

Further Comments from Durnford and Woodford Parish Councils

1. Introduction

We are somewhat surprised at the response from Highways Development, a department of the Council we are not familiar with. We find the response to be highly selective not just in the summary dismissal of many reasons for refusal of past applications but in the broad acceptance of the current application contrary to previous Highways recommendations.

A prime reason for three previous refusals at High Post, and the Council's decision to defend the latest refusal at an Appeal, is the fact that the proposed developments have not been sustainable in transport terms. Nothing in this latest application has significantly changed that might reduce the overwhelming dependence on private car use to reach the application site. It is a remote location where:

walking to work is both unsafe and unrealistic,

cycling is both unsafe and not an appealing option and

bus travel is clearly not a popular option based on existing lack of usage.

We believe the application site remains one where there will be an unavoidable reliance on private car use creating a large increase in traffic on the local road network. This makes the site unsustainable, by definition, using the Council's own transport and climate emergency criteria.

We contend that there is a fundamental misconception in Highways Development's comment which undermines the validity of the belief expressed by Highways that the application is sustainable on transport grounds.

The Highway's comment states: *"Callan Lenz is currently located at Chilmark well away from any significant population centres. As it continues to grow taking on more employees as set out in detail within the application documents, locating the development close to Amesbury and Salisbury with good public transport facilities as above will considerably reduce the number and length of private car vehicle miles travelled."*

However, Callan Lenz (CL) currently operates from four locations, Chilmark (as stated) plus Fonthill, Salisbury and Bristol. There is no evidence in the application about the distribution of employees across these locations, nor where any potential expansion might occur, or be capable of occurring within those four sites.

CL's current building at Chilmark is part of a farm barn conversion, shared with a number of other companies, there is a physical limit to the number of people who can work there, limiting considerably its potential for expansion. If they could expand at Chilmark, why build expensive new premises elsewhere? There is no

evidence within the application to support Highways Development's claim that moving to High Post would reduce car movements.

Looking at CL's job vacancies shows that the majority of current vacancies for Chilmark are hybrid, utilising working from home, perhaps to ease pressure on their current office space. If the new development were to replace hybrid working with office working, this would increase the number of private car miles travelled not reduce it, as claimed by Highways Development.

This is of course speculative, as is Highways Development's comment. There is no evidence to support Highways Development's claim that the number and length of private vehicle miles travelled will be considerably reduced. We believe the opposite is more likely.

Furthermore, we have shown that there are locations in Salisbury and Amesbury where CL could expand if they so desired. These locations would be expected to reduced vehicle movement and truly be accessible by foot and cycle. We contend High Post is not a sustainable location, as shown by the numerous previous Highways comments to previous applications at High Post.

2. Summary of past Comments from Highways

We find the current Comment from Highways Development to be somewhat inconsistent with four previous Comments (Objections) from Highways under the name of Sustainable Transport. We present a summary of those 4 previous Objections.

Also, the claim from Highways Development that there was "*no highway comment*" against PL/2021/11914 is incorrect. A Comment is there to be seen on the application site.

In all four applications (PL/2021/11914, PL/2022/09262, PL2023/07223 and PL/2024/09682) there are six consistent points of Objection. These are:

1. Safety concerns for those walking along any roads, crossing the A345 to access bus stops. These observations conclude that there is no modal shift away from very high private car use and thus the development fails CP60, CP61 and CP62 and the NPPF section 9, paras 103,103,108,110 which aim to reduce the need to travel particularly by private car and encourage the use of sustainable transport alternatives.
2. Cycling. This subject is specified and found to be an unsafe and unattractive option. The objections from Highways to past applications is well summed up in reference to PL/2024/09682: "*in reality, this clearly illustrates how poorly connected the site is by cyclable infrastructure. Cycling to this location lacks appeal.*"
3. Lack of swept path analysis for HGV's at the High Post junction.

4. Concerns for safety along the C292 that the Council terms substandard.
5. Modelling of the High Post Junction.
6. Walking, cycling and public transport. Two applications group these together and conclude that these options are very low and that the reliance on private car use is high and thus fails CP60 and CP61.

One very clearly stated point made by Highways against PL/2022/09262 concerning crossing the A345 to get to the southbound bus stop is :

"There is no pedestrian phase on the signalised junction at the A345 crossroads. The bus stop for southbound buses is located opposite the petrol station and currently serves High Post Golf Course. Passengers alighting the bus would be required to cross the busy, 60mph A road. There is no footway opposite the southbound bus stop so no safe pedestrian route to and from this bus stop and the site. Figure 2.3 in the TA appears to show a pedestrian route across the petrol station forecourt, this is not public highway and the route cannot be secured. It could also result in potential conflicts between pedestrians and vehicles entering / exiting the petrol station. The bus stops are not connected to the site and in the absence of this link, the bus cannot be considered to be a viable option."

In addition to these common points, different applications point out other failings.

Against PL/2021/11914 Highways referred to the capacity of the road network in stating that the Wiltshire Local Plan Transport Review 2021 illustrates that C292 in the vicinity of the site is reaching capacity. This resulted in Refusal Reason: *"The proposed development is therefore believed to further impact upon a congested highway network that would implicate the sustainability of local communities and areas contrary to Core Strategy Policy 60, 61 and 62."*

Note that this referred to the 2021 Atkins report that was further supported by the 2024 Atkins-Relais report on the same subject.

Against PL/2022/09262 Highways commented on the suggestion of restricting access to the C292 and the roads of the Woodford Valley to the West.

Highways commented that the claims of the Transport Assessment and Travel Plan to somehow deny employees access to these roads by placing signage and telling employees not to head West is *"insufficient"* and requested physical barriers were put in place to stop this. This resulted in Refusal Reason: *"To prevent intensified vehicle use of sensitive and insufficient areas of the highway network in accordance with highway safety and Core Strategy 60, 62 and 65."*

Despite kind words of advice and signage at the point of exit and even a physical barrier to deny travel by out out of an exist in one direction, if car drivers intent on

going in one direction but constrained from doing so, they would simply exit as constrained, drive down the road and turn around at the first available space.

Against both PL/2022/09262 and PL/2023/07223 Highways commented on the failings of parking provisions. We of course accept that these failings are easily overcome.

Against PL/2023/07223 Highways were critical of both the lack of a Road Safety Audit as well as the selective TRICS examples and the application of the Future Year Assessment.

Before we go further to examine other points of the Highways Development comment, it is vital to establish that the above main points have not gone away. Nor will the introduction of a new roundabout, new bus stops and an access road make them go away.

Whereas we accept that a proposed new roundabout and change of access for Chemring Counter Measures (CCM) might be considered to be a solution to certain of the Highways points, others such as the viability and likelihood of employees walking or cycling to work are not met. These options remain unsafe, unviable and forecasts of their use are improbable.

3. Connectivity and Pedestrian Danger

The comment from Highways Development reiterates what the JPC have already clearly stated. There is no safe connection for pedestrians between the proposed northbound bus stop and the filling station and High Post Business Park and Golf Club. This in turn indicates there would be no safe pedestrian connection between the application site the Stones Hotel, Petrol Station shop and the Golf Club. The latter would involve the unresolved risk of crossing the A345 at the crossroads.

To be clear, this is what Highways Development have stated:

"There is no highway verge on either side of the A345 upon which a footway link can be achieved from High Post to provide a safe, useable link from high Post to the proposed bus facilities".

It is also stated that the two existing bus stops are to be retained. This retains the element of danger of crossing the A345 that all past applications have cited as a concern and a reason for refusal.

Whereas pedestrian access for employees of PL/2026/01867 are met should they wish to use the bus service, they are not met if travelling from the only viable housing sources of villages in the Woodford Valley. This application sees the same consultant that appeared to accept (in PL/2024/09682) that walking was not a viable option, reverting to the past claims of an initial 4% rising to 5% after 5

years. As a reminder, none of the existing several hundred employees at High Post walks to work.

4. Implications for BREEAM scoring claims

Furthermore, this above concession from Highways Development proves the points already made by the JPC. The employees of the proposed site DO NOT HAVE safe access to any of the claimed Local Amenities. This point is relevant not just to the criteria of CP34 but to the Health and Wellbeing aspects of the BREEAM claims of the application. The preliminary BREEAM score cannot be "excellent" since the only safe way to access the supposed amenities is via private car from the application site.

5. A new roundabout and Chemring traffic

We agree that closing off all the six vehicular access points to CCM on the C292 and Jubilee Hill roads will take a significant volume of CCM traffic off these roads. The C292 remains a highways concern in that it is substandard and that 2 x HGV's cannot readily pass each other. A large portion of CCM traffic would be taken away, only to be replaced with the initial and cumulative traffic load from this proposed development.

It remains to be seen if CCM would agree to these closures and implement them.

The number of CCM employee cars and delivery vehicles arriving and leaving their existing entrance is unknown, but assuming a majority of vehicles use the proposed new entrance, this still leaves those arriving from the West and departing to the West as users of the C292 and Woodford Valley roads.

We and others read this application and associated documents and can clearly see the intent to greatly expand use of this 60 acre field. As we and others have stated, due consideration of the cumulative impact of all these suggested occupiers must be taken into consideration along with the cars of 120 EV Naish employees coming mainly from the West side of Salisbury.

We have already estimated car numbers. The removal of perhaps 300 to 350 CCM vehicles on just 500m of the C292 from the High Post junction to their existing entrance is one thing, the additional cars that a fully built out field would impose plus those of EV Naish would likely impose greater traffic numbers on the C292 - not just in the Woodford Valley but also in the Winterbournes.

The C292 remains a concern not just for cyclists but the risk of collisions from increased vehicle use. The already identified limitations of this road remain, and a new roundabout on the A345 as part of a development that would bring hundreds of additional cars does not mitigate this situation.

A further factor, also neglected by Highways, is the unpredictable increase of traffic on the C292 and A345 northbound from the High Post junction which occurs when

the A303 past Stonehenge is at capacity and car drivers are directed that way by their sat-navs. This is not an infrequent occurrence; especially during the summer months. As CL is expecting to expand to 500 employees, regardless of any further expansion to the vaunted "Innovation Park" in the applicants promotional material for the development, the area around the roundabout could easily grind to a halt regularly. This is not what passes for sustainable.

6. Past points of refusal have not gone away

Because the existing bus stops are to be retained and there is no safe connectivity between the CL site and the Local Amenities the points of past refusal remain in place.

Highways Development states plainly that the lights of the High Post junction are "***dated***". This observation should be coupled with the three serious collisions that have taken place in the past three months as we have reported and the comments from the police officer should be noted. A simplistic consideration of injury data is inadequate: if a junction is plainly unsafe then why consider an application that would increase traffic density through it?

Because this new application claims an initial 4% of employees will walk to work then the safety issues of all access routes apply; this includes the C292 from the nearest villages of the Woodford Valley. A new roundabout will not take this concern away.

The application envisages 500 employees and the cumulative total will be considerably higher. Employees living to the West of the site will use the C929. A new roundabout will not take the increased numbers of vehicles away.

Cycling the A345 is hopefully rejected by all concerned. Cycling up the High Post Road remains the same danger as it has always been recognised. A new roundabout will not take these dangers away.

The cumulative impact of a built-out field and hundreds more cars and related vehicles will likely increase their use of the C292 (both East and West of the site). A new roundabout will not take these dangers away.

6.1. Pedestrians cannot safely cross the A345 at the High Post junction.

6.2. Cycling remains a danger. The High Post Road is not a viable route. Cycling is not supported as clearly stated by Highways previously against PL/2022/09262:

"The proposed development is therefore not supported by sufficient cycling infrastructure required to maximise this sustainable mode share and thus the development is considered contrary to Core Strategy Policy 60, 61 and 62."

6.3. Rat running through small local lanes remains a concern. Politely suggesting to an employee that they drive a longer and more costly route is unrealistic.

6.4. The C292 remains unsuitable for HGV's. Increased development will bring more traffic. This lack of capable local network is contrary to Core Strategy Policy 60, 62 and 65.

6.5. The High Post junction remains a danger as witnessed by recent and on-going collisions at a junction. This Highways Comment described the traffic lights as "dated". We consider it dangerous and this same danger not only remains but will increase if several hundred more vehicles are imposed on it.

6.6. Highways has referenced its own reports describing how the A345 and C292 are at capacity at peak times. This remains the case.

6.7 Walking to work is unsafe and unviable and the history of employment at High Post shows that no employees actually do this. How can a professional firm of consultants state that 5% of the workforce will be walking to the CL site in 5 years time ? Where are these projected 25 people walking from?

7. A Cycle Path to Amesbury

The new Highways Comment introduces the cost of making an existing bridleway a suitable cycling route. While there is no mention of this possibility in the current application, it was originally proposed as a potential cycle route in PL/2022/09262 and the suggestion was considered by both Highways and the Case Officer.

That response from Highways to this stated:

"With regards to cycling, paragraph 2.36 and Figure 2.3 have now been added to highlight potential off-road cycling facilities between High Post crossroads and Amesbury, however this route is not lit and not surfaced for at least 1.8km of its 3.8km length. In order to resolve the surfacing alone, Costs of highway works - Wiltshire Council provides an indicative cost of £360 per linear m which would result in a total scheme cost of £648,000. Whilst this may or may not be within the viable cost effective mitigation of the development, the delivery of 1.8km of cycle route would do little to enhance the sites sustainability which would benefit from being win closer proximity to an urban area."

And in the Report, the Case Officer stated:

"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 proposed development is therefore not supported by sufficient cycling infrastructure required to maximise this sustainable mode share."

We understand that the given figure represents a Section 106 contribution.

We have various concerns on all this.

1. The land concerned is owned by the High Post Golf Club which already has incidents where bike users access this route and cause considerable damage to their greens. Is the Council sure that the land owners would welcome enhanced bike access?
2. Introducing more users of the path increases the health and safety issue that users will face from flying golf balls. The existing path runs along the side of the fairways of the first 3 holes.
3. If the 2023 estimated cost was £360 per linear metre. Surely the rate per meter has increased in 3 years?
4. How and who calculated the 2.5% Section 106 contribution ?

Besides all these points, the fact is that Highways Development appear to be saying that the development will draw on people living in the thousands of new homes in Amesbury. If this connection is so vital then why has CL not seriously considered the available site in Amesbury where prospective employees can happily walk or cycle to work?

But the point here is that the applicant is now clinging to the belief that if this cycle link was established that the site is then suddenly sustainable. There is no evidence of this. The site remains remote and the huge dependance on private car journeys remains.

8. The Bus Service

In previous applications the public bus service is typically described as having an "adequate frequency". With no material change in the High Post bus services, nor any other justification, the new Comment has upgraded this assessment to "very frequent".

9. Highways Development: Current application transport sustainability.

Point 1. The respondent cites a "very frequent" bus service to Amesbury and the significant new housing areas. This implies that prospective employees will be based in Amesbury and keen to use the bus service.

However, existing bus usage to High Post is small. Large employers have been at High Post for a long time and the percentage of their employees using the buses is

low. It seems unlikely the evaluation of bus service quality and the propensity to use buses are reliable.

If prospective employees are likely to be based in either Amesbury or Salisbury, it would be helpful to understand why CL failed to engage with the agents for the obvious employment sites at Solstice Park, Fugglestone Red and Churchfields?

Point 2. The topic of walking in respect to the Travel Plan is about employees actually walking to work. It is not about walking to catch a bus or walking to get into a car.

Point 3. We assume point 3 relates to cycling. The respondent appears to acknowledge that the stretch of the C292 from Netton to High Post is indeed "poor". We and dozens of residents have described this section of road as a danger to cyclists. The respondent failed to include the fact that this stretch of road is unlit and has poor road surfaces. Additionally, although National Route 45 does run through the Woodford Valley, in the winter months when it is dark (and quite possibly raining) the unlit country lanes are not conducive to cycle commutes and these remain unlikely to happen.

Point 4, concerning the location of CL is meaningless. If the respondent is assuming that existing CL employees live nearer Chilmark, then how is locating to High Post going to reduce private car travel? Any interactive route planner will define journeys from west of Salisbury to High Post through the lanes of the Woodford Valley and increases use of the substandard C292.

Point 5. Exactly what reduction of car vehicle miles are envisaged to be saved? If being close to QinetiQ at Boscombe Down is vital then why has the possibility of developing on this site not been explored since Boscombe Down contains a Principal Employment Area? This comment ignores the fact that the bulk of vehicle movement to and from CL would be employees commuting, not visiting military establishments or Boscombe Down. (Note the previous SDC policy E8B to develop 7Ha of employment land at Boscombe Down). We would also point out that Solstice Park is closer to these establishments than High Post.

Point 6. We are not aware of any inter-relationship between CL and Chemring or CL and Apsley. At the recent planning appeal hearing with a Planning Inspector, Apsley Precision Engineering were asked who their principal customers were, CL was not mentioned. The application may claim synergy between the companies but a claim is not the same as reality. Synergy implies that a combined effect of two or more entities is greater than the sum of their individual parts. There is nothing to validate this claim of synergy for these three companies operating near each other. It is wishful, rather than analytical thinking.

Point 7. This is plainly wrong. Past refusals of planning permission included the fact that the location is remote and increases dependency on private car use by employees. Only CL knows the exact location and journeys of its existing staff. The latest filed documents we can see show a total of 188 staff and the end of

2024, but the jobs section of their web site states there are 260 staff. Some will be in their Bristol office, some at Chilmark, Burcombe and Fonthill.

Without CL disclosing all the locations of existing staff who would travel to High Post then it is hard to make any claims about car journeys except that any persons travelling from the West side will take little time to work out that using the routes through the Woodford Valley is shorter, quicker and costing less for their fuel. Those travelling from the East will equally impact the C292 and High Post junction by accessing via the Winterbournes.

We have experienced past applications around High Post when claims were unrealistic and estimates were made on travel routes. Any similar claim relating to the current application should be independently verified.

For Highways Development to make any claims of reduced journeys as a result of being located at High Post is seriously questionable. It surely goes against all planning logic to suggest that siting developments in remote rural locations somehow reduces car travel.

Points 8 and 9. We feel the respondent is clutching at straws in making these claims. Planning Policies direct employment sites to already allocated employment land that is close to the main population centres, not to remote greenfield sites. If the prime aim of Highways Development is to encourage sustainable development, encourage people to walk, cycle or use the bus to get to work, then these are the sites to promote. They exist in Amesbury and Salisbury and the Council should be directing applicants to land it has already approved for employment use.

If, as Highways Development states, Amesbury is the target source of future employees, the argument should be made to locate CL at Solstice Park?

If "*extensive synergy*" with similar defence companies is sought by CL the argument should be made for locating in or around Swindon with its clearly established defence cluster?

10 . Highways Development: General Highway comments.

We note that the respondent recognises the High Post signals as "*dated*." We also believe the junction to be dangerous, as regular accidents confirm.

The respondent misses the concerns on the use of the C292. In re-locating the CCM entrance then those CCM employees accessing the site FROM the High Post junction will no longer use the C292. But those CCM (and others based at High Post) who access their work from the West and using the C292 will of course continue to do so.

It is the increasing use of this access road leading up from the existing routes through the Woodford Valley that continues to concern residents. This same concern is expressed by Winterbourne Parish Council in their objection.

In addition, the fact is that any new employees to any sites at High Post living to the west of Salisbury will most likely use the valley roads and the substandard C292.

We are surprised to see the respondent appear to be happy with the state of the A345 when the Council's own reports detail the capacity limits of this road at peak times.

We agree with the respondent that a roundabout a few hundred metres north of the High Post junction might slow down the south-bound traffic.

The respondent cites CP34 in much the same way as the Economic Development Unit has in the past by quoting Point (iv) of CP34 and failing to evaluate the five further criteria that it must also meet. While CL may be a good company, it cannot be defined as "essential" to the economic development of Wiltshire. It meets only one Point of CP34. As previous applications have claimed and been refused, there is a failure to satisfy Criteria a.) to e.) and thus it fails CP34.

Unless the application satisfies these criteria it fails CP34. Clearly it does not, and thus it fails.

For senior Council officers to state that a given business is "essential" to the economic future of Wiltshire is not some sort of "golden ticket" to planning consent being granted.

Core Policy 34 requires that developments do NOT add to private car use. This and all past applications at this location show a huge dependency on private car journeys that are contrary to CP60 and CP61.

We agree with the Highways Development that there is no safe access for employees at the High Post Business Park to the proposed new bus stops. It is most significant to this application that Highways report this since it supports the points made already that intended employees of CL cannot access the claimed Local Amenities and Recreational Facilities. This has severe implications on other claims made in the application.

If the existing bus stops are retained, then the existing dangers of crossing the A345 at the High Post junction remain.

The respondent recognises that the proposed roundabout and access routes to it will all require lighting as will the proposed footpaths. This means even more light spoil to the already polluted night skies above High Post. (See the light intensity map the JPC have already presented).

Further submissions and revised plans

Point 1. As other formal consultees have commented, this cumulative impacts of this application must be assessed. There are clearly defined additional users.

Why does Highways not also press for this? What is the sense of modelling or even contemplating the effects of the cars of 250 employees when the number is intended to be many times greater?

Point 2. We agree that if CCM offers to shut its six entrances then they must do so. We suspect that Chemring will wish to keep some entrances for emergency access for obvious reasons. How will this be monitored to stop employees using them to save a bit of time?

Points 3 and 4. The Joint Parish Councils have already commented that the suggested roundabout appears small and the proposed lanes narrow.

Points 4 to 7. These require the applicant to spend more money to present additional reports.

Our suggestion is that since the application fails on so many other grounds the applicant might be given the chance to withdraw now and save spending yet more money for a development of a remote greenfield site when other approved employment land is available that meets the needs of CL (and others) if they were to properly pursue them.

We wish to make these following comments on other submitted consultee reports.

11. Ecology

While it is noted that the submitted appraisal was defined as "Preliminary", we see certain shortfalls in this document. We are surprised that Ecology has not picked up on the topics and other protected species as well as questioning the practicality and enforceability of the mitigation of Stone Curlews.

We ask that the Ecology Officers are referred to the Ecological Assessment of PL/2021/11914 that identified the presence of various bat species. The presence of rare bat species has been sufficient to stop other Wiltshire applications. Since they have been recorded nearby, a complete bat survey is needed to establish if other rare bats in addition to Bechstein's are foraging at this site, and are assured proper protection.

We note that the formal response from Natural England to PL/2026/01867 also comments on the importance of both Bats and Skylarks.

We ask that the Council should be satisfied on the exact arrangements to set aside equivalent agricultural land in a legally acceptable agreement from the developer to assure the conservation of displaced Stone Curlews.

12. Historic England

We note that this organisation points out the differences in the HEA and LVIA particularly in respect to the ZTV. This needs checking.

We also applaud the comments from Historic England that the cumulative impacts of all intended developments at High Post need to be assessed.

13. Fire Risk

We cited examples of fires from BESS units. We quoted reports of their increasing numbers and asked why a known fire risk should be located next to a licensed explosives site.

We note that in their Objection, the Environment Agency stated that it is "*accepted best practice to let BESS fires burn out*".

We believe that this feature alone is sufficient to refuse the application. It is a shame that Dorset and Wiltshire Fire Service did not comment on this part of the application. We ask that they be further contacted to comment on this significant fire safety issue.

15. Water Supply

Not only is the supply of water a costly challenge, it is highly problematic. Part of the Environment Agency's (EA) Objection is the impact of a BESS fire on the groundwater but we see greater concerns.

Seeking greater clarity, the Joint Parish Councils asked the EA for details of the current extraction permits at High Post and have asked for an evaluation of the impact on the chalk aquifer and River Avon SAC. This is a large application and it comes with further occupiers already identified. The cumulative effect of abstracting additional water must be considered.

In response to our asking if any new abstraction licences would be offered in this location the Environment Agency have responded to say :

"Specifically in the Upper Hampshire Avon catchment, we are requiring Wessex Water to reduce or relocate some of their abstractions to ensure the rivers meet their flow targets, which are set to support the River Avon SAC reaching favourable condition."

and "as the area falls within the Upper Hampshire Avon and the groundwater there is classified as 'no water available for abstraction'. Which means there is a presumption that no new consumptive abstractions will be granted."

This is a clear statement of the situation. The River Avon is an SAC and those who recognise this status should require appropriate measures to uphold and protect it.

16. Summary

We appreciate that there are further important Consultee Responses to come. We trust that Active Travel England will examine this in the same way they did PL/2023/07223 and find it unsustainable.

We note the Conservation Officer's report who is looking at this from the view from Old Sarum. But but Figsbury Ring is also a scheduled ancient monument and the villages of the Winterbournes deserve consideration.

We hope that Wessex Water might do more than just say a water supply is costly and problematic but live up to their requirement to respect the River Avon SAC and particularly the subject of abstraction from this Upper Avon Catchment. We hope the Climate Team might for once recognise the prime tool it was provided with in the Council's Climate Strategy to counter the effects of climate change - to reduce private car journeys.

These further Comments from the Joint Parish Councils expose further evidence that we ask the Case Officer to consider and include the past road safety concerns far more realistically commented on in the past 4 applications that still apply.

We are especially concerned at the very different stance taken by Highways Development in which a simple and unsubstantiated reference to part of CP34 is made and where there is no significant discussion of relevant Core Policies 60, 61, 62 and 65 is presented, and just a single, brief mention of the NPPF.

We find this particular response limited in scope and quality and ignores the main, previously described pedestrian, cycling and road safety issues that still very much remain. It appears as if Highways Development have already explored a Section 106 agreement for an upgraded cycle path on land they do not own where the land owner might not welcome it. The focus seems to be very much on a new roundabout and not on road safety or sustainability.

A new roundabout, bus stops, access road and pedestrian access to and along these do not negate the fact that this application is in a remote location, on a greenfield site, removing BMV land and with an overwhelming dependance on private car journeys.

The applicant has control of the land and thus no incentive to consider other sites they do not own, but Callen-Lenz could and should make their own enquiries.

This is poor application where proposed solutions actually negate claims already made. We urge that the clearly defined ambitions to expand the site are taken into all considerations and that this foot-in-the-door application be refused.