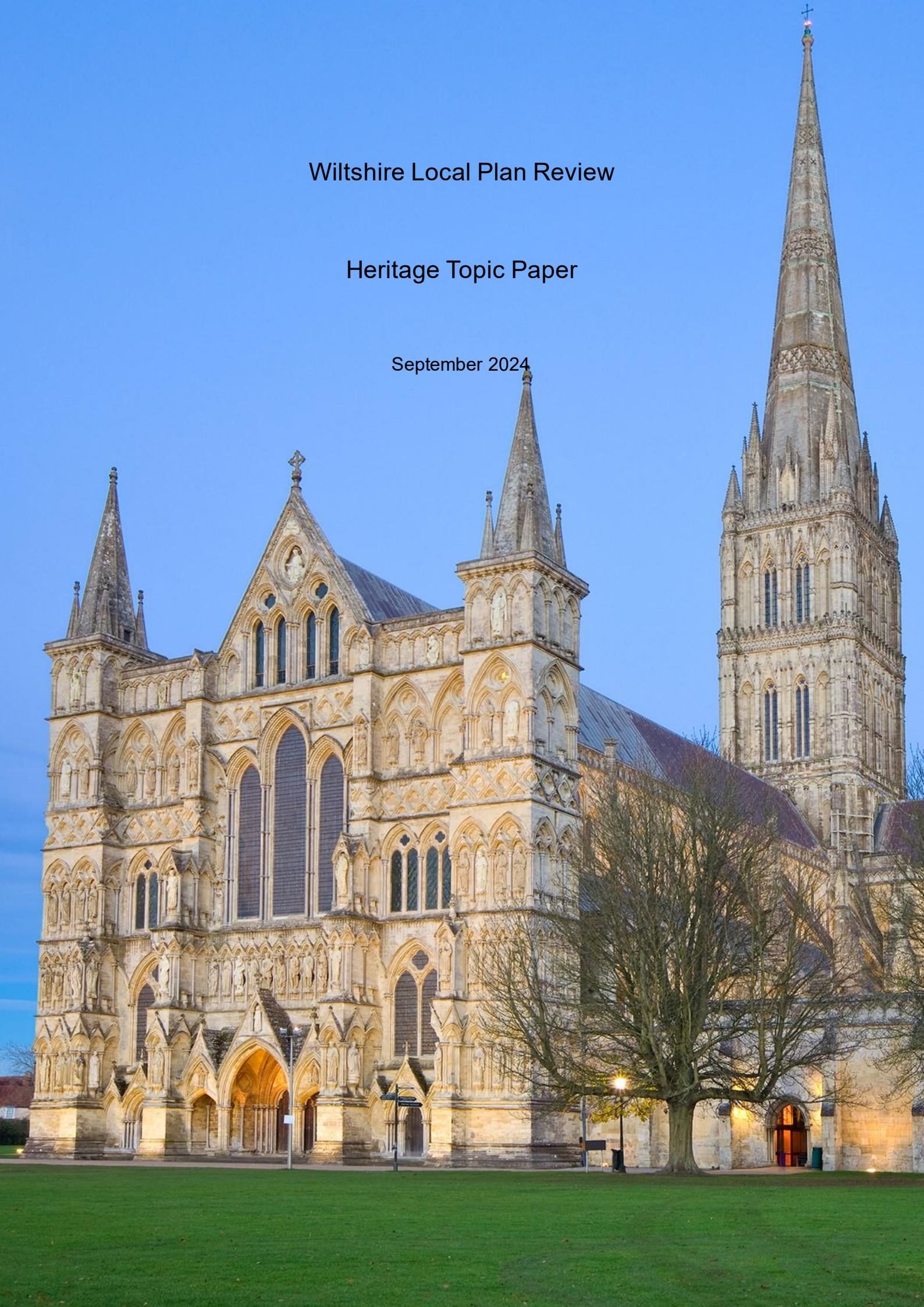


Wiltshire Local Plan Review

Heritage Topic Paper

September 2024



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1. Introduction

- 1.1. Wiltshire has a rich and diverse historic environment. In accordance with legislation and national planning policy the conservation and enhancement of Wiltshire's historic environment and heritage features is a key component of the Wiltshire Local Plan review. The purpose of this topic paper is to signpost to those elements and policies of the draft Local Plan where heritage has played a key role in the plan making process and to demonstrate that the council has considered heritage throughout the site selection and policy formulation processes.
- 1.2. In preparing the Wiltshire Local Plan review, Wiltshire Council has worked collaboratively with Historic England as required by the duty to cooperate process. In their response to the Regulation 19 consultation, Historic England reiterated the benefits a topic paper for heritage can provide to assist the appointed Planning Inspector during the examination process.
- 1.3. Whilst this topic paper has been produced at a late stage in the plan making process, it is nonetheless designed to illustrate the work that has been carried out to develop a positive strategy for Wiltshire on heritage matters. Opportunities to develop further planning guidance¹ to bolster a positive strategy for heritage will also be explored during the plan period and will include a setting study for the Stonehenge, Avebury and Associated Sites World Heritage Site. This paper will also reference the heritage evidence that has been relied upon to prepare the Local Plan and inform the site selection process. It also publishes some additional evidence at Appendix 1. This is in response to the Historic England Regulation 19 representation that the evidence underpinning the suitability of allocations in accordance with national policy needs clarifying – see table at Appendix A in the Historic England Statement of Common Ground (SoCG).

2. National policy context

- 2.1. The National Planning Policy Framework (NPPF, December 2023) sets out the national policy position for the conservation and enhancement of the historic environment. It recognises at paragraph 195 that heritage assets are:

“...an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.” (paragraph 195)

- 2.2. Paragraph 196 goes on to require plans to set out a ‘**positive strategy**’ for heritage and that they take into account:

“a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

¹ Paragraph 5.244 of the Regulation 19 draft Local Plan sets out what this guidance might include.

- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of place.” (paragraph 196).*

2.3. Paragraph 205 of the NPPF states that when considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the conservation of the asset.

3. The Historic Environment Record and the historic environment of Wiltshire

3.1. Paragraph 198 of the NPPF requires the Local Planning Authority (LPA) to maintain and provide access to a historic environment record (HER)² that contains up to date evidence for the historic environment. The evidence should be used to:

- “a) assess the significance of heritage assets and the contribution they make to their environment; and*
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.”*

3.2. Wiltshire Council has a comprehensive and well maintained HER used by the specialist Archaeology team who have used this evidence to inform the site selection process. Wiltshire Council also has a Historic Landscape Character Assessment (2015) that has informed the heritage input on site selection.

3.3. Wiltshire's heritage is unique and outstanding, ranging from pre-historic monuments, such as Stonehenge, to links with the industrial revolution such as the mill buildings in Trowbridge, as well as canal and railway structures.

3.4. The landscape of Wiltshire as we see it today is the product of a series of major changes through which its character has been transformed by the interaction of natural and human or anthropogenic processes. This historic landscape forms an important part of Wiltshire's rich natural and cultural heritage.

3.5. Like most areas, the landscape of Wiltshire bears the imprint of successive periods of human habitation and land use. While the basic landforms have remained the same, the vegetation covering and land uses have been subjected to constant change, although some periods of change have been far more rapid and radical than others.

3.6. These changes are important not only from an archaeological perspective but also in determining the overall character of Wiltshire. Wiltshire in particular has a rich

² The Wiltshire HER can be found via the following link: [Archaeology and historic environment record - Wiltshire Council](#).

prehistory including the outstanding prehistoric landscapes contributing to the Stonehenge, Avebury and associated sites World Heritage Site. The West Kennet long barrow, for example, is some 113m in length and contains individual chambers constructed of sarsen slabs.

- 3.7. Henge monuments are also part of this period, the most famous being Stonehenge, although it is only the bank and ditch that are Neolithic. Stonehenge is surrounded by other henge monuments, which vary considerable in their size, such as Durrington Walls and Woodhenge, both of which contained circular settings of timber posts. Huge henge enclosures such as at Avebury and at Hatfield Farm, Marden in the Vale of Pewsey were built, together with the remarkable circular mound of Silbury Hill.
- 3.8. There are at least 21,000 archaeological sites ranging from the prehistoric through to Roman and medieval times and the civil war battlefield at Roundway Down. There are also approximately 12,000 listed buildings, 43 historic parks and gardens, approximately 1300 scheduled monuments, three National Landscapes (formerly known as Areas of Outstanding Natural Beauty) and 245 conservation areas.
- 3.9. The majority of the conservation areas in Wiltshire consist of the historic parts of our towns and villages, but some include other special landscapes which can also be designated, such as the canal corridor at Wilcot. The high number of conservation areas reflects the importance of the county's heritage, much of which is recognised at national and international levels.
- 3.10. The north of Wiltshire contains many notable historic assets including the 7th century abbey, founded by St Aldhelm in Saxon times, at the heart of Malmesbury town. The abbey is now the parish church and includes some of the finest Norman architecture and statuary in England. Many of the historic market towns have retained much of their architectural heritage and owe much of their prosperity to the wool and textile industry and the quarrying of Bath stone. The northern area of Wiltshire also includes many historic railway structures including the Box railway tunnel completed in 1841 under the direction of Isambard Kingdom Brunel.
- 3.11. The town of Devizes to the east of Wiltshire has more than 500 listed buildings. The Kennet and Avon Canal was built between 1794 and 1810 to link Devizes with Bristol and London. The canal fell into disuse after the coming of the railway in the 1850s, but has been restored for leisure uses. Near Devizes the canal rises 237 feet (72 m) by means of 29 locks, 16 of them in a straight line at Caen Hill. Further to the east lies the Neolithic henge monument of Avebury. The monument contains the largest stone circle in Europe, and is one of the best known prehistoric sites in Britain. This ancient monument forms part of the Stonehenge, Avebury and associated sites World Heritage Site.
- 3.12. To the west lies the county town of Trowbridge. Like many Wiltshire towns Trowbridge has a rich wool and textile heritage. The canal that runs to the north of the town has also played a large part in the town's development. There is much of architectural interest in Trowbridge, including many historic assets associated with the textile industry, and the Newtown conservation area, a protected zone of mostly Victorian

houses. Bradford on Avon is situated to the north of Trowbridge its canal, historic buildings, shops, pubs and restaurants make it popular with tourists. The history of the town can be traced back to Roman origins. It has several buildings dating to the 17th century, when the town grew, again due to the thriving woollen textile industry.

- 3.13. The historic Salisbury city lies to the south of Wiltshire. The city is home to numerous medieval streets and alleyways coupled with rich architecture including many half-timbered buildings. Salisbury Cathedral has the tallest spire in Britain and stands in the largest medieval close in Britain. The Stonehenge element of Wiltshire's world heritage site is located just 8 miles north of Salisbury. One of the most famous sites in the world, Stonehenge is composed of earthworks surrounding a circular setting of large standing stones. It is at the centre of the most dense complex of Neolithic and Bronze Age monuments in England, including several hundred burial mounds.
- 3.14. Wiltshire has a significant military presence being home to 20 percent of the entire British Army. This presence has greatly influenced both social and physical characteristics of Wiltshire including its heritage assets. RAF Chilmark, to the west of Salisbury, was a former armaments depot used in the Second World War and during the Cold War, with both surface and below ground storage facilities. It was established at the site of a stone quarry which itself had a long history of supplying stone for buildings such as Salisbury Cathedral. In addition to the military sites themselves are older buildings, such as Zouch Manor, and landscape features such as the water meadow known as the North-East Quadrant, Tidworth.

4. The Local Plan review and a positive strategy for heritage

- 4.1. Consideration of the conservation and enhancement of heritage cuts across many elements of the Wiltshire Local Plan review. This section of the paper will signpost to those sections of the draft Local Plan.

Key challenges and objectives

- 4.2. The important role heritage assets play in Wiltshire in terms of attracting investors, visitors and communities is recognised in the "*Environmental quality*" challenge in Section 2 of the draft Local Plan where it states, "*the challenge will be to accommodate Wiltshire's developmental needs whilst conserving and enhancing the natural and historic environment*" (paragraph 2.19). This objective includes ensuring new development protects and enhances the natural, built and historic environment through for example, making efficient use of land and conserving and enhancing the historic environment.
- 4.3. In their representation to the Regulation 19 consultation on the draft Local Plan, Historic England suggested the addition of a specific outcome on heritage under the environmental quality challenge of the Local Plan, as well as some minor changes to the key challenges and objectives section on the role of the historic environment for tourism, in town centres, and the use of brownfield sites as well as referencing the Stonehenge, Avebury and Associated Sites World Heritage Site. In the Statement of

Common Ground Appendix A table minor changes are suggested to reflect these comments and to ensure the role of the historic environment is fully recognised within its wider context.

Delivery strategy

- 4.4. The Local Plan review carries forward the settlement strategy established in the adopted Wiltshire Core Strategy (January 2015) which sets out the hierarchy of different types of settlement in the county. In line with the settlement strategy the delivery strategy seeks to distribute development in a sustainable manner. This recognises that at some main settlements (i.e. Principal Settlements and Market Towns) the supply of greenfield land is limited due to, for example, historic assets and therefore “the release of land needs to be managed particularly carefully, due to future opportunities for expansion being more limited and the need to conserve the character and setting to a settlement, allowing for steady growth” (paragraph 3.40 of the draft Local Plan).
- 4.5. Some settlements are recognised as more constrained than others, including by historic assets. At these settlements the scale of growth has factored in a contribution from small sites of less than 10 dwellings to provide additional protection to the setting and character of these settlements by ensuring allocations only come forward when it is essential. These settlements include Devizes where the castle limits expansion to the west and Malmesbury where the Abbey constrains growth to the east. This approach ensures careful planning is carried out to conserve and where necessary enhance those assets through development.

Area strategies

- 4.6. Chapter 4 of the Local Plan review sets out area strategies for each of the four Housing Market Areas in Wiltshire. Within these area strategies there are community priorities and outcomes that development can achieve for each Principal Settlement and Market Town. This includes the scale of growth for these settlements. Amongst other elements factored into the scale of growth for each settlement is the historic environment and heritage assets (paragraphs 4.10-4.11 of the draft Local Plan).
- 4.7. For each of the Principal Settlement and Market Towns place shaping priorities have been developed. The place shaping priorities have been developed through a review of the Wiltshire Core Strategy, analysis of consultation with the community and stakeholders in 2021 and through work with the relevant town council for each area. These place shaping priorities are the key issues and opportunities for each place. The place shaping priorities are explained in the suite of ‘Planning for ...’ documents that supported the Regulation 19 consultation, and which form key components of the place-based policy for each Principal Settlement and Market Town. The place shaping priorities also provided assessment criteria informing the site selection process (see paragraph 5.9 below).
- 4.8. A heritage themed place shaping priority has been identified for many settlements tailored to the specific character and opportunities of that place. Table 1 below shows places with heritage themed place shaping priorities:

Table 1

Settlement	Place shaping priorities (PSP) in the area strategy policies – heritage themes
Trowbridge	PSP2 Regenerating and repurposing the town centre / Trowbridge central area as a resilient service area that supports the development of the whole town and wider area, though the delivery of the Trowbridge Masterplan and neighbourhood plans. These plans will be outcome focused and help deliver a holistic strategy for the town centre that..... and safeguards heritage.
Chippenham	PSP2 Ensuring the town centre will be a vibrant meeting place for the community to shop, interact and enjoy their leisure time, and a visitor destination in its own right by.... Conserving and enhancing the special historic character of the town centre.
Salisbury	PSP3 Landscape: Conserving the landscape setting of Salisbury, notably in terms of the city skyline, and views to and from Salisbury Cathedral and Old Sarum Ancient Monument.
Amesbury	PSP3 Town centre: Encourage town centre improvements to the quality of the public realm and encourage development of tourism and tourist accommodation to capitalise on the town's proximity to Stonehenge.
Bradford on Avon	PSP4 Historic Environment: Continue to conserve, maintain, and enhance the unique historic architecture and recognise and give proper attention to the landscape character of Bradford on Avon.
Calne	PSP1 Housing needs: A balanced approach to housing growth, that allows the wide ranging housing needs of Calne to be met whilst preserving the special market town feel of the town, including its heritage and landscape qualities.
Corsham	PSP7 Landscape: To conserve and enhance the distinctive characteristics of Corsham's historic landscape, historic centre and other heritage rich areas including underground stone mines.
Devizes	<p>PSP1 Housing needs Deliver homes to respond to local needs that are within the environmental constraints of the town recognising the proximity of the North Wessex Downs Area of Outstanding Beauty, the unique topography, historic fabric and setting of the town, the extent of best and most versatile agricultural land and air quality issues.</p> <p>PSP4 Town centre regeneration and Devizes Gateway Encourage town centre and tourism-led regeneration including through the delivery of the Devizes Wharf Regeneration and Assize Court Scheme, and support for the Devizes Gateway train station proposal.</p> <p>PSP5 High quality design Ensure new development has high design standards to reflect the high-quality built form in Devizes.</p>

Malmesbury	<p>PSP1 Housing needs: Deliver a range of housing to respond to local needs recognising the environmental constraints that affect the town's growth including the historic character of the town and its setting with Malmesbury Abbey and Market Cross at its core, areas of flood risk within the town and proximity to the Cotswolds Area of Outstanding Natural Beauty.</p> <p>PSP4 Town centre strategy: Develop a strategy for the town centre that builds on Malmesbury's attractive town centre and further encourages spending and tourism, improves accessibility, better manages traffic and parking and safeguards, as well as capitalises on, heritage assets in the town centre.</p>
Marlborough	<p>PSP2 Economy and town centre: Support additional opportunities for job growth and business investment ensuring the Town Centre remains a vibrant hub for the community and as a visitor destination. This should facilitate self containment and maximise the tourism opportunity Marlborough and its surroundings offer while preserving and enhancing the special historic character of the Town.</p>
Warminster	<p>PSP3 Town Centre: Support the town centre as a principal location for services and facilities, including food retail shopping, by improving accessibility to the town centre from new developments; promoting better traffic integration and management; and safeguarding heritage assets in the town's historic core.</p>
Westbury	<p>PSP1 Housing: deliver high quality design that draws on Westbury's local heritage, landscape and contributes to local sense of place, and are well connected to existing services and facilities.</p> <p>PSP2 Town centre: support the delivery of a strategy for town centre regeneration, taking into consideration the emerging Westbury Town Plan Centre Vision and Neighbourhood Plan, to encourage spending, improve accessibility, better manage traffic and parking and safeguard heritage assets.</p>
Royal Wootton Bassett	<p>PSP7 Historic environment: maintaining the town's elevated historical setting and central conservation area.</p>

Policy 99 Ensuring the conservation and enhancement of the historic environment

- 4.9. Policy 99 is the historic environment specific development management policy that ensures the conservation and enhancement of the historic environment in proposals put forward in Wiltshire. The Wiltshire Core Strategy Core Policy 58 'Ensuring the Conservation of the of the Historic Environment' was reviewed with input from heritage and development management colleagues to ensure its effectiveness, as well as ensuring Policy 99 meets the requirements of the latest national planning policy.

Policy 100 The Stonehenge, Avebury and associated sites World Heritage Site

- 4.10. The Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites World Heritage Site, along with its exceptional archaeological and cultural significance is protected and sustained in Policy 100 with a number of criteria. A setting study is also being produced for this World Heritage Site with the intention of it being adopted as Supplementary Planning Guidance.

Examples of other policies and heritage

Policy 15 Devizes Wharf, Assize Court and Wadworth Brewery, Devizes

- 4.11. This is a large regeneration site where reuse and restoration of heritage assets will be ensured through the requirements of Policy 15. These requirements are based on the Devizes Wharf Masterplan and Feasibility Study.³ Heritage is a central component of this regeneration initiative and there are number of specific heritage requirements set out in Policy 15 that ensure heritage is a main feature of this project. These include ensuring the listed buildings at the former Wadworth Brewery and Assize Court are retained, restored and converted to viable new uses and that their settings will be conserved and enhanced, as well consideration given to the interfaces between them and other built development. Non designated assets, the conservation area and the relationship between these historic assets must be considered. The development is also required to take account of the settlement pattern, settings of heritage assets and factor in the alignment of New Park Street with the outer baileys of the Scheduled Monument Devizes Castle. The expertise of New Masterplanning consultancy and internal heritage experts informed the Devizes Wharf Masterplan and Feasibility Study and the strategic elements of this have been translated into the criteria in Policy 15 to ensure that heritage forms a central component of the regeneration of this area, in turn increasing the attractiveness of the area and the benefits this brings for tourism and leisure uses. The role heritage can play in regeneration is shown here.

Policy 68 Managing town centres

- 4.12. Paragraph 5.27 for the draft plan identifies five 'heritage settlements' for investment opportunities at Bradford on Avon, Corsham, Devizes, Malmesbury and Marlborough and the important role that heritage plays in the delivery of town centre regeneration projects is also recognised. Policy 68 itself requires the protection of character and appearance to be particularly important in town centres that contain Conservation Areas. The role heritage plays for attracting visitors and fueling regeneration projects is also recognised in the supporting text.

Policy 82 Housing in the countryside

- 4.13. Policy 82 prevents proposals for housing development outside of the defined settlement boundaries and outside of the built areas of Small Villages unless one of a number of criteria are met. This includes allowing a proposal in these locations if it

³ The Devizes Wharf Masterplan and Feasibility Study is published on the following link: [Submission and document library - Wiltshire Council](#)

would enable a viable and sensitive alternative use of a heritage asset. This reuse of heritage assets must secure the heritage asset's protection and retain its valued characteristics.

Policy 85 Sustainable construction and low carbon energy

- 4.14. Retrofitting measures to improve energy performance of existing buildings and the alleviation of summer overheating is supported in Policy 85. However, the policy also stipulates that in all cases proposals related to historic buildings and listed buildings, buildings within conservation areas and the World Heritage Site should ensure that sensitive approaches and materials are used to seek to maintain the significance of heritage assets.

Policy 98 Ensuring high quality design and place shaping

- 4.15. The consideration of heritage is an integral part of high quality design and this is reflected in Policy 98. It is recognised that the historic environment plays a key role in Wiltshire's distinctive character and that historic centres play a key role for the county. Criteria 1 and 4 ensure that the historic environment is a key part of ensuring high quality design.

5. The site selection process and heritage

Overview of the site selection process

- 5.1. In line with the settlement strategy the site selection process identifies sites for housing and employment growth at the main settlements in Wiltshire. There are four stages to the site selection process for identifying sites followed by further work to develop proposals that consider the capacity of the identified sites as well as policy requirements to ensure the development is well planned and sustainable. The detail of the process can be found in the Wiltshire Local Plan Site Selection Methodology⁴. Consideration of the impact on the historic environment and heritage assets has run through each of these stages of the site selection process and section 5 of this document will set this out.
- 5.2. In line with paragraph 31 of the NPPF (December 2023) the preparation and review of plans should be underpinned with relevant and update to evidence that is adequate and proportionate. This section of the report will signpost to this evidence and will also publish further evidence at Appendix 1.

Stage 1 Identifying sites for assessment

- 5.3. At the outset Stage 1 of the process rules out land that is fully or partly within areas involving the internationally or nationally designated heritage assets of the World

⁴ The Site Selection Methodology can be found on the following link: [Submission and document library - Wiltshire Council](#)

Heritage Site, Scheduled Ancient Monuments, Historic Parks and Gardens, Registered Parks and Gardens, and Registered Battlefields.

Stage 2 site sifting

- 5.4. Stage 2 of the site selection process includes two parts, both which consider heritage assets. Firstly, an assessment of impacts on surroundings beyond the site itself. This includes a high level consideration of impacts on heritage assets in the wider area. Paragraphs 36-40 of the Site Selection Methodology set out that this process involves a 'RAG' (Red, Amber, Green) system of scoring and the focus is on recognising the contribution made by the setting to a heritage asset's significance. The cumulative impact of development on the setting of a heritage asset is also taken into account at this stage.
- 5.5. The second part of Stage 2 considers the strategic context of the place, and this includes significant environmental factors and how they have affected the current pattern of growth, and how that might affect future growth. For example, at Corsham the Historic Park and Garden of Corsham Court restricts development potential to the east of the town and at Westbury the Grade II Listed Leighton House is within the southern part of the main built-up area of the town, the Grade II Listed Heywood House is to the north of the town and the Scheduled Monument of Bratton Camp is a consideration affecting land to the east.
- 5.6. The findings of this stage of the site selection process can be found at Appendix 2 of each of the 'Planning for...documents'⁵.

Stage 3 Sustainability Appraisal of sites

- 5.7. At Stage 3 of the site selection process, sustainability appraisal (SA) was carried out for each of the sites that had not been ruled out at earlier stages. The SA identified the 'likely significant effects' by assessing each site against twelve sustainability objectives. This included an objective to protect, maintain and enhance the historic environment. Proportionate evidence was gathered to assess sites against this objective using a set of decision aiding questions as set out the SA Main Report⁶.
- 5.8. Heritage evidence that fed into the SA comprised assessment from internal specialists on the built historic environment together with assessment commissioned from CBA covering archaeology and historic landscape matters. This evidence has been summarised in detail in annexes 2.1-2.15 of the SA⁷.

Selection of sites

⁵ The suite of Principal Settlements and Market Town 'Planning for...' documents can be found on the following link: [Submission and document library - Wiltshire Council](#)

⁶ Set out on page 167 SA Main Report found here: [Submission and document library - Wiltshire Council](#)

⁷ The evidence for Stage 3 of the site selection process is summarised in Annexes 2.1-2.15 of the SA which can be found here: [Submission and document library - Wiltshire Council](#)

5.9. Stage 4 of the site selection process used the outcomes from the SA assessments and undertook further assessment of sites to select preferred site allocation(s). This included an assessment of each site against the place shaping priorities for the main settlements (see paragraph 4.7- 4.8 above). As set out earlier in this paper, many of the main settlements have heritage themed place shaping priorities. The outcome of this stage of the site selection process can be found in Appendix 2 in each of the ‘Planning for...documents’⁸.

Policy requirements – mitigation and enhancement of heritage assets

5.10. Once sites had been selected for allocation further work was carried out with thematic specialists, including heritage, to ascertain the capacity of the site and any specific policy requirements that would be needed. This included ensuring policy requirements or mitigation is in place so that the settings of heritage assets would be protected or enhanced through the development. For example, by ensuring some parts of the site do not contain built development thereby acting as a buffer to heritage assets, or by requiring particular layout or landscaping arrangements. This stage also identified required policy requirements for further setting and archaeological assessments at the planning application stage. For example, heritage assessments to assess impacts on the setting of Old Sarum Scheduled Monument and archaeological investigation to identify the presence and significance of buried archaeological remains where additional mitigation may be required. The outcome of this work to identify policy requirements can be found in the site allocation policies and concept plans in the draft Local Plan and in the ‘Planning for...documents’⁹.

5.11. Feedback from internal specialists required further input to be sought from Historic England for sites that may impact (including cumulative impact) on a Scheduled Monument or the Stonehenge, Avebury and Associated Sites World Heritage Site. These sites, and the response from Historic England, are set out below:

Table 2

Site	Summary of response from Historic England
50 dwellings and 1.8ha of employment use on land North of Chopping Knife Lane, Marlborough (SHELAA sites 660 and 661)	<p>Unfettered development is likely to cause an inappropriate degree of harm to numerous heritage assets inc setting of SM (various), LB (Elcott + Mildenhall various highly graded), CA (Mildenhall, below ground archaeology. The setting of the monument to the south of the site is a particular concern.</p> <p>If the principle of any development is considered suitable, then the design and landscaping response and the sites capacity needs to be informed by formal assessment before allocation.</p> <p>In addition, a greater understanding of the presence and significance of the (likely) archaeological remains being found needs to be established, again, before allocating the site.</p>

⁸ The suite of Principal Settlements and Market Town Planning for...’ documents can be found on the following link: [Submission and document library - Wiltshire Council](#)

⁹ The suite of Principal Settlements and Market Town Planning for...’ documents can be found on the following link: [Submission and document library - Wiltshire Council](#)

	<p>Any harm needs to be minimised, and if not, then fully justified. Of relevance will be whether there are more suitable sites and that all brownfield sites been included in the emerging LP.</p>
<p>Employment use on the south west corner of Site 5 East of Solstice Park, Amesbury</p>	<p>Historic England is concerned by the likely impact on OUV and relationship between prehistoric monuments associated with WHS. The considerable archaeology is related to this 'landscape without parallel'. Although the suggested allocation seeks to avoid the solstice alignment from Woodhenge it is not a proposal Historic England could support.</p> <p>This site has not been taken forward for allocation.</p>
<p>226 dwellings on land at Bratton Road, Westbury (SHELAA sites 3679 and 3404)</p>	<p>if evidence gathered indicates harm to the significance of affected assets that cannot be sufficiently minimised then justification is required e.g. are there no other more suitable sites; have all brownfield sites been included?</p> <p>We note that WC consider that the site is <i>“heavily constrained by archaeology both buried remains and to the setting of designated monuments – further assessment required”</i>.</p> <p><i>“Heywood House (Grade II*) has a designed view towards the White Horse and the impact of development in these views requires assessment and may cause unacceptable harm”</i>.</p> <p>Such assessment of all affected assets will inform site suitability, and without prejudice, the capacity, and strategic design response. As the suggested site allocation is adjacent, and in the foreground, to existing development, the impact on key views from the White Horse /Bratton Camp, and their setting is likely to be nominal. Although we will undertake a site visit to review and contextualise this initial desktop appraisal it is unlikely that if this site is to be pursued then the further heritage assessment and illustrative strategic design response and conditions will still need to be gathered.</p>
<p>222 dwellings on Land to the west of Mane Way, Westbury (SHELAA site 3205)</p>	<p>We note that WC consider this site is “heavily constrained” by archaeology. <i>“Moated sites were often status symbols with deliberate primacy in landscape. This would be lost with surrounding development as would relationship with surrounding historic assets and field systems etc. Mitigation would be very difficult. The Penleigh estate was a high-status estate and the group of buildings may have had a designed setting in addition to the usual fundamental relationship between the farmstead and its surrounding hinterland (here constrained already by railway to west)”</i>. <i>“...public benefit of any significant scale of development are unlikely to be such that they could outweigh harm to the designated assets”</i>.</p> <p>These WC comments appear fairly pivotal for any plan making decision, and as such one needs to consider whether it is expedient to commission further evidence. However, if there is a desire to further explore the sites suitability, heritage assessment should be undertaken of all affected assets</p>

	<p>including their setting before any decision on the principal of an allocation here is taken; HE site allocation and setting guidance is recommended.</p> <p>The illustrative evidence would need to demonstrate an appropriate response is possible. A hydrological survey is also recommended to understand if development would cause dewatering of the waterlogged deposits within the moat.</p> <p>Might there be any benefits arising from any potential development relating to an improved enjoyment, interpretation and sustainable conservation of the moated site, in particular?</p>
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5.12. In response to these comments and advice from Wiltshire Council internal specialists the south west corner of Site 5 East of Solstice Park, Amesbury was not taken forward for allocation.

5.13. The advice also recommended taking into account the Historic England advice note 3 ‘The Historic Environment and Site Allocations in Local Plans’¹⁰ and the Historic England good practise advice in planning 3 ‘The Setting of Heritage Assets’¹¹. In response to this the staged approach advocated in Historic England advice note 3 ‘The Historic Environment and Site Allocations in Local Plans’ was applied to the sites above. The guidance was also applied to Land North East of Old Sarum due to potential impact on Old Sarum Scheduled Monument. The findings from this can be found in Appendix 1. This evidence has been published in response to the Historic England Regulation 19 representation comment that the evidence underpinning the suitability of allocations in accordance with national policy is not clear (see Appendix A in the SoCG with Historic England).

6. Additional evidence gathered after the Regulation 19 consultation

6.1. Historic England responded to the Autumn 2023 Regulation 19 consultation on the draft Local Plan review. The key issues raised were demonstrating a positive strategy for heritage has been developed and a suggestion that a Heritage Topic Paper would aid understanding of this, and comments on publication of evidence and whether there is sufficient evidence in the public domain. This paper addresses these points by signposting to where heritage has informed the strategy for Wiltshire and signposting to the evidence behind the site allocations, as well as publishing some additional evidence in Appendix 1. Further commentary on this can be found in the Historic England SoCG.

¹⁰ Historic England Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’ (2015) can be found on the following link: [The Historic Environment and Site Allocations in Local Plans | Historic England](#)

¹¹ Historic England good practise advice in planning 3 ‘The Setting of Heritage Assets’ (2017) can be found on the following link: [The Setting of Heritage Assets | Historic England](#)

6.2. Historic England also commented on a number of sites individually. The response to those comments can be found in the Historic England SoCG. Internal heritage colleagues reviewed these comments, and a decision was made that for seven sensitive sites further detailed Heritage Impact Assessment (HIA) would be beneficial to further bolster, in a proportionate manner, the existing evidence and support the submission of the Wiltshire Local Plan review. This work is considered necessary to demonstrate that great weight has been given to the conservation and where possible enhancement of heritage assets in or near these proposed sites and that the capacity, layout and requirements for the proposals are deliverable from a heritage perspective.

Heritage Impact Assessments of seven sensitive sites

6.3. The seven sites where it was considered additional HIA would be beneficial were as follows:

Table 3

Site reference	Name	Capacity
Policy 7	Land South of Chippenham and East of Showell Farm, Chippenham	2525 dwellings, 15ha employment land, district and local centre, two primary schools
Policy 23	Land North East of Old Sarum Old Sarum, Salisbury	350 dwellings
Policy 25	Land North of the Beehive Park & Ride, Old Sarum, Salisbury	100 dwellings
Policy 26	Land North of Downton Road, Salisbury	220 dwellings
Policy 27	Land South of Harnham, Salisbury	265 dwellings
Policy 28	Land West of Coombe Road, Salisbury	45 dwellings
Policy 61	Land West of Mane Way, Westbury	220 dwellings

6.4. CBA were commissioned to carry out the HIAs. The work is being published as a separate document to support the submission of the Wiltshire Local Plan review. For each site the HIAs provide an assessment of known assets on the site and within a wider study area, consider potential impacts and outline opportunities and recommendations for enhancement or mitigation. For each site a residual risk of harm to the historic environment is given on a scale of high risk, moderate risk or low risk.

6.5. The overall residual risk for each site is as follows:

Table 4

Site reference	Name	Residual risk
Policy 7	Land South of Chippenham and East of Showell Farm, Chippenham	Moderate
Policy 23	Land North East of Old Sarum Old Sarum, Salisbury	High
Policy 25	Land North of the Beehive Park & Ride, Old Sarum, Salisbury	High

Policy 26	Land North of Downton Road, Salisbury	Low
Policy 27	Land South of Hamham, Salisbury	High
Policy 28	Land West of Coombe Road, Salisbury	Low
Policy 61	Land West of Mane Way, Westbury	High

6.6. These seven sites are known to be rich in historic assets and to be within landscapes where the setting of wider historic assets must be assessed. The outcomes of high residual risk for some of the sites is not unexpected. High residual risk does not mean the site cannot be allocated or developed, but that very careful planning and design will be required to bring forward development that both protects and enhances the historic environment on these sites. The CBA HIAs report includes a section on ‘Managing Risks’¹² which sets out how this risk can be managed, and explains how the residual risk may change through the development management process as further detailed assessments provide further certainty on how harm to historic assets can be managed. In summary the CBA HIAs report states:

‘new information and more detailed assessment is undertaken that can both manage and reduce risk and / or identify new or greater sensitivities than was anticipated in earlier stages of assessment. Therefore, the risks set out within the HIAs are not fixed and could be subject to change as proposals and assessments progress. Therefore, as a site moves through the development management process towards planning application stage, further assessment and design activities will enable greater confidence when reporting the level of impact to the historic environment than is currently possible within the HIAs’.

The concluding section for each site also includes a section on further work required at the development management stage.

6.7. Supporting the assessment of each site is a set of figures including a figure showing spatial recommendations which outline the suitability of different parts of the site for development.

6.8. The HIA will be published alongside this document as a background document to support the submission of the Wiltshire Local Plan. Subsequent suggested modifications to policy requirements and concept plans for these sites will be developed through the SoCG process with Historic England.

7. Conclusion

7.1. This paper highlights the positive strategy for heritage that has been developed within the Wiltshire Local Plan. Further planning guidance will be developed to bolster this positive strategy for heritage in Wiltshire. Such guidance may carry out further research on heritage in Wiltshire and its role in sense of place in the county, its role in regeneration as well as work to out the steps required to produce a list of locally important heritage assets in Wiltshire. It will include the setting study of the

¹² Page 8 of the CBA HIAs Sept 2024.

Stonehenge, Avebury and Associated Sites World Heritage Site. Further work to consider the findings of the CBA HIAs will be developed through the Historic England SoCG.

Appendix 1: Application of Historic England Advice Note 3 ‘The Historic Environment and Site Allocations in Local Plans’ to the following sites:

- Land at Chopping Knife Lane, Marlborough (SHELAA sites 660 and 661).
- Land at Bratton Road, Westbury (SHELAA sites 3679 and 3404).
- Land to the west of Mane Way, Westbury (SHELAA site 3205).
- Land north east of Old Sarum, Salisbury (SHELAA site S80)
- Employment use on land east of Solstice Park, Amesbury (part of SHELAA 3748)

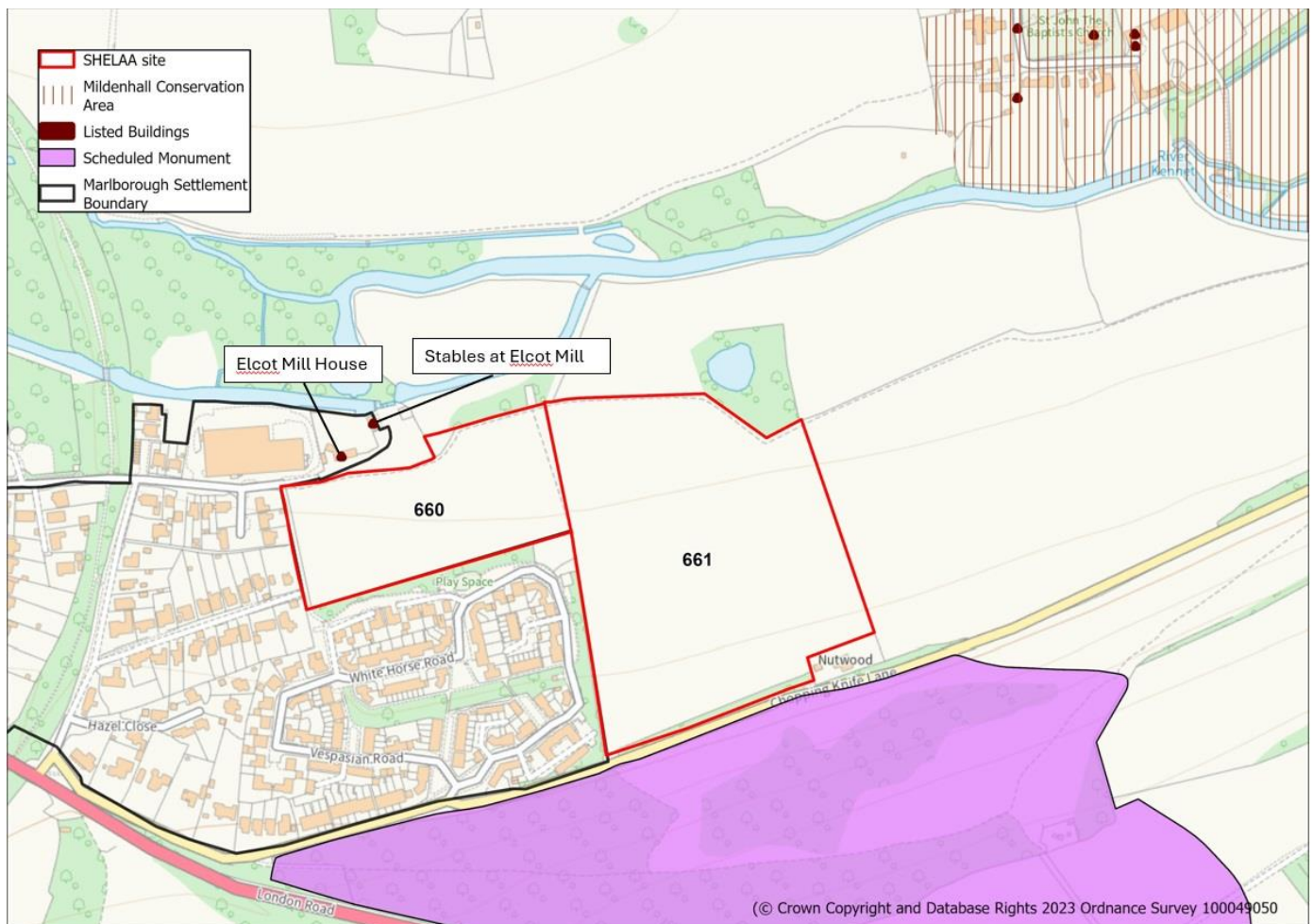
Land at Chopping Knife Lane, Marlborough

Further assessment in light of Historic England feedback

May 2023

Heritage assets of importance relating to this site:

- Scheduled Monuments (notably Camp on Forest Hill)
- Setting of Listed Buildings (notably Elcot Mill House and Stable, those within Mildenhall also noted by Historic England)
- Conservation Area (Mildenhall)
- Buried archaeology



Historic England (HE) feedback:

“Unfettered development is likely to cause an inappropriate degree of harm to numerous heritage assets inc setting of SM (various), LB (Elcott + Mildenhall various highly graded), CA (Mildenhall), below ground archaeology. The setting of the monument to the south of the site is a particular concern.”

If the principle of any development is considered suitable, then the design and landscaping response and the sites capacity needs to be informed by formal assessment before allocation; HE site allocation and setting guidance recommended.

In addition, a greater understanding of the presence and significance of the (likely) archaeological remains being found needs to be established, again, before allocating the site.

Is there any relevant planning history here? It is unclear how the LA had previously considered the historic environment in relation to the adjacent development mindful that it appears Historic England (English Heritage as was) was not consulted.

Any harm needs to be minimised, and if not, then fully justified. Of relevance will be whether there are more suitable sites and that all brownfield sites been included in the emerging LP.

Although we will undertake a site visit to review and contextualise this initial desktop appraisal it is unlikely that if this site is to be pursued then the further heritage assessment and illustrative strategic design response and conditions will still need to be gathered.”

HE comments refer to an adjacent site that was granted consent (planning application number K/53412/F Demolition of existing buildings and 174 new dwellings at St Johns Comprehensive School) and subsequently built out. The adjacent site appears to have been granted consent back in circa 2009. The previously developed nature of the site may have impacted the extent to which the setting of the noted heritage assets was a concern. It is understood that archaeological potential may have been reduced given the playing fields had been worked in a way that may have eliminated archaeological interests.

In terms of the point raised about other suitable brownfield/greenfield sites; whilst no other brownfield sites present development opportunity at Marlborough, there are other greenfield site options. However, heritage is one of many constraints to balance. The question is the extent to which heritage is a major concern constraining development at this site. This is considered further below.

CBA archaeology and historic landscape assessment:

Alongside concurring with the aforementioned constraints, evidence highlights heightened archaeological potential due to a former roman road running through the north of the site and a former medieval settlement to the north of the site. It highlights how the Scheduled Monument iron age hill fort to the south of the site also heightens chances of archaeological remains on site. Evidence suggests further investigation is likely needed during a planning application process in the form of geophysical survey and subsequent trial trenching. It concludes, based on evidence that is currently available and known, the site appears to be constrained by archaeological remains.

Mitigation for archaeological remains may include avoidance where preservation in situ is required. A mitigation strategy may also include preservation by record if avoidance/preservation isn't possible.

Evidence also concludes further research is likely required to inform future development regarding the setting of the Scheduled Monument, with potential development being limited or avoided in the southern site area.

Overall the CBA assessment concludes that the potential for significant adverse archaeological effects is moderate.

Wiltshire Council Conservation Officer built heritage evidence

The built heritage evidence reiterates that the contribution of the site to the setting of the Scheduled Monument requires assessment and again raises the potential for archaeological significance at the site.

Built heritage evidence also notes that the site wraps around Elcot Mill and Stable (Grade II Listed Buildings) but indicates their primary interest may lie in their relationship with the river, the mill buildings and any cut river channels or pools which served the mill rather than the more general rural landscape. However, this will be part of their wider setting and sensitive design will be required to respect this.

Summary

There are four broad areas of heritage concern that relate to this site:

- **Scheduled Monuments (notably Camp on Forest Hill)**
The development of the wider site, both SHELAA 660 & 661, is highly likely to impact on the setting around Scheduled Monument next to the site. While a buffer can be provided to the south, it appears unlikely that the setting of the Scheduled Monument would avoid being further eroded (from the impacts that have already taken place as a result of the adjacent development).
That being said, with regards the Scheduled Monument, should development only take place on SHELAA 660 then the impacts would appear to be significantly reduced. It is worth noting that the residential requirement for Marlborough would be capable of being met on 660, it is the need to find employment land that led to the possibility of extending into 661 (partially, not fully).
- **Setting of Listed Buildings (notably Elcot Mill House and Stable, those within Mildenhall also noted by Historic England).**
Development at site 660 will inevitably impact the wider setting of Elcot Mill and Stable (Grade II Listed). However, development has already taken place to the west of the site and comments indicate a possibility their relationship with one another is more important than to the wider landscape. Development of the site would not impact the river corridor to the north/east of the site. If mitigation were to be provided to the south of the asset within the development site through landscaping, then it is a reasonable conclusion that significant impacts can be avoided.
- **Conservation Area (Mildenhall)**
Historic England commented on the relationship of site 661 with the Mildenhall conservation area. If development, notably at site 661, were to be widely developed, this would erode the rural gap between Marlborough and Mildenhall. Significant effects upon the conservation area seem unlikely as the entirety of the site would not be required.
- **Buried archaeology**
The extent and significance of buried archaeology is unknown. The assessment by CBA points towards a reasonably high likelihood that archaeological remains will be found on site due to a former roman road running through the north of the site and a former medieval settlement to the north of the site. It highlights how the scheduled

monument iron age hill fort to the south of the site also heightens chances of archaeological remains on site.

Conclusion

It is concluded that, even were both 660 and part of 661 to be developed, the listed building and conservation area concerns can be mitigated.

With regards archaeology, the evidence points towards a high likelihood of assets on site. However, the extent to which this would significantly constrain or prevent development is unknown.

Where the Scheduled Monument is concerned, the need to preserve this asset and its setting adds weight to the principle of restricting development to SHELAA 660. This would leave the employment land needs of Marlborough needing to be met elsewhere. It should be noted that extending development into SHELAA 661 also increases the risk of landscape impacts upon the National Landscape.

TABLE 5 – Land at Chopping Knife Lane, Marlborough: Assessment against HE’s ‘Site Selection Methodology’ in guidance document	
STEP 1 Identify which heritage assets are affected by the potential site allocation	
Informed by the evidence base, local heritage expertise and, where needed, site surveys	<p>Key heritage constraints:</p> <ol style="list-style-type: none"> 1. Scheduled Monuments (notably ‘Camp on Forest Hill’) 2. Setting of Listed Buildings (notably Elcot Mill House and Stable, those within Mildenhall also noted by Historic England) 3. Conservation Area (Mildenhall) 4. Buried archaeology <p>Numbers 1-4 used below relate to these heritage assets.</p>
Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration.	<ol style="list-style-type: none"> 1. The open setting to the Scheduled Monument, already compromised by the adjacent development, would be further eroded by this development (notably the development of site 661). A buffer could be provided but would still remove current elements of the open setting. If only site 660 were developed, it can be concluded that significant effects upon this asset would be avoided. 2. With regards the Grade II Listed Buildings (Elcot Mill and stable), it might be that the valuable setting to these assets is their relationship with one another and the river corridor. With this in mind, significant harm could be avoidable. A buffer could also be provided should development take place to reduce negative impacts upon the setting of the Listed Building’s. 3. The Mildenhall conservation area sits approximately 240m from the edge of SHELAA 661 at its closest point, although the allocation would not likely stretch that far east. Development of site 660 in isolation would be less intrusive to the setting of this designation. 4. Intrusive field evaluation would be required to determine buried remains. A high likelihood of archaeological remains in this landscape has been identified. Until field evaluation is undertaken, it is not known if there are buried remains of significance that merit preservation in situ or other mitigation measures.

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	
Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)	<ol style="list-style-type: none"> 1. The Scheduled Monument appears to be a largely vegetated site consisting of grassland and scrub. The site contributes to the open setting of Scheduled Monument, and this would be further eroded by development. Separation/buffer could be provided but would still remove current elements of the open setting. 2. Listed buildings lie to the northwest of the site. The site contributes to the rural setting of these assets. Relationship between listed buildings and the River Kennet would not be impacted and landscaping would assist in screening development from the assets. 3. Mildenhall is separate from Marlborough and development of the entirety of the site would impact the rural setting and separation of Mildenhall from Marlborough. 4. Extent of on-site archaeology unknown, but high potential.
Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)	<ol style="list-style-type: none"> 1. Site part of open landscape and absence of urban noise surrounding Scheduled Monument, albeit to some degree already compromised. Possible to retain rural setting to Scheduled Monument by restricting development to site 660. 2. Site contributes to rural setting around Listed Buildings. Development that already surrounds Listed Buildings already compromises tranquillity. 3. Site contributes to rural separation between Marlborough and Mildenhall. Site 661 notably extends towards Mildenhall. 4. Site possibly holds archaeological artefacts.
Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information	<ol style="list-style-type: none"> 1. Scheduled Monument setting is clear to see, the extent that setting impacts the significance of the Scheduled Monument needed assessing. Question is the extent to which any impact is unacceptable/extent to which mitigation is sufficient. 2. Listed Building setting is clear. It appears mitigation in terms of landscaping on site may be sufficient. Further assessment could confirm this. 3. Setting to Mildenhall Conservation Area is clear. Extent to which development would unacceptably encroach upon the conservation area is something that could be assessed further. A planning judgement would be needed given the constraint is as much to do with coalescence as any heritage concern. 4. Extent of archaeological remains on site is unknown and further assessment would be required to understand this and the mitigation required.
For a number of assets, it may be that a site makes very little or no contribution to significance.	<p>Considered unlikely in this case. Restricting development to SHELAA 660 reduces impact upon the Scheduled Monument, conservation area and likely reduces extent of archaeological potential.</p>
STEP 3 Identify what impact the allocation might have on that significance, considering:	

Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views	<ol style="list-style-type: none"> 1. Site is adjacent to the Scheduled Monument which is currently largely surrounded by an open landscape. Restricting development to site 660 would help reduce negative effects as it is SHELAA 661 that adjoins this Scheduled Monument. 2. Listed Buildings lie in close proximity to the site, sitting northwest of the development site. Views from Listed Buildings are currently rural when looking towards the site. 3. Mildenhall currently separate from Marlborough. Development of the whole site would encroach on the rural setting of Mildenhall conservation area. 4. Extent on on-site archaeology unknown, but high potential.
Form and appearance of development e.g. prominence, scale and massing, materials, movement	Layout, scale and massing could be minimised to reduce potential impacts on known features. Could be informed by Heritage Impact Assessment (HIA). Restricting development to site 660 would minimise impact upon Scheduled Monument and conservation area.
Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use	Could be informed by HIA. Introducing urban form to this location will likely increase noise, lighting, use and landscape erosion.
Secondary effects e.g. increased traffic movement through historic town centres as a result of new development	There will be an increase in pedestrian movement which will likely include the use of footpaths passing through the Scheduled Monument and in front of the Listed Buildings and onwards towards the conservation area.
STEP 4 Consider maximising enhancements and avoiding harm through:	
<i>Maximising Enhancement</i>	
Public access and interpretation	Footpaths already pass through the site of the Scheduled Monument, towards the Mildenhall conservation area and pedestrian movement is also likely to pass nearby to Listed Buildings along Elcot Lane. Full extent of buried archaeology unknown, but potential to improve interpretation by retaining features in situ or recording offsite.
Increasing understanding through research and recording	Mainly appears to relate to archaeological discoveries which will only be discovered if assessment/development takes place. In the absence of development/assessment, archaeological remains will remain unknown.
Repair/regeneration of heritage assets	N/A
Removal from Heritage at Risk Register	N/A
Better revealing of significance of assets e.g. through introduction	<ol style="list-style-type: none"> 1. Potential to improve interpretation of Scheduled Monument within the landscape, utilising existing PROWs. 2. N/A

of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design	3. N/A 4. Not fully understood in the absence of excavation.
<i>Avoiding Harm</i>	
Identifying reasonable alternative sites	All other site options are reviewed through the Local Plan site selection process. It should be noted that site 661 was only introduced as a result of needing to meet employment needs.
Amendments to site boundary, quantum of development and types of development	Development could be restricted to SHELAA 660 and within this, landscaping could be incorporated bordering the Listed Buildings and to the east screening it from conservation area. Alternatively, the development would need to suitably buffer the Scheduled Monument if developing part/all of site 661. Development on site 661 should not develop the whole site and include a significant landscape buffer to the east to integrate development into the landscape and minimise negative impacts upon Mildenhall conservation area.
Relocating development within the site	<ol style="list-style-type: none"> 1. Developing only SHELAA 660 would appear to largely eliminate significant effects upon Scheduled Monument. If developing SHELAA 661, buffering would need to be present to Scheduled Monument. 2. Moving development away from Listed Buildings would not appear feasible as this would leave 660 with little scope to deliver housing development. Landscaping would be the best approach for the Listed Buildings. 3. Landscaping at developments eastern edge is the best option to screen development from Mildenhall conservation area. Restricting development to site 660 would move development further away from Mildenhall. 4. Extent of on-site archaeology unknown, further assessment required at development management stage.
Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings	As above
Addressing infrastructure issues such as traffic management	N/A
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	
Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving	The Scheduled Monument is the asset of primary significance in relation to development at this site with the significance of impact increasing as development encroaches further into SHELAA site 661. It appears that with mitigation, the extent to which needs clarification, it is likely that less than substantial harm will arise from development.

<p>sustainable development (including the conservation of the historic environment)</p>	<p>Taking account of the steps possible to mitigate harm, the same judgment can be reached on the evidence available with regard to the impact on nearby Listed Buildings and Mildenhall conservation area.</p> <p>There is good evidence of archaeological remains on site and advice to say there is a reasonable likelihood of national remains of high value.</p> <p>See findings of site selection process in the Planning for Marlborough paper.¹³</p>
<p>Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence</p>	<p>See findings of site selection process in the Planning for Marlborough paper.</p>
<p>Effective in terms of deliverability, so that enhancement is maximised, and harm minimised</p>	<p>See findings of site selection process in the Planning for Marlborough paper.</p>
<p>Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance</p>	<p>See findings of site selection process in the Planning for Marlborough paper.</p>

¹³ The Planning for Marlborough paper can be found on the following link: [Submission and document library - Wiltshire Council](#)

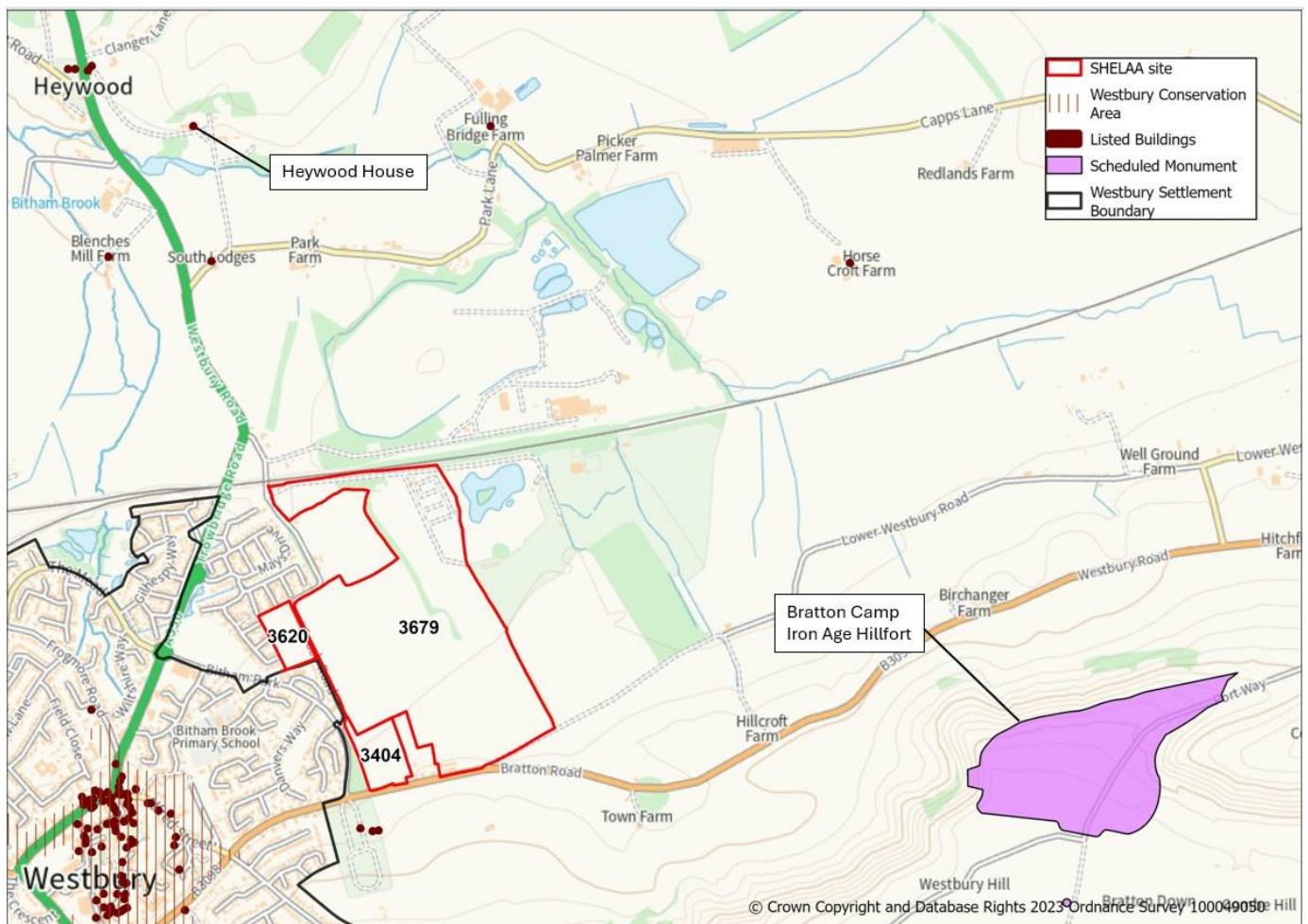
Land at Bratton Road, Westbury (SHELAA 3620, 3679, 3404)

Further assessment in light of Historic England feedback

May 2023

Heritage assets of importance relating to this site:

- Setting of Grade II* Listed Heywood House
- Scheduled Bratton Camp and White Horse
- Multi-period archaeological features and remains onsite



Historic England feedback:

“As with the Marlborough site, if evidence gathered indicates harm to the significance of affected assets that cannot be sufficiently minimised then justification is required e.g. are there no other more suitable sites; have all brownfield sites been included?”

We note that WC consider that the site is “heavily constrained by archaeology both buried remains and to the setting of designated monuments – further assessment required”.

“Heywood House (Grade II) has a designed view towards the White Horse and the impact of development in these views requires assessment and may cause unacceptable harm”.*

Such assessment of all affected assets will inform site suitability, and without prejudice, the capacity, and strategic design response.

As the suggested site allocation is adjacent, and in the foreground, to existing development, the impact on key views from the White Horse /Bratton Camp, and their setting is likely to be nominal.

Although we will undertake a site visit to review and contextualise this initial desktop appraisal it is unlikely that if this site is to be pursued then the further heritage assessment and illustrative strategic design response and conditions will still need to be gathered.”

CBA archaeology and historic landscape assessment:

The evidence highlights the potential for significant adverse archaeological effects from the following to be:

Archaeological evidence	Location	Potential for significant adverse archaeological effects
Multi-period remains, including Mesolithic, Bronze Age, Iron Age, Roman, Saxon, Medieval and Post-medieval – indicative of settlement of other significant activity.	Entire site	High risk
Several features of uncertain date – true significance depend on age and survival extent.	Entire site	High risk
Medieval and post-medieval ridge and furrow, as well as field systems, boundaries, and other agricultural earthworks	Entire site	Low risk

The assessment recommends further investigation to identify the presence and significance of as yet unknown archaeological remains across the site. It also recommends mitigation to include avoidance of high value archaeological remains where preservation in site is likely to be required.

Further recommendations include providing opportunities to interpret and enhance understanding and/ or improve land management regimes, and preservation by record where preservation in situ is not required.

Overall, the evidence concludes potential for significant adverse archaeological effect is high.

Built heritage evidence:

The following impacted built heritage assets were identified:

- Scheduled Monument - Bratton Camp and White Horse
- Setting of Grade II* listed Heywood House

The built heritage evidence noted that the whole of 3679 (including 3404) “*is a very large site in a prominent position within the landscape. PPG setting guidance requires that LPAs also take account of the cumulative impact of development on the settings of designated assets and this may be an issue here. The impact on setting of Bratton Camp and White Horse requires assessment. I would advise the HE be consulted in this respect. Heywood House has designed view towards the White Horse and the impact of development in these views requires assessment and may cause unacceptable harm.*”

So, with the “*Site beyond current built envelope of town - adequate mitigation for potential impact on wider landscape settings of highly graded monuments/buildings seems likely to severely reduce any capacity of the site.*”

Summary:

There are three broad areas of heritage concern relating to this site:

1. Setting of Grade II* Listed Heywood House:

Heywood House is a Grade II* Listed Building and has a designated view towards the White Horse. The whole of 3679, including 3404, is a very large site in a prominent position within the landscape. Adequate mitigation for the potential impact on the wider landscape setting is likely to severely reduce the capacity of this site. The impact of development on these views requires further assessment to determine whether it would cause unacceptable harm.

2. Scheduled Bratton Camp and White Horse:

The site is adjacent and in the foreground to existing development and, as such, the impact on key views from the White Horse/ Bratton Camp and their setting is likely to be nominal. However, the impact on the setting of Bratton Camp and the White Horse requires assessment.

3. Multi-period archaeological features and remains onsite:

Multi-period remains, including Mesolithic, Bronze Age, Iron Age, Roman, Saxon, Medieval and Post-Medieval, have been found across the entire site and are indicative of settlement or other significant activity. The CBA archaeological assessment concluded that there was a high risk of the potential for significant adverse archaeological effects. Other features found across the entire site included medieval and post-medieval ridge and furrow, as well as field systems, boundaries, and other agricultural earthworks.

Conclusion:

The site appears to be heavily constrained by archaeological remains. Therefore, further investigation will be required to identify the presence and significance of yet unknown archaeological remains across the site. Potential mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required. The impact of development on the setting of Grade II* Listed Building Heywood House and that of the Scheduled Monument Bratton Camp and White Horse will both require further assessment.

TABLE 6 – Land at Bratton Road, Westbury: Assessment against HE’s ‘Site Selection Methodology’ in guidance document	
STEP 1 Identify which heritage assets are affected by the potential site allocation	
Informed by the evidence base, local heritage expertise and, where needed, site surveys	<p>Key heritage constraints:</p> <ol style="list-style-type: none"> 1. Setting of Grade II* Listed Heywood House 2. Scheduled Bratton Camp and White Horse 3. Multi-period archaeological features and remains onsite <p>Numbers 1-3 used below relate to these heritage assets.</p>
Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration.	<ol style="list-style-type: none"> 1. The Grade II* Listed Building Heywood House is a significant country house in a designed landscape which enjoyed deliberately framed views towards the White Horse and the impact of development in these views requires assessment and may cause unacceptable harm. An assessment of the possible impact of cumulative development on the setting is required. 2. The contribution of the wider landscape and the impact of increasing development within the setting of the Scheduled Bratton Camp and White Horse requires assessment. The impact on the setting of Bratton Camp and White Horse requires assessment. 3. Intrusive field evaluation would be required to determine buried remains. A high likelihood of archaeological remains in this landscape has been suggested. Until field evaluation undertaken, it is not known if there are buried remains of significance that merit preservation in situ or other mitigation measures.
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	
Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)	<ol style="list-style-type: none"> 1. The openness of the site contributes to the deliberately framed view of the White Horse from the Grade II* Listed Building Heywood House. An assessment of the possible impact of cumulative development on the setting is required. 2. The openness of the site contributes to the open rural and landscape setting of the Scheduled Bratton Camp and White Horse. The impact on the setting of Bratton Camp and White Horse requires assessment. 3. Extent of on-site archaeology unknown, but high potential.
Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)	<ol style="list-style-type: none"> 1. The site is part of the open landscape and absence of urban noise between the Grade II* Listed Building Heywood House and the White Horse is already compromised (albeit to some degree) by existing development. 2. The site contributes to the rural setting of the Scheduled Bratton Camp and White Horse and is on the edge of existing development that may have already compromised its tranquillity. 3. Site possibly holds archaeological artefacts.
Recognising that additional assessment may be required due to the nature of the heritage	<ol style="list-style-type: none"> 1. The designated view from the Grade II* Listed Building Heywood House to the White Horse is clear to see. The impact of development in these views and the possibility of mitigation requires assessment.

assets and the lack of existing information	<p>2. The rural setting of the Scheduled Bratton Camp and White Horse is clear to see. The impact on the setting of Bratton Camp and White Horse and potential mitigation requires assessment.</p> <p>3. Extent of archaeological remains on site is unknown and further assessment would be required to understand this and the mitigation required.</p>
For a number of assets, it may be that a site makes very little or no contribution to significance.	<p>Considered unlikely in this case.</p> <p>Adequate mitigation for potential impact on the wider landscape settings of highly graded buildings/ monuments seems likely to severely reduce any capacity of the site.</p>
STEP 3 Identify what impact the allocation might have on that significance, considering:	
Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views	<p>1. Adequate mitigation for the potential impact of development on the designated view from the Grade II* Listed Building Heywood House to the White Horse seems likely to severely reduce the capacity of the site.</p> <p>2. Adequate mitigation for the potential impact of development on the wider landscape setting of the Scheduled Bratton Camp and White Horse seems likely to severely reduce the capacity of the site.</p> <p>3. Extent on on-site archaeology unknown, but high potential.</p>
Form and appearance of development e.g. prominence, scale and massing, materials, movement	<p>Layout, scale, and massing could be minimised to reduce potential impacts on known features. Could be informed by an Historic Impact Assessment.</p> <p>Restricting the capacity of the site would minimise the impact upon Heywood House and Scheduled Bratton Camp and White Horse.</p>
Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use	<p>Could be informed by an Historic Impact Assessment.</p> <p>Introducing urban form to this location will likely increase noise, lighting, use and landscape erosion.</p>
Secondary effects e.g. increased traffic movement through historic town centres as a result of new development	<p>There will be an increase in pedestrian movement which will likely include the use of footpaths passing through the site and traffic in the surrounding roads.</p>
STEP 4 Consider maximising enhancements and avoiding harm through:	
<i>Maximising Enhancement</i>	
Public access and interpretation	<p>There is the potential for new public access, i.e., footpaths, and areas of public open space to be created through the site.</p>

	Full extent of buried archaeology unknown, but potential to improve interpretation by retaining features in situ or recording offsite.
Increasing understanding through research and recording	Mainly appears to relate to archaeological discoveries which will only be discovered if assessment/development takes place. In the absence of development/assessment, archaeological remains will remain unknown.
Repair/regeneration of heritage assets	1. N/A 2. N/A 3. Not fully understood in the absence of excavation.
Removal from Heritage at Risk Register	Unknown
Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design	1. N/A 2. Potential to improve/ promote interpretation of the Scheduled Bratton Camp and White Horse within the landscape. 3. Not fully understood in the absence of excavation.
<i>Avoiding Harm</i>	
Identifying reasonable alternative sites	All other site options reviewed through the Local Plan site selection process.
Amendments to site boundary, quantum of development and types of development	Site beyond current built envelope of town - adequate mitigation for potential impact on wider landscape settings of highly graded monuments/buildings seems likely to severely reduce any capacity of the site.
Relocating development within the site	1. Development could be relocated towards the western edge of the site, that directly adjoins existing residential development, and woodland and green space designed to preserve viewpoints to the White Horse and Ridgeway. 2. Development could be relocated towards the western edge of the site, that directly adjoins existing residential development, with new woodland to soften the eastern edge of the site. 3. Extent of on-site archaeology is unknown, so unclear whether some parts of the site would be more/less appropriate in the context of archaeology.
Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings	As above
Addressing infrastructure issues such as traffic management	N/A
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	

<p>Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)</p>	<p>This site is beyond the current built up form of the town. Adequate mitigation for the potential impact on the wider landscape settings of the Scheduled Bratton Camp and Grade II* Listed Building Heywood House seems likely to severely reduce any capacity of the site.</p> <p>There is good evidence of archaeological remains on site and advice to say there is a reasonable likelihood of national remains of high value and therefore possibility of harm arises.</p> <p>See findings of site selection process in the Planning for Westbury paper.¹⁴</p>
<p>Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence</p>	<p>See findings of site selection process in the Planning for Westbury paper.</p>
<p>Effective in terms of deliverability, so that enhancement is maximised, and harm minimised</p>	<p>See findings of site selection process in the Planning for Westbury paper.</p>
<p>Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance</p>	<p>See findings of site selection process in the Planning for Westbury paper.</p>

¹⁴ The Planning for Marlborough paper can be found on the following link: [Submission and document library - Wiltshire Council](#)

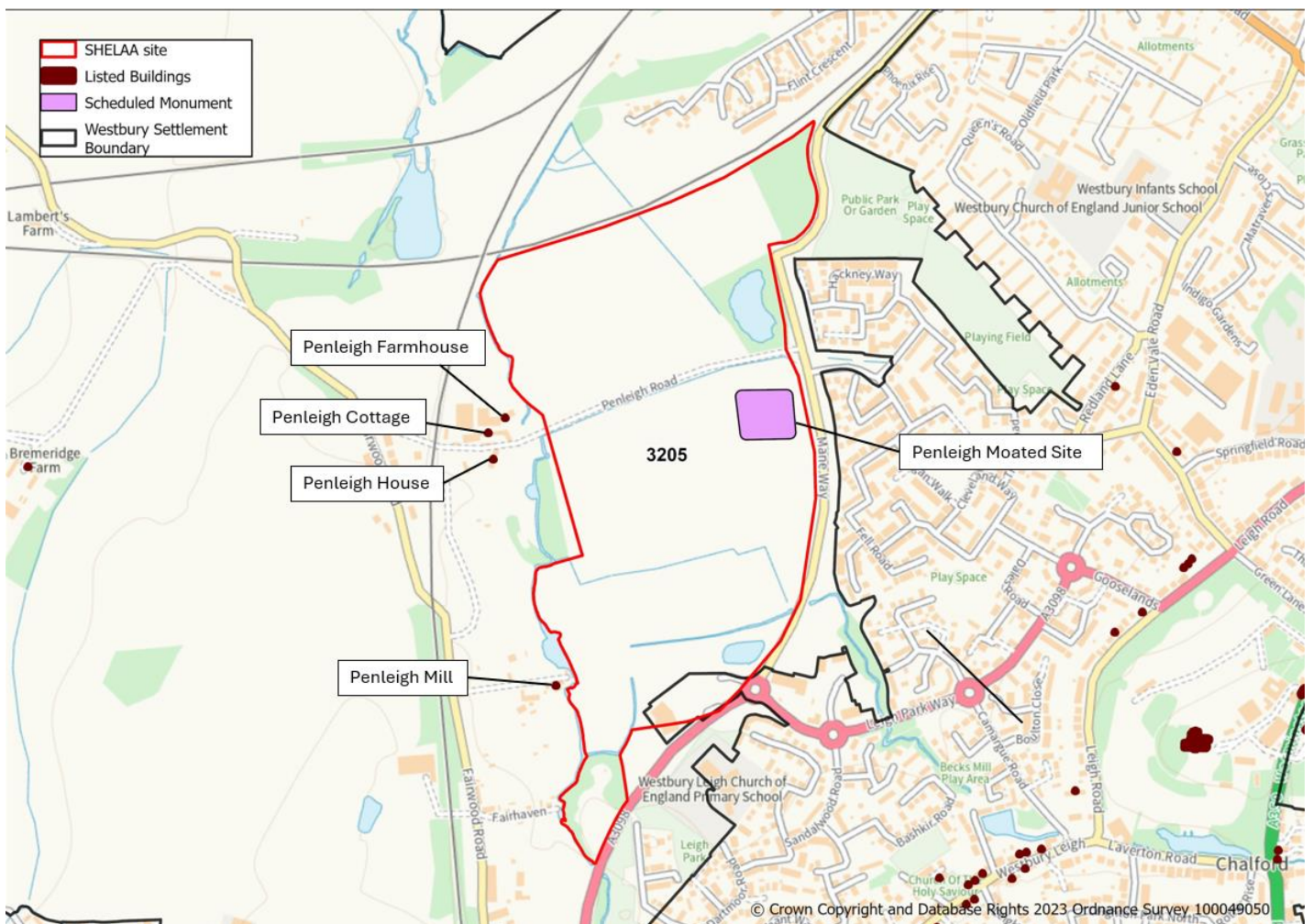
Land west of Mane Way, Westbury (SHELAA 3205)

Further assessment in light of Historic England feedback

May 2023

Heritage assets of importance relating to this site:

- Scheduled monument – Medieval moated site
- Grade II Listed Buildings (i.e. Penleigh House, Cottage, Mill and Farmhouse)
- Water meadows
- Medieval earthworks and finds



Historic England feedback:

“We note that WC consider this site is “heavily constrained” by archaeology. “Moated sites were often status symbols with deliberate primacy in landscape. This would be lost with surrounding development as would relationship with surrounding historic assets and field systems etc. Mitigation would be very difficult. The Penleigh estate was a high-status estate, and the group of buildings may have had a designed setting in addition to the usual fundamental relationship between the farmstead and its surrounding hinterland (here

constrained already by railway to west)”. “...public benefit of any significant scale of development are unlikely to be such that they could outweigh harm to the designated assets”.

These WC comments appear fairly pivotal for any plan making decision, and as such one needs to consider whether it is expedient to commission further evidence.

However, if there is a desire to further explore the sites suitability, heritage assessment should be undertaken of all affected assets including their setting before any decision on the principal of an allocation here is taken; HE site allocation and setting guidance is recommended.

The illustrative evidence would need to demonstrate an appropriate response is possible. A hydrological survey is also recommended to understand if development would cause dewatering of the waterlogged deposits within the moat.

Might there be any benefits arising from any potential development relating to an improved enjoyment, interpretation, and sustainable conservation of the moated site, in particular?

Historic England will undertake a site visit as soon as we can to review and contextualise this initial desktop appraisal. However, this is unlikely to change the above advice that if the site is to be pursued then the further evidence needs to be compiled. “

CBA archaeology and historic landscape assessment:

The assessment highlights the potential for significant adverse archaeological effects from the following to be:

Archaeological evidence	Location	Potential for significant adverse archaeological effects
Scheduled Monument – medieval moated site.	Eastern site area	High risk
Earthworks, representing probable medieval flax industry (Penleigh Mill) – potential for medieval industrial archaeological remains extending further into the site	Eastern border of the site	Low to moderate risk
Medieval silver ring findspot	Eastern buffer area	Low risk
Inferred deserted medieval settlement of Penleigh	Eastern buffer area	Low risk
Water meadows	Extant around the site	Low risk

The assessment recommends further evidence, likely during the planning application process, in the form of a geophysical survey and subsequent trial trenching to identify the extent and significance of potential further remains. Further research is also recommended to inform future development regarding the site and setting of the Scheduled Monument.

Further mitigation could include avoiding high value archaeological remains, such as the Scheduled Monument and any other high value remains identified within the site, where preservation in situ is required. The evidence also recommends opportunities to interpret and enhance understanding and/ or improve land management regimes, and preservation by record where preservation in situ is not required.

Overall, the evidence concludes potential for significant adverse archaeological effect is high.

Built heritage evidence:

The following impacted built heritage assets were identified:

- Scheduled Penleigh moated site
- Grade II listed Penleigh House
- Grade II listed Penleigh Cottage (former stables and coach house to Penleigh House)
- Grade II listed Penleigh Farmhouse
- Grade II listed Penleigh Mill

The built heritage evidence noted that *“Moated sites were often status symbols with deliberate primacy in landscape. This would be lost with surrounding development as would relationship with surrounding historic assets and field systems etc. Mitigation would be very difficult. The Penleigh estate was a high status estate and the group of buildings may have had a designed setting in addition to the usual fundamental relationship between the farmstead and its surrounding hinterland (here constrained already by railway to west). Contribution of surrounding land to Mill requires further assessment but possibly more related to watercourses and mill sluices etc than wider landscape.”*

However, this is a *“large site so development of some areas may be acceptable but would involve a much reduced capacity. Otherwise, requirement to protect settings of various assets, including scheduled site is likely to significantly constrain development - in these areas, although not involving direct and clear 'substantial harm', the public benefit of any significant scale of development are unlikely to be such that they could outweigh harm to the designated assets. Site boundaries should be amended to omit these areas.”*

Summary:

There are four broad areas of heritage concern relating to this site:

4. Scheduled Monument – Medieval moated site:

The development of site 3205 is likely to result in the loss of the primacy of the moated site in the landscape and its relationship with the surrounding historic assets and field systems. However, this is a large site and so development of some areas may be acceptable but would involve a much-reduced capacity. Nevertheless, the requirement to protect the setting of the Scheduled Monument is likely to significantly constrain development. In these areas,

the concern is that, while not involving direct and clear 'substantial harm', the public benefit of any significant scale of development is unlikely to be such that could outweigh harm to the Scheduled Monument. The recommendation is that site boundaries should be amended to omit this area. Other recommendations are that a further heritage assessment of the Scheduled Monument should be undertaken and a hydrological survey to understand if development would cause dewatering of the waterlogged deposits within the moat. There may also be benefits arising from development of the site in terms of improved enjoyment, interpretation, and sustainable conservation of the moat.

5. Grade II Listed Buildings (i.e. Penleigh House, Cottage, Mill and Farmhouse):

The Penleigh Estate was a high-status estate. This group of buildings may have had a designated setting in addition to the usual fundamental relationship between the farmstead and its surroundings (already constrained by the railway to the west). The contribution of the surrounding land to the Mill and associated buildings is possibly more related to watercourses and mill sluices rather than the wider landscape. However, recommendations include a further heritage assessment of the buildings and their setting.

6. Water meadows:

There are water meadows extant around the site, in the northern buffer areas, but the CBA archaeological assessment concludes that they are of little archaeological importance and therefore present a low risk in terms of the potential for significant adverse archaeological effects from development.

7. Medieval earthworks and finds:

Earthworks, representing the medieval flax industry (Penleigh Mill) have been found on the eastern border of the site, with the potential for further medieval industrial archaeological remains extending further into the site. Other heritage issues include a medieval silver ring findspot and the inferred deserted medieval settlement of Penleigh on the eastern buffer area of the site. However, the CBA archaeological assessment concludes that these present a low to moderate risk in terms of the potential for significant adverse archaeological effects. Recommendations include further evidence, likely during the planning application process, in the form of a geophysical survey and subsequent trial trenching to identify the extent and significance of potential further remains. Potential mitigation could involve avoiding development in areas of high value archaeological remains, where preservation in situ is required. Provision of opportunities to interpret and enhance understanding and/ or improve land management regimes and preservation by record, where preservation in situ is not required, could also be considered.

Conclusion:

The requirement to protect the setting of the medieval moat Scheduled Monument and the Grade II Listed Buildings is likely to significantly constrain development. However, this is a large site and, so, development of some areas may be acceptable but with a much-reduced capacity. It is recommended that further heritage assessment of the Scheduled Monument and Listed Buildings and their setting is undertaken, as well as a hydrological survey. Further assessments, such as a geophysical survey and subsequent trial trenching, should be undertaken, most likely during the planning application process, to identify the extent and significance of potential further remains. Potential mitigation could involve avoiding

development in areas of high archaeological remains and the provision of opportunities to interpret and enhance understanding of the medieval moat.

TABLE 7 – Land west of Mane Way, Westbury: Assessment against HE’s ‘Site Selection Methodology’ in guidance document	
STEP 1 Identify which heritage assets are affected by the potential site allocation	
Informed by the evidence base, local heritage expertise and, where needed, site surveys	<p>Key heritage constraints:</p> <ol style="list-style-type: none"> 1. Scheduled Monument – Medieval moated site 2. Grade II Listed Buildings (i.e. Penleigh House, Cottage, Mill and Farmhouse) 3. Water meadows 4. Medieval earthworks and finds <p>Numbers 1-4 used below relate to these heritage assets.</p>
Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration.	<ol style="list-style-type: none"> 1. This is a large site so development of some areas may be acceptable but would involve a much-reduced capacity. Otherwise, the requirement to protect the setting of the Scheduled Monument – Medieval moated site is likely to significantly constrain development. Site boundaries should be amended to omit these areas from development. 2. The Penleigh estate was a high-status estate, and the group of buildings may have had a designated setting in addition to the usual functional relationship between the farmstead and its surroundings (here constrained already by a railway to the west). The contribution of the surrounding land to the Mill requires further assessment but is possibly more related to watercourses and mill sluices than the wider landscape. 3. The water meadows extant around the site are of little archaeological importance but could possibly provide opportunities for green space. 4. Intrusive field evaluation would be required to determine buried remains. A high likelihood of archaeological remains in this landscape has been suggested. Until field evaluation undertaken, it is not known if there are buried remains of significance that merit preservation in situ or other mitigation measures.
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	
Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)	<ol style="list-style-type: none"> 1. Moated sites were often status symbols with deliberate primacy in landscape. This would be lost with surrounding development as would the relationship with surrounding historic assets and field systems. 2. The contribution of the surrounding land to the Mill requires further assessment but is possibly more related to watercourses and mill sluices than the wider landscape. 3. The water meadows extant around the site are of little archaeological importance but could possibly provide opportunities for green space. 4. Extent of on-site archaeology unknown, but high potential.
Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-	<ol style="list-style-type: none"> 1. The site is part of the setting of the Scheduled Medieval moat and absence of urban noise, but this may already be compromised by Mane Way and existing development to the east and the railway line to the north and west.

visibility (for example, the impact of noise, dust or vibration)	<ol style="list-style-type: none"> 2. The site is part of the setting of the Grade II Listed Buildings at Penleigh and absence of urban noise, but this may already be compromised by the railway line to the west 3. The water meadows extant around the site are of little archaeological importance but could provide opportunities for green space. 4. Site possibly holds archaeological artefacts.
Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information	<ol style="list-style-type: none"> 1. Further investigation into the Scheduled Monument and its setting should be undertaken to inform future development. Potential mitigation may involve avoidance of archaeological remains where preservation is required in situ, namely the Scheduled Monument and its immediate setting. There may be opportunities to offer interpretation and enhance understanding of the Scheduled Monument. 2. The contribution of the surrounding land to the Grade II Listed Buildings at Penleigh requires further assessment. The Penleigh estate was a high-status estate, and the group of buildings may have had a designed setting in addition to the usual fundamental relationship between the farmstead and its surrounding 3. The water meadows extant around the site are of little archaeological importance but could provide opportunities for green space. 4. Extent of archaeological remains on site is unknown and further assessment would be required to understand this and the mitigation required.
For a number of assets, it may be that a site makes very little or no contribution to significance.	<p>Considered unlikely in this case.</p> <p>This is a large site so development of some areas may be acceptable but would involve a much-reduced capacity. Otherwise, requirement to protect settings of various assets, including scheduled site is likely to significantly constrain development. Site boundaries should be amended to omit these areas.</p>
STEP 3 Identify what impact the allocation might have on that significance, considering:	
Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views	<ol style="list-style-type: none"> 1. The site surrounds the Scheduled Monument. This is a large site so development of some areas may be acceptable but would involve a much-reduced capacity. So, avoidance of the Scheduled Monument and its immediate setting, which could involve retaining the adjacent field as open space, is a potential mitigation. 2. Development could be set back from Penleigh Farm and green buffers to screen the development from the setting of the Grade II Listed Buildings. 3. The water meadows extant around the site are of little archaeological importance but could provide opportunities for green space. 4. Extent on on-site archaeology unknown, but high potential.
Form and appearance of development e.g. prominence, scale and massing, materials, movement	<p>Layout, scale, and massing could be minimised to reduce potential impacts on known features. Could be informed by an Historic Impact Assessment.</p> <p>Restricting the capacity of the site would minimise the impact upon the Scheduled Moat and the Grade II Listed Buildings at Penleigh Farm.</p>

Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability, and communal use	Could be informed by an Historic Impact Assessment. Introducing urban form to this location will likely increase noise, lighting, use and landscape erosion.
Secondary effects e.g. increased traffic movement through historic town centres as a result of new development	There will be an increase in pedestrian movement which will likely include the use of footpaths passing through the site and traffic in the surrounding roads.
STEP 4 Consider maximising enhancements and avoiding harm through:	
<i>Maximising Enhancement</i>	
Public access and interpretation	There are existing footpaths throughout the site and there is the potential for new public access, i.e., footpaths, and areas of public open space to be created through the site. Full extent of buried archaeology unknown, but potential to improve interpretation by retaining features in situ or recording offsite.
Increasing understanding through research and recording	Apart from the Scheduled moated site, this mainly appears to relate to archaeological discoveries which will only be discovered if assessment/development takes place. In the absence of development/assessment, archaeological remains will remain unknown.
Repair/regeneration of heritage assets	1. N/A 2. N/A 3. N/A 4. Not fully understood in the absence of excavation.
Removal from Heritage at Risk Register	Unknown
Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design	1. Potential to improve interpretation of the Scheduled moated site within the landscape utilising existing and new public rights of way (PROW) and signage. 2. N/A 3. N/A 4. Not fully understood in the absence of excavation.
<i>Avoiding Harm</i>	
Identifying reasonable alternative sites	All other site options reviewed through the Local Plan site selection process.
Amendments to site boundary, quantum of development and types of development	Large site so development of some areas may be acceptable but would involve a much-reduced capacity. Otherwise, requirement to protect settings of various assets, including scheduled site is likely to significantly constrain development -

	in these areas, although not involving direct and clear 'substantial harm', the public benefit of any significant scale of development are unlikely to be such that they could outweigh harm to the designated assets. Site boundaries should be amended to omit these areas.
Relocating development within the site	<ol style="list-style-type: none"> 1. The Scheduled monument (Moat) lies with a 3.2ha field, which could be left free from development with potential for a multi-functional green space. The 3.7ha field to the immediate west of the field with the Scheduled Monument (Moat) could be retained as open space to preserve the setting of the ancient monument, with potential for multi-functional green space, e.g. allotments, recreation etc. There could be a 50m buffer to the Moat and setting, indicatively planted with woodland to screen housing from the setting, both to the north and south of the ancient monument. 2. The housing development edge could be set back 100m from Penleigh Farm. 3. The water meadows could provide an opportunity for green open space. 4. Extent on on-site archaeology unknown, so unclear whether some parts of the site would be more/less appropriate in the context of archaeology.
Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings	As above
Addressing infrastructure issues such as traffic management	N/A
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	
Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)	<p>This is a large site so development of some areas may be acceptable but would involve a much-reduced capacity. The requirement to protect the setting of the Scheduled Monument (Moat) and the Grade II Listed Buildings at Penleigh Farm is likely to significantly constrain development. In these areas, although not involving direct and clear 'substantial harm', the public benefit of any significant scale of development is unlikely to be such that they could outweigh harm to the designated assets. Therefore, site boundaries should be amended to omit these areas.</p> <p>There is good evidence of archaeological remains on site and advice to say there is a reasonable likelihood of national remains of high value and therefore possibility of harm arises.</p>

	See findings of site selection process in the Planning for Westbury paper and further work in CBA HIAs. ¹⁵
Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence	See findings of site selection process in the Planning for Westbury paper and further work in CBA HIAs.
Effective in terms of deliverability, so that enhancement is maximised, and harm minimised	See findings of site selection process in the Planning for Westbury paper and further work in CBA HIAs.
Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance	See findings of site selection process in the Planning for Westbury paper and further work in CBA HIAs.

¹⁵ The Planning for Westbury paper can be found on the following link: [Submission and document library - Wiltshire Council](#)

1. Historic England Regulation 18 representation (February 2021):

“The site’s landscape character is prominent and exposed, with few hedgerows, and assessment shows that any development would have to accommodate this successfully whilst taking account of the setting for Ende Burgh scheduled long barrow to the east of The Portway”.

Without further expert assessment by the local authority as part of the plan making process and subsequent clear and appropriate response to the numerous heritage concerns, one must question how such development might successfully be accommodated in this sensitive and historic landscape setting.

Currently the view of the local authority’s in-house heritage and landscape expertise isn’t apparent. We assume the planning history and evidence base associated with previous planning applications and development plans also continue to be relevant and may help inform the principle of development today.

It isn’t clear how the indicative concept diagrams accompanying the consultation acknowledge or positively respond to the significance of numerous on and off-site heritage matters.

From our initial assessment we note that the barrow is not very well understood and could be Bronze Age or Roman, it could be one barrow or two. If Bronze Age, then it is likely to be part of a wider cemetery with other known barrows in the area (not scheduled as ploughed flat) including a large example on the north edge of the current development northwest of the Portway. Views to and from other Bronze Age monuments then becomes a factor of its significance.

If Roman, then it is likely to be associated with the Portway Roman Road and may be part of a cemetery along the road here. There is a single ditched oval enclosure next to it which goes across the road. This may be Roman, and it may define a cemetery.

The barrow is a significant landscape feature sitting on a high point in the landscape and is visible from a wide area. As a burial marker it was meant to be seen and to project power and control, the person buried here was important and they wanted to make sure everyone knew it.

The undesignated barrows are the circles (single and double) forming a small cemetery. The public space next to Norman Drive preserves these.

The view from Figsbury Ring may also be important, as is (certainly) the relationship of the site to the adjacent Monarchs Way, and Old Sarum heritage assets within their wider landscape setting.

The nations heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. One must carefully consider whether further expansion of the current development off the Portway would accord with such national policy, legislation, guidance and advice to help protect such finite and nationally important heritage assets and their appreciation within context i.e. their setting.

Development planning considerations

- i. Presence of **Ende Burgh long barrow Scheduled Monument** has been noted through the plan-making process and a buffer has been allowed on the south-eastern perimeter of land NE of Old Sarum (subsequently 'the site') to accommodate the asset's setting.
- ii. In archaeological terms the critical matter on the site is to understand what the 'numerous heritage concerns' might be in 'this sensitive and historic landscape setting'.
- iii. Wiltshire Council heritage team (June 2023) state that, whilst it has been attempted to provide buffers to protect areas of archaeological significance, perhaps more needs to be done. There is for example a **Roman enclosure** in the south-east margins, all of which should be removed from the developable area. On the southwest boundary there is a **barrow** that falls into this site, which will need protection and buffering. Any related public open space would need to be restricted land use, with no ground works.
- iv. On the **barrow(s)** (non-scheduled) the concept plan for the site has sought to make allowance in the area bordering existing development in Old Sarum to the south-west, where land has been set aside for archaeology. It is proposed to extend this area by inclusion of some of the land in the south-west of the site associated with the barrow(s). What is difficult to assess at plan-making stage is the *heritage significance* of such remains, especially in the context of the wider archaeology. Whether, meanwhile, the barrow is significant in landscape terms is difficult to determine. Arguably *Ende Burgh*, in adjoining land separated by The Portway to the south-east, is more significant in this regard.
- v. As perceived from the site **Figsbury Ring**, rather distant in an elevated position to the east, is a feature that forms part of the wider downland ridge (Porton Down). Arguably the ridge, which stretches north-south from the Tidworth area to east of Salisbury, is a more prominent feature in the landscape than the Ring itself.

2a. CBA Historic Environment appraisal (March 2020):

- **Ende Burgh** scheduled monument (in adjacent land to south-east) for which wider landscape could contribute to setting
- Series of **high-value** Bronze Age / undated bowl barrows / ring ditches across site and in buffer areas
- The feature adjacent to and north-west of The Portway (see above) is described as being a **low/medium value Roman enclosure**
- **The Portway** is described as having **medium value**
- **Undated pits** in western buffer area are described as having **medium value**
- Other assets are characterised as having low value

2b. CBA Heritage appraisal (June 2020)

Only substantive addition to above is setting of **Old Sarum Airfield conservation area**

Development planning considerations

- i. **Ende Burgh:** no change from above. Buffer is provided on the Site to assimilate asset's setting, although proper analysis would be needed to define extent of setting.
- ii. **Roman Enclosure:** the significance of this seems to be uncertain, between HE advice and CBA appraisal. In any case buffer is anyway provided for Ende Burgh along south-east of the Site, which the Roam feature can essentially be captured within.
- iii. **High value bowl barrows / ring ditches:** this feature, in principle, is difficult to mitigate at plan-making stage since the *heritage significance* and concentration of remains cannot easily be determined.
- iv. **Old Sarum Airfield CA:** designation is primarily for openness of grass airfield, one of only three remaining across Britain. Development at the Site would not be likely to harm the prime reason for designation since there are already built features between the airfield and the Site.

3. Sustainability Appraisal

Sustainability Appraisal in respect of the site has largely drawn on the evidence above. This is its summary:

<i>Summary points</i>	<i>Further commentary</i>
The site is close to Old Sarum Scheduled Monument and close to Old Sarum Conservation Area. Mitigation via design and landscaping would be required.	Design and landscaping to accommodate Airfield CA is incorporated in policy although, in truth, the CA is designated essentially for its openness (i.e. of the Airfield) and there is already development between that and the Site.
The site includes various archaeological features of high and medium value.	As noted above, this is the factor that is hardest to determine at plan-making stage.
Following further investigation, mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required, particularly around the south and south-eastern site edges.	This is incorporated in policy, but heritage significance and concentration are difficult to determine at plan-making stage.
The site is not considered to have a particularly sensitive historic landscape.	Even the Ende Burgh feature, adjacent to the south-east, is largely covered by trees and is barely discernible in the landscape.
Overall, a moderate adverse effect is considered likely.	This SA judgement seems reasonable given what is known.

4. Development Planning: conclusion

On balance it seems reasonable to promote the site for development. It is believed that the setting of Ende Burgh Scheduled Monument can be accommodated, although such a judgement cannot be achieved with precision without detailed study. It is also believed that development will not harm the openness of Old Sarum Airfield (conservation area). The Roman Enclosure meanwhile seems to be of uncertain value, though would anyway be contained within buffering at the south-east of the site.

What remains difficult to understand at the plan-making stage is the heritage significance and concentration of bowl barrows and ring ditches on the site. Investigation of this aspect is nevertheless incorporated in policy.

5. Development Planning: further recommendations

- I. Following further investigation (as per WLP policy 23) mitigation could include avoidance of high value archaeological remains where preservation in situ is likely to be required, particularly around the south-eastern and south-western site edges.
- II. Potential further discussion with Historic England.

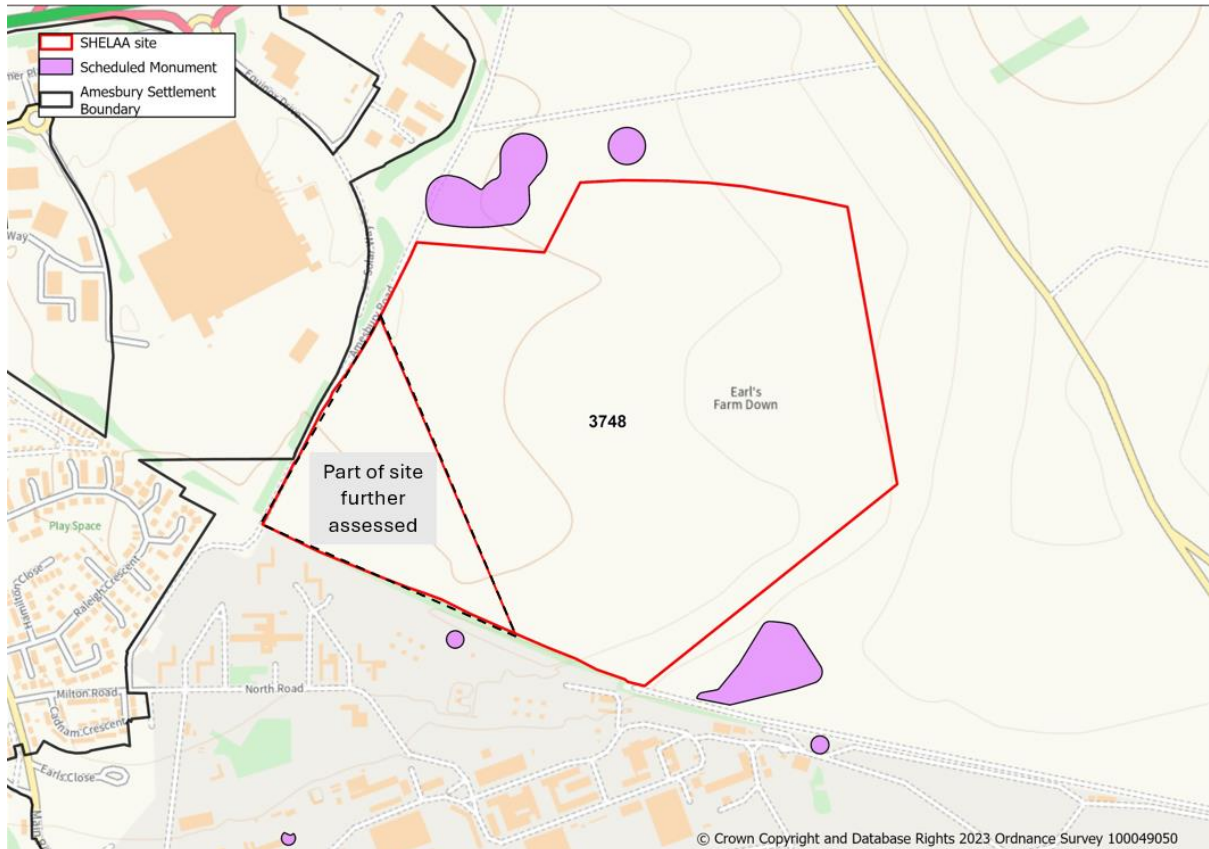
Land east of Solstice Park (reduced part of wider SHELAA site), Amesbury

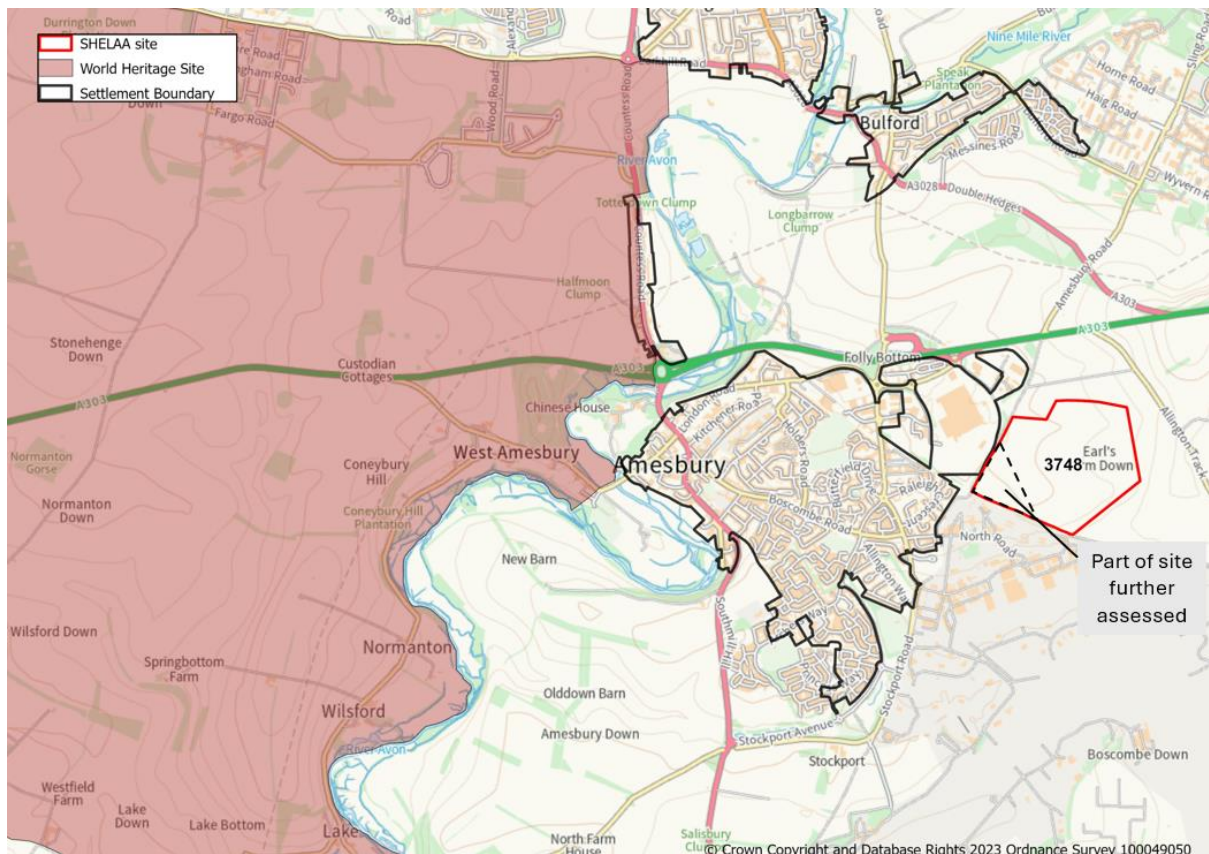
Further assessment in light of Historic England feedback

April 2023

Heritage assets of importance relating to this site:

- Stonehenge World Heritage Site (WHS) and its Outstanding Universal Value (OUV)
- Scheduled Monuments
- Buried and visible archaeology





Historic England feedback:

“Historic England is concerned by the likely impact on OUV and relationship between prehistoric monuments associated with WHS. The considerable archaeology is related to this ‘landscape without parallel’. Although the suggested allocation seeks to avoid the solstice alignment from Woodhenge it is not a proposal Historic England could support.”

HE feedback is clearer than for other sites they have provided comments on, framed as an in-principle objection rather than a prompt for more evidence to be gathered.

See Table 1 (bottom of this document) for assessment of the site against HE’s ‘Site Selection Methodology’ within ‘The Historic Environment and Site Allocations in Local Plans guidance document’.

CBA feedback:

With regard to archaeology, CBA considered the wider Earls Down Farm site to be a high-risk site (red score) due to the risk of impacts on Scheduled Monuments, and known multi-period archaeological remains identified across the site, outside of but directly related to the Stonehenge and Avebury WHS. No mitigation was considered suitable given the large coverage of high value remains and likely need for avoidance across all or the majority of the site. The assessment would apply equally to the smaller site now under consideration.

With regard to historic landscape, CBA considered impacts on the setting of the Stonehenge WHS to be high risk (red score). Heritage specialists at the council consider the assessment would apply equally to the smaller site that now under consideration.

Summary

There are three broad areas of heritage concern that relate to this site:

Stonehenge WHS and its OUV

In the absence of a HIA, it appears from the evidence available it cannot be conclusively said that there would be no detriment to the OUV of the WHS. This is perceived as a high risk to the allocation of the site.

Scheduled Monuments close to the site

The development of the site is highly likely to impact on the openness of the setting around Scheduled Monuments close to the site. While it would be possible to pull the development back, and to enable the relationship between the Scheduled Monuments to be recognised, it appears unlikely that the significance of these features would avoid being further eroded (from the impacts that have already taken place as a result of the Solstice Park development). This is perceived as a medium risk to the allocation of the site.

Buried and visible archaeology

The extent and significance of buried archaeology is unknown, which presents a risk on this site for which the extent of any mitigation that would be required is unknown. This is perceived as a high risk to the allocation of the site.

Due to the combination of unknown risks and the potential impact on the significance of the assets identified this site will not be taken forward.

TABLE 1 – Land east of Solstice Park (reduced part of wider SHELAA site), Amesbury: Assessment against HE’s ‘Site Selection Methodology’ in guidance document	
STEP 1 Identify which heritage assets are affected by the potential site allocation	
Informed by the evidence base, local heritage expertise and, where needed, site surveys	Key heritage constraints: 1. Stonehenge WHS and its OUV 2. Scheduled Monuments close to the site 3. Buried and visible archaeology
Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration.	1. There is no Heritage Impact Assessment, so it is not possible to ascertain impacts on Stonehenge WHS. Concern about impact on OUV raised by HE. 2. Open setting to Scheduled Monuments already compromised by Solstice Park and would be further eroded by this development. Separation/buffer could be provided but would still remove current elements of the open setting. 3. Intrusive field evaluation would be required to determine buried remains beyond what has been identified by developer’s geophysical surveyed remains. A high likelihood of archaeological remains in this landscape due to known finds in the area. Until field evaluation is undertaken, it is not known if there are other buried remains of significance that merit preservation in situ or other mitigation measures. High risk.
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	

Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)	<ol style="list-style-type: none"> 1. Potential to form part of the WHS setting (unclear in the absence of the WHS setting study) 2. Open setting of Scheduled Monuments would be further eroded by development. Separation/buffer could be provided but would still remove current elements of the open setting. 3. Extent on on-site archaeology unknown, but high potential – a risk.
Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)	<ol style="list-style-type: none"> 1. Relationship of site to the WHS not fully understood in absence of HIA (including assessment of noise and light) or Setting Study. 2. Site part of open landscape surrounding Scheduled Monuments, albeit to some degree already compromised. Possible to retain intervisibility between the Scheduled Monuments by restricting development to south west corner. 3. Extent on on-site archaeology unknown, but high potential.
Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information	Additional assessment would be required – the outcome of which leaves uncertainty over the developability of the site. High risk.
For a number of assets, it may be that a site makes very little or no contribution to significance.	Considered unlikely in this case.
STEP 3 Identify what impact the allocation might have on that significance, considering:	
Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views	<ol style="list-style-type: none"> 1. Site is some way from the WHS, with Amesbury, Solstice Park and vegetation in between. However, there is variable topography and within an open landscape with potential large buildings there is potential for perceptibility from the WHS. 2. Site is very close to Scheduled Monuments (burial mounds) which have a relationship with each other within an open landscape. The site could be pulled back towards the south west corner of the site, but would still erode the openness of the landscape in this area. The relationship between the Scheduled Monuments could be preserved through the retention of undeveloped land between the assets. 3. Extent on on-site archaeology unknown, but high potential – a risk.
Form and appearance of development e.g. prominence, scale and massing, materials, movement	Layout, scale and massing could be minimised to reduce potential impacts on known features. Could be informed by HIA.

Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use	Could be informed by HIA.
Secondary effects e.g. increased traffic movement through historic town centres as a result of new development	N/A
STEP 4 Consider maximising enhancements and avoiding harm through:	
<i>Maximising Enhancement</i>	
Public access and interpretation	<ol style="list-style-type: none"> 1. Unlikely to be applicable due to distance to the WHS. 2. Potential to improve interpretation of Scheduled Monument barrows within the landscape, utilising existing PROWs. 3. Full extent of buried archaeology unknown, but potential to improve interpretation by retaining features in situ or recording offsite.
Increasing understanding through research and recording	As above.
Repair/regeneration of heritage assets	<ol style="list-style-type: none"> 1. N/A 2. Scheduled Monuments understood to be partly excavated. Potential to complete excavation and repair/mark features. 3. Not fully understood in the absence of excavation.
Removal from Heritage at Risk Register	Unknown.
Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design	<ol style="list-style-type: none"> 1. N/A – due to distance 2. Potential to improve interpretation of Scheduled Monument barrows within the landscape, utilising existing PROWs. 3. Not fully understood in the absence of excavation.
<i>Avoiding Harm</i>	
Identifying reasonable alternative sites	All other site options reviewed through Local Plan site selection process.
Amendments to site boundary, quantum of development and types of development	Site has been reduced already to just the south west corner of the site. Site unsuitable for residential. Quantum of development proposed to meet employment land needs identified at Amesbury.
Relocating development within the site	<ol style="list-style-type: none"> 1. Relationship of site to the WHS not fully understood in absence of HIA, so unclear whether some parts of the site would be more/less appropriate in the context of visibility from the WHS. 2. Development can be located to avoid the relationship between the Scheduled Monuments, but would nonetheless further

	<p>erode the open landscape part of the setting to the Scheduled Monuments</p> <p>3. Extent on on-site archaeology unknown, so unclear whether some parts of the site would be more/less appropriate in the context of archaeology – a high risk.</p>
Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings	As above
Addressing infrastructure issues such as traffic management	N/A
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	
Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)	Unclear given high level of risk due to unknown factors about this site.
Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence	<p>Unclear given high level of risk due to unknown factors about this site.</p> <p>Update: this site has not been taken forward to allocation. Further information can be found in the Planning for Amesbury document.¹⁶</p>
Effective in terms of deliverability, so that enhancement is maximised and harm minimised	<p>Unclear given high level of risk due to unknown factors about this site.</p> <p>Update: this site has not been taken for to allocation. Further information can be found in the Planning for Amesbury document.</p>
Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance	<p>Unclear given high level of risk due to unknown factors about this site.</p> <p>Update: this site has not been taken for to allocation. Further information can be found in the Planning for Amesbury document.</p>

¹⁶ The Planning for Amesbury paper can be found on the following link: [Submission and document library - Wiltshire Council](#)