Rawlings / Lambert Smith Hampton*

Hi Dan

Further to our conversation the other day I wonder if you could advise whether the Helix 2 site at Amesbury might be suitable to accommodate two buildings similar to those shown on the attached layout plan. Building 1 would be approximately 2500 sq mtrs and Building 2 approximately 1300 sq mtrs.

Also please confirm whether if these could be built whether the completed site could be made available freehold.

Many thanks

XXXXXX

*Reply: 30<sup>th</sup> June 2025 – 4.38 pm – From : Dan Rawlings / Lambert Smith Hampton*

Hi XXXXXX

Hope you had a pleasant weekend.

Absolutely, co



nfigurations can be tweaked (as per attached example plan), but we are restricted by the estate road.

We can also offer the units freehold.

I am happy to send across quoting terms on a leasehold or freehold basis subject to confirmation of covenant and specification i.e. eaves height/office/content/parking requirement etc...

Kind regards

Dan Rawlings

*Reply: 1<sup>st</sup> July 2025 – 4.22pm - To: Dan Rawlings / Lambert Smith Hampton*

Thanks Dan, what is the estate road restriction??

xxxxxxxxx

*Reply: 1st July 2025 – 9.18am – From : Dan Rawlings / Lambert Smith Hampton*

Hi XXXXXX,

No restriction per say (*sic*) but more for configuration of the wider state that is the best place for the estate road and so units are more rectangle rather than square along that stretch.

Kind regards

Dan Rawlings