

# Wiltshire Housing Site Allocations Plan (WHSAP)

## Examination Hearing Statement - Historic England

### RE: Policy H3.3 Netherhampton Road, Salisbury

### Matter 3: Housing Site Allocations

Issue 5: Are the proposed sites justified, effective and consistent with national policy?

5.2 Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

5.3 What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated: heritage assets; landscape quality and character

5.9 For sites in Salisbury, will the plan be effective in preserving or enhancing the setting of the Cathedral?

- As the Government's adviser, Historic England aims to support the delivery of sustainable development and the National Planning Policy Framework's (NPPF) objective of protecting and enhancing the historic environment (NPPF para 8).
- Historic England acknowledge the relevant evidence gathered by the council, in particular WHSAP Heritage Impact
  Assessment (LUC) March 2018 (ref WHSAP.05) that sets outs the likely impact on the significance of the effected heritage
  assets and their setting.
- 3. Historic England acknowledges the findings and conclusions of this evidence.
- 4. The proposed allocation is of particular interest to Historic England due to its impact on the national and international importance of Salisbury Cathedral (Grade | listed), and the Salisbury Conservation Area. Ones experience of the Cathedral in a wider landscape setting contributes to its significance and Historic England is concerned that evidence indicates development of the proposed allocation will adversely affect key views.
- 5. The Heritage Impact Assessment considers that the site provides "one of the few sections of the view (of the Cathedral within a wider landscape context) largely unencumbered by electricity transmission infrastructure".
- 6. The setting of Salisbury and views to the Cathedral are both identified as 'key characteristics' in the Salisbury Conservation Area Appraisal and Management Plan (2014). The Heritage Impact Assessment indicates the proposed allocation would fail conserve the setting of the Cathedral, its landscape and townscape context and in particular a 'strategic approach view'.
- 7. Local Plans are required to set out a positive strategy for the conservation and enjoyment of the historic environment and conserve heritage assets in a manner appropriate to their significance (NPPF para 184). In terms of potential site allocations, we would suggest this means identifying sites which are compatible with the requirements of national policy. At present the local authority has not demonstrated this would/could be the case.
- 8. The Framework (NPPF para 32) requires that significant adverse impacts should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. As the Plan's evidence base indicates that significant adverse impacts will occur, Historic England considers that an alternative option to the inclusion of this site should be considered.
- 9. Deferring the resolution of the principle of the allocation to a future planning application stage is not considered appropriate as fundamental heritage considerations may affect the principle of development, its form and quantum, and as a consequence, its deliverability i.e. informing whether the allocation is justified.

#### Conclusion

- 10. Historic England considers that the inclusion of Policy H3.3 of the Wiltshire Housing Site Allocations Plan fails to sustain and enhance Salisbury Cathedral and the Salisbury Conservation Area in a manner appropriate to their significance (NPPF paral84).
- 11. Historic England considers that the proposed allocation would fail to make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment and therefore fails to provide a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185).
- 12. Historic England considers that the local authority has failed to:
  - take sufficient account of its Heritage Impact Assessment to avoid or minimise harm (NPPF para 190)
  - attach great weight to the conservation of Salisbury Cathedral and the Salisbury Conservation Area (NPPF
    para.193), and
  - had due regard to the desirability of preserving the setting of the Cathedral in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.
- 13. Historic England therefore consider the Plan is
  - unjustified in terms of impacts upon the historic environment;
  - ineffective in terms of avoiding harm and delivering enhancements to the historic environment, and
  - inconsistent with national policy

#### Addendum

It should be noted that there has been an ongoing dialogue between the local authority. Historic England and the promoters of the site. Revised design and Masterplaning work from the promoter of the site has increased an understanding of the potential impact on the setting of Salisbury Cathedral and Conservation Area.

Collaborative work is ongoing between Historic England, Wiltshire Council and the promoters of the site to further explore potential design solutions that may ensure that the setting of Salisbury Cathedral and Conservation Area is safeguarded and harm minimised to an acceptable extent.

Historic England understands that further amendments to PC105 may be promoted by the Council through the Hearings to cover matters that may be agreed between Historic England, the Council and the site promoters.

Further dialogue on these matters will be required with all parties before the commencement of the Hearing sessions.

#### ENDS

Statement prepared and issued on behalf of Historic England by

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