

1. Background

- 1.1 The draft Wiltshire Housing Site Allocations Plan ('draft WHSAP') has been prepared in the light of relevant legislation¹ and national policy². However, through the formal pre-submission consultation process, Historic England submitted representations that identified concerns with the Council's evidence base in terms of how it had assessed, where relevant, the significance of heritage assets, including any contributions made by their setting.
- 1.2 Historic England did not raise any 'show-stopper' concerns through their representation. Nevertheless, they were concerned about the potential scale of effects that would be attributable to development proceeding on certain site allocations where the risk of harm to designated and non-designated heritage assets represents a key consideration. In this regard, they advised that the draft WHSAP should address heritage matters head-on and not delegate the need for detailed assessments to be undertaken at the planning application stage.
- 1.3 It was agreed with Historic England that a proportionate assessment of six of the proposed allocations would be undertaken to bolster the evidence base. Consultants were commissioned to undertake a Heritage Impact Assessment (HIA)³. The report produced is robust and adds to the Council's understanding of the various heritage assets associated with the six sites appraised. In this regard, it is a helpful piece of work as it provides a deeper understanding of heritage constraints.
- 1.4 The HIA appropriately addresses the statutory and national planning policy advice. Indeed, it takes a conservative and precautionary approach to the assessment of heritage assets and the degree to which their significance would potentially be harmed by development proceeding. Of the six sites assessed, the proposed allocations at Upper Studley (H2.4) and Church Lane (H2.5) on the urban edge of Trowbridge and adjacent to H2.6 – Southwick Court are considered to be low risk in terms of the scale of harm to the significance of heritage assets and can therefore proceed as allocations. However, the report establishes that significant challenges would likely be generated if development proceeds in respect of the other four sites at:
- Southwick Court, Trowbridge (H2.6);
 - Land off the A363 at White Horse Business Park, Trowbridge (H2.2);
 - East of The Dene, Warminster (H2.7); and
 - Land North of Netherhampton Road, Salisbury (H3.3).
- 1.5 What follows is a summary of the HIA advice as it applies to these four sites.

¹ Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and Section 72(1)

² National Planning Policy Framework, March 2012

³ Wiltshire Housing Site Allocations Plan - Heritage Impact Assessment, Land Use Consultants, March 2018

2. H2.6 - Southwick Court, Trowbridge

- 2.1 The HIA acknowledges that the proposed allocation (H2.6) is set within the vicinity of the Grade II* listed Southwick Court farmstead complex (including the medieval moat and gatehouse). The significance of this very important heritage asset and its functional relationship with surrounding, non-designated but somewhat degraded water-meadows and wider agrarian landscape is firmly acknowledged in the HIA and the draft WHSAP.
- 2.2 The HIA recommends that development of the entire proposed allocation would sever Southwick Court from its historic, economic agrarian context. The nature and extent of the contribution of the setting to Southwick Court is understood to make the historic landscape within and around the proposed allocation particularly sensitive to change, a point acknowledged in the draft WHSAP at paragraphs 5.78 and 5.79.
- 2.3 Taking a precautionary position on these matters, the HIA notes that applying mitigation by design to minimise harm would not be a realistic option if delivery of significant numbers of houses on site are proposed.
- 2.4 The overall assessment of likely effects associated with development proceeding on the proposed allocation is considered to be significant. Indeed, based on an assessment of potential cumulative effects on the relationship between the various assets that comprise Southwick Court and its agrarian connections, the scale of harm of development proceeding is conservatively assessed as approaching substantial.
- 2.5 The starting point for the assessment of whether a proposal would cause substantial harm to a heritage asset is the consideration of impact on its significance. Significance derives from the physical presence of a heritage asset and the contribution made by its setting. It is the degree of harm to the asset's significance rather than the scale of development that is to be assessed when determining the scale of harm. In this context, a judgement of substantial harm would likely result from:
- total loss of a heritage asset; or
 - physical damage to an asset; or
 - the insertion of development within the setting of an asset that would significantly alter the experience, or interpretation of an asset.
- 2.6 Whilst presenting an appropriate, conservative and precautionary approach to addressing the significance of heritage assets, the HIA does not state that substantial harm would be caused by development proceeding on the proposed allocation. In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.
- 2.7 It is clear that development of the proposed allocation will be significantly challenging. However, the decision to allocate this site (and all sites the

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subject of the HIA) is based on a balance of a range of factors, where heritage is afforded special regard.

- 2.8 As outlined in the draft WHSAP, it is considered that appropriate urban design measures would need to be employed to lessen the scale of likely impacts associated with developing the eastern half of the site for housing. Indeed, based on such measures being delivered as part of a comprehensive and sensitively planned development, a range of significant public benefits would be accrued (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc). These undeniable benefits are considered capable of satisfying the test set out in paragraph 134 of the Framework and would significantly outweigh the less than substantial harm to heritage assets.

3. H2.2- Land off the A363 at White Horse Business Park, Trowbridge

- 3.1 In a similar vein to the proposed Southwick Court site, the proposed allocation H2.2 presents a challenge in terms of managing the risk of harm to the significance of heritage assets and their respective settings. The HIA assesses such matters in a robust manner. Five heritage assets are identified as being sensitive to change and would potentially be affected if development proceeds:

- Baptist burial ground – Grade II listed gateway and perimeter walls (curtilage listed);
- Kings Farmhouse – Grade II listed building and associated agricultural connections;
- Willow Grove – Grade II listed building and associated agricultural connections;
- Little Common Farm – non-designated, but closely related in agricultural terms to neighbouring farmsteads; and
- Manor Farm – Grade II listed building to the south of proposed site with potential for development to lead to setting changes

- 3.2 The HIA considers that the current landscape structure of relatively large fields enclosed by hedgerows would offer few easy options for mitigating harm to these heritage assets. However, the assessment concludes that development of whole allocation would result in less than substantial harm to the four designated heritage assets. That said, the level of change that would be introduced by development proceeding would be significant and thereby capable of eroding the legibility of the relatively intact post-medieval agricultural landscape, which in turn informs the character of North Bradley.

- 3.3 As the designated assets are essentially clustered in the south-eastern half of the site, the report considers that development should be concentrated in the north-east end of the site. Such an approach would help conserve the relationships between the local farmsteads and still deliver a reasonable developable area.

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- 3.4 Moreover, and as outlined in the draft WHSAP, with the application of appropriate urban design measures, including significant bolstering of existing green infrastructure to help support protected bat species, a sensitively planned development could minimise harm to the significance of heritage assets and character of North Bradley village.
- 3.5 In addition, development would likely deliver significant public benefits (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc) capable of satisfying the test set out in paragraph 134 of the Framework and thereby significantly outweigh the less than substantial harm to heritage assets.

4. H2.7 - East of The Dene, Warminster

- 4.1 As outlined in the draft WHSAP, the development of this proposed allocation would be challenging from a heritage perspective. The site is complex and clearly relates to a number of designated and non-designated heritage assets including:
- Bishopstrow House – Grade II listed building and associated designed landscape/agricultural setting;
 - Bishopstrow Home Farm ('model farm' complex) – non-designated farmstead and associated agricultural setting;
 - Bishopstrow Conservation Area – potential for development to affect the setting of the Conservation Area;
 - 196/198 Boreham Road – non-designated dwellings of historic character;
 - An area of high archaeological potential; and
 - Potential loss of a section of historic walling along the Boreham Road.
- 4.2 As outlined in the draft WHSAP, the development of southern half of the site would likely lead to significant effects on the setting of Bishopstrow House and Bishopstrow Home Farm and this is highlighted in the HIA. The report considers the scale of effects on individual heritage assets arising from developing the site would be high and difficult to mitigate. Moreover, the challenge for developing the site essentially arises when the scale of effects is considered in a cumulative manner. In this sense, the report takes a precautionary approach and conservatively considers harm would be significant, but nonetheless less than substantial.
- 4.3 As outlined in the draft WHSAP, the site will need to be sensitively planned to give special regard to conserving the significance of local heritage assets and thereby deliver appropriate urban design measures to lessen the scale of likely impacts. Indeed, based on such measures being delivered, a range of significant public benefits would also be accrued through developing the site (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc). These benefits are therefore considered capable of satisfying the test set out in paragraph

134 of the Framework and would significantly outweigh the less than substantial harm to heritage assets.

5. H3.3 - North of Netherhampton Road, Salisbury

- 5.1 There are no designated heritage assets within the proposed allocation site, but the site nonetheless has a functional relationship with recorded archaeological features and non-designated water-meadows. The draft WHSAP acknowledges that the proposed allocation is situated in a sensitive location on a key approach to the City of Salisbury where relatively uninterrupted, long distance views of the internationally significant Cathedral are important considerations in heritage terms. The HIA therefore takes a holistic approach and considers these issues within the context of the City of Salisbury Conservation Area Appraisal and Management Plan (2014), rather than just the heritage significance of the Cathedral.
- 5.2 The HIA considers that development would likely result in substantial harm to / loss of archaeological remains on site. However, it is considered unlikely that this would constitute a major constraint to development provided a precautionary approach is taken (e.g. undertaking detailed field evaluations to support a subsequent planning application).
- 5.3 Development would potentially reduce or remove visibility of the Cathedral Spire and thereby conflict with the objective to conserve the key characteristics of the Conservation Area. The extent to which this effect could be considered to be harmful to the heritage significance of the Cathedral itself is debatable, as longer views of the Spire from the west would remain available.
- 5.4 However, applying a precautionary approach would suggest that it would be unlikely that the effects of development could be entirely avoided, or totally mitigated and hence development would likely be considered as conflicting with the requirement to conserve strategic views set out in the City of Salisbury Conservation Area Appraisal and Management Plan. That said, the HIA is silent on the scale of harm to the significance of heritage assets, albeit there would be no direct impact on the Cathedral itself and archaeology would not be a sufficient reason to stop development. Therefore, the conclusion one reasonably draws in this circumstance is that in an overall sense, the scale of harm can only be described as being less than substantial.
- 5.5 The report recognises that the nature, scale (particularly height and massing) and location of development would be critical considerations in determining the precise levels of impact. Therefore, as anticipated by the draft WHSAP, development of the site will need to be sensitively planned to give special regard to the significance of local heritage assets and thereby deliver appropriate urban design measures to lessen the scale of likely impacts. Indeed, based on such measures being delivered, a range of significant public benefits would also be accrued through development. Whilst the HIA is silent of the assessment of harm, these benefits are considered to be significant within the overall planning balance.

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5.6 Therefore, if less than substantial harm can be definitively demonstrated, the scale of public benefits (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc) would be capable of satisfying the test set out in paragraph 134 of the Framework and thereby significantly outweigh the less than anticipated less than substantial harm to heritage assets.

6. Considerations

6.1 The degree of harm to the significance of heritage assets brought about by developing each of the six sites appraised through the HIA is considered to be less than substantial. However, in the case of the four sites detailed above, the scale of likely harm associated with such development would nonetheless be of a more severe nature. In the light of this evidence consideration needs to be given to how the Council proceeds.

6.2 One option would be to bolster the policy considerations already set out in the draft WHSAP through a set of proposed changes that will then be considered through the independent Examination process. A second option would be to simply recommend to the appointed Inspector that the Council wishes to remove the proposed allocations in question on heritage grounds alone and thereby not consider the benefits that would undoubtedly accrue from development.

6.3 If the four proposed site allocations are recommended for removal prior to the examination, the net effect will be to weaken the draft WHSAP and thereby undermine one of its purposes, namely – the timely delivery of housing to maintain local supply. In this circumstance, the Council will likely need to provide contingency measures to address the loss of housing.

6.4 Whilst a case could be made to recommend the deletion of all four sites, a counter case will undoubtedly be made by the proponents of these sites. In this context, the HIA is a helpful piece of work in terms of furthering our understanding of heritage constraints. Indeed, based on the evidence gathered to date through the site assessment process, including that provided by the proponents of the sites through representations, the level of harm to the significance of heritage sites that may result through development proceeding is recognised as being a significant concern.

6.5 However, it is important to note that the assessments for all six sites essentially concludes that the potential scale of harm that would be generated because of development proceeding would be less than substantial. Therefore, the advice set out in paragraph 134 of the National Planning Policy Framework ('the Framework') would be engaged.

6.6 As defined by paragraph 134 of the National Planning Policy Framework, where a proposed development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of development proceeding.

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6.7 The need for housing, including affordable housing is recognised as being a priority of national and local policy. Moreover, addressing the need for housing in Trowbridge, Warminster and Salisbury goes to the heart of the strategy of this draft Plan. A public interest case can be demonstrated for proceeding with the proposed allocations, albeit the planning balance exercise that would flow through the determination of detailed development proposals would need to carefully consider a range of matters. In this regard, heritage impact is but one of many competing and important issues that need to be balanced through the planning system.

7. Conclusion

7.1 Having appraised all options in the light of the evidence prepared and submitted to date, it is considered that there is no justification for recommending the deletion of proposed site allocations on heritage grounds. However, in the light of the HIA, officers recommend that proposed changes be submitted alongside the draft Plan that emphasises and reinforces the special regard that must be applied to conserving heritage assets in a manner appropriate to their significance. These changes and the evidence relating to the proposed allocations will then be considered through the Examination.