



Cranborne Chase Area of Outstanding Natural Beauty



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Dear Becky

PL/2022/04332 Retrospective Full planning permission. Change of use of the Lodge and Units at Ham Cross, Chilmark, SP3 5RW

This application has been brought to the attention of the AONB Partnership. I can confirm that neither the applicant or the agent has sought pre-application advice from the AONB team.

The AONB Partnership has the following comments on this application.

1. The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles two County, two county scale Unitary, and three District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.
2. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.
3. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' policies for the management of this nationally important area and the carrying out of their functions in relation to it, as required by section 89 (2) of the CRoW Act. The national Planning Practice Guidance [Natural Environment paragraph 040 (21.07.2019)] confirms that the AONB and its Management Plan are material considerations in planning.

4. The National Planning Policy Framework (July 2021) states (paragraph 174) that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, commensurate with their statutory status.
5. Furthermore, it should be recognised that the ‘presumption in favour of sustainable development’ does not automatically apply within AONBs, as confirmed by paragraph 11 and footnote 7, due to other policies relating to AONBs elsewhere within the Framework.
6. For decision making the application of NPPF policies that protect an AONB ‘provides a clear reason for refusing development proposals’ (paragraph 11[d]). Furthermore paragraph 11(b) explains that, for plan making, being in an AONB provides ‘a strong reason for restricting the overall scale, type or distribution of development in the plan area’.
7. It also states (paragraph 176) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and enhancement of wildlife and cultural heritage are important considerations in these areas. This paragraph is also clear that the scale and extent of development within all the designated areas of AONBs and National Parks should be limited. Furthermore, development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas.
8. Paragraph 177 is explicit that when considering applications for development planning permission should be refused for major development, other than in exceptional, public interest, circumstances. Footnote 60 also provides for the decision maker to regard development less than the threshold defined in the NPPF glossary as ‘major’ in the context of an AONB or National Park.
9. The Planning Practice Guidance, paragraph 042 highlights the importance of AONB and National Park settings, their contributions to natural beauty, and the harm that can be done by poorly located or designed development especially where long views from or to the AONB are identified. Paragraph 041 is clear that NPPF policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development, and any development in an AONB will need to be located and designed in a way that reflects its status as a landscape of the highest quality.
10. Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body, statutory undertakers and holders of public office also have a statutory duty in section 85 of the CRoW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions relating to, or so as to affect, land in an AONB. This is explained in NPPG [Natural Environment paragraph 039, (21.07.2019)] which also confirms this applies to the setting of an AONB.

11. More detailed information in connection with AONB matters can be found on the AONB [website](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB. I would draw attention to our [Good Practice Note on Colour in the Countryside](#).
12. This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars and, in particular, the Milky Way, is a key attribute of this AONB. On the 18th October 2019 this AONB was designated the 14th International Dark Sky Reserve in the world. Development that could contribute to light pollution, and hence impact adversely on those dark night skies, has to be modified so that such impacts are eliminated.
13. The AONB is, therefore, concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the [AONB's Position Statement on Light Pollution](#) and the more recent [Good Practice Notes on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#). That means all lighting complying with at least Environmental Lighting Zone E1 as defined by the Institute of Lighting Professionals 2021.
14. The location is in the Vale of Wardour landscape character area of the Rolling Clay Vales landscape character type of this AONB's Integrated Landscape Character Assessment. Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#). Those documents can be viewed in full ([High Resolution](#)) on our [website](#).
15. On the 30th May 2022 the Cranborne Chase Area of Outstanding Natural Beauty Board endorsed a Position Statement on Biodiversity Gain (see attachment), and the Board looks to that guidance having immediate effect. That means that each property should have at least one bird box, one bat box, and one bee brick incorporated into the structure. That level of provision is, nevertheless, fairly basic but is seen by our Board as making an immediate contribution to environmental net gain rather than waiting for the outcome of Government's consultations on national guidance. Our Board's position is that this Area of Outstanding Natural Beauty should, without delay, make a contribution to environmental net gain whenever there is development approved, at whatever scale, within this AONB. The Board has confidence that you will take this guidance on board if you are minded to consider an approval.
16. The application is for retrospective permission for the change of use of the Lodge to offices and both physical changes and change of use in respect of the other structures to light industrial / workshops and storage. The site is at the southern end of the long disused RAF Chilmark. The proposal relates to 0.22ha and would utilise the existing access onto the adjacent unclassified lane. The two linear structures, apparently previous platform shelters, have been converted to be 5.8m deep, 7.4m ridge height and around 54m long, providing a total of 10 units, 5 in each.

17. I read that the works / change of use started 2/12/2019 and were completed 3/8/2020. Whilst I appreciate completing the application form for a retrospective application is not entirely intuitive, there do seem to be some responses that could be misleading.

- The site seems to have been vacant for a long time, as evidenced by Google Streetview photographs of 2011.
- There were no parking spaces previously so it is not correct to state that the provision of 30 parking units is not a change.
- As the works have been completed and the units occupied the applicant must know what arrangements there are for foul sewage; it is not sufficient to record 'unknown'.
- Similarly, the waste storage statement is vague, and as such fails to comply with the AONB Management Plan.
- It also seems most unlikely that light industrial / workshop units will not have trade effluents, so that response seems overly optimistic.
- The 15 employees will be new workers to a site that has been vacant for a long time, and they will all have to commute to the site, using personal transport.
- Surely the response to the section on whether the proposal is for 'industrial or commercial processes' should be 'yes', and not the submitted 'no'?

18. The site is in an isolated location, relatively remote from dwellings for workers, and accessed by unclassified highways that are unsuitable for additional traffic. It is, therefore, not a sustainable location and fundamentally in conflict with NPPF guidance on sustainability. Additional traffic, noise, and lighting could impact adversely on the tranquillity of the AONB, one of its key attributes.

19. The Planning Statement in support of the application appears to indicate there is no ecological interest in the site, despite the proximity of SSSIs, SAC, and protected species. There is no ecological survey within the submitted documentation to support that contention.

20. The Planning Statement makes no reference to the very relevant NPPF paragraph 176, and simply asserts, with no demonstration, that the development takes account of the aims and objectives of the AONB Management Plan as required by Wiltshire Core Strategy policy 51.

21. Reference is made to the Brief on the possible reuse of RAF Chilmark. However, over two decades on the Consultation Draft Brief 1999 could be regarded as out of date. Nevertheless, para 5.2 [within section 5.0] and section 5.2 are pretty clear that there are significant restrictions on the site and that it is not suitable for promotion for development in the local plan. Section 5.3 emphasises the difficulties of access. Para 6.5.2 is clear that proposals should relate to reuse of buildings and protect and enhance the AONB, SSSIs, and protected species. Conclusion 9.1 is fairly unequivocal that 'The nature and environmental importance of the site are paramount and should be protected and where possible enhanced by proposals.' Photograph G on the last page indicates the buildings at the transfer station are in poor condition [1998].

22. Mindful of the application [2022/04333] to the north, the AONB Partnership is very concerned about not just the combined and cumulative effects on the character and tranquillity of the locality but also the precedent an approval could set for office / workshop / industrial / storage development nearby and elsewhere in this AONB and its setting.
23. You may be aware of the AONB's concerns that a permission for 'storage' can be interpreted as storage and distribution which, in our experience, has led to regular deliveries by very large HGVs of materials which are then repackaged as distributed by a fleet of vans. Not only does that create substantial traffic movements on unsuitable roads in the AONB but it also requires workers to commute into the countryside to work at a facility that should more appropriately be located at an edge of town business park. Long term storage obviously generates less activity but that would, in the opinion of the AONB Partnership, need to be appropriately controlled.
24. If, however, you are minded to consider an approval then the AONB Partnership has a number of recommendations it urges you to take on board and ensure are covered in an approved scheme.
- a. There is no net environmental gain and that should be addressed.
 - b. There is no capture and utilisation of renewable energy, and the roofs of the two blocks of workshops could accommodate a significant number of PV panels.
 - c. In this International Dark Sky Reserve any external lighting needs to be dark sky compliant and approved by the LPA before installation. There should be a lighting strategy and specification that should meet the criteria for Environmental Lighting Zone 0 as described by the Institution of Lighting Professionals. That should also apply to any additional lighting being considered at a later stage.
 - d. There is no roof plan in the submitted documentation so it is unclear whether roof lights are provided in the 10 workshop units. If they are then to prevent the upward escape of light and pollution of the skies of the IDRS they need to be fitted with integral blinds or louvres that can be closed automatically at dusk by light sensitive switches.
 - e. The existing trees and hedges contribute to screening the location from public view, and there should be a Landscape Management Plan identifying those features and how they will be regularly managed for the next 25 years to ensure the landscape of the locality is conserved into the future. Enhancements to that planting could, of course, contribute to biodiversity net gain.
 - f. Undercover storage of waste and recyclable materials is needed to avoid clutter and visual intrusion.
 - g. To prevent clutter and visual intrusion, no external storage should be permitted.
 - h. In this rural location opening hours should be limited to weekdays, and from 8am to 6pm on those days.

I hope these comments are helpful to you and I would, of course, be happy to consider any further information you may receive.

Yours sincerely

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For and on behalf of the Cranborne Chase AONB Partnership Board

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