

Wiltshire Council Planning Consultation Response

13 March 2018

World Heritage Site Officer (East)
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Spatial Planning Team
County Hall
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Officer's Name: Morgan Jones
Officer's Title: Senior Planning Officer
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Application No: 18/00397/FUL
Erection of 160 no. dwellings to provide Service Families Accommodation (SFA), land for public open space, landscaping, internal roads and all infrastructure works, including drainage improvements.
Land North of The Packway and East of Larkhill, Larkhill, Wiltshire, SP4 8PY
412491 Northings: 144232
Defence Infrastructure Organisation

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

I would welcome any comments that you have about this particular application by **02 April 2018**. If I do not receive your observations and comments by this date I will assume you have none. If you require an extension of time please contact the Planning Officer above who will do their best to accommodate this.

Recommendations:

<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Support subject to conditions (please set out below)
<input type="checkbox"/>	Object (for reasons set out below)
<input type="checkbox"/>	No objections

Matters Considered:

Policy context

The UK, as a signatory to the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO, 1972) is obliged to protect and conserve the Site's significance or Outstanding Universal Value (OUV) and appropriately present and transmit this to future generations. The Statement of OUV (SOUV) outlines the reasons for the Site's inscription on the WHS and acts as a guide to what we need to protect and how this will be achieved. The SOUV underlines the dominance of the principal monuments and the fact that their location, settings and interrelationships continue to form a landscape without parallel that can be easily perceived and appreciated (UNESCO, 2013).

The National Planning Policy Framework (NPPF) states at paragraph 132 that great weight should be given to the conservation of designated heritage assets. "The more important the asset, the greater the weight should be." WHSs are recognised as designated assets of the highest significance.

Change within the World Heritage Site (WHS) and its setting requires very careful management that will protect and enhance the WHS and maintain its OUV. The attributes of OUV include the physical remains of the Neolithic and Bronze Age monuments and their settings as well as the relationship of the monuments to the landscape and the interrelationship of monuments within that landscape and the character of the landscape as a whole.

Policy 59 of the Wiltshire Core Strategy underlines that precedence will be given to the protection of the WHS and that development will be acceptable only where it is “not adversely affecting the World Heritage Site and its attributes of OUV. This includes the physical fabric, character, appearance, setting or views into or out of the World Heritage Site.”

Any development proposal is required to set out how it will protect and enhance the WHS in line with Policy 59. As part of the application it is necessary to “demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the Site and its OUV. Consideration of opportunities for enhancing the World Heritage Site and sustaining its OUV should also be demonstrated.”

The agreed Vision for the WHS highlights the need to “work together to care for and safeguard this special area and provide a tranquil, rural and ecologically diverse setting for it and its archaeology”. Policies of particular relevance to this proposed development in the Stonehenge and Avebury World Heritage Site Management Plan (2015), a key material consideration in the planning process, include the following:

Policy 1d – Development which would impact adversely on the WHS, its setting and its attributes of OUV should not be permitted

Policy 1e - Minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of Outstanding Universal Value

Policy 3c – Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself

Policy 6a – Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore the WHS.

Comments

This is the first element of development related to the masterplan for rebasing that the WHSCU has been consulted on. We appreciate the invitation to comment on this application and the opportunity we were given at the pre-application stage to request the HIA to assess impacts on the WHS and its OUV. We welcome the preparation of an HIA. Although the appraisal photographs from the LVIA included in the appendix to the HIA are to some extent helpful, it would have been useful to see photomontages from points agreed within the WHS including identified viewpoints at Durrington Walls. In addition, a more accurate assessment of the impacts on light pollution from the development would have provided evidence to assist in assessing the overall impact on the WHS and its OUV. Existing tree cover is not reliable and should not be taken into account as a justification for unsuitable development: a bare earth approach would provide more accurate evidence.

The proposed development represents substantial change in the setting of the WHS. It is for 160 dwellings to provide Service Families Accommodation (SFA), land for public open space, landscaping, internal roads and all infrastructure works, including drainage improvements. The development is a relatively short distance from the boundary of the WHS in the north east. It lies within the setting of the WHS landscape and the setting of Durrington Walls a scheduled monument which conveys the attributes of OUV of the WHS. In addition, although not directly on a Solstitial alignment, it is nearby and has the potential as identified in the HIA to impact on the level of light pollution that could affect experience of this and wider astronomical alignments.

As mentioned above more detailed and targeted evidence would have been helpful in assessing the impact however it is possible to extrapolate that the development would create a substantial change but that the landform might make its impact less adverse. It would however represent a cumulative impact on its tranquil and rural nature of the setting. It is important that the layout of the development makes maximum use of the landform to minimise impacts on the WHS. Tree cover is not in itself adequate to justify development on higher ground as tree cover cannot be guaranteed as sustainable.

The most significant change would appear to be the potential to increase light pollution which is acknowledged in the HIA. To minimise this impact in line with Policy 59 of the Core Strategy and Policy 1e of the Management Plan, I would advise that the very highest standards are followed in mitigating any impacts. The Cranbourne Chase AONB

Position Statement 1 provides useful guidance on minimising light pollution which should be considered in adapting the design of lighting schemes as required:

“No external lights should be erected or installed in, or within the setting of, the AONB unless:

- (a) They can be shown to be essential for security or safety, and the minimum necessary to achieve it;
- (b) They are directed downwards and designed or shielded to prevent upward, sideways, and outward spillage;
- (c) They give a light whose colour and intensity are appropriate for the wider setting;
- (d) They do not highlight a structure or feature that would have an adverse visual impact on the surrounding landscape; and
- (e) They utilize the most energy- and pollution-efficient equipment that is reasonably available.

http://www.ccwwdaonb.org.uk/uploads/docs/Planning/Pos1_Light.pdf

Minimising light pollution is essential for avoiding adverse impacts not only on the experience of the Solstitial alignment which runs close by the proposed development but also on other potential alignments and interrelationships either identified or that may be identified in the future.

In addition to very careful lighting design, great care should be taken to further minimise impacts on the character of the setting in the choice of materials and palette. These should be the least intrusive in long views as possible.

Possible impacts of any changes in traffic, parking and road layout need to be mitigated in terms of its impact on the WHS and its setting. Additional signage should be kept to a minimum to minimise reduction in the rural and tranquil character of the setting.

I am very happy to advise further.

Sarah Simmonds Stonehenge and Avebury WHS Partnership Manager