

**SOUTH WILTSHIRE CORE
STRATEGY**

EXAMINATION IN PUBLIC

**Statement of Common Ground as
agreed between
Wiltshire Council and the English
Heritage**

19 FEBRUARY 2010

Plan reference: paragraph 1.13

Representation Number: 9962

Issues Raised

Bullet point should read: Heritage strategies such as ... and the Stonehenge World Heritage Site Management Plan 2009.

Wiltshire Council Response

Referring to a specific document would not allow the flexibility for accommodating subsequent publications that might be adopted as planning policy guidance.

Agreed position

No changes necessary.

Plan reference: Paragraph 3.8

Representation Number: 9988

Issues Raised

Should be entitled 'The Pressures on South Wiltshire's high quality natural and historic environments'.

Add archaeological sites to the list in introductory paragraph.

Amesbury is proposed as the second area for growth after Salisbury (see 5.3 and core policy 1 in 5.17). There is no mention of the challenge of combining significant growth (1,900 new homes) in Amesbury with the protection of the Stonehenge World Heritage Site. This should be mentioned in 3.8 (a) pressures on landscape. We recommend additional text indicating that the new development in Amesbury will be carefully designed so as not to affect the Stonehenge World Heritage Site or its setting.

Wiltshire Council Response

This paragraph is specifically intended to deal with the natural environment.

The following paragraph, 3.9, deals with built heritage, where the protection of archaeological sites is inferred by the specific example of Stonehenge.

However, there is no objection to adding a general reference to archaeological sites to this paragraph.

Agreed position

In paragraph 3.9, add the words 'archaeological sites and' after 'lack of protection for'.

Plan reference: 4.0+

Representation Number: 9991

Issues Raised

Unfortunately the vision in the opening paragraph only refers to historic buildings which appears to undervalue the nationally significant historic landscape as a whole including archaeology, settlements (places), parks, gardens and buildings.

Wiltshire Council Response

Whilst there is clearly no intention to undervalue the matters referred to, several subjects appear frequently throughout the Core Strategy, and a balance has to be struck to ensure the document is not overloaded with unnecessary words or repetition.

Agreed position

In last sentence of opening paragraph: Remove 'landscapes and historic buildings' and replace with: '*..which makes the most of the natural and historic landscapes, together with historic buildings and compliments them with exciting new buildings*'.

Plan reference: Paragraph 4.7

Representation Number: 9965

Issues Raised

Support reference in the desired outcomes.

Wiltshire Council Response

Noted.

Agreed position

No changes necessary.

Plan reference: Paragraph 5.54

Representation Number: 9967

Issues Raised

Add a last bullet point: Working with the Stonehenge stakeholders to improve the setting of Stonehenge, interpretation and access, and the protection of the World Heritage Site.

Wiltshire Council Response

Agree.

Agreed position

Add bullet point as suggested.

Plan reference: Paragraph 6.0+

Representation Number: 9995

Issues Raised

The Salisbury Historic Environment Assessment, April 2009 highlights the strong possibility of nationally significant archaeology on several of the strategic sites.

As this needs to be preserved in situ in, capacity assumptions may be affected. The Core Strategy should therefore note the consequences of PPG16 in this respect and arguable the thorough archaeological investigation of these strategic sites should occur before designation.

Wiltshire Council Response

Core Policy 2 allocates the strategic sites and is not in this section but rather in section 5. The Policy is supported by the Strategic Site Development Templates contained within Appendix A.

The strategy has evolved taking account of archaeological advice through the Consultative Technical Group. The Templates already take account of known/probable archaeological interests and provide enough flexibility for retention in situ'. As with any unforeseen circumstances, these will need to be taken account of through the development process. There is already a robust policy framework to address this (PPG16, and saved Local Plan polices CN21, 22 and 23) and hence in accordance with PPS12, no need to repeat it in the Core Strategy.

Where appropriate, these Templates clearly require that archaeological investigations should be undertaken prior to master planning and that designs should take account of the results.

Agreed position

No changes necessary.

Plan reference: Paragraph 8.0

Representation Number: 9952

Issues Raised

We recommend the modification of text to read: The town is the gateway to the ancient Neolithic site of Stonehenge, which attracts over a million visitors a year.

Wiltshire Council Response

No objection.

Agreed position

Replace text 'The parish boundary of Amesbury encompasses' with 'it is the gateway to'.

Plan reference: Paragraph 8.2

Representation Number: 9960

Issues Raised

We recommend an additional bullet point: 'Development around Amesbury should be carefully designed so as not to affect the Stonehenge World Heritage Site or its setting'.

Wiltshire Council Response

No objection.

Agreed position

Add bullet point as suggested.

Plan reference: Paragraph 8.4

Representation Number: 9969

Issues Raised

Support the prominent feature of Stonehenge in the vision for Amesbury.

Add at the end: The other objectives of the 2009 Management Plan, such as improving access to the WHS, developing sustainable transport and improving the conservation of archaeological sites, will have been realised.

Wiltshire Council Response

This issue has been addressed by including the suggested text in a schedule of changes submitted with the Core Strategy.

Agreed position

Change already made at submission stage, no further changes necessary.

Plan reference: Paragraph 8.25

Representation Number: 9948

Issues Raised

The parish boundary of Amesbury encompasses Stonehenge, which together with its surrounding prehistoric monuments forms the 2,600 hectare World Heritage Site. We recommend the first sentence at 8.25 (a) is adjusted to read: Stonehenge is one of the most important monuments in the world. It is surrounded by many other outstanding monuments and hundreds of prehistoric burial mounds which together make the 2,600 hectare World Heritage Site. However, Stonehenge is marooned...

It would be beneficial if at section 8.25(a) mention is made of the specific policy in the 2003 Local Plan of development affecting the Stonehenge WHS which has been saved, and to quote it.

Policy CN24 Stonehenge WHS – Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted.

We would also recommend reference in this section to the Stonehenge WHS Management Plan and that it has been endorsed by Wiltshire Council as supplementary guidance with the addition of the following paragraph:

A new Stonehenge World Heritage Site Management Plan was published in January 2009 after extensive consultation with the Stonehenge stakeholders and the public. The Plan provides a long-term strategy to protect the World Heritage Site for present and future generations. The primary aim of the Plan is to protect the prehistoric monuments which give the World Heritage Site its Outstanding Universal value, taking into account other interests such as tourism, farming, nature conservation, research, education and the local community. The Management Plan sets out many objectives for the World Heritage Site, such as improving the setting of Stonehenge and other prehistoric monuments, providing new visitor facilities, improving interpretation and access, and promoting sustainable transport. The Plan has been endorsed in July 2009 by Wiltshire Council as supplementary guidance and a material consideration in determining planning applications affecting the Stonehenge WHS. It replaces the 2000 Management Plan.

Wiltshire Council Response

No objection to addition to first sentence as suggested.

Also have no objection to cross-references to the saved policy and supplementary guidance.

The issue of the Management Plan has been addressed by including the suggested text in a schedule of changes submitted with the Core Strategy.

However, quoting the saved policy is unnecessary and would not add any value to the document.

Agreed position

Add text to first sentence as suggested.

Plan reference: Paragraph 13.0+

Representation Number: 10002

Issues Raised

The SA at pg 41 no.23 recommends inclusion of indicators relating to Heritage @Risk. English Heritage support this but would also recommend reference to all assessed assets including Grade 1 and 2* LBs, Conservation Areas, Parks and Gardens, and Scheduled monuments.

Building for Life criteria, and Manual for Streets have also been issued since your Creating Places guidance was issued and should therefore be referred to. They will act as effective indicators in ensuring high quality, distinctive places.

Wiltshire Council Response

The SA in fact deals with more than the policies on the submitted version of the Core Strategy.

At the time of the SA development policies were proposed in respect of a range of issues including design and protection of heritage assets.

These policies, among others, were removed (where it was considered saved Local Plan policies will continue to be effective for the time being). These matters will be dealt with in subsequent DPDs, which will include appropriate indicators.

Agreed position

Accept EH position.
Recommended agreed position
No change to the South Wiltshire Core Strategy although Building for Life, Manual for Streets and Heritage at Risk concerns will be considered during the preparation of the Wiltshire Core Strategy.

Plan reference: Map 7

Representation Number: 9951

Issues Raised

Unfortunately, though perhaps understandably, the Core Strategy currently focuses on Stonehenge rather than the World Heritage Site. It is important therefore to add the WHS boundary to map 7 at 8.2.

Wiltshire Council Response

This issue has been addressed by including the suggested addition in a schedule of changes submitted with the Core Strategy.

Agreed position

Change already made at submission stage, no further changes necessary.

Plan reference: Core Policy 2 (Longhedge)

Representation Number: 9977

Issues Raised

The Salisbury Historic Environment Assessment, April 2009, is included as part of the Core Strategy's evidence. It clearly demonstrates the unsuitability of at least 2/3rds of the site for various direct and indirect reasons. English Heritage considers for the reasons demonstrated by this independent evidence the designation as identified is unjustified and contrary to national policy.

Whilst the principle of development may have been established for the current development taking place to the north of Old Sarum airfield it does need establish the principle of further development in this area of open countryside.

The Core Strategy does not consider the future role of the settlement of Old Sarum and does not feature in the hierarchy. There is no indication of a long-term vision for it.

A lack of confidence in the robustness of the SA applies equally in respect of this and other allocations.

Wiltshire Council Response

This issue is dealt with in paragraph 6.41(i) of the Core Strategy.

In summary, whilst the concerns about the pressure on the historic landscape are acknowledged, in this instance there are other factors that outweigh the potential heritage concerns.

These factors include:

- The lack of any less constrained alternative deliverable sites;
- The extant planning permission for 650 dwellings and 6ha of employment provides a firm base upon which to provide a greater degree of self-containment and a critical mass of population and services in this area;
- The extant consent already introduces the principle of development into the setting of Old Sarum;
- The development can be sensitively designed to partially mitigate impacts.

When the strategic allocation is implemented it will need special mitigation measures. These mitigation factors are outlined in detail in the Development Template for the site contained in Appendix A.

Continued/...

Although all of the 'available' land in this location is indicated in the Development Template map, it is not envisaged that development will be carried out to the full extent of all its boundaries.

The Regional Spatial Strategy requires a density of at least 40 dwellings per hectare on sites of this nature and the Core Strategy does not include any locally distinctive policies to over ride this. The proposed number of dwellings for this site is 800, which at the suggested density should require a maximum of 20 hectares. A further 8 hectares of employment land is proposed.

Whilst this constitutes more than one third of the site, it demonstrates how master planning of the built elements could be concentrated towards the southern end of the site, allowing space for mitigation measures such as informal open space, strategic landscaping, perimeter buffers and strengthening existing tree belts.

Considering the allocated site in isolation, particularly in the manner shown in paragraph 4.2 of the Historic Environment Assessment, is misleading. The combination of the extant permission adjoining the site, together with other existing development along The Portway and, especially, the city to the South, means that the new development would in fact have little additional impact, provided the proposed sensitive master planning and mitigation measures are adhered to.

The developed area of Old Sarum is considered to effectively blend with that of Salisbury. It is not therefore identified separately within the settlement hierarchy.

There is no explanation as to why there is a lack of confidence in the robustness of the SA, and no comment can therefore be offered on this.

Although it is accepted that Old Sarum is detached from Salisbury, the Inspector at the previous Local Plan considered it to be a suitable location for an urban extension to the City. In this context, the area has not been considered as a place in its own right in the settlement strategy, but rather an area that is part of Salisbury and its environs. As with all strategic sites, through every stage of the production process, the future role of the area has been a paramount consideration as has the evaluation of benefits and constraints. Prioritisation has been given to locations for development that will best contribute to building sustainable, linked, mixed-use and balanced communities.

Agreed position

In order to ensure that the environmental capacity of the site and important landscapes and views are conserved through the development management process it is agreed that the Development Template at Appendix A, page 164 is revised under sub-heading 'Place shaping requirements' to include:

- Density and building height of development will vary in response to the visual sensitivity of different parts of the site allowing a balance between built and 'green areas' with a higher density of development in the southern part of the site through to predominantly 'green / planted areas'. This 'topographical progression' of development would be matched by a 'structural landscape / green infrastructure progression' in order to minimise visual impact and help to maintain an appropriate landscape setting for Old Sarum.
- Retaining and strengthening the landscape elements of the site to inform the layout of development and allowing it to relate, respond and assimilate with the surroundings.
- Embedding the majority of the new development within a newly established network of green corridors and strategic landscaping.
- Ensuring the design responds to a detailed analysis of the historic environment; safeguards key views to and from Old Sarum and; integrates the sites important archaeology.
- Overall building mass is in keeping with the rural setting.
- Lighting does not exceed the height of the development and is designed to minimise light pollution and skyglow. Lighting should not impinge on the views from Old Sarum.
- There are no alterations, (unless essential in the interests of road safety and gaining safe access to the site – issue to be agreed at masterplanning stage), to the line of the Roman road and long views of Old Sarum are preserved as vehicles travel southwards along the A345 (old Roman road) by containing development within the site by structural roadside planting.

Plan reference: Core Policy 2 (Kings Gate)

Representation Number: 9980

Issues Raised

This is another extremely sensitive historic landscape assessed by the Salisbury Historic Environment Assessment, April 2009. It recognised the potential for development but not at the most sensitive (and therefore unsuitable) part of the site, fortunately excluded from consideration. However this part of the site now appears to have been included. The risk to the historic environment is therefore of such significance that a designation would be unjustified, unacceptable and contrary to national policy.

Wiltshire Council Response

This is another case where the indication of all the 'available' land in this location on the Development Template map has led to an objection. It is agreed that land to the north of the site is particularly sensitive and would benefit from being removed from the red area and its importance given more prominence

It is not envisaged that development will be carried out to the full extent of all the indicated boundaries. Master planning of the site will need to take into account the archaeological constraints that are clearly identified within the Development Template, as well as including a range of mitigating landscaping elements.

Agreed position

Revise map in Development Template on page 167 of the Core Strategy in the *Place Shaping Requirements* on pg 169 add the following

- Development to be set back from the northern boundary and limited in height to two storeys to protect views from the designed parkland at Amesbury Abbey and water meadows and limiting any adverse impact to the setting of the Stonehenge World Heritage Site .
- Strategic landscape buffer to the north of the site to minimise the landscape impact of development.
- Retain, strengthen and extend existing tree screens to the north of the site.
- Lighting not to exceed the height of the development and designed to minimise light pollution and skyglow.
- Appropriate design and mitigation response to the important archaeology identified by a programme of evaluation

Plan reference: Core Policy 2 (Hampton Park)

Representation Number: 9983

Issues Raised

We accept that the recommendations of the Salisbury Historic Environment Assessment, April 2009 have been considered however we would suggest greater clarity is provided in respect of managing change in such an important historic location. This could reflect guidance applied to the proposed urban extension (reflected in the Core Strategy Submission version) to the east of Swindon. Again we recommend liaison with the county archaeologist who has had detailed involvement with guiding such an allocation.

Wiltshire Council Response

The County Archaeologist has been consulted at all appropriate stages in the production of the Core Strategy, and the Development Template for this site (included in Appendix A of the document) specifically states that trial pitting should be undertaken under their supervision.

This site is now subject of a full planning application (reference S/2009/1943). Archaeology is addressed in the Environmental Statement submitted with this application, on which the County Archaeologist has also been consulted.

Agreed position

No changes necessary.

Plan reference: Core Policy 13

Representation Number: 9946

Issues Raised

We are very supportive of the new core policy on Stonehenge (no 13 in chapter 8) which is supporting new visitor facilities, and of the saved Stonehenge WHS policy (CN24) which is a key tool to control development affecting the WHS.

Wiltshire Council Response

Noted.

Agreed position

No changes necessary.

Plan reference: Core Policy 23

Representation Number: 9998

Issues Raised

Advice on the preparation of green infrastructure emphasises the relationship of such plans to the natural and historic environment, many features of which will be affected and can be included, and therefore managed via green infrastructure strategies. Core Policy 23 and references to green infrastructure planning throughout the document make no reference to the historic environment. It should. We strongly suggest liaison with Melanie Pomeroy-Kellinger, the County Archaeologist who is aware of the highly regarded and robust Green Infrastructure policy as part of Swindon's Core Strategy. Adjustments should then be made.

Wiltshire Council Response

The County Archaeologist has been consulted at the appropriate stages of the Core Strategy.

Although the policy contains specific references to important ecological sites, this does not imply that benefits to the historic environment have been ignored. It is however suggested that a change to make this explicit in the policy might be appropriate.

Agreed position

Add new bullet to Core Policy 23 to read: 'identifies opportunities to enhance and improve linkages between the natural and historic landscapes of south Wiltshire'

inclusion of the following at the end of para 12.7.

The Wiltshire Green Infrastructure Plan will also consider the conservation of elements of the historic landscape such as historic and designed landscapes and scheduled monuments and consider provision for the restoration of historic or lost landscape features.¹

Plan reference: Core Policy Appendix A, Development Template for Longhedge, pages 165, the following passage has been included in error and should be deleted

'There are opportunities to secure the long term future of Old Sarum Aerodrome through some sensitive new development, acting as a catalyst for a new Management Plan related to heritage and a legal agreement which controls the level of flying activity, which has been a longstanding issue locally.'