

Cranborne Chase Area of Outstanding Natural Beauty



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By Email developmentmanagement@wiltshire.gov.uk

Dear Becky

17/05957/FUL demolition of Knighton Mill and replacement with a new building

Thank you for consulting the AONB on this proposal. There has been considerable pre-application consultation and correspondence in connection with this proposal. The main changes from the initial, pre-application, documentation seems to be the LVIA. That was a major recommendation arising from the pre-application consultations. The form and structure of the proposed buildings do not appear to have been amended in any significant way in response to pre-application advice.

The AONB Partnership has the following comments on this application.

1. The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' policies for the management of this nationally important area and the carrying out of their functions in relation to it, as required by section 89 of the CRoW Act. The national Planning Practice Guidance [Natural Environment paragraph 004] confirms that the AONB and its Management Plan are material considerations in planning.
2. The National Planning Policy Framework states (paragraph 109) that the planning system should contribute to and enhance the natural and local

environment by protecting and enhancing valued landscapes which include AONBs. Furthermore it should be recognised that the ‘presumption in favour of sustainable development’ does not automatically apply within AONBs, as confirmed by paragraph 14 footnote 9, due to other policies relating to AONBs elsewhere within the Framework. It also states (paragraph 115) that great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas.

3. Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body, statutory undertakers and holders of public office also have a statutory duty in section 85 of the CRoW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions relating to, or so as to affect, land in an AONB.
4. More detailed information in connection with AONB matters can be found on the AONB [web site](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB I would draw attention to our [Good Practice Note on Colour in the Countryside](#)
5. As you may be aware, the AONB is concerned about light pollution. Any external lighting should be approved by the Local Planning Authority and comply with the [AONB’s Position Statement on Light Pollution](#) and the more recent [Good Practice Note on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#).
6. The site is in the Ebble Chalk River valley landscape character area of the Chalk River Valleys landscape character type of the AONB’s landscape character assessment. Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#). That document is available and it can be viewed in [FULL](#) on our [web site](#).
7. The issues relating to this proposal seem to revolve around two elements. Firstly there is the demolition of the existing building. That comprises the old mill and two additions. It is noted that in 2015 a further additional structure was approved but that has not been implemented. The second element is the character and nature of the proposed new structures and the impacts they could have on the site and the neighbourhood.

Design and Access Statement

8. Considerable emphasis is given in the submitted documentation to the fact that the existing mill is not a listed building. Nevertheless the Design and Access Statement recognises the history of the mill, one of the very few remaining within the valley, and shown on the Andrews and Dury map of 1773. It must not be forgotten that the mill, and its relationship to the river and associated water bodies, constitutes an undesignated heritage asset. Demolition of the mill will be a significant loss to the cultural history of the Valley and the proposed reorientation of the new buildings will also hide, cloud, and confuse any future understanding of the way the mill worked with the river to serve the local

community. Whilst there have been additions and changes to the historic mill building it is still possible to see and understand how it worked.

9. The proposed new building would have two parts, one of cut stone and another of glass with the two linked by a glass atrium. The linear arrangement of the existing structure would be completely changed, as would be the orientation and relationship with the River Ebble. Although the submitted documentation makes repeated comments to 'referencing the old mill' in the new structures the brick and timber features of the old mill are not repeated and the proposed polished stone work and recessed fenestration shown in the illustrations is very different. That polished stone work and recessed fenestration is also uncharacteristic of the Valley. The substantial glass box and glass link atrium are even less characteristic of the buildings of the neighbourhood or even the wider AONB.
10. The submitted Design and Access Statement helpfully provides illustrations and colour photographs. The massing diagram on page 29 clearly shows that the proposed stone building would be obviously higher than the existing mill building. There are, therefore, issues of landscape and visual impact to consider.

Landscape and Visual Impact Appraisal

11. Unfortunately the Design and Access Statement abbreviates comments made in the separate, more detailed, and reflective expert reports. These abbreviated statements can be misleading. In particular the conclusion on page 44 relating to the landscape impacts. The LVIA is a substantial document and is considerably more nuanced than the conclusion produced in the Design and Access Statement. A closer inspection of the LVIA demonstrates that there are a number of caveats and that the proposed structures would be seen from a number of viewpoints. The statement in the Design and Access Statement over simplifies the LVIA.
12. The Landscape and Visual Impact Appraisal is, as I said, a substantial document that follows standard guidelines and considers not just the immediate surroundings of the mill but also views from public roads and public Rights of Way in the Valley. Although the LVIA refers this to the AONB Management Plan it does not, somewhat surprisingly, refer to the AONB Landscape Character Assessment 2003. Of the two landscape character assessments mentioned, the Salisbury District LCA completed in 2008 is rather more refined and relevant than the Wiltshire LCA of 2005.
13. The submitted LVIA notes that the landscape character can be considered in terms of the river valley floor and the surrounding river valley slopes. In both cases the landscape sensitivity is high, the magnitude of change for the river valley floor is considered to be low, and this also applies to the valley slopes. The resultant effects of the proposed development are classified as moderate. It may, therefore, be less than easy to understand how it is then possible for the LVIA to state that the effects of the proposals in the river valley floor and river valley slopes respectively would not 'result in any degree of harm' or 'result in overall harm'.
14. A similar approach is adopted for the visual impact and it may be helpful if I explain this rather nuanced approach to the LVIA. What is being considered is

the effect upon the landscape character area in its widest sense, which stretches from Berwick St John in the west to Coombe Bissett in the east. By looking at that extended area it is possible to conclude that the proposal associated with a single property would not harm the wider landscape character area. That does not mean that there are no impacts on the area around Broad Chalke or the study area considered by the LVIA. This is where extracts from the LVIA to the Design and Access Statement grossly over-simplifies the situation and are potentially significantly misleading.

15. Turning to the visual effects of the proposals the LVIA looks from a number of footpaths and public roads, as well as in the immediate vicinity of the property. Whilst it is reasonable to consider that views from vehicles on roads are likely to be quite fleeting the LVIA very fairly points out that in a rural area there are likely to be walkers on the roads that could see the new development for longer periods. The proposed building, being higher than the existing mill, would be more obvious in the scene from a range of Public Rights of Way. A couple of the Rights of Way do direct the view of walkers directly towards the site.
16. Again there is scope for misunderstanding and over-simplifying this carefully prepared and written LVIA. In connection with nearby properties, one of which is Listed, the visual sensitivity is judged to be high, the magnitude of change is assessed as medium to low, and the effect of the proposals is moderate. Given that assessment of moderate effect it is perhaps strange that it is considered that there will not be 'any negative impacts on the visual amenity'. A similar approach is adopted to the assessment of the visual impacts from public Rights of Way. However the extended periods that walkers may experience the visibility of the new proposals are not explicitly incorporated in the assessment. The sensitivity is rated as high throughout and the magnitude of change varies from moderate to negligible. The effects of the proposals range from moderate to low with the view from one Right of Way being judged as moderate to major. The assessment makes a judgement about the enjoyment of the use of the footpath when stating 'the development will not result in any negative effect' when the appearance or visibility within the scene of the proposed changes is the main issue.
17. I have to advise that because the site is visible from a number of public Rights of Way the cumulative effect of these changes has to be considered within the context of where the proposed buildings would be seen. Issues that are not given attention within the LVIA are whether the proposed buildings would attract attention from the various viewpoints and whether they would integrate with the rural scene rather than standing out.
18. The LVIA recognises the need to consider night time effects on the landscape and refers to a separate lighting study that is submitted with the application.
19. In its conclusions the LVIA refers to effects of development on a 'very small element' of the landscape character area and then defines that as 1 - 1.5km radius. An area of 3km diameter is not an insignificant area. It is not unreasonable to conclude that outside of that area there would be no harm. The issue, within this particularly nuanced LVIA, is the impact the development would have within that study area. Close reading of the LVIA indicates that there would be effects and that these would range, depending on the location, from moderate to negligible. It does, however, seem that from a number of viewpoints

the effects of the development would be moderate. The Design and Access Statement does, as I have already indicated, paraphrase the carefully worded statement in paragraph 6.13 on page 45 of the LVIA. There the conclusion is wrapped around with caveats relating to the whole site and the key element is the statement that 'the new property has the ability to sit within the wider landscape setting, without causing harm to the character, quality of visual amenity of the surrounding landscape'. That is a rather more subtle assessment than the sweeping statement on page 44 of the Design and Access Statement. Clearly the extent to which the proposed development will be obvious and alien within the scene is a matter for the decision maker and I will return to this later.

Planning Statement

20. Although the Planning Statement identifies the importance of Wiltshire Core Strategy Core Policy 51 it is far from clear how the application complies with the requirements of that policy in connection with AONB matters. You may also have spotted that in paragraphs 2.23 and 2.45 the relevance of the AONB Management Plan appears to be played down. AONB Management Plans are material considerations in planning, and it is not the case that they 'may also be material considerations'.
21. In connection with the actual proposals the Planning Statement, paragraph 3.10, seems to have described the proposed development the wrong way around. As I read the plans they show the contemporary glass box design on the northern side and the stone building on the southern side, not the opposite way around.
22. Furthermore the statements about lighting e.g. paragraph 3.14, indicates that the planning consultants have not referred to the AONB's Management Plan policy on Dark Night Skies nor have they referred to the AONB Guidance on Lighting. The 2007 document referred to is a little dated and the AONB has made considerable advances since then.

Design and Materials

23. Turning to matters of design and materials, the proposed stone element is taller than the existing building that is to be demolished. There seems to be some confusion between the plans and the illustrations. The illustrations appear to show polished stone whereas the plans refer to rough cut stone. Clearly the latter would be more in keeping with the character of the settlements through the Ebble Valley.
24. A stainless steel flue is shown emerging from the glass box element. It would seem that the AONB's advice on Colour in the Landscape has not been considered as shiny elements reflect sunlight and attract attention. If you are minded to consider an approval then the chimney flue should be a dark matt colour in accordance with the AONB's Guidance on Colour in the Landscape.
25. I note that clay tiles are proposed for the stone building which would echo many of the buildings within the valley. Reference is made to the flat roof of the glass box element a number of times but there do not appear to be any details. The LVIA indicates that the roof may be a 'green roof'; however the document entitled 'Proposed Roof Plan' does not provide any further clarification. That

document does, nevertheless, appear to show the link atrium between the two buildings as having a clear glass roof which could create light pollution.

Dark Night Skies

26. There are, therefore, still a considerable number of concerns relating to light pollution and adverse impacts on the Dark Night Skies of this AONB. Both the Design and Access Statement and the specialist Lighting Report fail to recognise the criteria for achieving International Dark Sky status. It is not a question of permitting an increase in light pollution but ensuring that, firstly, no new buildings contribute to light pollution and, secondly, that existing sources are improved so that light pollution is reduced further. Whilst recognising the Institute of Lighting Professionals Guidance Notes for Reduction of Light Pollution 2011 and their light limitations for environmental zones the lighting report should have considered the adopted AONB Management Plan Policy to achieve IDA Dark Sky status. That indicates that new developments should comply, within the AONB, with environmental zone E0.
27. Whilst good lighting schemes, informed by the AONB's Good Lighting and Advice Notes, can ensure compliance with the environmental zone the concern is that the proposed glass structure, together with the linking glass atrium, will lead to inappropriate amounts of light pollution. There does, therefore, have to be some formal mechanism whereby light emissions from the buildings in sideways or upwards directions, that could contribute to light pollution, can be effectively prevented. Although the lighting report indicates that this could be achieved by the mitigation strategies something more explicit, detailed, and formal would need to be provided. Whilst a condition might be sufficient to handle external lighting the issue of light emission from the buildings, and in particular the glass box and link atrium, seem so fundamental to the proposal that a scheme to prevent light pollution would need to be provided before a permission could be granted.
28. A roof light is also indicated within the roof of the stone structure and this would need to be fitted with a blind or louvres to prevent light emission. Alternatively a dormer design could limit the upwards emission of light.

Renewable Energy

29. The adopted AONB Management Plan indicates that all new build works should incorporate schemes for the capture and utilisation of renewable energy. The comments made in the Design and Access Statement are rather vague and it would appear that these matters have not yet been thought through in any detail. The orientation of the proposed new structures indicate that solar panels, both thermal and photo voltaic, could be incorporated into the roofs. Ground source heat pumps could involve considerable excavations which could be both disruptive to any archaeological remains and tricky in relation to the water courses and water bodies. The existence of water bodies suggest that water source heat pumps could be effective, especially when powered by solar generated electricity. To comply with the adopted policy a more specific and clear statement of a renewable energy commitment within the proposed redevelopment should be provided if permission is to be granted.

Landscape Treatment

30. I note there is a document entitled 'Landscape General Arrangement' and whilst this provides a general vision it needs considerably more detail in relation to species, sizes, and numbers to be a realistic scheme. Again, if a permission is to be granted a more detailed landscape scheme and specification should be provided.

Conclusions

31. The proposed design would be taller than the existing mill building and the reorientation of the building, together with the split design approach, would substantially remove any obvious history of the mill.

32. As you will have gathered, the AONB is concerned that the innovative design of the redevelopment will be obvious within the scene. The location in the river valley means that the site is an element within the lower ground of the valley when viewed from the numerous and elevated public Rights of Way. The considered judgement of the AONB is that the submitted LVIA needs to be read very carefully and in the context of the study area rather than the whole of the Ebble valley or the whole of the AONB.

33. The extent to which the proposed structures will be clearly obvious within the scene, and the extent to which they will impinge adversely on the views, are matters for the decision maker. The use of clay tiles and rough cut stone is more likely to achieve integration than the polished stone that was initially proposed in the pre-application material.

34. The two issues of reflectiveness and light emission of the substantial glass structures do not seem to have been entirely overcome. The reflectiveness issues are mentioned in passing in the Design and Access Statement, and it is reassuring to see that a specialist lighting consultant has been involved. Nevertheless those matters do need to be fully worked up, before a decision is made, if the development is to progress without adverse impacts on the AONB where great weight should be given to the conservation of landscape and natural beauty.

I hope these comments are helpful to you and the AONB would, of course, be happy to comment on any additional information you may receive and to assist you in considering lighting or landscape issues.

Yours sincerely

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