

Rep ID: AMES1	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
Reasonable	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Yes	
AM3. Is this the right pool of potential development sites?	

Yes - providing shopping facilities are included in the developments

AM4. What land do you think is the most appropriate upon which to build?

Brownfield or rough pasture

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes Infrastructures to meet the needs of potential residents

AM6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

Do not allow the financial needs of Salisbury override the quality of life of the residents of Amesbury

Rep ID: AMES2	
Consultee code: Other	Consultee Organisation (if applicable): Wiltshire Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
Amesbury has seen significant growth over the past 15 years or so with Archer's and King's Gate estates, the proposals extend the scale of development to new levels and further strain the already limited infrastructure. There are limited brownfield sites within Amesbury, so whilst it is an admirable aspiration, it is not a practical proposition.	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
I believe the priorities are well founded and with the correct support achievable. The one priority that is missing is the development and integration of Boscombe Down within the town. It has so much potential with regard employment and yet is	

currently an "add-on" to the town. There have been many rumours about the future of the station and these need to be openly communicated and incorporated into the local plan.

AM3. Is this the right pool of potential development sites?

AREA 1. I have little knowledge of the site apart from being aware of its proximity of the River Avon and the potential for flooding.
AREA 2. This site overlooks the section of the A303 approaching the Avon bridge which when the tunnel is built will be a 70mph highway with little relief. The position of the proposed site will attract high noise levels for householders and will be extremely disruptive making houses extremely unattractive for buyers, the lay of the land will prevent noise abatement measures being installed.
AREA 3. Only part of this site is within Amesbury, the boundary being the tree-line that divides the area, However the most significant consideration of this site is the potential impact on the flying activities of MOD Boscombe Down. The site contains vital radio navigational aids and the land is a potential landing area for aircraft having to execute an emergency landing. There are explosive storage areas to the west of the base that limit development within a certain radius (Boscombe Down is a top-tier COMAH Site). If this area was developed, flying activities at Boscombe would have no option other than to cease!

AM4. What land do you think is the most appropriate upon which to build?

The country park - which has Roman remains buried beneath.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: AMES3	
Consultee code: Landowner	Consultee Organisation (if applicable): West Amesbury Farms
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES3
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
In order to achieve sustainable development, it will be essential the focus of growth is around more major settlements and I believe Amesbury is a sustainable settlement which is capable of delivering higher levels of growth.	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
AM3. Is this the right pool of potential development sites?	
In respect of SHELAA reference S1010 (coloured pink on the enclosed land (LAnd on the South Side of Stockport Road, Amesbury, Wiltshire Site, postcode SP4 7LN, OS grid reference: SU 16409 39147) SEE AMES3:	

I fully support the carrying forward of this 59.836ha site for further assessment as set out in the Site Selection Report for Amesbury paper. This site is immediately available for development and is capable of delivering a comprehensive, residential-led scheme. The site is capable of addressing unmet housing needs for Amesbury as identified within the consultation papers, and also the wider district. The site offers the compactness for promotion of a comprehensive development therefore, I respectfully suggest this could be taken forward as a preferred option for the development in the new Wiltshire Local Plan. Detailed responses to the Consultation, in respect of SHELAA Ref: S1010 plus further technical information and evidence in support of an allocation, will be supplied to follow this submission.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Please find attached a copy of the Market Town Consultation Response Form regarding the above, with comments on the proposed land shaded pink on the enclosed plan (SEE AMES3).

I, as the Landowner, fully support the carrying forward of this 59.836ha site for further assessment as a site suitable for development, as set out in the Site Selection Report for Amesbury consultation papers. This site is immediately available for development and capable of delivering a comprehensive residential-led scheme. Further technical information and evidence in support of an allocation for development will be supplied in due course. I would suggest, with respect, this site be considered as a preferred option in the new Wiltshire Local Plan.

Rep ID: AMES4	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
No comment	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
We support point ii to improve the recreational facilities and sports pitches in Amesbury	
AM3. Is this the right pool of potential development sites?	

No comment

AM4. What land do you think is the most appropriate upon which to build?

No comment

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

I think there should be a greater emphasis on health - consideration should be given to Sport England and Public Health England <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design> when designing new housing and in environmental improvements

AM6. Are there any issues or infrastructure requirements that should be identified?

I would advise carrying out a county wide built facility strategy

Further comments

No

Rep ID: AMES5	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Benchmark Development Planning Ltd
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES5
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>2. Executive Summary: Our objection is based on four themes that indicate the emerging LPR is unsound because it is: not sufficiently positively prepared; not properly justified; ineffective and will not deliver sufficient housing land; and it is therefore inconsistent with national policy about housing delivery.</p> <p>[Theme 1] Durrington is too big and sustainable to be proposed to be downgraded to a Large Village (LV) – it is at least a Local Service Centre (LSC) and it should have a “baseline indicative housing requirement 2016 – 2036”^{**} for at least 200 dwellings. [*Source: Table 2.5 of Emerging Rural Communities.] [Theme 2] The proposed housing allocation for Durrington (1 house between 2026 and 2036[*]) is too small and not proportionate to the scale of the settlement and local housing need.</p>	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

AM3. Is this the right pool of potential development sites?

[Theme 3] The objector's land at Hackthorne Rd, Durrington (S98) is a sustainable and preferable housing site for 80 dwellings – a proportionate amount of housing for this very large Local Service Centre that forms part of the sustainable Amesbury cluster of settlements.

[Theme 4] There is a compelling case for allocating up to 80 houses on S98 with an access from Hackthorne Rd because the site is viable, available, and deliverable.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

1. We object to the Wiltshire Council Local Plan documents (all dated January 2021) titled:
Emerging Spatial Strategy

Looking to the Future: Empowering Rural Communities
Site Selection Report for Amesbury

2. Executive Summary: Our objection is based on four themes that indicate the emerging LPR is unsound because it is: not sufficiently positively prepared; not properly justified; ineffective and will not deliver sufficient housing land; and it is therefore inconsistent with national policy about housing delivery.

[Theme 1] Durrington is too big and sustainable to be proposed to be downgraded to a Large Village (LV) – it is at least a Local Service Centre (LSC) and it should have a “baseline indicative housing requirement 2016 – 2036”^{*} for at least 200 dwellings.

[*Source: Table 2.5 of Emerging Rural Communities.]

[Theme 2] The proposed housing allocation for Durrington (1 house between 2026 and 2036^{*}) is too small and not proportionate to the scale of the settlement and local housing need.

[Theme 3] The objector’s land at Hackthorne Rd, Durrington (S98) is a sustainable and preferable housing site for 80 dwellings – a proportionate amount of housing for this very large Local Service Centre that forms part of the sustainable Amesbury cluster of settlements.

[Theme 4] There is a compelling case for allocating up to 80 houses on S98 with an access from Hackthorne Rd because the site is viable, available, and deliverable.

Rep ID: AMES6	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Amesbury Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Amesbury Town Council supports the development of balanced self-sufficient communities. The large developments of Archer's Gate and Kings Gate have delivered and continue to deliver the housing in the Wiltshire Core Strategy – as noted some 660 houses then a further 624 in pipeline. The Link Road was the southern boundary to development. There was no previous suggestion of a further substantial build to follow these.</p> <p>Previous consultations have emphasised the importance of balance in development. The emphasis on self-sufficient towns reinforces this.</p> <p>Amesbury Town Council recognizes that sustainable growth depends on self-sufficient communities where numbers of residents are balanced with scales of employment, education, retail, medical, and leisure infrastructures.</p> <p>A development of 350 house would be of a similar scale to most of another King's Gate. Amesbury Town Council is concerned that the 350 additional houses proposed appear to have been allocated to the area on a top-down basis without adequate consideration of local factors.</p>	

In moving from the 2006-2026 figures for Amesbury, Bulford and Durrington to Amesbury alone the Town Council would welcome information on how these house numbers were defined to be distributed.

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Considering the Priorities in the Wiltshire Local Plan:

i. Promoting Amesbury as a self-sufficient town, thus encouraging residents to work in the town- The Town Council considers that self-sufficiency also requires enough infrastructure in retail, leisure, health including dentistry, and education accessible to the residents.

ii. Improve recreational facilities and sports pitches in Amesbury – supported by the Amesbury Town Council

iii. Develop a town centre strategy that improves the public realm and encourages tourism and spending – supported by the Amesbury Town Council.

iv. Improve infrastructure and transport, particularly relating to the A303 and A345, both of which currently experience congestion to improve linkages to and from the town. The planned tunnelling of the A303 may relieve some of the issues once constructed. Having sufficient infrastructure and transport is supported by the Amesbury Town Council.

v. The Town Council supports the encouragement of potential tourism and transport linkages with Stonehenge.

Considering Amesbury as a Market Town with Durrington and Bulford as Large Villages seems sensible. Preparations for an Amesbury Neighbourhood Plan explored the question in 2013-2016 and stopped at the point of defining what the neighbourhood was. It was apparent that there were areas of separate local interest in each of the three potential components - Amesbury, Durrington and Bulford - with separate constituencies so separate development seems sensible.

The feasibility study for a Business Improvement District (BID) scheme found that there was too much dispersion across the area to proceed.

AM3. Is this the right pool of potential development sites?

In moving from the 2006-2026 figures for Amesbury, Bulford and Durrington to Amesbury alone, the Town Council would welcome advice on how the house numbers were determined and distributed.

The proposed development seems unlikely to fit in any of the 3 locations suggested.

Area 1 overlooks the A303 at close range in a valley,

Area 2 seems very close to the river and Area 3 is very close to Boscombe Down. These may be “material considerations”.

This question links to the Strategic Housing and Economic Land Availability Assessment (SHELAA) that identified three potential sites for meeting residual housing requirements. Amesbury Town Council agrees that the three sites;

- Are within 6400m buffer of Salisbury Plain Special Protected Area (SPA) which may result in recreational pressures that would need mitigation.
- Need to be connected to the town centre by methods other than private transport to help minimise congestion – and emphasise the challenges of distance and elevation between these and the infrastructures.
- Need to contribute to expand primary education and secondary education.
- Larger sites identified are better able to provide public open space.
- Are all located within close proximity to Stonehenge therefore, there is some potential for impact on the Outstanding Universal Value of the World Heritage Site (WHS) which will require assessment.

Site 1: Land north of London Road (SHELAA reference 3379), to the north of Amesbury between the edge of the town’s settlement boundary and A303. Standing above the A303 so noise and air quality (vehicular emissions) would be a major design consideration in terms of achieving acceptable amenity levels for future residents. Landscaping of the site will require mitigation including a strong landscape buffer along the north of the site.

Site 2: Land to rear of Countess Services (SHELAA reference 3186), to the north of the town and north of the A303. The site is set apart from the main settlement and therefore this could be regarded as urban encroachment into the countryside, located apart from the main settlement of Amesbury, segregated by the A303 roundabout making access by walking and cycling into the main settlement difficult.

- Bounded by the River Avon green infrastructure corridor – and is awfully close to flood areas.
- The Traffic impacts from development of this site are unlikely to be an issue given the existing infrastructure associated with the service station currently on part of the site which has been designed to accommodate a significant volume of vehicular movements.

Site 3: Land adjacent to Stockport Road and Land at Stock Bottom (SHELAA references S1054 and S1010) Amesbury Town Council notes that the Site 3 connects southern extension of the urban area so it would be logical to consider this area comprehensively, to what extent and for what uses the area may be suitable for development.

- To the south of Amesbury and slightly separate from the built form and does not adjoin the settlement boundary.

- Some heritage impact is identified at this stage as the site incorporates scheduled linear boundary and may possibly impact on setting of scheduled Ogbury Camp.
- The site open to views from the south and west and there is little existing vegetation to act as a buffer to the urban development of Amesbury South. This would need to be mitigated by planting. (It would be better to maintain the urban edge of Amesbury to the North of Stockport Avenue where there is already an establishing urban edge of planting as part of site S1013 that can be reinforced. By developing this and s1010 it would be unacceptable urban development in the countryside.
- The site is located 1000m away from a congested corridor. Amesbury Town Council noted that this site is remarkably close to Boscombe Down Airfield. It appears likely to fall within safety areas for some of the facilities (CONT at 10).

AM4. What land do you think is the most appropriate upon which to build?

CONTINUED FROM 9 ... within the perimeter and those outside, such as Very High Frequency (VHF) Omnidirectional Radio Range (VOR). For new residents there will be aircraft noise to consider versus amenity. There may also be security concerns from overlooking of the airfield from some residences.

Page 9 of the site selection document makes frequent reference to the A435. Presumably, this is a misprint for the A345. The A435 is near Cheltenham. This does not do much for the confidence of the reader.

The proposed development may not fit in any of the 3 locations suggested. Area 1 overlooks the A303, Area 2 seems very close to the river and Area 3 is very close to Boscombe Down airfield and encroaches on its supporting infrastructure. These seem to be “material considerations” making the 3 choices poor ones.

It is essential that the infrastructures match the numbers of homes to be built and are accessible to them. Amesbury Town Council is exploring the possibility of working in a partnership with Natural England and a local farmer to establish a bio-corridor along Stockport Road in order to promote bio-diversity and preserve some rare calcareous grassland. Further development in this area will undermine its viability and raise potential pressures for further development.

Further building to the south of Amesbury will encourage additional ribbon development towards High Post, Long Hedge and Sarum/Salisbury. In the long term this development could remove the separate nature of Amesbury Town and reduce it to the status of a northern suburb of Salisbury.

To establish a limit of development invites consideration of what the natural boundaries of Amesbury may be. Geography is likely to be a major driver in determining what these boundaries are.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Boscombe Down Airfield is not mentioned in the Environmental assessment for the southern areas. This is a major omission. On Local Employment the impacts of Covid and the ambitions for a Net Zero economy are changing some long-standing assumptions. These should be considered in the review. Transport links are the enablers to use infrastructure outside the town. Tourism is an area for development but depends on travel becoming viable.

The Centre of Amesbury is the road in what was the centre of the old town forming a triangle with High Street and Salisbury Street. Until 2007 these contained the vast bulk of the retail. Developments over the last 20 years have spread the town's area and population to the east and south. The distances are further complicated by the changes in elevation between the old centre at the foot of the downs and the developments across the tops of these.

The 2009 planning inquiry led to the establishment of the Tesco's on London Road. This required a decision by the Secretary of State for Communities because it did not comply with the Salisbury District Local Plan. This inquiry acknowledged the need for more retail identified by the Amesbury Market Town Partnership's consultations in developing the Amesbury Community Strategic Plan. At that time, the scale of the developments in Kings Gate was not known – had it been then the application by Asda for store on Solstice Park might also have been accepted.

The self-sufficiency of the town depends on more than employment availability. Other aspects of infrastructure include education and health capacities, retail offering, and leisure facilities. Accessibility for these is essential to all the residents of Amesbury that may require sub-hubs across Amesbury.

Bus links are limited rather than good – private transport is necessary to access Andover within reasonable time.

Movement around Amesbury is complicated by the differences in elevation and distance. Moving to the old town centre, from Kingsgate is downhill, about a mile, but the return trip uphill, perhaps laden with groceries, is not always viable without a car.

The statement that Amesbury has a reasonably healthy town centre with a good mix of retail, services and facilities seems over optimistic, especially given the additional houses built in the pipeline and now proposed.

- The town centre has unit vacancies well below the national average. (what is the significance of this?)
- Some capacity for a medium-sized convenience food store and no capacity for comparison goods retail up to 2036. This appears inaccurate and was not supported by Amesbury Market Town partnership consultations.
- The town benefits from strong links to military establishments and the growth of technology parks at Boscombe Down and Porton Down. – This is true but ignores the Effects of working with a military airfield.

• The Solstice Business Park is predominantly fully occupied, supporting a range of local employers and large national companies. Based on current evidence, there does not appear to be a need to identify further land for traditional B-class uses at the town.

Establishing what the boundaries to Amesbury are depends on the overall idea for the settlement.

AM6. Are there any issues or infrastructure requirements that should be identified?

The effects of Covid-19 and the move towards a Net Zero economy on the forms and scales of tourism will emerge. It is essential that the infrastructures match the numbers of homes.

The extent of working from home may change the needs for transport but also the design of dwellings. These will shape the requirements for Amesbury.

Further comments

On this form Question 9's box truncated the response so it continues into Question 10's box

Rep ID: AMES7

Consultee code: Statutory Body

Consultee Organisation (if applicable): Wessex Water

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): no

If this representation refers to attachment(s), these are listed below:

AM1. What do you think to the scale of growth? Should there be a brownfield target?

Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

Site 1: Land north of London Road (SHELAA reference 3379)

No identified capacity issues for moderate development at this area in respect of connection to the public foul and water supply networks. A 9 inch water main passes through the site; appropriate easements to be observed. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

Site 2: Land to rear of Countess Services (SHELAA reference 3186). Approximately half of the development area is within the odour and flies consultation zone for Ratfyn Sewage Treatment Works. We will object to development at this location if it is within 250 metres of the works (flies) and within the 3 OUEm3 (or above) odour contour as defined by odour modelling. No identified capacity issues for moderate development at this area in respect of connection to the public water supply network. Depending on development numbers it is highly likely that improvement works will be required to the Wessex Water pumping station on Countess Roundabout, causing significant disruption. Surface water to be discharged in accordance with local and national policy. There must be no surface water connections to the foul sewer network.

Site 3: Land adjacent to Stockport Road and Land at Stock Bottom (SHELAA references S1054 and S1010). A moderate amount of development can be accommodated in networks constructed and proposed at the Kings Gate development without additional local improvements. Early indication of development certainty, numbers and phasing will ensure efficient investment where downstream capacity improvements are planned to accommodate recently approved development.

AM4. What land do you think is the most appropriate upon which to build?

Sites 1 & 3 through desktop appraisal appear to be most appropriate for connections to our services. Site 2 is adjacent to our sewage treatment works with a risk of reduced amenity due to fly and odour issues. Limited foul drainage capacity with possible improvements required at Countess Roundabout.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see comments under AM3

AM6. Are there any issues or infrastructure requirements that should be identified?

We welcome early involvement in contributing to an Infrastructure Delivery Plan. We take this opportunity through consultation to identify any particular serious constraints in accordance with our statutory undertaking and such as those outlined with Site 2.

Further comments

Rep ID: AMES8	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Already the town is overloaded with homes and no services such as dentists, schools or doctor surgery. There is limited land for grave sites, places of worship (there is currently no mosque or synagogue areas for worship). I utterly oppose the building of more houses when there is such opposition to the Stonehenge Tunnel. Perhaps make a deal that we can take a few hundred houses (including those built by independent developers such as those built on Parsonage Road as my understanding is Council only takes notice of houses built by large scale developers.) We should have transparency over exactly how many houses have been built versus the Developer's sites such as Archers gate and similar and the number of one off houses that have been built. We have already absorbed much of Army Basing 2020 - surely that should count for the increase in accommodation? We have more than filled our quota of properties built.</p>	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

There is no point in encouraging people to work in town when there are no jobs in town nor are there many facilities such as doctor,s dentists, enough reasonably priced parking etc.

AM3. Is this the right pool of potential development sites?

No - we already have enough development. However at a push it would be land behind Countess Services or indeed the services themselves as they are an eyesore and not very well utilised.

AM4. What land do you think is the most appropriate upon which to build?

Countess Services

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes - need more doctor's, dentists, schools, need more parks, social services etc

AM6. Are there any issues or infrastructure requirements that should be identified?

Deal with pollution with all the new buildings and cars, the lack of parking as if you build a 3 bedroom house you will need usually 3 parking spaces for the parents and teenage kids.

Further comments

Rep ID: AMES9	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
Yes, there should be a brownfield target and it should be assessed through a local consultation process and take into account changes to retail and office buildings. There has been too much development on greenfield land outside of the settlement. The scale of growth should be agreed only in balance to the scale of local employment growth.	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
The priorities should be that housing growth must be for smaller, affordable homes which remain smaller and affordable.	

AM3. Is this the right pool of potential development sites?

The selected site is more greenfield agricultural land. The brownfield survey needs to take priority and in conjunction with an employment need survey.

AM4. What land do you think is the most appropriate upon which to build?

Brownfield and housing which meets the assessed local needs through a local consultation.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Housing provision should be tailored to the needs of a particular area. Using the housing needs survey sent to each household in Wiltshire to identify those needs will reveal the social and economic factors if the survey is properly applied. This could include a section on the immediate environment to Amesbury and the effects huge housing growth has had the surrounding area. A Neighbourhood Plan is the best vehicle.

AM6. Are there any issues or infrastructure requirements that should be identified?

Providing for medical and educational services within the immediate area and encouraging the use of all means of travel other than the car. There is no reference to plans to regenerate Amesbury town centre and serve the new estates rather than tacitly encouraging car journeys.

Further comments

Rep ID: AMES10	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Atlas Planning Group
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES10
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
The scale of growth should be agreed only in balance to the scale of local employment growth.	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
AM3. Is this the right pool of potential development sites?	

Our Client has an additional site for consideration that has been submitted simultaneously to the ongoing 'call for sites':

1) Land adjacent to Highpost Business Park – 146.5 acres of land for employment use.

The call for sites forms are appended to this submission which includes more details on each site which are considered suitable for future development. The site is considered suitable for a mix of B2/ B8 uses as an expansion to the existing High Post Business Park, which is a principal employment area.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

On behalf of our Client, [NAME REDACTED], we enclose a site for consideration as part of the current Call for Sites exercise which is being undertaken.

The completed SHLAA submission form is accompanied by this covering letter and a plan (LOCATION PLAN SEE AMES10) identifying the site boundaries.

The site, which currently comprises agricultural land, measures circa 59ha and is located to the north, west and immediately south of the existing High Post Business Park. Although the site is in the open countryside, it is directly adjacent to a designated 'Principal Employment Site' High Post Business Park as defined by Appendix G of the Wiltshire Core Strategy (2015) (MAP SEE AMES10). Given this adjoining employment use, the submitted site is a logical choice to be considered for future provision of employment land.

According to the Environment Agency's Flood Map for Planning, the site is within Flood Zone 1 where there is a low risk of flooding.

The only Public Right of Way affecting the site is shown below in Figure 2 (SEE AMES10) and runs east to west along one of the current field boundaries. Should you require any further information regarding the site, please do not hesitate to contact me.

Rep ID: AMES11	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Lincoln College	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES11
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>4. Planning for Amesbury</p> <p>4.1. The majority of the Local Plan Review Consultation is divided into documents which look at the individual planning needs for the main settlements within the county. These Representations will focus on the Planning for Amesbury document, within which the site is included as a potential development site for allocation.</p> <p>4.2. The level of additional growth required for Amesbury is set out within the Emerging Spatial Strategy (ESS), which has been discussed earlier within these representations, and is set out in further detail within the Planning for Amesbury document.</p> <p>4.3. As stated, Lincoln College wishes to support the higher level of growth identified for Amesbury, which looks to achieve annual targets higher than the minimum levels set by the Government within the Standard Methodology for Housing Need, and also looks to ensure jobs and workers are suitably aligned.</p> <p>4.4. However, this representation has identified a fundamental flaw associated with the proposed Plan Period which, at the anticipated date of adoption, would not be compliant with national planning policy. As a result, the Plan Period should be</p>	

amended from 2016-2036 to 2018-2038 as a minimum. This in turn has implications for the amount of housing that should be developed in Amesbury through the Local Plan Review.

4.5. The Wiltshire Housing Land Supply Statement published by the Council in December 2020, indicates that 2,690 dwellings were delivered in Wiltshire for the period 2016/17, and 2,428 dwellings were delivered in the period 2017/18. This equates to a surplus of 918 above the Core Strategy requirement for that two year period.

4.6. The emerging housing figures contained within the Local Plan Review states that the Council is only planning for the 'residual requirement', which is the number of new homes left to be planned for once completions and commitments have been taken off the overall requirement (Emerging Spatial Strategy Paragraph 3.7 (i)).

4.7. However in doing so, this takes into account the over-supply of housing to date, which results in a reduction of the Local Plan Review requirement. Savills disagrees with this approach of using the over-supply to date to reduce future requirements. The principle of a housing requirement adopted within a strategic policy, or as calculated using the Standard Methodology, is a minimum requirement – provision in excess of this is acceptable, but provision of less than this requirement is not. Therefore, a review of Local Plan policies should include and provide for any shortfall to date, but does not need to be reduced if there has been over-provision. This action would seek to constrain housing delivery to the minimum requirement, essentially therefore treating it as a fixed target requirement, rather than a minimum; there is no basis for such an approach in any planning policy or guidance.

4.8. This approach would be significantly at odds with the Government's aims of significantly boosting the supply of housing.

4.9. Therefore, although recognition can be made that the Core Strategy requirements for 2016-2018 have been met, and no undersupply needs to be delivered, the residual requirement should not be reduced by the oversupply within these years.

4.10. For the Wiltshire area there was an over delivery of 918 dwellings within the period 2016-2018. If these years are to be removed from the Plan Period, as suggested earlier within these representations, the previous oversupply should therefore be included within the emerging Local Plan Review requirement, and the 'residual requirement'. Additionally, if the Plan Period is to be extended to 2038 (as a minimum, also set out earlier within these Representations), the additional two years of requirement should be added to the Local Plan Review total. Across the Wiltshire area this equates to a minimum uplift of 5,118 dwellings for the period 2018-2038.

4.11. Currently, the Local Plan Review identifies a requirement for 1,635 dwellings in Amesbury for 2016-2036. However, based on the strategy contained within the ESS, the residual requirement reduces to 350 up to 2036. It is therefore recommended that, along with the wider Wiltshire numbers, the appropriate uplift is applied to the housing requirement for Amesbury, to allow for the revised Plan Period (2018-2038 as a minimum) and to remove the erroneous reliance on previous over delivery within the settlement.

4.12. Notwithstanding this concern, it is also recommended that the housing figures for Amesbury are increased to allow for flexibility throughout the course of the remaining Plan Period.

4.13. The NPPF also states, in Paragraph 11(a), that Local Plans should “be sufficiently flexible to adapt to rapid change”. The proposed 350 dwellings for the significant settlement of Amesbury, which not only serves residents of the town but also of neighbouring areas including Bulford, Durrington, Larkhill, and other smaller settlements along the A345, does not appear sufficient to either meet the housing needs of Amesbury, or allow for sufficient flexibility to adapt to rapid change.

4.14. There were many unexpected events in 2020 which indicate just how rapid and substantial such changes may be.

4.15. First and foremost, the country was significantly affected by the Coronavirus (Covid-19) Pandemic which has affected all aspects of life, including but not limited to people’s housing desires, working patterns (with a particular emphasis on working from home), outdoor leisure and exercise, and transport patterns. These considerable changes are likely to have long-term impacts on the country, and although it is too early to have surety about what this may look like for future growth patterns, this serves to demonstrate the necessity of the flexibility that the NPPF desires within emerging Local Plan policies.

4.16. Secondly, in August 2020, the government announced a revision to the Standard Methodology for Local Housing Need, known as SM2. SM2 looked to significantly boost supply, create a more predictable calculation, and take better account of past trends than was currently considered within the standard methodology adopted at the time.

4.17. For Wiltshire, SM2 would have increased the annual housing requirement from 2,100 dpa (adopted within the Core Strategy) to 2,917 dpa, an increase of nearly 39%. In December the Government announced that the changes to the standard methodology would not be as significant, and therefore largely reverted to a previous iteration of the calculation. However, this again serves to demonstrate both how rapidly housing requirements within an area can change and how significant this change can be.

4.18. It is therefore recommended that the housing requirement for Amesbury be increased to allow for sufficient flexibility to respond to rapid change as required by the NPPF. It is recommended that a minimum uplift of 20% should be applied to the residual requirement, as well as an uplift to take account of the extended Plan Period 2018-2038 (as a minimum).

4.19. An uplift in Amesbury’s housing figures could also create other benefits. The Wiltshire Local Plan Review Interim Sustainability Appraisal Report states that, with regard to the Emerging Spatial Strategy: “At Amesbury minor positive effects only for housing provision are considered most likely for this emerging strategy as, taking into account existing commitments, a residual requirement of just 349 dwellings would be required for the plan period. It is suggested that the housing requirement for Amesbury could be increased to increase these benefits” (Paragraph 4.3.10, emphasis added).

Question AM4: What land do you think is the most appropriate upon which to build?

4.20. The Planning for Amesbury document identifies that even with brownfield/ windfall development within the town, it will be necessary to allocate greenfield sites for development through the Local Plan Review to meet the housing requirements.

4.21. Lincoln College fully supports the inclusion of Land North of London Road as one of the three preferred options for allocation within Amesbury.

4.22. The site is within a highly sustainable location very close to the town centre and High Street of Amesbury. Its southern boundary is formed by the Amesbury built area boundary, indicating both the proximity to Amesbury, but also the ease in which a future development at the site could be assimilated into the settlement.

4.23. A development of approximately 170 units is proposed for the site. This will significantly boost the supply of dwellings within Amesbury, meeting a large proportion of the residual requirement identified for the remainder of the Local Plan Review period.

4.24. As set out earlier within these representations, there are no significant constraints to development that have been identified at the site. Access is afforded to the site via London Road, and multiple pedestrian connections could be provided within a future development to achieve high levels of connectivity. Despite the proximity of the site to the A303, a Noise Assessment has been undertaken which identifies that suitable noise levels can be achieved within future development proposals and this is not a constraint to development at the site. The Site Landscape Assessment, published by Wiltshire Council in June 2017, confirms that the site has a moderate to high capacity to accommodate change, and despite its 'pleasant' nature it is not attractive in landscape character terms, nor does it contribute to the settlement setting of Amesbury.

4.25. A landscape buffer, as recommended within Page 8 of the Planning for Amesbury document, could easily be incorporated into the proposals without the need to significantly reduce the developable area of the site.

4.26. The inclusion of Land North of London Road (SHELAA Reference 3379) as a preferred option for future development is fully supported by Lincoln College, and it is recommended that the site is taken forward as a residential allocation through the next stages of the Local Plan Review preparation.

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

AM4. What land do you think is the most appropriate upon which to build?

The Planning for Amesbury document identifies that even with brownfield/ windfall development within the town, it will be necessary to allocate greenfield sites for development through the Local Plan Review to meet the housing requirements. Lincoln College fully supports the inclusion of Land North of London Road as one of the three preferred options for allocation within Amesbury.

The site is within a highly sustainable location very close to the town centre and High Street of Amesbury. Its southern boundary is formed by the Amesbury built area boundary, indicating both the proximity to Amesbury, but also the ease in which a future development at the site could be assimilated into the settlement.

A development of approximately 170 units is proposed for the site. This will significantly boost the supply of dwellings within Amesbury, meeting a large proportion of the residual requirement identified for the remainder of the Local Plan Review period.

As set out earlier within these representations, there are no significant constraints to development that have been identified at the site. Access is afforded to the site via London Road, and multiple pedestrian connections could be provided within a future development to achieve high levels of connectivity. Despite the proximity of the site to the A303, a Noise Assessment has been undertaken which identifies that suitable noise levels can be achieved within future development proposals and this is not a constraint to development at the site. The Site Landscape Assessment, published by Wiltshire Council in June 2017, confirms that the site has a moderate to high capacity to accommodate change, and despite its 'pleasant' nature it is not attractive in landscape character terms, nor does it contribute to the settlement setting of Amesbury.

A landscape buffer, as recommended within Page 8 of the Planning for Amesbury document, could easily be incorporated into the proposals without the need to significantly reduce the developable area of the site.

The inclusion of Land North of London Road (SHELAA Reference 3379) as a preferred option for future development is fully supported by Lincoln College, and it is recommended that the site is taken forward as a residential allocation through the next stages of the Local Plan Review preparation.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

6.9. A development of approximately 170 units is proposed for the site. This will significantly boost the supply of dwellings within Amesbury, meeting a large proportion of the residual requirement identified for the remainder of the Local Plan Review period.

6.10. Overall, the positive assessment of the site at Land North of London Road is welcomed and supported. It provides an opportunity for sustainable development immediately adjacent to the current settlement boundary of Amesbury, and within walking distance of many of the facilities and services provided by the town. The inclusion of Land North of London Road (SHELAA Reference 3379) as a preferred option for future development is fully supported by Lincoln College, and it is recommended that the site is taken forward as a residential allocation through the next stages of the Local Plan Review preparation.

Rep ID: AMES12

Consultee code: Statutory Body

Consultee Organisation (if applicable): Ministry of Defence

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
AMES12

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

2.1 Potential Development Sites. The MOD has the following comments to make on the Potential Development Sites identified:

2.2. Amesbury

2.2.1 Site 3 'Land to the West of Boscombe Down'. The MOD object to the identification of this site as a potential development site. Site 3 is located at the western edge of Boscombe Down Airfield. I repeat the comments made by the DIO Safeguarding Team as support for this objection:

"The site identified as no. 3 in the Market Town Site Selection Report for Amesbury (formerly with ref nos. S1010 Land at Stock Bottom and S1054 Land adjacent to Stockport Park) is constrained by the Aerodrome and Technical safeguarding zones associated with Boscombe Down which require consultation on any development of this site, in addition a substantial part of the site is washed over by an explosives storage safeguarding zone that precludes inhabited development. It is recommended that this allocation is removed from the local plan".

There is an additional impact on the flight safety/operational activity of the Airfield. Due to the proximity of the area (Plot 3) to the runway, the current lack of housing means that it remains an option for forced landings for single engine aircraft in an emergency. In the event that the 'departure channel' [Site 3] becomes filled with housing development this effectively eliminates forced landing options for departing single-engine aircraft which could see the cessation of single-engine Fixed Wing and Rotary operations from that area; this would significantly impact Empire Test Pilot School and Rotary Wing T&E Squadron H125 operations and Southampton University Air Sqn (SUAS) (Tutor operations). The MOD would therefore consider the allocation of residential development on Site 3 as being contrary to Paragraph 95b of the NPPF.

3. Conclusion

3.1 The MOD respectfully submit that:

- a. Site 3 'Land to the West of Boscombe Down' in Amesbury is removed as a potential site for residential development for the reasons set out in paragraph 2.2.1.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

We thank the Council for the opportunity to comment on the above Consultation. Please find set out below specific representations submitted on behalf of the Secretary of State for Defence on the above consultation. Please note that these comments should be read in addition to those provided by colleagues in respect of MOD Safeguarding interests. The comments set out below relate to wider MOD estate related interests.

We would be grateful if you could acknowledge their receipt, by return.

If you have any questions arising, please contact me on 0300 1510344 in the first instance. 1. Background

1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the Wiltshire Local Plan Review Consultation. The consultation relates to a number of documents including the Emerging Spatial Strategy, Empowering Rural Communities, and Addressing Climate Change and Biodiversity Net Gain through the Local Plan. In addition, a series of settlement specific papers have been published which highlight potential development locations and place shaping priorities. The DIO manages the Defence Estate on behalf of the MOD.

The MOD has a number of operational establishments within Wiltshire and has a long and proud history of working with the Community, which is reflected in both local level and county wide liaison meetings, such as the MCI Partnership. Additionally, MOD establishments provide civilian employment and training opportunities and many service personnel and their families choose to settle within the County both during and after their military service.

1.2 The MOD welcomes the opportunity to work closely with Planning Authorities in the development of policies and strategies within the Development Plan. As recognised in the National Planning Policy Framework, it is important that Planning Authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites.

I would like to draw your attention to paragraph 95 of the National Planning Policy Framework (February 2019), which states:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:... b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

Rep ID: AMES13	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Pro Vision
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES13
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
No comment at this stage	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
No comment at this stage	

AM3. Is this the right pool of potential development sites?

We comment specifically in regard to 'Site 3'.

Site 3 is supported. It is a logical area of search for future development noting the road access and footpath/cycle connectivity and proximity to the new developments at Archer's Gate and King's Gate, including new schools and convenience retail facilities. The boundary to Site 3 should be amended to reflect the precise land ownership and availability of land (see the attached Site Location Plan, drawing 51012 P1-02 Rev A) (AMES13). This identifies that there is more land available than currently included in Site 3, presumably based on SHELAA Site s1054, which is not entirely accurate. In addition, we include a Site Location Plan (drawing reference 51012/P1-01 Rev A) (AMES13) identifying the land in our Client's ownership which they wish to put forward for consideration as part of the 'Site 3' allocation (land adjacent to Stockport Road and Land at Stock Bottom, SHELAA references S1054 and S1010) for further assessment.

I would be grateful if you could confirm receipt of this email. Site 3, including land being put forward adjacent to S1054, shown on the submitted Site Location Plan (drawing 51012 P1-02 Rev A), whilst currently outside of the Settlement Framework Boundary is suitable for mixed-use development and is available. The site is accessible via the existing road infrastructure, including direct public transport links to Salisbury, and would form a logical extension to the town.

AM4. What land do you think is the most appropriate upon which to build?

In respect of the opportunity at Site 3, it would be appropriate for a mix of housing and employment development, noting the close proximity to the cluster of businesses at Stockport Road, and proximity to the mixed uses at MoD Boscombe Down, as well as the new residential areas at Archer's Gate and King's Gate. The natural topography would see the development sit within a partial 'basin' allowing the development to nestled into the landscape and screened from long-distance views.

Site 3 is relatively unconstrained, with few existing trees and no water bodies of other significant environmental features.

There are radio masts associated presumably with the neighbouring MoD airfield that would need to be safeguarded.

Heritage issues would also need to be investigated noting the historic earthworks identified on the OS mapping, and factored into any master planning, such as decisions on the location of public open space.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Together with the additional land available adjoining it, Site 3 can provide extra land for housing and for commercial development which will ensure the delivery of further social, economic and environmental benefits in an accessible part of the town, with direct public transport links to Salisbury.

AM6. Are there any issues or infrastructure requirements that should be identified?

Infrastructure requirements for Site 3 are likely to be limited noting the close proximity of the new round about on the A345 (at Stock Bottom) serving the Archer's Gate and King's development, and providing close connection to the strategic road network and public transport.

Further comments

On behalf of our Clients, [NAMES REDACTED], please find attached the Market Town Consultation Response Form in relation to the 'Planning for Amesbury' document.

In addition, we include a Site Location Plan (drawing reference 51012/P1-01 Rev A) (AMES13) identifying the land in our Client's ownership which they wish to put forward for consideration as part of the 'Site 3' allocation (land adjacent to Stockport Road and Land at Stock Bottom, SHELAA references S1054 and S1010) for further assessment.

I would be grateful if you could confirm receipt of this email. Site 3, including land being put forward adjacent to S1054, shown on the submitted Site Location Plan (drawing 51012 P1-02 Rev A), whilst currently outside of the Settlement Framework Boundary is suitable for mixed-use development and is available.

The site is accessible via the existing road infrastructure, including direct public transport links to Salisbury, and would form a logical extension to the town.

The natural topography would see the development sit within a partial 'basin' allowing the development to nestle into the landscape and be screened from long-distance views.

Site 3 is relatively unconstrained, with few existing trees and no water bodies or other significant environmental features.

There are radio masts associated presumably with the neighbouring MoD airfield that would need to be safeguarded.

Heritage issues would also need to be investigated noting the historic earthworks identified on the OS mapping, and factored into any master planning, such as decisions on the location of public open space.

Rep ID: AMES14

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Atlas Planning Group

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Nationwide Engineering Group

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
AMES14

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

Our Client has an additional site for consideration that has been submitted simultaneously to the ongoing 'call for sites':
1) Land west of A345 at High Post (Fourmile Hill), – 355 acres of land for mixed use development The call for sites forms are appended to this submission which includes more details on each site which are considered suitable for future development.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Land west of A345 at High Post (Fourmile Hill), SP4 6BG – SHLAA Call for Sites.
On behalf of our Client, [NAME REDACTED], we enclose a site for consideration as part of the current Call for Sites exercise which is being undertaken.
The completed SHLAA submission form is accompanied by this covering letter and a site location plan (LOCATION PLAN SEE AMES14).
The site, which currently comprises agricultural land, measures circa 144ha and is located to the west of the A345 at High Post. Although the site is in the open countryside in planning policy terms, it is located close to the settlement boundary at Longhedge

(directly to the south as shown in black on the map extract below), where there is a recent housing allocation (CP2) (MAP SEE AMES14).

The site therefore represents a logical option to consider for future mixed-use development (residential and employment), particularly also considering the close proximity to the existing High Post Business Park, less than 500m to the north. According to the Environment Agency's Flood Map for Planning, the site is within Flood Zone 1 where there is a low risk of flooding.

There are no Public Rights of Way directly crossing the site as shown by the extract below taken from the Wiltshire's Public Rights of Way map (MAP SEE AMES14). Should you require any further information regarding the site, please do not hesitate to contact me.

Rep ID: AMES15	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Fowler Fortescue
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Shaftesbury International Services Limited	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES15a -d
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>4.1. SIS do not consider that the scale of growth proposed for Wiltshire and the Salisbury HMA is sufficient to accommodate a sustainable level of growth for Amesbury.</p> <p>4.2. Based on SIS's response to the Emerging Spatial Strategy (ESS), it is considered that the level of growth which should be directed to the Salisbury HMA should be increased in order to accommodate 4 additional years of growth (i.e. up to 2040). The resulting residual level of growth can be accommodated on land proposed for allocation by SIS at South West Amesbury (approximately 1,200 homes) and on non-strategic sites (i.e. land North of London Road and Land East of the A345). - Brownfield Target</p> <p>4.3. SIS note that a brownfield target is set for Amesbury for the period 2021-2031. This target is questionable and SIS consider that it should be deleted from the Plan. Instead, there should be a policy included in the Local Plan Review which encourages the redevelopment of brownfield sites.</p>	

4.4. The brownfield target relates to a source of housing land supply, rather than to the stated housing requirement. Whilst the target appears to be derived from past windfall rates of development, which are by their nature are uncertain and difficult to predict, it is unclear if the figure stated by the Council relates to the identification of sites which are demonstrably deliverable. The use of this target is also confusing because it relates to a period which does not correspond to the full Plan period.

4.5. SIS also note that the Local Plan Review identifies that its brownfield targets will be reconsidered under future reviews. This adds a further layer of uncertainty in terms of being able to establish what is the relevant residual housing requirement for Amesbury.

4.6. Instead of setting a brownfield target, SIS consider that the Local Plan Review promotes the effective use of land, in accordance with National planning policy (NPPF 2019, Paragraph 117). In this way, the Plan will seek to make as much use as possible of previously-developed or brownfield land, whilst promoting place shaping principles which allocate greenfield sites which can deliver development which improves the sustainability of towns like Amesbury and makes them more attractive places to live, work and socialise.

Overall Housing and Employment Requirements – Wiltshire and the Housing Market Areas

3.13. SIS support the general principle behind the Council's decision not to use the Standard Method calculation of additional dwellings but instead to base its calculation of housing requirements upon a Local Housing Need Assessment.

3.14. This is consistent with National Planning Policy Guidance which states that "The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure" (NPPG Paragraph: 002 Reference ID: 2a-002-20190220). SIS also note that NPPG states that "Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate" (Paragraph: 008 Reference ID: 2a-008-20190220).

3.15. In setting the overall housing requirement for the Local Plan Review period, SIS also note that NPPG states that "The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates" (Paragraph: 010 Reference ID: 2a-010-20201216).

3.16. However, SIS does not consider that the appropriate levels of housing requirement have been identified in the Local Plan Review, either in relation to the overall housing requirement for Wiltshire or in relation to the HMAs.

3.17. In relation to the Salisbury HMA, which is of particular interest to SIS, it is considered that the level of housing requirement identified in the emerging Spatial Strategy is below what SIS considers to be appropriate for this location.

3.18. The level of housing identified for the Salisbury HMA does not adequately take into consideration the sustainability of Amesbury to accommodate both non-strategic and strategic levels of growth to meet future housing needs (i.e. sites including

land South West of Amesbury and land North of London Road and Land East of the A345). Nor does it fully reflect the close proximity of the town to other larger settlements including Salisbury and Andover, the town's location on the strategic road network (i.e. the A303) and its access wider employment opportunities and higher order facilities, using sustainable modes of transport.

3.19. In addition, the proposed level of housing requirement identified in the Emerging Spatial Strategy will not result in a level of growth during the Plan period which can support the delivery of the type of community infrastructure which would result in Amesbury being a more sustainable town. For example, a primary school, additional community facilities, opportunities for small-scale employment, public open space (including a riverside park, community orchard and allotments) and a public transport hub (including facilities such as additional bus laybys, public conveniences and coffee shop).

3.20. In view of this, SIS consider that the housing requirement for Wiltshire and the Salisbury HMA should be increased, as outlined below.

- Increase Housing Requirements to 2040 (4 Additional Years Supply)

3.21. On the basis of extending the timeframe of the Local Plan Review from 2016-2036 to 2018-2040, SIS propose that the overall housing requirement for Wiltshire is increased to take account of these additional 4 years.

3.22. This proposed increase in housing requirements for Wiltshire is identified in Table 2 below (AMES15a).

3.23. The apportionment of the proposed additional 4 years of development should be a matter for further consideration. In relation to Amesbury, SIS consider that the town should be the subject of a minimum residual housing requirement of approximately 1,500 dwellings. This proposed level of increase in housing requirement would accord with the sustainable location of Amesbury and its capacity to accommodate both non-strategic and strategic levels of growth which can also deliver infrastructure to serve the town (i.e. land at South West Amesbury, land North of London Road and land East of the A345).

- Conclusion: Housing Requirements for Wiltshire and the Salisbury HMA

3.24. On the basis of the arguments identified above, SIS consider that the overall housing requirement for Wiltshire should be increased from 45,630 dwellings to 50,204 dwellings for the period 2018-2040. For the same period, the residual housing requirement for Amesbury should be increased from 350 dwellings to a minimum of approximately 1,500 dwellings.

Delivering the Spatial Strategy

- Main Settlements

3.25. SIS support the identification of Amesbury as a Market Town (Page 3) and agree with the statement in the Emerging Spatial Strategy (ESS) that towns like Amesbury "have the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities". In the case of Amesbury, this should involve the development of non-strategic and strategic scale sites in order to deliver growth both in the short term and in the medium to longer term (i.e. land at South West Amesbury, land North of London Road and land East of the A345).

- Delivery Principles

3.27. SIS support the aims of the 5 delivery principles identified on Page 6 of the ESS. The Local Plan Review should be led by the 'place shaping priorities' in order to ensure that settlements such as Amesbury have the opportunity to become more sustainable and more attractive places to live, work and socialise.

3.28. These place shaping priorities should, in turn, focus upon the identification of development allocations in Amesbury which can deliver new infrastructure which is needed by existing and new residents. In terms of new infrastructure for Amesbury, this could include a primary school, additional community facilities, opportunities for small-scale employment, public open space (including a riverside park, community orchard, informal open space, allotments, play areas, strategic woodland planting and the provision of cycling, walking and fitness trails within the site, as well as on adjoining land in the same ownership.) and a public transport hub (including facilities such as additional bus laybys, public conveniences and coffee shop).

3.29. With regard to the third delivery principle, SIS request that its emphasis is changed. The Local Plan Review's delivery principles should not be led by simply finding sites to meet the housing requirement which is currently identified in the Plan. Instead, the Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like Amesbury and provides opportunities to deliver enhanced levels of infrastructure to serve existing and new residents.

3.30. With regard to the fifth delivery principle and the allocation of large greenfield sites, SIS request that this principle should be expanded to state that their phasing could, in certain circumstances, extend beyond the Plan period.

3.31. SIS also consider that the delivery principles should be clarified in order to state that the Local Plan will identify the allocation of sites which are of a non-strategic and strategic scale (i.e. land at South West Amesbury, land North of London Road and Land East of the A345). In this regard, SIS's proposal for South West Amesbury is considered to be of a strategic scale.

Salisbury Housing Market Area

- Alternative Development Strategies

3.32. On the basis that the overall housing requirement for Wiltshire and the HMAs is increased in line with our request, SIS consider that the allocation and development of land at South West Amesbury can form part of and be consistent with whichever development strategy is ultimately selected for the Salisbury HMA. This includes the allocation of non-strategic sites (i.e. land North of London Road and Land East of the A345) to meet short term housing needs and strategic sites to meet medium to longer term housing and infrastructure needs.

3.33. In view of this, SIS does not have any specific comments about the Alternative Development Strategies. Meeting the Residual Housing Requirement at Amesbury

3.34. On the basis that the housing requirement for Wiltshire and the Salisbury HMA is increased, as identified in our response to the Emerging Spatial Strategy, the housing requirement for the period up to 2040 will require the delivery of new housing allocations.

3.38. With regard to the comments made by the Council in relation to Alternative Development Strategies, SIS note the following:
(i) Paragraph 3.57: The reference only to Salisbury in this paragraph should be extended to include other main settlements within the HMA (such as Amesbury). This is because development at the scale SIS envisage at Amesbury is capable of providing opportunities to design new neighbourhoods, whether on strategic or non-strategic sites, which can incorporate renewable energy production, alternatives to the private car and more energy efficient new buildings. Indeed, SIS considers that there is a need for an urban extension to Amesbury, in order to meet the increase level of growth during the Plan period to 2040.

Concluding Summary

3.39. On the basis of the responses made above to the Emerging Spatial Strategy, SIS request that the Plan period should be changed from 2016-2036 to 2018-2040. In doing so, the overall housing requirement for Wiltshire should be increased from 45,630 to 50,204 dwellings. The residual housing requirements for the HMAs and towns identified in the Local Plan Review also require further consideration. The process of deciding the level of housing requirements for these areas should be based on place shaping principles and seeking to make settlements more sustainable and attractive places to live, work and socialise.

3.40. In the case of Amesbury, the residual housing requirement should be increased from 350 dwellings to a minimum of approximately 1,500 dwellings for the period 2018-2040. This proposed level of increase in housing requirement would accord with the sustainable location of Amesbury and its capacity to accommodate both non-strategic and strategic levels of growth which can also deliver infrastructure to serve the town (i.e. land at South West Amesbury, land North of London Road and Land East of the A345).

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Developer/Agent

AM3. Is this the right pool of potential development sites?

3.35. In order to accommodate the housing requirement for the period up to 2040, SIS propose that its land at South West Amesbury is made the subject of a strategic allocation, comprising the following elements:

South West Amesbury

- Up to 1,200 new homes (on the basis of approximately 33 dwellings per hectare).
 - Mix of housing including affordable.
 - New local facilities including a village centre with community facilities including a potential new health hub.
 - A mobility hub adjacent to the Salisbury Road/Stockport Avenue roundabout (including facilities such as additional bus laybys, public conveniences and coffee shop close to the existing roundabout served by existing bus services).
 - New 2 Forms of Entry (FE) primary school and contributions to sixth form provision.
 - Public open space, including provision of a riverside park, community orchard, informal open space, allotments, play areas and strategic woodland planting (including the provision of cycling, walking and fitness trails within the site, as well as on adjoining land in the same ownership).
 - 2 vehicular accesses to the site from the A345.
 - Access to an improved public transport service.
 - Delivering appropriate car parking.
 - Improved access to the countryside.
 - Biodiverse network of green infrastructure.
 - Multi-functional SuDS network.
 - Enhanced cycle and walking connections within the development and into Amesbury.
 - The proposed development is also capable of being served by sources of renewable energy.
- 4.8. SIS do not consider the pool of sites which has been identified by the Council to include all of the most sustainable development sites, from which the final selection of allocations will be made. The pool of sites does not include land which is now being promoted by SIS in relation to South West Amesbury.
- 4.9. For the reasons given in answer to Question AM4, land at South West Amesbury should be considered for strategic allocation in the Local Plan Review.
- AM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?
- 4.10. SIS consider that land at South West Amesbury, as identified in this consultation response, is an appropriate location for strategic scale development in Amesbury. This is in addition to non-strategic sites which can meet a shorter term housing requirement (i.e. land North of London Road and Land East of the A345).
- 4.11. The delivery of development on this site will not only deliver housing to meet local needs but its development will also deliver opportunities to facilitate much needed improvements to infrastructure.
- South West Amesbury
- 4.12. SIS consider that this site is suitable for the development proposed for the following reasons.

- (i) The site is capable of accommodating a strategic scale of development which can meet the medium to long-term housing requirements of Amesbury and the Salisbury HMA.
- (ii) The proposed development is capable of being phased in order to deliver a flexible approach to the delivery of housing. Such phasing could progress from the north-eastern part of the site, closest to the existing urban area of Amesbury, and then continue south westwards.
- (iii) The strategic scale of development would allow for the provision of infrastructure which can not only serve new residents but also the existing residents of the town. For example, the provision of a new primary school, community facilities, improvements to public transport facilities and public open space (including the creation of a riverside park).
- (iv) Being accessed from the A345 and adjoining the existing urban area of Amesbury, the site is in a sustainable location for development. The A345 is a very well used public transport corridor which includes regular bus services to a number of towns in the surrounding area (including Salisbury). The proposed development will also provide connections to existing pedestrian and cycle routes which surround the site and which connect to the town centre, employment, other facilities and the wider countryside (including the provision of a riverside walk and cycling, walking and fitness trails through the site, as well as on adjoining land in the same ownership).
- (v) The proposed development will be located outside of the flood zone associated with the River Avon (i.e. the site is located within Flood Zone 1).
- (vi) Appropriate measures will be taken to ensure that recreational pressures which could arise as a result of the proposed development in relation to the Salisbury Plain Special Protected Area (SPA) are mitigated. In this regard, provision will be made as part of the proposed development for public open space, including provision of a riverside park, community orchard, informal open space, allotments and play areas (including the provision of cycling, walking and fitness trails within the site, as well as on adjoining land in the same ownership).
- (vii) Although the western part of the site does not adjoin the boundary of the Stonehenge World Heritage Site (WHS), land within the ownership of SIS – which is not proposed for allocation – does adjoin the River Avon on the opposite bank to the WHS. Taking this into consideration, a Landscape and Visual Impact Assessment (LVIA) has been undertaken on behalf of SIS which concludes that there are no direct views of the proposed development from Stonehenge. SIS also note that existing shelterbelts within the site, together with additional land within SIS's ownership which can be dedicated to additional planting, between it and the WHS, can and would provide further screening of the proposed development from views from the west. In addition, the distribution of the proposed built development within the site will respect Outstanding Universal Value of the WHS. In particular, it is proposed that a riverside park and strategic woodland planting will be provided in those parts of the site which are nearest to the WHS boundary.
- (viii) In terms of the relationship between the site, the proposed development and heritage assets, it is noted that, based on the LVIA undertaken on behalf of SIS, there would be no views of the proposed development from Amesbury Abbey. In addition, as a

result of the presence of existing tree belts for screening, as already exists on the boundaries of the site, and as existing and to be undertaken outside of the site but on land in the same ownership (including proposed woodland planting), there will be no or only glimpsed views of listed buildings which are located on the northern and western sides of the River Avon and within the town.

(ix) Whilst SIS note that the site is currently located within a Special Landscape Area, it is considered that the proposed development at South West Amesbury represents a logical sustainable extension of Amesbury. In addition, there is a new residential neighbourhood under construction immediately to the east of the site (i.e. King's Gate and Archer's Gate) which is changing the landscape character of the immediate surrounding area and also extending the southern edge of the town. The proposed development would not extend the urban edge of Amesbury any further south than King's Gate and Archer's Gate and, by comparison, would not represent a significant encroachment into the countryside.

In terms of the quality of the landscape within the site and the immediate surroundings (i.e. to the west and to the south), SIS note that the preliminary analysis of the visual context of the site shows that, due to the rolling terrain of the area, the new homes would have no intervisibility with Stonehenge or much of the floodplain of the River Avon. Whilst much of the site is elevated and open in nature, it benefits from an existing structure of mature trees around the majority of its boundaries which provide good screening from the surrounding area. This is further assisted by the screening effects of existing buildings at Kings Gate, for example. Whilst there would be some clear views into the site from the public footpath immediately adjacent to its southern boundary, additional planting can help mitigate the change to views from here. Whilst there could be views of parts of the development from a few elevated footpaths and part of the A303 to the north and west, due to their distance from the site and presence of existing/proposed planting adjacent to the western boundary, impacts on these visual receptors should not be significant. It should be borne in mind that, in addition to the landscaping on the edge of and within the site itself, there is substantial additional land in the same ownership which SIS intend to dedicate as appropriate for additional tree planting and screening in order to mitigate any remaining visual impact.

As a result, SIS consider that the site is suitable for the proposed development in terms of landscape quality. On this basis, and as part of the Council's further work to allocate sites for development at Amesbury, the Special Landscape Areas currently identified around the town should also be reviewed – particularly in those areas where there have been recent changes to the character of the area (i.e. to the south of Amesbury).

4.13. In terms of the form of the proposed development, a Vision Document is submitted with this response to the Local Plan Review. The Vision document includes a masterplan for South West Amesbury and sets out the proposals for development.

4.14. A summary of the proposed development at South West Amesbury is provided below:

- Up to 1,200 new homes (on the basis of approximately 33 dwellings per hectare).
- Mix of housing including affordable.
- New local facilities including a village centre with community facilities including a potential new health hub.

- A mobility hub adjacent to the Salisbury Road/Stockport Avenue roundabout (including facilities such as additional bus laybys, public conveniences and coffee shop close to the existing roundabout served by existing bus services).
- New 2 Forms of Entry (FE) primary school and contributions to sixth form provision.
- Public open space, including provision of a riverside park, community orchard, informal open space, allotments, play areas and strategic woodland planting (including the provision of cycling, walking and fitness trails within the site, as well as on adjoining land in the same ownership).
- 2 vehicular accesses to the site from the A345.
- Access to an improved public transport service.
- Delivering appropriate car parking.
- Improved access to the countryside.
- Biodiverse network of green infrastructure.
- Multi-functional SuDS network.
- Enhanced cycle and walking connections within the development and into Amesbury.
- The proposed development is also capable of being served by sources of renewable energy.

4.15. As stated in relation to the response to the ESS, SIS also notes that its proposed development at South West Amesbury can be phased such that it can be commenced and deliver development during the Plan period, and potentially extend beyond the end date of 2040 (depending on the scale of development which is allocated at South West Amesbury and in relation to other non-strategic sites, such as land North of London Road and Land East of the A345).

AM4. What land do you think is the most appropriate upon which to build?

2. The Site and Proposed Development

2.1. As part of this consultation response, SIS is submitting one site in single ownership for allocation as a strategic housing site in the Local Plan Review.

2.2. The site has not previously been promoted for allocation and does not appear in the Strategic Housing and Economic Land Availability Assessment (SHELAA).

The Site

2.3. The site is located outside of the settlement boundary of Amesbury, as identified in Policy CP1 of the adopted Wiltshire Core Strategy (2015).

2.4. The site is located within a Special Landscape Area, as identified in Policy C6 of the Salisbury District Local Plan (SDLP) (saved policies) (2011). However, the site is not the subject of any statutory or non-statutory ecological or heritage designations.

2.5. The site is also located within an Affordable Housing Zone (Policy CP43).

2.6. The Site is bordered by the A345 Salisbury Road to the east, the banks of the River Avon to the north and farmland to the south and west. The site includes a group of barns (Vineys Farm) in its north-eastern corner.

2.7. The River Avon is a SSSI and a Special Area of Conservation.

2.8. Beyond the site to the west of the River Avon, and to the west of the site, lies the Stonehenge World Heritage Site. In addition there are a number of listed buildings on the northern and western sides of the River Avon.

2.9. Land immediately to the east of the site is a strategic allocation site (Policy CP2). The allocation site also includes land for recreational purposes (Kings Gate), as identified in Policy R8 of the SDLP.

2.10. Land to the north of the site, on the other side of the River Avon at Bonnymead, is identified in Policy CP7 of the SDLP as a Development Restraint Site. Land to the south of the site is in agricultural use and includes a 'L' shaped Scheduled Ancient Monument which runs northwards up to the edge of the site.

2.11. The A345 which runs immediately to the east of the site is an important bus corridor which has a high frequency of bus services connecting destinations such as Andover, Durrington, Larkhill Camp, Ludgershall, Marlborough, Pewsey, Swindon and Tidworth.

The Proposed Development: South West Amesbury

2.12. A summary of the development proposal is provided below:

- Site area of approximately 73.7 hectares.
- Net developable area of approximately 36 hectares.
- Up to 1,200 new homes (on the basis of approximately 33 dwellings per hectare).
- Mix of housing including affordable.
- New local facilities including a village centre with community facilities including a potential new health hub.
- A mobility hub adjacent to the Salisbury Road/Stockport Avenue roundabout (including facilities such as additional bus laybys, public conveniences and coffee shop close to the existing roundabout served by existing bus services).
- New 2 Forms of Entry (FE) primary school and contributions to sixth form provision.
- Public open space, including provision of a riverside park, community orchard, informal open space, allotments, play areas and strategic woodland planting (including the provision of cycling, walking and fitness trails within the site, as well as on adjoining land in the same ownership).
- 2 vehicular accesses to the site from the A345.
- Access to an improved public transport service.
- Delivering appropriate car parking.

- Improved access to the countryside.
- Biodiverse network of green infrastructure.
- Multi-functional SuDS network.
- Enhanced cycle and walking connections within the development and into Amesbury.
- The proposed development is also capable of being served by sources of renewable energy.

2.13. SIS also notes that its proposed development at South West Amesbury can be phased such that it can be commenced and deliver development during the Plan period, and potentially extend beyond the end date of 2040 (depending on the scale of development which is allocated at South West Amesbury and in relation to other non-strategic sites, such as land North of London Road and Land East of the A345). 3.36. SIS also notes that its proposed development at South West Amesbury can be phased such that it can be commenced and deliver development during the Plan period, and potentially extend beyond the end date of 2040 (depending on the scale of development which is allocated at South West Amesbury and in relation to other non-strategic sites, such as land North of London Road and Land East of the A345).

3.37. The benefits of delivering development at land at South West Amesbury are described in the Vision Document which is submitted with these consultation responses. Table 3 below (AMES15c) includes an extract from the Vision Document which summarises these benefits. 1.4. With regard to the letter of support which has been written on behalf of Stagecoach and Go South Coast, SIS wish to draw the Council's attention to their support in principle to the proposed allocation of land at South West Amesbury. In addition, the Council's attention to Stagecoach/Go South Coast's comment that the site lies, uniquely, at the point that all the inter-urban bus routes serving Amesbury converge onto the A345 before continuing south to Salisbury.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

4.16. Please refer to SIS's answers to Questions WB1-WB4 which identify SIS's proposals for the site it is promoting for allocation in the Local Plan Review. These responses identify the relevant social, economic and environmental issues which relate to land at South West Amesbury.

AM6. Are there any issues or infrastructure requirements that should be identified?

4.17. In response to the contents of the table provided under Question AM6, SIS note the following:

(i) Education: The proposed development at South West Amesbury will deliver a 2FE primary school.

(ii) Health: SIS note that the Clinical Commissioning Group (CCG) is currently reviewing whether new or enhanced healthcare facilities are required in Amesbury. As part of the masterplanning of South West Amesbury, land can be made available for the future development of a healthcare facility if the CCG and local GP surgeries conclude that a new or relocated healthcare facility should be located on this site.

(iii) Transport: SIS note that reference is made to there being congestion on the A345. As part of the proposed development enhancements are proposed to public transport facilities, including a public transport hub; and new or improved connections will be made between the site and existing pedestrian and cycle routes into the town centre. SIS also note that the proposed development will be served by the various bus services which use the A345. As a result, SIS consider that the proposed development will provide opportunities to help alleviate congestion along the A345 in Amesbury.

Further comments

I am pleased to submit responses to the Wiltshire Local Plan Review – Consultation January 2021 on behalf of Shaftesbury International Services Limited.

Shaftesbury International Services Limited is the agent of the owner of land to the South West of Amesbury, which is being promoted for strategic allocation in the Local Plan Review.

The responses submitted on behalf of Shaftesbury International Services Limited relate to the following consultation documents which have been produced by Wiltshire Council for consultation:

1. The Emerging Spatial Strategy.
2. Planning for Amesbury.

The package of information which has been prepared on behalf of SIS, and which forms the consultation response, comprises the following:

- Completed Response Forms (Emerging Spatial Strategy and Planning for Amesbury).
- Planning Report (AMES15a), which includes full responses to the emerging Spatial Strategy and the Planning for Amesbury document and a letter for support from Stagecoach/Go South Coast (February 2021) (AMES15d)
- Vision Document for South West Amesbury (March 2021) (AMES15c)
- Landscape and Visual Impact Assessment (March 2021) (AMES15b).

We look forward to discussing the proposals in more detail in due course.

The responses submitted on behalf of Shaftesbury International Services Limited relate to the following consultation documents which have been produced by Wiltshire Council for consultation:

1. The Emerging Spatial Strategy.
2. Planning for Amesbury.

The package of information which has been prepared on behalf of SIS, and which forms the consultation response, comprises the following:

- Completed Response Forms (Emerging Spatial Strategy and Planning for Amesbury).
- Planning Report, which includes full responses to the emerging Spatial Strategy and the Planning for Amesbury document and a letter for support from Stagecoach/Go South Coast (February 2021).
- Vision Document for South West Amesbury (March 2021).
- Landscape and Visual Impact Assessment (March 2021).

We look forward to discussing the proposals in more detail in due course.

1. Introduction

1.1. This response is submitted on behalf of Shaftesbury International Services Ltd (SIS). SIS is the agent of the owner of land to the South West of Amesbury.

1.2. As part of this response to the Local Plan Review consultation, SIS is promoting one site in single ownership for allocation in this Local Plan Review, namely land at South West Amesbury. An aerial photograph and site location plan is provided at Appendix 1 (AMES15a).

1.3. To support the response made to this consultation on behalf of SIS, this submission also includes the following information:

- Completed Response Forms
- Emerging Spatial Strategy
- Planning for Amesbury
- Site Location Plan: Land at South West Amesbury
- Vision Document for South West Amesbury (March 2021).
- Landscape and Visual Impact Assessment (March 2021).
- Letter of support (Stagecoach/Go South Coast, February 2021) (see Appendix 2) (AMES15d)
- Climate Change Outcomes

3.26. SIS support the statement on Page 4 of the ESS that focusing new development within the County's main settlements reduces carbon in different ways. SIS also consider that Amesbury is a settlement which should be the focus of future non-strategic and strategic scale development. In terms of the points made in the ESS in relation to climate change outcomes, SIS note the following in relation to Amesbury and the site being promoted by SIS for development:

(i) New development at Amesbury, as proposed by SIS, will be within walkable and cycling distance of a wide range of existing infrastructure and services which are present in the town. Land at South West Amesbury will also provide opportunities for primary education, community facilities and smallscale employment. The site being promoted by SIS will also be connected to the existing urban area of Amesbury and to Salisbury and surrounding settlements (such as Andover, Durrington, Larkhill Camp, Ludgershall, Marlborough, Pewsey and Tidworth) by a public transport corridor via the A345 which provides frequent services to employment and higher order services. As a result, opportunities will be created to encourage the use of sustainable modes of transport and to reduce the need to travel, in particular by private car.

(ii) It is anticipated that the development proposed by SIS at Amesbury will be connected to existing energy networks. In addition, development of the type and scale proposed by SIS will be capable of creating a new neighbourhood which could be served by sources of renewable energy.

(iii) An increase in the scale of development at Amesbury and population will also assist in supporting existing businesses in the town centre as a result of increased spending. The land at South West Amesbury is in close proximity of the town centre, which is therefore capable of encouraging greater use of the shops, community facilities and services, particularly by pedestrians and cyclists.

Concluding Summary

4.18. On the basis of the responses to the questions set in the Planning for Amesbury consultation document, SIS request that the scale of growth is increased. The residual housing requirement should be raised from 350 dwellings to a minimum of approximately 1,500 dwellings for the period 2018 to 2040. In doing so, both non-strategic and strategic allocations should be made, including land at South West Amesbury, land North of London Road and Land East of the A345.

4.19. The brownfield target should also be removed and replaced with a policy requirement which promotes the effective use of land; and promotes place shaping principles which allocate greenfield sites which can deliver development that improves the sustainability of towns like Amesbury and makes them more attractive places to live, work and socialise.

4.20. The pool of sites which has been identified by the Council should also include land which is now being promoted by SIS in relation to South West Amesbury (i.e. in addition to land North of London Road and Land East of the A345). As stated in this consultation response, SIS consider that land at South West Amesbury is an appropriate location for strategic scale development in Amesbury. The delivery of development on this site will not only deliver housing to meet local needs but its development will also deliver opportunities to facilitate much needed improvements to infrastructure. Development in this location is also considered to be acceptable in landscape and visual terms, in relation to heritage assets and in terms of delivering sustainable development.

Rep ID: AMES16	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Wiltshire Council - Major Projects
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
<p>The priorities of supporting future development at Porton Down and Boscombe Down should in our view be included. These high value exceptional sites, as recognised by the Employment Land Review, are important because of their role in the county's global competitiveness and potential to create more specialist, high quality employment in the area thereby supporting the wider economy. The Major Projects service is actively developing Porton Science Park, with a second phase of development on programme to open in early 2022, and is open to further discussions with DIO and MOD on the future development of Boscombe Down.</p>	

AM3. Is this the right pool of potential development sites?

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

We have referred to the SSEN Contracted Demand Map and find that Amesbury BSP is constrained for distribution and that Boscombe Down Substation is constrained for both transmission and distribution.

Further comments

We would observe that it is worthwhile recognising Porton Down's significance not only as a strategic employment site, but also as an important contributor to national and international public health, defence and security. In particular Porton Down has had an important role to play in the worldwide response to the Covid-19 pandemic and for this and other reasons the science and

technology community there make a valuable contribution to global society. For these reasons we further recommend that its status as an exceptional employment site and support for its further growth be identified as priorities in the Local Plan Review.

Rep ID: AMES17	
Consultee code: Other	Consultee Organisation (if applicable): Cheltenham and Gloucester Omnibus Company Ltd dba Stagecoach West
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Cheltenham and Gloucester Omnibus Co. Ltd. AND Go South Coast Ltd.	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Stagecoach and Go South Coast (GSC) consider that it is entirely appropriate that “The Local Plan Review aims to encourage the development of each community in its own right by considering each individual settlement’s roles rather than taking the collective approach of the adopted Core Strategy (that also includes Bulford and Durrington) . It is proposed that Amesbury is designated a Market Town in the settlement strategy.” The level of growth identified in paragraph 9 is based on the local housing needs assessment of Wiltshire for the period 2016-2036 rather than the Standard Methodology. This indicates a slightly higher level of growth than the Standard Method for the County. We support this approach.</p> <p>Notwithstanding this, and as we go on to discuss here and elsewhere, we do not agree that the overall housing requirement for the plan is appropriate, as it needlessly inappropriately and unjustifiably truncates the overall requirement by folding in an excessive amount of historic delivery between 2016-2019, and fails to provide for a suitably long horizon of at least 15 years following proposed adoption in 2023. We consider that 2040 is a much more appropriate horizon for the Plan, allowing proper</p>	

and prudent consideration of strategic issues and their resolution, a level of flexibility, and to ensure that the plan is positively prepared to meet the assessed development needs of the plan area.

Within that total County figure, the quantum for the Salisbury HMA appears in itself to be suppressed, in favour of much higher growth being directed to the Chippenham and Trowbridge HMA. The justification for this is opaque, to say the least. In particular this fails to recognise both the very significant housing and employment development needs of this part of the County, that cannot be offloaded onto an entirely different part of the County. Nor does it reflect the potential role that Amesbury can play, and indeed should play, to meet the five delivery principles set out in the Emerging Spatial Strategy, to meet those needs.

It is very evident that Salisbury as the Principal Settlement of this HMA has come close to reaching the environmental limits to its growth and resolving these is likely to have quite serious negative implications. Among these is the way in which local and longer-distance traffic unavoidably penetrates to the centre of the city, leading to acute congestion that seriously affects both air quality, environmental ambience, economic efficiency and – most importantly from our perspective - the reliable and cost-effective operation of bus services in the city and its wider hinterland. In common with many ancient cities, that are also environmentally constrained, it is simply not possible to deliver meaningful improvements to highways capacity to resolve these issues.

This threatens the need to disperse housing and employment land requirements more broadly in the HMA, which tend to undermine a sustainable pattern of development. Following from this, there needs to be an acute sensitivity as the plan goes forward, to ensuring that meeting housing needs in this HMA does so in a manner that allows existing or potential public transport to play an exceptionally strong role.

Within the HMA Amesbury offers unique potential to achieve this delicate balance because:

The town is already relatively self-contained, with key services and facilities and substantial employment, including nationally and internationally-important knowledge and high-technology activity focused on Porton Down and at Boscombe Down, which can be expected to grow.

This is a very different approach that simply finding a quantum of development land to meet a pre-judged level of housing requirement, that itself has been arrived at through a somewhat arcane methodology that is far from transparent.

The existing adopted Wiltshire Core Strategy 2006-2026, identifies a requirement for 2440 homes in Amesbury. The Emerging Strategy for Amesbury only proposes a requirement of 1635 homes for the plan period 2016-2036, greatly lesser dwellings than in the adopted Core Strategy. This figure certainly does not imply any “substantial boost to the supply of housing”; rather the contrary, a very substantial reduction in delivery, in the face of housing need in the HMA that the Council already concedes its current approach cannot meet. We do not follow any putative logic that could lead to the conclusion the “main reason” for the excision of needs in the predominantly military settlements, which are now categorised as “large villages” could justify such a reduction.

Assuming that the current unbuilt pipeline of 626 dwellings is delivered, as it should be, by 2026, and 110 plot could be found on previously-developed land, this creates a residual requirement to 2036 of only 350 dwellings, which suggests that over the remaining plan period development would reduce to about 35-40 dwellings per annum. This is a fraction of that that has been sustained over many years in the town. This conclusion suggests that no real intent exists to capitalise on the opportunities that there might be around the town to deliver sustainable development. From first principles, it does not reflect the existing or the potential role of Amesbury as a market town and as such a relatively very sustainable location to meet pressing housing and employment needs.

Nor does this plan show any regard for the clear evidence that the town has substantial potential to accommodate growth. The high level assessment in the Alternative Development Strategies demonstrates that Amesbury is somewhat less constrained than most in the HMA, though these constraints certainly do exist. Nevertheless, we consider that at least one development opportunity does exist at Amesbury that is quite unconstrained and would demonstrably support the place-shaping priorities. According to the Council's figures, once completions and commitments have been taken into account (footnote 1 on page 3) the residual figure for the remaining plan period to 2036 is 350 dwellings. A brownfield target is proposed for the period 2021-2031 of 110 dwellings which has the effect of further reducing the requirements for greenfield land to be identified in the local plan (paragraph 17 of the Planning for Amesbury document).

We think this approach is inappropriate and challengeable.

As referred to in our response to the Emerging Strategy it is considered that the plan period should be 2020 – 2040. This is essential if the plan to be positively prepared and sufficiently flexible to respond to rapid change as paragraph 11 of the NPPF expects it to be. Rolling forward the plan only 10 years from the end date of the adopted Core Strategy i.e. 2026 to 2036, obviously jeopardises any ability for the Plan to provide a long-term strategy for the town. Paragraph 22 of the NPPF makes clear that the strategic policies in the plan should look ahead at least 15 years from the date of adoption to respond to long-term requirements and opportunities.

The fact that 660 dwellings have already been built in Amesbury between 2016-2019 – well over 200 dwellings per annum - should be taken prima facie to demonstrate very significant housing need. This comes within the wider context of seriously declining housing affordability in the County. It is exactly this kind of delivery “at scale and at pace” that the locality and the wider HMA requires to address the historic undersupply of homes that Government is intent on addressing. It is unjustified, and indeed irrational, to deduct this historic delivery from the plans forward delivery target is contrary to both the spirit and the letter of NPPF and supporting PPG. As we discuss elsewhere, NPPF does not support, much less permit this principle of “retroactive offset”, which is entirely at odds with requirements to “plan positively” and “significantly boost the supply of housing”. This historic delivery offset should be removed from the delivery totals and added to the residual requirement.

Given the clear requirement at NPPF para 22 that the Plan should look ahead at least 15 years from the date of adoption we urge the Council to plan with at least a 2038 horizon and realistically a 2040 end date is considered to be the most appropriate. This will require additional supply to be identified.

This suggests in combination, that at least 1400 dwellings would be required in Amesbury over a 2020-2040 plan period, without in any way exceeding the rate at which the town has developed over the last few years. To the 350 residual quantum should be added the 660 offset from 2016-2019, and a further factor to meet post-2036 needs.

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

The Council proposes the following place-shaping principles:

- i. Promote Amesbury as a self-sufficient town, thus encouraging residents to work in the town
- ii. Improve recreational facilities and sports pitches in Amesbury
- iii. Develop a town centre strategy that improves the public realm and encourages tourism and spending
- iv. Improve infrastructure and transport, particularly relating to the A303 and A345, both of which currently experience congestion to improve linkages to and from the town. The planned tunnelling of the A303 may relieve some of the issues once constructed.
- v. Create and encourage potential tourism and transport linkages with Stonehenge to encourage tourists to visit the town while visiting the area around Stonehenge.

Generic place-shaping priorities are not appropriate and need to directly address the opportunities and challenges that are presented by the locality. They should relate to the development and use of land, which is the primary purpose of the planning system and plan-making.

Stagecoach and GSC welcomes and broadly supports most of the principles stated. Many reflect the particular transport challenges that are a direct result of excessive car-dependency not just in Amesbury, but a much wider area within the County. It is a great shame that the emerging planning strategy for the town says or does nothing that would meaningfully and demonstrably address these challenges.

For example a higher level of growth, including employment land would help maintain momentum in the way the facilities available in the town have been developing. It should be pointed out that this is one of the few sustainable settlements that is on the A303 Trunk Road and as such its attractiveness to all kinds of employment development is already evident. Alongside this, the potential for a range of developments to support the visitor economy would imply a greatly more ambitious approach to the development strategy for the town.

Therefore while Stagecoach and GSC broadly supports the place shaping priorities for Amesbury consideration must be given to the longer term, and in so doing properly reflect the strategic opportunities available at the town. Achieving these priorities through the development strategy for Amesbury, is discussed in the context of the specific development sites being consulted upon. Without an appropriate amount of new development that addresses a place-specific vision and clearly informed by the opportunities it would be impossible to effectively meet these priorities.

AM3. Is this the right pool of potential development sites?

In order to satisfy the tests of soundness in NPPF, the Council needs to demonstrate that it has considered a sufficient range of reasonable alternatives. At this stage, in the absence of a transparent Sustainability Appraisal of the sites the intention appears to pre-screen potential sites even before they are subjected to a sustainability appraisal process. We are concerned that this approach may fail to properly evaluate sites that potentially had strong credentials.

As a consequence of the non-NPPF-compliant plan period to 2036 (paragraph 28) there is also an inadequate site requirement to meet the alleged strategic housing requirement.

Just three potential sites have been identified at Amesbury for further assessment of their development potential. Two of these are small and take together, even if they were suitable, they would be insufficient to meet even the minimal 350-unit residual quantum the Council identifies. This starts to pose the question of how far a large-scale release is more appropriate to meet housing needs, merely for the town, and a restricted plan period. As soon as a positive approach is taken involving NPPF-compliant planning period, and the unmet needs of the Salisbury Principal Settlement are considered, the case for evaluating more strategic releases that could catalyse major public transport improvements becomes even stronger.

As we have made plain above, the Wiltshire Plan should seek to set a clear and deliverable long-term strategy for Amesbury to 2040. The incremental, minimalist approach proposed can in no way be described as establishing a strategic set of policies, and could not assist in meeting longer term objectives.

There is a current 5-year housing land supply deficit in much of the County, and a new round of departure sites has now already commenced with multiple already lodged as planning applications. We have expressed wider concern that the plans over-reliance on very large, infrastructure dependent schemes risks compounding this situation into the future. It is essential that Wiltshire Council takes a properly evidenced and positive approach to Amesbury, without which a greatly higher quantum of development is likely to come forward on an un-coordinated, piecemeal basis.

All this points to a need to make the best use of the development opportunities in Amesbury to achieve a more balanced and more deliverable pattern of growth, that can demonstrably deliver the identified development needs of the Salisbury HMA in full over a period to 2040, that in turn can identify, manage and maximise the positive benefits of development for the town. In addition to the three sites, a fourth should be introduced, that has yet to be considered by the Council. This is South West of Amesbury, West of the A345. We are aware that this site is now under active promotion. It offers very unusual opportunities to capitalise on sustainable transport and meet the delivery principles of the Plan as well as the proposed place-shaping priorities of the Plan. We discuss these opportunities below.

AM4. What land do you think is the most appropriate upon which to build?

Of these opportunities, from our perspective, in many regards the best one is represented by development to the west of the A345 south-west of Amesbury which has yet to be evaluated through the SHELAA. This would represent a compact form of development in a relatively unconstrained location that better yet, would be exceptionally well-connected to the town centre and to Salisbury by sustainable travel modes, including walking and cycling, but in particular, by public transport. If the Council had considered thoroughly our previous representations and written input to this plan review, it would have already become aware that Stagecoach is keen to see the provision of a local multi-modal interchange on the A345, that would intercept traffic arriving onto the corridor from multiple origins across a much wider hinterland, consolidating them onto an much improved service taking advantage of bus priority on the approaches to Salisbury.

Options for higher growth in Amesbury should be considered to support the delivery of a quantum that can fully meet the housing need arising in the HMA, without coming up against with the clear environmental and other constraints, including highways capacity, in and around Salisbury. Stagecoach and Go South Coast (GSC) - branded as Salisbury Reds - operate a comprehensive level of bus service in Amesbury and its environs. Prior to COVID, these well-established services have typically provided for up to five buses an hour between the town and Salisbury. The bus corridor along the A345 between Amesbury and Salisbury thus benefits from one of the most intense levels of public transport provision of anywhere in the County – rural or urban. In fact this has become one of the most frequent inter-urban bus service corridors in Southern England.

These services all run up the A345 between Salisbury and Amesbury, to the Stock Bottom Roundabout, where they then diverge to run through Amesbury and then to the north, to provide regular links across the area and the wider County.

They include:

- Salisbury Reds' X4 to Durrington and Larkhill Camp
- Salisbury Reds' X5 to Durrington, Pewsey, Marlborough and Swindon

- Stagecoach South/Salisbury Reds' jointly-operated "Activ8" to Bulford, Tidworth, Ludgershall and Andover. Stagecoach in particular has previously signalled to the Council through its formal responses to previous consultations to the Wiltshire Local Plan Review, that Amesbury and the A345 route between the two in particular, presents a clear set of opportunities to meet the housing needs of this part of Wiltshire, which closely relates to both Salisbury and the wider Salisbury Plain, in such a way that the need to depend on the private car could most credibly be minimised. The strength of this relationship with both Salisbury and the wider hinterland is readily apparent from the manner in which these frequent commercial bus services have developed steadily over recent years.

This is one of the most frequent bus services in the whole County as well as the more local area. Both companies employ state-of-the art EURO VI double deck buses, which produce negligible harmful Nitrogen Oxide or particulate emissions and offering a premium customer experience. These are services that prior to COVID had seen many years of steady growth, demonstrating its broad relevance in meeting people's travel needs.

In the case of South Wiltshire, covering the Salisbury HMA including Amesbury and the southern part of the Plain, we note that the Council already recognises that clear physical and environmental constraints actually close the door on the current plan strategy that has sought to concentrate development around Salisbury, as urban extensions.

The need to look beyond the immediate edge of Salisbury to meet needs arising in the City means that a new approach is therefore begged: one that seeks to identify relatively unconstrained but highly sustainable locations away from the City, but close enough that avoid elevating the energy and carbon intensity of mobility provision as far as possible, while ensuring that sustainable modes can play at least as great a role in meeting travel needs as they would in the City itself. Clearly, this demands identification of options that offer potentially very high levels of local self-containment, relate directly to existing and future employment growth; while also maximising the potential to use public transport for longer-distance journeys. We see sites at Amesbury, in particular to the South and South West of Amesbury, as being potentially highly sustainable options to meet housing and possibly some other development needs both arising locally and in the wider HMA. Site 1: Land north of London Road (SHELAA reference 3379). This site lies on the Activ8 service running between Bulford and Amesbury, as well as the X4 between Larkhill, Durrington and Amesbury. Both continue to Salisbury. However the route to Salisbury operates in different directions so there is not a combined frequency offered at a single stop, which is not ideal. However in the Wiltshire the site is exceptionally well-served by public transport. It is also well within walking distance of the secondary school and increasing numbers of jobs and services at Solstice Park as well as the town centre. It is also a very compact rounding off within the line of the A303. The impact of noise from the Trunk Road and its relatively small size mean that this site cannot go far meet even the suppressed residual development requirement identified for Amesbury. This could be released with little or no infrastructure dependency though noise attenuation might present some cost issues, as well as limiting the developable area. We strongly support this site being considered further.

Site 2: Land north of A303 to rear of Countess Services (SHELAA reference 3186). This site is served only by the X5, which runs every hour between Salisbury, Amesbury, Pewsey and Swindon. This presents a mode choice but far from an exceptional one. It cannot be compared with the multiple frequencies per hour and evening and Sunday provision available at other options south and south-west of Amesbury, or even on London Road. The level of bus service is the least of the transport issues presented by this site. Walking and cycling routes to the town involve crossing the busy Countess Interchange which is intimidating and unpleasant, as the consultation implicitly concedes. We doubt that Highways England will share the relaxed view that the Council seems to have about the bulk of traffic generated from this site being added to the SRN interchange which operates above capacity. Given the severance issues and the precedent this could be seen to set for development breaching the line of the A303 north of Amesbury we struggle to see why this site has been retained as an option except in response to the very limited number of credible alternatives. We do not support its continued evaluation because a realistic view leads to the unavoidable conclusion that there is no prospect if it being properly integrated into a sustainable access and movement strategy for Amesbury.

Site 3: Land adjacent to Stockport Road and Land at Stock Bottom (SHELAA references S1054 and S1010): We had previously highlighted the scope for development south of Amesbury, potentially as a new village off the A345 in our commentary on the JSF, and in the Autumn 2019 Informal Consultation. The consultation document suggests that the A345 is congested, though we consider the major issues relate to capacity issues common to all the radial corridors and junctions within Salisbury. Irrespective the plan and its supporting transport strategy needs to go beyond stating the obvious, and start to look at credible strategies to mitigate both congestion and carbon across the County, something it has not even begun to do, despite this being one of the delivery principles of the plan as a whole.

The volume of demands toward Salisbury on the A345 begs the solution of a wholesale mode shift towards bus on this corridor. Very importantly, the A345 Castle Road corridor into Salisbury is the only one on which comprehensive bus priority is offered on most of its length approaching the A36 inner ring road. Thus its ability to support and facilitate an effective capacity increase through mode shift to bus cannot be matched, by any other credible alternative route. This capability exists from the point the development mobilises and is not dependent on delivery of complex off-site engineering schemes and traffic regulation orders being put in place. As NPPF requires, this allows development on the A345 corridor to “cost-effectively limit the transport impacts of development”.

The combined frequency of buses south of the Stock Bottom Roundabout already is 5/hour and it would be relatively straightforward to provide a sixth and coordinate services more closely to provide a 10-minute frequency from this point to Salisbury. We should stress that this frequency exceeds any that is currently provided to any of Salisbury’s Park and Ride sites which are generally every 15 minutes (4 buses/hour).

Superficially Site 3 looks as if it could directly benefit from this provision and even allow buses to run through the development. However we recognise that this site represents a significant intrusion into open countryside south of Amesbury, and it is further constrained by scheduled heritage assets and further likely archaeological potential. To this should be added the adjacent

boundary of a major airfield, with its associated noise and technical safeguards, something we are surprised is not picked up in the consultation to any extent.

Topography and breaks of slope, including a major established tree belt running along a ridgeline across the site east to west, suggest to us that the actual area that is likely to be appropriate for assessment is actually quite limited, and would be insufficient to accommodate a development of sufficient size to offer local self-containment, including a local centre and primary school. This would be important as existing facilities are some distance away in Archer's Gate to the north, aggravated by being a significant uphill walk. While Stockport Avenue is clearly not an insurmountable barrier to development – it is a 40 mph road accommodating a bus route - we also recognise that “It would be better to maintain the urban edge of Amesbury to the North of Stockport Avenue where there is already an establishing urban edge of planting as part of site S1013 (Archers Gate) that can be reinforced.” This area is therefore going to present some significant issues to arrive at a satisfactory amount and form of development that is sustainable, properly integrated into the landscape and the town, and avoids exacerbating problems of car-dependency.

We nevertheless support the northern part of this site being considered further, perhaps in conjunction with, and subordinate, to the additional site South West of Amesbury we suggest below, should the development requirement for the HMA and a rational spatial strategy demand it.

New site - Site 4: Land South West of Amesbury, West of the A345 :

This site is now under active promotion. The site extends along the western side of the A345 immediately west rather than south of the built-up area, and extends to about 73Ha. This land parcel is of a size and nature that is considered able to support the development of a up to about 1200 homes, sufficient to provide a compact and attractive new residential quarter for Amesbury, very closely related to the existing town. It seems evident to us that this is the only site available in the Amesbury area able to deliver a quantum of development that is sufficient to meet the needs of this area in the Plan period. In doing so it is able to support the viable delivery of supporting community infrastructure. This includes a local centre and primary school, as well as incidental and formal open space, creating local self-containment and reducing the need to travel.

Passed directly by Activ8 and X5 three times an hour, along its longest side, much of the site would be well within 400m of a bus service, without any need diversion, depending on land use and master planning, and the provision of appropriate new stops on the A345, which helpfully would also directly serve the final phases of Kings Gate to the east. However the scope to create an efficient diversion into a larger development is likely to exist subject to the movement and access strategy for the site achieving a seamless movement into the development and out of it again. If achieved this is likely to bring a very large proportion of the development within sufficiently convenient walking distance to start to present the necessary relevant choice for local and longer distance journeys especially to Salisbury.

Notwithstanding this, there is still more interesting and highly unusual potential to create a local inter-modal hub facility near Stock Bottom at the south east corner of the site, where a primary access is planned and considered to be technically feasible as

a fourth arm of an enlarged Stock Bottom Roundabout. This offers immediate potential, subject to detailed design and master planning, for the hub site to be served with up to 5 buses per hour to Salisbury from the outset, as well as the full range of northbound passing services.

Readily accessible by walking and cycling as well as cars from a local hinterland, including the existing Kings Gate and Archers Gate developments to the east, the objective of the inter-modal hub would be to consolidate personal vehicle journeys of all kinds onto public transport towards Salisbury at an attractive multi-functional venue combining:

- Convenient local access by multiple modes
- the maximum bus service frequency and connectivity and an attractive generalised journey time,
- with a range of local facilities and amenities.

Far from being a car park with bus service attached, this compact facility providing perhaps up to 250 parking spaces would also include secure cycle and scooter parking and charging, a car club pick up and dedicated spaced for liftsharing. This would be set within a high quality public realm, as an evolution of concepts that are well-established in more urban contexts in Europe. The potential positive impacts of this on the carbon intensity of travel not just from this site, but from the wider existing and committed development in the Amesbury and Boscombe Down area, could be very material.

From first principles, it also looks technically feasible to introduce an additional bus per hour between Salisbury and Amesbury via the site within a single vehicle operating resource, providing the potential for a more regularly spaced service at 6 BPH; about every 10 minutes. This exceeds the frequencies available at many of the existing established Park and Ride sites on the edge of Salisbury, which have shown their relevance over many years.

When considering the existing bus network in Salisbury City, it should be pointed out that the journey time from this inter-modal hub to the city centre by bus would be very comparable with those on offer at the outer end of the City's own network. Counter-intuitively in some cases, although the site is about 10km from the City centre, it would actually be slightly quicker than some existing recently-built developments on the edge of the city.

As the Council looks at how to address a clear challenge in meeting the housing needs of the City of Salisbury in a sustainable location that avoids greatly extensifying travel patterns, car dependency and carbon intensity, we would point to this site as one that could represent a very unusual opportunity to achieve this while avoiding much more sensitive and more constrained locations that while geographically closer to the City, may not actually be as sustainable in the round.

This site present an outstanding opportunity to provide for housing needs in the area and the wider HMA. The potential for a local inter-modal interchange at its south east corner directly accessible from the Stock Bottom Roundabout, served every 10 minutes by buses to Salisbury, with a journey time highly competitive with driving, is one that warrants this site being very highly favoured, in our view, especially when looked at in the context of how few other credible options there are to meet needs.

We strongly support this site and respectfully urge the Council to consider it further.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Stagecoach and GSC have no further observations to make.

AM6. Are there any issues or infrastructure requirements that should be identified?

Of any Market town in the County it is not only the largest one in the orbit of Salisbury within the HMA, but also the closest. The 10km distance along the A345 is such that already-extant direct frequent bus links can offer a highly attractive and relevant public transport offer to meet many trip requirements: greatly more so than any credible alternatives that we can see. GSC and Stagecoach already together operate as many as 5 departures every hour each way between Amesbury and Salisbury. These continue to the north to provide regular links to Swindon, Tidworth, Ludgershall and Andover.

A303 is likely to see an enhancement of long-distance coach services, especially when chronic congestion associated with Stonehenge is resolved as expected. There is scope for a dedicated local coachway operation at Amesbury responding to this in due course, further assisting and transforming longer-distance connectivity in the absence of a rail service.

The scope to further transform the attractiveness, relevance and reliability of bus services towards Salisbury demonstrably exists. This builds on an already-high level of public transport connectivity and frequency, principally provided by GSC and Stagecoach services X4, X5 and Activ8, which presents an excellent starting point from which to increase the public transport mode share both for existing and new residents, greatly reducing the carbon-intensity of mobility for the town.

Development on sufficient scale could facilitate and catalyse a new local multi-modal hub on the A345 south of the town. Among the many benefits this brings would be the reduction in traffic pressure on the A345 corridor south towards Salisbury.

We note the conclusion reached in para 3.72 of the ESS (Climate Change Outcomes), which refers to strong travel patterns between RWB and Swindon and focussing development (in RWB) will "increase[s] the scope for public transport to cater for this demand and reduce carbon use". Amesbury and Salisbury are entirely analogous and we regret that this same of conclusion has not been explicitly drawn in this instance.

The Local Plan Review should seek to enable the allocation of development which improves the sustainability of settlements like Amesbury and provides opportunities to deliver enhanced levels of infrastructure to serve existing and new residents. This is far from merely justifying and facilitating the delivery of new highways infrastructure. It includes focusing development in those

localities that can crystallise and take advantage of a step change in the quality and reliability of public transport. Amesbury would evidently form a key part of a “public transport corridors-focussed” approach to the spatial strategy – on that was considered at the outset by the then proposed Joint Spatial Framework but for some reason entirely dropped as a potential option thereafter. Stagecoach highlighted this potential strongly at the very earliest stages of plan preparation. We also reiterate our wider major concern is that as the plan period commences at 2016 and the end point is only 2036 the plan is fundamentally hampered in achieving all it needs to. A longer term view and a clearly strategic approach are essential to arrive at a sound and positively-planned approach to the future of the market town offering hugely greater scope to maximise the opportunities to address the strategic priorities for RWB.

Further comments

Stagecoach and GSC have no further comments to make.

Rep ID: AMES18

Consultee code: Statutory Body

Consultee Organisation (if applicable): Natual England

Is this response on behalf of someone else/another organisation?

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
AMES18

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

Planning for Amesbury

Site 2 (SHELAA reference 3186)

Natural England advises this site supports a mixed area of both Deciduous Woodland and Lowland Fen (HQ7) registered under the Priority Habitat Index, we would advise that this site demonstrates significant sensitivities and should not be taken forward for further detailed assessment to allocate housing. Please refer to comment on Priority habitats and species. Priority habitats, ecological networks and priority and/or legally protected species populations.

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environmental value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Site 3 (SHELAA reference S1054 & S1010)

Natural England does not hold any site specific survey data but the land at this site is highlighted provisionally as Grade 3 in the Agricultural Land Classification (ALC). Natural England advise that proposals at this site should not be permitted in the absence of site specific soil surveys to determine whether soils qualify as Best and Most Versatile (3a). Please refer to comment on soils and ALC below.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees.

Soils

Soil and Agricultural Land Quality

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example: 1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:

A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).

Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60). 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).

2. The conservation and sustainable management of soils also is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 170 and 171. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially

productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example to:

Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.

To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) (See comments below on biodiversity and geodiversity), and, where development is proposed.

Ensure soil resources are conserved and managed in a sustainable way.³ To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraphs 170 and 171 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan

4. General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm>

which contains more information about obtaining soil data.

5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: AMES19

Consultee code: Statutory Body

Consultee Organisation (if applicable): Highways England

Is this response on behalf of someone else/another organisation?

Organisation being represented (if applicable):

Does this representation refer to attachment(s):

If this representation refers to attachment(s), these are listed below:

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

Also in the Salisbury HMA is Amesbury. The Amesbury Market Town document notes that two of the three potential selected sites abut the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset. It is assumed that both sites would be accessed from the local road network and not the A303. Highways England would welcome clarification of this within the emerging strategy.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

The priorities highlighted for the area include improved infrastructure and transport, particularly relating to the A303 and A345 (both of which currently experience congestion) to improve linkages to and from the town. The construction of the A303 Stonehenge scheme may offer some relief to the issues identified. It would be helpful to be aware what other, if any improvements, are also considered necessary.

Further comments

Rep ID: AMES20

Consultee code: Statutory Body

Consultee Organisation (if applicable): Environment Agency

Is this response on behalf of someone else/another organisation?

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
AMES20

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Amesbury, Salisbury, Warminster, Devizes

These areas are within the Hampshire Avon catchment which is currently failing protected area and WFD objectives because of elevated phosphorus. Increased phosphorus levels that may reach the Hampshire Avon as a result of the development should be offset in line with the Environment Agency and Natural England Hampshire Avon Nutrient Management Plan, Memorandum of Understanding and Local Authorities Supplementary Planning documents and other relevant documents/agreements.

Rep ID: AMES21	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Historic England
Is this response on behalf of someone else/another organisation?	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: AMES21
AM1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Historic England considers that the character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale and form of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an updated Conservation Area Appraisal.</p>	
AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

An updated Amesbury Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185).

AM3. Is this the right pool of potential development sites?

An updated Conservation Appraisal and setting assessment can inform the availability of suitable development sites.
Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around Amesbury due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.

AM4. What land do you think is the most appropriate upon which to build?

An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be helpful.
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
Up to date Conservation Appraisals and setting assessments will also help inform this exercise.

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The information accompanying the consultation in the Settlement Profile does not appear to set out how a strategic understanding of the history, character and landscape setting has informed the spatial distribution, capacity and specific

allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield and place shaping opportunities. Any further site assessment should be independent and robust, and undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by a site promoter.

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments

It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below ground archaeology and landscape setting. The Amesbury Conservation Area Appraisal and Management Plan is now 13 years old; to ensure the Local Plan is informed by up to date information about the historic environment it seems timely that this document is perhaps updated and supplemented by a setting assessment, mindful of the towns significant historic landscape context and proposed expansion.

Rep ID: AMES22

Consultee code: Other

Consultee Organisation (if applicable): Salisbury Reds (Part of the Go South Coast Group)

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s): yes

If this representation refers to attachment(s), these are listed below:
AMES22

AM1. What do you think to the scale of growth? Should there be a brownfield target?

AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

AM3. Is this the right pool of potential development sites?

Amesbury

AM3: Pool of Development Sites & Additional Sites for Consideration

The bus corridor along the A345 between Amesbury and Salisbury benefits from one of the most intense levels of public transport provision of anywhere in the County – rural or urban. In fact this has become one of the most frequent inter-urban bus service corridors in Southern England.

These services commence in Salisbury, then fan out through Amesbury and to the north, to provide regular links across the area and the wider County and include:

- Salisbury Reds X4 to Durrington and Larkhill Camp;
- Salisbury Reds X5 to Durrington, Pewsey, Marlborough and Swindon;
- Stagecoach South/Salisbury Reds jointly operated Activ8 to Bulford, Tidworth, Ludgershall and Andover.

It is therefore regrettable that the transport key features suggest a new station at Porton, which unlike Devizes and Wilton is not being progressed and completely negates the opportunities provided by buses at this location. This needs to be reflected in any emerging policies as well as developments at these locations enabling multi modal hubs, contributing to service improvements and enhancements as well as infrastructure and highway layout issues discussed in section 7.0 of this response.

Amesbury and the A345 route in particular, presents a clear opportunity to meet the housing needs of this part of Wiltshire, which closely relates to both Salisbury and the wider Salisbury Plain, in such a way that the need to depend on the private car could most credibly be minimised. The strength of this relationship with both Salisbury and the wider hinterland is readily apparent from the manner in which these frequent commercial bus services have developed steadily over recent years.

Considering the approach in the Salisbury HMA including Amesbury and the southern part of the Plain, we note that the Council already recognises that clear physical and environmental constraints actually close the door on the current plan strategy that has sought to concentrate development around Salisbury, as urban extensions.

The need therefore, to look beyond the immediate edge of Salisbury to meet needs arising in the City means that a new approach is therefore begged: one that seeks to identify relatively unconstrained but highly sustainable locations away from the City, but close enough that avoid elevating the energy and carbon intensity of mobility provision as far as possible, while ensuring that sustainable modes can play at least as great a role in meeting travel needs as they would in the City itself. Clearly, this demands identification of options that offer potentially very high levels of local self-containment, relate directly to existing and future employment growth; while also maximising the potential to use public transport for longer-distance journeys. There is also potential to connect these sites to a potential new Wilton Junction station though a project currently subject to a “Restoring your Railways” bid and initiative on which both Salisbury Reds and Wiltshire Council are partners.

We are working with developers on the western side of the A345, south of Stockport Avenue and have provided a letter of support – together with Stagecoach regarding these proposals and would recommend the potential for this to be included in the

plan for the reasons set out in this section and would welcome further discussions on this which we consider would be more sustainable than sites 1 or 2 for example.

Accordingly we consider that there is an opportunity for Amesbury to become a more sustainable development location to play a role in accommodating the additional housing requirement for Salisbury that cannot be met from the city centre itself, with high frequency and high quality public transport connectivity as well as these developments being able to enable bus access and service enhancements.

The journey time, from South Amesbury in particular, to the city centre by bus would be very comparable with those on offer at the outer end of the City's own network. Counter-intuitively in some cases, although the site is about 10km from the City centre, it would actually be slightly quicker than some existing recently-built developments on the edge of the city.

Site 1: Land North of London Road (SHELAA Ref 3379)

We SUPPORT this site being allocated with RESERVATIONS.

This site is located relatively close to employment allocations and accordingly may be suitable in terms of containment levels but overall is quite small and therefore less attractive than the larger site to the south of Amesbury. Lying between the A303 and the main settlement access means bus services are relatively close to the site but would need to be accessed from London Road. Any policy in respect of this site would need to address suitable walking access from the site to London Road as well as improved bus shelter stops etc. as set out in section 7.0 of our response.

Site 2: Land to Rear of Countess Road (SHELAA Ref 3186)

We OBJECT to the allocation of this site.

We concur development of this site would be encroachment into urban countryside as it is north of the A303 and therefore any Amesbury development needs to be south of the A303 in transport terms. Sites to the south of Amesbury abutting the A345 would be more sustainable in this respect which can provide larger, better connected settlements. The ability of this site be self-contained is unlikely due to its physical separation by the A303 and will create additional crossing movements across the SRN. Whilst it is near existing bus services between Amesbury Salisbury and Swindon it is much less attractive in terms of potential modal shift than other Amesbury sites.

Site 3: Land Adjacent to Stockport Road and Land at Stock Bottom (SHELAA Ref S1054 & S1010)

We SUPPORT the allocation of this site with SUGGESTED POLICY WORDING.

The site is passed directly by Activ8, X4 and X5 five times an hour, along its longest side, much of the site would be well within 400m of a service without diversion depending on land use, and the provision of appropriate new stops on the A345. However the scope to create an efficient diversion into a larger development is likely to exist subject to the movement and access strategy for the site achieving a seamless movement into the development and out of it again. If achieved this is likely to bring a very large proportion of the development within sufficiently convenient walking distance to start to present the necessary relevant choice for local and longer distance journeys especially to Salisbury.

There is still more interesting and highly unusual potential to create a local inter-modal facility near Stock Bottom at the south east corner of the site, which would also allow the site to be served by up to 5 buses per hour to Salisbury. Readily accessible by walking and cycling as well as cars from a local hinterland, including the existing Archers Gate development to the east, the objective would be to consolidate personal vehicle journeys onto public transport towards Salisbury at the point where both service frequency was maximised, alongside a generalised journey time that is most likely to be attractive and competitive with driving. The potential positive impacts of this on the carbon intensity of travel not just from this site, but from the wider existing and committed development in the Amesbury and Boscombe Down area, could be very material.

From first principles, it also looks technically feasible to introduce an additional bus per hour between Salisbury and Amesbury via the site within a single vehicle operating resource, providing the potential for a more regularly spaced service at 6 BPH; about every 10 minutes. This exceeds the frequencies available at many of the existing established Park and Ride sites on the edge of Salisbury, which have shown their relevance over many years. When considering the existing bus network in Salisbury City, it should be pointed out that the journey time from this point to the city centre by bus would be very comparable with those on offer at the outer end of the City's own network.

As the Council looks at how to address a clear challenge in meeting the housing needs of the City of Salisbury whilst reducing car dependency and carbon intensity, we would point to that this site as well as potentially the site to the west of the A345 could both represent an unusual opportunity to achieve this while avoiding much more sensitive and more constrained locations that while geographically closer to the City, may not actually be as sustainable in the round.

We would therefore propose that any policy includes the provision of a mobility hub in this location for buses to coalesce and enable a better modal share for sustainable transport from this location as well as the provision, if required to support additional bus frequency as set out above. The Policy also should highlight the need, depending on layout and mobility hub location the requirement for roads to be accessible for buses as set out in section 7.0 of our response.

AM4. What land do you think is the most appropriate upon which to build?

AM5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

AM6. Are there any issues or infrastructure requirements that should be identified?

Further comments