



Historic England

Wiltshire Housing Site Allocations Plan (WHSAP)

Examination Hearing Statement - Historic England

RE: Policy H2.7 East of Dene, Warminster

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

- 1. 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).*
- 2. Historic England acknowledge the relevant evidence gathered by the council, in particular WHSAP Heritage Impact Assessment (LUC) March 2018 (ref WHSAP.05) that sets out 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 Heritage Impact Assessment highlights the significant predicted adverse effects in relation to the setting of numerous heritage assets including Bishopstrow House (Grade II listed), Bishopstrow Home Farm, Bishopstrow Conservation Area, 15 and 17 Grange Lane, The Cotes and Stable building (all Grade II listed), 196/198 Boreham Road (non-designated heritage asset) and areas of potentially high archaeological importance. Page 76 of the Heritage Impact Assessment provides a synopsis.*
- 5. The Heritage Impact Assessment considers that the development would have a significant effect on the historic landscape created by Bishopstrow House, its designed landscape and the historical, functional and aesthetic connections to Home Farm and associated agricultural land that forms part of the setting of several heritage assets.*
- 6. This historic landscape creates a key part of the setting of the Bishopstrow Conservation Area. The Bishopstrow House designed landscape comprises a significant proportion of the Conservation Area and its setting should therefore be considered of value.*
- 7. Historic England would add that the site is located within a historic landscape with evidence of prehistoric activity and includes the imposing Iron Age Battlebury Hillfort to the north and bowl barrows to the south. Further urbanising of the setting of this historic landscape character, and restriction of views across the site are important considerations. Wiltshire Council's archaeological expertise could provide further local interpretation.*
- 8. The Heritage Impact Assessment considered that only a limited amount of development at the far NW of the site might be suitable to avoid harm to the significance of affected heritage assets.*
- 9. 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.*
- 10. 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.

11. *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

12. *Historic England considers that the inclusion of Policy H2.7 of the Wiltshire Housing Site Allocations Plan fails to sustain and enhance effected heritage assets in a manner appropriate to their significance (NPPF para184).*
13. *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).*
14. *By allocating the site 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 effected heritage assets (NPPF para.193), and*
 - *had due regard to the desirability of preserving the setting of effected listed buildings in accordance with S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.*
15. *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*

ENDS

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