

## THE STONEHENGE ALLIANCE\*

From the Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB  
c/o Kate Fielden, Hon. Secretary,

Mr Morgan Jones,  
Development Management  
Wiltshire Council  
Bourne Hill  
Salisbury, SP1 3UZ

Sent by email on 14 August 2017

Dear Mr Jones,

**Planning Application 17/06373/FUL:** *New Medical and Dental Facility (LA0692) together with associated external works, including car parking, landscaping, cycle parking and bin stores at Larkhill Garrison The Packway Salisbury Wiltshire SP4 8QT*

I write on behalf of the Stonehenge Alliance of non-governmental organizations and individuals, which encourages enhancement of the World Heritage Site (WHS) and its setting and maintains a watch over development proposals that would impact adversely on them.

The Alliance fully accepts that the present building on the application site might be demolished and a replacement healthcare facility be constructed in its place, so long as certain conditions are met. We wish, however, to raise the following concerns in respect of our strong objection to the present application.

1. The proposed replacement building is substantially larger in ground plan and in height (10m+ including rooflights and depending on slab level: e.g., see ‘Visualisation Sheet 1, Image 02’) than measurements agreed in the 1970 Concordat between the Ministry of Public Buildings and Works and the MoD. Neither Historic England, in its response to consultation on the application, nor the applicant refer to the Concordat; and it is mentioned only obliquely under Section 4.2 of the ‘Army Basing Master Plan’ agreed with Wiltshire Council (June 2014).

1.1 The Concordat document is published in the WHS Management Plan (2015), pp. 284–85. The DCLG now undertakes the duties of the MPBW. The Concordat is a material consideration in respect of any decision relating to this application.

1.2. One of the ‘principal issues’ for development at Larkhill highlighted in Section 4.2 of the Master Plan is

“Potential impact on the Stonehenge landscape and the landscape sensitivity of the area”.

For this reason, Section 4.2, p. 27 of the Master Plan refers to the requirements of the Concordat in respect of new housing at Larkhill:

“Due to the significance of the Stonehenge WHS and the Concordat Agreement it would not be appropriate to build 540 SFA below the Packway.”

We see no reason why the Concordat should be respected in the case of siting two-storey housing (presumably lower than 10m in height) and ignored in the case of a considerably higher two-storey health centre.

2. Notwithstanding the agreement in the Army Basing Master Plan that the current building on the application site might be replaced with a two-storey building, we consider the height of the proposed building to be excessive and that it ought to meet the specification set out in the Concordat, notably at its southern edge, unless convincing reasons are given for departure from that Agreement. Furthermore, the raised roof lights with glazing facing the Stonehenge WHS landscape are, in our view, both unattractive and unnecessary, especially as they will be reflected in critical distant views from the higher WHS countryside south of the A303. We hope that the Council will ask for these more distant views of the application site to be supplied as an amendment to the proposal, given that they have been omitted in the heritage impact assessment undertaken. It ought also to be borne in mind in respect of the proposal that tree cover may not always be a given in years to come.

3. The design of the proposed building is undistinguished and not in harmony with development in the vicinity which, though itself undistinguished, is no reason for perpetuating poor architectural achievement. The metal cladding will reflect light, making the structure more obtrusive. The proposed wooden cladding is of an unattractive colouring that would stand out, probably gather drip staining over time, and not blend well with the surrounding landscape: a green or dark brown stain might be an improvement. Para.5.5. of the D&A Statement states that one of the ‘sustainability’ aims of the development is “protecting the local environment, by respecting ecological and cultural heritage constraints, and *minimising* visual / landscape impacts” (our emphasis); at the same time, the sustainability aim to “enhance the overall aesthetic appeal of the estate” is not addressed. Furthermore, attempts to reduce the height impact of the building in critical views from the south would not be achieved by setting the building back into the hillside.

3.1. Relevant Core Strategy Policy 37 requires redevelopment of redundant MoD sites and buildings to be “well related to an existing settlement in terms of both location and scale” and that “proposals will not exceed the existing building footprint and floorspace unless they are well located to an existing settlement”. The policy also requires “development at operational MoD sites to enhance the overall character of the site”. We consider that the proposals do not meet any of these requirements.

3.2. The Design and Access Statement omits to mention the key policies in the Core Strategy relating to development in or affecting the setting of the WHS: Core Policies 6 (preamble) and 59 (entire). We consider that the proposals are not in harmony with either of these policies on matters of scale, design, visibility and setting. This is a location where all of these factors need to be considered with the utmost sensitivity for the longer term as well as the present.

3.3. Similarly, NPPF paragraph 132, which relates to heritage assets of the highest significance (including WHSs), is not mentioned in the D&A Statement: the NPPF policy is critically relevant in this instance.

3.4. There is no mention of the WHS Management Plan: its vision (p.10), priorities (p.11), and aims and policies for the WHS in respect of new development.

4. The Army Basing Master Plan: Section 6.4, p.41, under ‘Camp Issues: Larkhill’, states:

“The strongest weight has been given to the Outstanding Universal Value of the Stonehenge World Heritage Site and its component monuments. At Larkhill no substantial development has been proposed on sites south of the Packway within the WHS or in proximity to scheduled monuments. Every effort will be made to minimise visual impact of new development on the WHS and other designated assets.”

We consider the proposed new building to be without doubt a ‘substantial development’ and that this strong commitment concerning development south of The Packway would be clearly breached should permission be granted.

5. We would further refer the Council to statistics in the Master Plan agreed by the Council under Section 8.4 (‘Healthcare’). It is unclear whether some of the requirements for medical and dental care of the increased population arising from Army rebasing will be expected to be met outside the military establishments. Even if some of that need is met elsewhere, it appears that fewer than one GP and one dentist will be required for the new population at Larkhill and around two GPs and two dentists for the entire the population of the rebasing scheme. This leads us seriously to question the necessity for such a large new building for the healthcare centre at Larkhill and whether it or a part of it might be built elsewhere in a less visually and environmentally sensitive location.

**In conclusion**, we hope that the Council will take our views into account and either refuse the present application or ask the applicant to amend it to:

- i) provide clear evidence of the need for such a large building (well in excess of the dimensions agreed in the 1970 Concordat referred to in the Master Plan) *and* patient needs as stated in the Master Plan;
- ii) provide views of the proposed development from higher WHS land south of the A303, taking into account loss of tree leaves in winter and the possibility of unexpected loss of tree cover altogether at some future date;
- iii) minimize the impact of the building both close-up and in distant views by: reducing it in size and height, introducing a more sympathetic overall design eliminating south-facing roof lights and obtrusive facings; and
- iv) give consideration to splitting the function of the facility to reduce its size or consider locating it entirely elsewhere.

Yours sincerely,

George McDonic  
Chairman, the Stonehenge Alliance

\* The Stonehenge Alliance is supported by: Ancient Sacred Landscape Network; Campaign for Better Transport; Campaign to Protect Rural England; Friends of the Earth; and RESCUE: The British Archaeological Trust.