

The Joint Parish Councils have read with great concern the counter documents that the applicant has submitted.

We stand firmly by the clear and detailed Objections we have already submitted.

Since the applicant is allowed to present additional information, correct glaring errors and to counter objections already submitted, we feel we too should add further comments.

Part 1: POINTS RAISED BY THE APPLICANT'S AGENT

1.1 Additional Plans, Floor Space and Building Design

We note these and that approximately 75% of the first floor space is given over to offices and related staff use and 100% of the available first floor space. is also clearly office space.

The proposed building is clearly just an office block.

The spectacular visual of the intended building gives a first impression of a car showroom, no different to those on any industrial estate. What is detailed in the floor plans is predominantly an office building.

Callen-Lenz (CL) is a wholly owned subsidiary of BAE systems and in turn part of BAE Systems Falconworks, a UK wide grouping of BAE subsidiaries, academic partnerships and production facilities focussed on the company's Unscrewed Aerial System (UAS) strategy. This gives Callen-Lenz access to differing facilities across the country.

Any proposed manufacturing and storage area in the application is marginal compared to Callen-Lenz's output and available facilities elsewhere. The recent Nyan drone has a 2.9m wingspan and Callen-Lenz say they have already produced over a thousand of them. The proposed development does not have the space for this level of production and storage.

Furthermore, the Nyan drone is classified as munitions. It is a military weapon. The production and storage of munitions require specific planning permission, alongside specialised hazardous substances consent and explosives licensing due to major off-site safety risks and strict land-use regulations. Which is not the scope of this application.

Production and storage of Nyan and any similar munitions must surely be elsewhere. Especially since placing such a facility next to Chemring Countermeasures could be considered unwise. As such, the application is for a large office block with a small workshop. An office block which could be situated in locations other than at High Post.

It is surely not a Council policy to permit offices on greenfield sites in remote locations.

1.2 Land Use Framework

We note the applicant sees this LUF document only as offering visions and objectives and that it has no material consideration in the planning process.

We ask Wiltshire Council to please ascertain if the LUF has any status in this matter. If it does, please apply the clearly defined intentions.

The applicant dismisses the LUF position on placing solar arrays on BMV land. However CP42 remains clear on this practice - it should not be done.

1.3 Solar Panels on Curved Roofs

The applicant's four previous applications at High Post had buildings with curved roofs with solar panels. Also Nationwide Engineering proudly promoted their own construction of the "solar powered" Birchall Tea building with a curved roof.

It is now admitted that it is possible to place solar panels on curved roofs despite previously stating this was not possible.

The new drawings show just 75 panels on the south facing side of the roof. This is covering barely a third of the available space for solar panels on the roof. As it is a shallow curved roof, panels even on the north side would be capable of generating some power.

There is still no consideration of ground sourced heat pumps, which would have a better contribution towards BREEAM Excellent standard than the proposed air source heat pumps. The location has enough room for ground source heat pumps. The application is proposing more solar panels than are needed to power the proposed building with a local grid which is unable to take excess generation but not proposing ground source heat pumps which are more efficient and longer lasting than the proposed air source heat pumps.

1.4 Battery Storage Systems and Solar Arrays

The applicant clearly recognises the folly of seeking to site known fire hazards next to a licensed explosives site. Removing them may diminish the degree of Objection from the Environment Agency, but we continue to question the advisability and safety risks of siting a munitions factory adjacent to a pyrotechnics factory.

The proposed solar fields are, in our opinion, not necessary. The new documents again stress how quickly these can be erected and how vital they are to businesses seeking to control energy costs, but there is still no sign of CCM acting on their already granted solar field.

The Agents Response to Comments states: "Solar on Roof: as stated in the Planning Statement Paragraph 4.48 the solar requirements for the proposal have been carefully calculated to ensure it meets the BREEAM Excellent standards."

But no figures presented for the energy requirements of the proposed office building to satisfy the BREEAM standards.

There is no requirement for 100% of the electricity to be supplied by solar power for a BREEAM Excellent standard. There is no set amount or minimum requirement at all. So why does the revised application have even more panels than the previous application? How does this fit with the claimed "carefully calculated" requirements?

Despite knowing from the start that the grid is unable to accept any spare capacity from the suggested solar fields and despite now removing the BESS components, the applicant now offers 75 further solar panels on the curved roof of the building.

We believe that the roof space still allows for significantly more solar panels.

Surely a cost conscious business would seek to reduce the number of panels in the solar array by the number they could place on their roof. This saves both on solar panels and expensive development land.

The solar fields are "red herrings" to enlarge the area of land required so as to deny Callen-Lenz the opportunity to locate to the already allocated sites at Fugglestone Red or Solstice Park.

As previously stated, if solar power is so critical to CCM, then why have they not proceeded with the array already consented and why don't they place panels throughout their already extensive property rather than buying more development land ?

If the Council accepts this approach to planning then it is effectively inviting every new application of size to demand greenfield land over allocated development land if the applicant demands sufficient land for a solar array. A very dangerous precedent could be set.

If this were approved then, as the JPC demonstrated in the case of PL/2024/09682, the occupiers would have power from the arrays during the day that they could not store and could not feed into the grid. Without the battery storage which the applicant has now withdrawn, excess solar provision is completely pointless and unnecessary.

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1.5 C-L staff

The scale of this slide allows no serious viewing of locations or staff travel routes. The coloured map has no obvious meaning in relation to possible staff journeys. Do staff hundreds of miles away seriously commute to Chilmark? What staff travel to the various other premises C-L operate from? We have seen these isochrone displays before and they were inaccurate.

If C-L are to present meaningful data on intended staff journeys it should be firstly sufficiently detailed but far more importantly, be independently verified.

What it does reveal is that some 25% of existing staff with realistic daily commutes live in Salisbury, with several more to the south and west of Salisbury yet very few to the north and east. Surely the Fugglestone Red site is far more appealing in commuting and planning terms being a site which clearly would result in reduced travelling compared to either Chilmark or High Post?

1.6 LVIA, Heritage and Dark Skies

The view from Old Sarum has been discounted. But Figsbury Ring is an equally qualified Ancient Monument. Looking to the North West from Figsbury Ring one clearly sees the Stones Hotel. No doubt the proposed gleaming 10m high office building would be visible.

Why has no consideration been given to this adverse impact on this scheduled site?

It is accepted that the building will not be visible from the WHS except perhaps the first floor level. However, the lighting will add to the significant signature already generated by CCM and documented against PL/2024/09682. It is not right that more and more light pollution should be added to this remote site.

1.7 Ecology : Skylarks and Bats

It is ridiculous that no actual observation of skylarks has taken place and affront to nature that they are dismissed and the Stone Curlews "mitigated".

It is also noted that the applicant chooses to ignore the subject of endangered bat species being present in the "south field" that is immediately the other side of the C292.

1.8 Public Comments

In respect to topic a.): As we have seen for the previous 4 applications, the tactic is to attempt to get one "over the line". This remains the case with further business clearly identified.

Many concerns from residents are about the loss of open farmland but these are coupled with the clear position of there being already zoned employment land available. The applicant rejects these for reasons that no doubt relate to their own

ambitions and financial interests in the High Post location. Callen-Lenz has not expressed any opinions.

In respect to topic b.): Residents of course recognise that the A345 is intended to provide a new access point. Their concerns on traffic numbers is simply based on the fact that if a development is permitted that involves an additional "x" hundred number of private cars, then a certain portion of them will access the site through the narrow roads of the Woodford and Winterbourne valleys.

Yet again the applicants response clings to the hope that new staff will be walking and cycling to work: all previous applications have shown that this is highly unlikely and a telling comment on this that should be read is that from the then and current MD of CCM in relation to PL/2022/09262 who described the Travel Plan as "flawed" and the claims made of staff walking and cycling to work as "unrealistic".

This and further intended developments can only ADD to the numbers of vehicles accessing High Post via the C292 (from west and east). The well recognised perils of the High Post junction have not gone away; if more traffic is loaded onto it, then accidents will only increase. A new roundabout and additional bus stops will not take this danger away.

We agree that the expansion of C-L in Chilmark is undesirable for the residents there and in villages affected by their traffic. Large office blocks employing up to 500 staff should be located in or on the outskirts of large urban areas as indicated by both Council and National policies. These locations exist and this application is configured to deny these options.

In respect to topic c.): BNG is a metric that has the perverse result of deeming car parks with limited hedges around them more acceptable than open fields.

In respect to topic d.): Accepted

In respect to topic e.): As stated, the landscape character will be affected. Please view the site from the South East. The site sits on a prominent ridge line and it is astonishing that Landscape Officers have not commented on this.

In respect to topic f.): This single sentence belies the principal reason for refusal. It avoids consideration of the key criteria that MUST be satisfied and we state again that this is yet another in a long list of businesses and public services that are claimed to be essential to the economy of Wiltshire.

Simple analysis of the criteria accompanying CP34 shows that this application fails to meet them. The site is remote and is not sustainable in transport terms because it add huge private car dependancy.

In respect to topic g.): The existing light signature of High Post is an affront to any Dark Skies policy. Adding more buildings with extensive car park and security lighting can only add to this light pollution.

In respect to topic h.): Concerns have been raised because documents attached to PL/2024/09682 and accompanying this application clearly show further intended users.

Highways Development called for not just the traffic related to this application but committed traffic (120 from Naish) and "traffic growth". How can Highways have participated in a meeting with other defined potential occupiers of this 60 acre site and not ask for the easily estimated additional cars to be taken into consideration.

Part 2: NEW ISSUES AND THOSE IGNORED BY THE APPLICANT

2.1 Water Supply

Hot summers for the past 2 years place huge strain on water resources. The River Avon is currently as low as many people can recall and the cause of this is over abstraction of water. Wessex Water recognises this within measures set out in its WINEP programme.

The Environment Agency (EA) seriously restricts water abstraction and the clear advice on this is stated on the JPC objection.

It seems necessary to repeat what the EA have stated :

"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 this is classified as "no water available for abstraction". Which means there is a presumption that no new consumptive abstractions will be granted."

The applicant has not detailed where they propose to gain a water supply ?

Individual businesses with boreholes (and there are 5 licensed ones only at High Post) are not permitted to share their supply. Existing users like the High Post Golf Club are not allowed to abstract more water.

The River Avon is an SAC. We urge that the Council gives serious consideration to this vital issue. It is clear from documents lodged in previous applications that further development of the total site is intended. It should not be a case of looking at things "one at a time" but seeing an overall picture.

Sinking further boreholes and abstraction yet more water from the aquifer is harmful to not just the whole supply of water in the area but to the River Avon that is already in a perilous state.

Low water levels coupled with low flows and high temperatures deplete oxygen levels and pose serious concerns not just to the fish but all the flora and fauna of a protected river system.

The JPC has submitted a request that a Grampian Condition be attached should this application be approved.

2.2 Is this application for Callen-Lenz (C-L) ?

The documents so far submitted show that the applicant is not C-L. The various planning statements are not from C-L and none of the many commissioned reports appears to have been commissioned by C-L.

The Application is for a building on the site and not for a specific company. It should be treated on its merits and consideration be given to the fact that the occupant might be any business unless its use is conditioned by the Planning Authority.

Can the Council be sure that this is a genuine application from this company ?

2.3 Archaeology

The trial trenches revealed some very interesting finds. Beaker pottery is rare as are the crinoidal beads and it is clear that further, more detailed evaluation is needed.

2.4 Active Travel England (ATE)

The ATE response to this application is that the LPA should follow their standard advice. ATE applied their standard advice to PL/2023/07223 which was for buildings totally 7532sq.m with an initial total of 320 employees rising after 5 years to 475. Their submission dated 9 October 2023 was an **emphatic objection**.

The Travel Plans of that and the current application deliver identical Modal Targets for each suggested method of travel.

The applications are incredibly similar in location and employee numbers. It has also been established and accepted over the past 4 applications and at the Appeal of PL/2024/09682 that car use is at least 92%, no employees walk to work, few cycle and few use the buses.

ATE stated that it "*considers it likely that no staff at the site will travel by foot to the site.*" ATE dismissed the claim that "*commuting by bike will be a realistic option*" and agreed with the LPA that the use of cycle routes through the Woodford Valley and thence the High Post Road was "not genuine alternative".

How much clearer could they be? We state again that ATE are a Government funded body charged with encouraging sustainable methods of transport. Unlike the Comment from Highways Development, ATE were clear in defining:

"The proposed development does not meet sustainable development objectives, contrary to the Settlement and Delivery Strategies/Spatial Vision and policies of the WCS for sustainable development within Wiltshire and contrary to WCS Policies CP1, CP2, CP4, CP34, CP60, CP61 and CP62, strategic objectives of the Wiltshire Local Transport Plan and the NPPF paragraph 7 and section 9, paragraphs 104, 105, 110 & 112 which aim to reduce the need to travel particularly by private car and encourage the use of sustainable transport alternatives."

This new application may seek to add 2 new bus stops, but that alone is not likely to see increased bus use.

ATE previously applied their standard advice and firmly objected to the one application they commented on. Nothing has changed to rationally arrive at any other conclusion.

2.5 BREEAM

The response fails to engage with the fact that the much heralded local amenities and recreational facilities are in effect denied to intended staff (unless they drive there). This was stated by the JPC and supported in the Comment from Highways Development.

As the JPC has also pointed out, the self allocated BREEAM scores for these facilities must be discounted and hence the initial score cannot be "excellent".

As we have stated, massive solar arrays are not a BREEAM requirement.

2.6 Highways

The comments from Highways Development resulted in 7 defined requirements.

Requirement 1:

This states that the Transport Assessment should include traffic movements for the proposed roundabout. The key wording is that it should include "traffic growth". the applicant ignores this requirement.

Surely any infrastructure projects must take account of all projected growth - especially when it is clearly known to all concerned that future occupiers of the site exist ? Surely modelling must be carried out that allows for the potential of over 1000 employees on this site ? To ignore this would seem to be a serious mistake.

Requirement 2: It appears that the applicant does not agree with this requirement.

Requirement 3: Have ALL parameters needed in respect to the roundabout design been submitted? The JPC previously commented that the proposed roundabout appeared small and the lanes narrow.

Requirement 4: Both a Stage 1 and Stage 2 RSA were requested (as with all 7 conditions from Highways) prior to Highways taking things further. No Stage 2 RSA is submitted.

Requirement 5: This appears to have been done.

Requirement 6: The applicant questions this requirement.

Requirement 7: Has this been met ?

Highways also requested a full Travel Plan but there is no such new document. If one is requested then please can it be made clear that it must be realistic and should discount to less than 1% the numbers who would ever walk to work and no more than 2% of those who would cycle given the unviability of the A345, the bridleway route from Amesbury and the C292. The public bus user percentage should be set at no more than 3% or the exact percentage of the 400 CCM employees independently verified as using the public bus service.

The comments from Highways introduced the subject (previously never mentioned and definitely not a part of the application) of a £468,000 contribution to upgrade cycling facilities towards Amesbury. It transpires that this initiative involves the bridleway that runs alongside the first three holes of High Post Golf Club.

It is curious that the applicant's response suggests this upgrading of a bridleway was a Council initiative. The first the JPC saw of it was a suggestion from the applicant (Mr Hibberd of Hibberd Developments) in PL/2022/09262.

It must be noted that this right of way is a **bridleway** and that Wiltshire Council has defined details of exactly what surface a bridleway must be and it does not include any sort of cycle friendly paved surface.

In respect to PL/2022/09262, both Highways and the Case Officer criticised and rejected this suggestion. In the latest response to the current application is it pleasing to note that the applicant also discounts this suggestion and declines the opportunity to contribute the £468,000.

Clearly there is no viable cycle access to High Post from Amesbury and it is also totally clear from the refusal of PL/2024/09682 (and the refusal of the related Appeal), that cycle options using the routes of the Woodford Valley and the substandard C292 are equally unviable.

Another point that Highways appear to have overlooked is that a huge number of additional vehicles may well use the intended roundabout. BUT all those travelling from the South or either from East or West on the C292 will still engage the "dated" (we contend dangerous) High Post junction. This has not gone away - it will feature even more. Previous Transport Assessments have only focused on collision data involving documented injuries and ignore the all too common unreported collisions that so badly affect people.

Just to be clear : it was accepted at the APE appeal that no High Post employees walk to work and none are realistically expected to. It was also accepted at the

appeal that the Woodford Valley route to High Post using the C292 High Post Road is unfriendly for cyclists and the above abandonment of a cycle link to Amesbury means that the High Post site is unviable for cycling access. This leaves just public buses and private cars.

Even if the claimed bus use rate of 5% (the JPC think this is too high) was accepted, private car use to this remote location is a minimum of 95%.

Surely this means a failure of the related Core Policies and a clear failure of CP34.

2.7 Alternative Sites

Clearly the applicant's response ignores this subject. These alternatives exist, especially if the completely unnecessary requirement for solar arrays is taken away.

It would also be most enlightening if Callen-Lenz actually confirmed their own desires, where else they themselves had searched, why they consider a site in Salisbury or Amesbury unacceptable or even why joining a Government promoted defence cluster in Swindon is unacceptable.

We note that the coloured slide of suggested employee numbers shows approximately 25% of staff living in Salisbury. Surely from a planning and socio-economic view it would be better for these staff living in Salisbury to be working in Salisbury? Do they have a view ?

2.8 Piecemeal Development of a Greenfield Site

The Agent's response concedes that the assessment of the application should take "account of cumulative effects where relevant". The JPC ask how much more relevant the evidence might be?

Wiltshire Council participated in meetings with further prospective occupiers of the site and adjacent land that is documented within PL/2024/09682. The applicant has presented the concept of an Innovation Park and the "north field" would still have extensive space for further occupiers.

The JPC contend that the cumulative effect of this clearly intended development should be considered and this application refused before a flood of further applications is unleashed and massive traffic problems are imposed on the High Post area, the A345 and the neighbouring villages.

2.9 CP34

It is insufficient to simply claim that because any business is claimed to be essential to the economic development of Wiltshire, then this should allow development of non-allocated land.

Time and again for the past 4 related applications this Core Policy is cited and time and again the fact remains that High Post is a remote location that creates huge

dependency on private car use. The Council's position should not change just because a new roundabout and 2 bus stops are proposed.

This application fails CP's 60, 61 and 62 and thus fails CP34.

And finally

Newspaper articles report that recent Ukrainian drone strikes deep into Russia used a drone made by Callen-Lenz. There are also articles reporting the threats issued by the Russian embassy against the United Kingdom for having supplied these drones.

The people of Salisbury know first hand that Russian intentions of revenge are real. It should surely be a national and local concern that weapons manufacturers clearly identified by a hostile nation are located within seriously secure locations, not in our peaceful, open countryside.

If Callen-Lenz becomes a Russian target then it brings into question the wisdom of it being located next to the Chemring site.

The Government might wish to locate defence establishments should be located within existing secure sites.

Please refuse this and please put and end to this needless and profit driven onslaught on our cherished countryside , protected species and protected river.