WELLHEAD VALLEY LANDSCAPE CHARACTER ASSESSMENT

REPORT TO WHITE HORSE ALLIANCE (WHA) JUNE 2011

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ALAN JAMES BA MSC MLI

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1.0 INTRODUCTION

1.1 This report assesses the landscape between the town of Westbury and the western edge of Salisbury Plain. This landscape gives the town the main elements of its unique setting - the spectacular escarpment of the plain, guarded by the White Horse that provides the town's emblem, and the calm seclusion and tranquillity of the Wellhead Valley. The report examines different ways in which the planning process can be used to protect a landscape that is an important environmental asset not just for Westbury but for the county as a whole. It was commissioned by the White Horse Alliance in the summer of 2010 with the intention of contributing to the Council's work in drawing up progressive policies for landscape protection and enhancement within the evolving LDF Core Strategy for Wiltshire.

1.2 The White Horse Alliance was formed in the summer of 2007. Its agreed aims and objectives are summarised as 'Defending countryside, wildlife and local communities against a Westbury Eastern Bypass and seeking a better plan for transport and the environment in West Wiltshire and the region.' The WHA represents 12 organisations ranging from local environmental bodies to national NGOs, including the Woodland Trust, and three parish councils. Between its formation and the summer of 2008 the Alliance raised sufficient funds to retain specialist legal representation and to commission expert witnesses to appear on its behalf at the Planning Inquiry ordered by the Secretary of State.

1.3 A public inquiry into the Westbury Eastern Bypass was held between June and October 2008. The author of this report appeared as an expert witness for the Alliance on landscape and on transport policy issues. The Inspector's report was published in July 2009 (1). His main conclusion was that the scheme would have a large adverse impact on the qualities and tranquillity of the exceptional landscape lying between the town and the escarpment of Salisbury Plain (2). This impact on landscape outweighed any benefits Westbury might have gained from the removal of some traffic from the A350 route through the town (3). The Inspector's conclusions and recommendations were accepted by the Secretary of State for Communities and planning permission was refused on 1 July 2009.

1.4 It is not the purpose of this report to dwell on the rejection of the bypass. However the history does provide two important lessons. Firstly, an objective and thorough examination of the landscape has highlighted its exceptional value. Secondly, the case provides a worked example of the extent to which local designations can be relied on to protect exceptional landscapes from development.

1.5 The effectiveness of different types of area designation, and the rival case for criteria-based protection, provide the context for this report, and the underlying reason for commissioning it. Neither the designation of the secluded and deeply rural Wellhead Valley and the western escarpment of Salisbury Plain as a Special Landscape Area (SLA), nor the robust conservation policies emerging from landscape character assessment (LCA), had deterred the local authority from developing the bypass project over a period of 10 years, even though it would have resulted in overwhelming change to the Wellhead Valley and other important landscapes on the edge of Westbury. The District Plan Inspector's recommendation in 2003 (4), that the Eastern Bypass route should not be safeguarded partly because of the SLA designation, was likewise overruled.

1.6 The SLA designation implied a presumption against development detrimental to the landscape character of the designated area, and the criteria-based policies emerging from LCAs in 2005 (5) and 2007 (6) restated the importance of landscape conservation to protect the character of the area irrespective of the SLA designation. In essence, the peripheral areas of Salisbury Plain are landscapes worthy of protection against significant change both in SLA policy statements and LCA conclusions. However, one problem with the LCAs was that they did not capture the essential qualities of the Wellhead Valley, as it was always included in wider landscape character areas which did not accurately reflect its particular character.

1.7 This report in part aims to provide a LCA for the Wellhead Valley at the scale that captures its essential character, but also explores the issue of what would constitute an appropriate level of protection for such an exceptional landscape, in the context of the emerging Local Development Framework (LDF) for the new Wiltshire Council (WC). The intention is to assist the provision of an evidence base for LDF policies that would safeguard the rural area which is simultaneously the edge of Westbury on the one hand and of Salisbury Plain on the other, to an extent commensurate with its special character. Past experience suggests that this may only be achieved by national designation, most probably AONB (Area of Outstanding Natural Beauty) status, as an extension of an adjacent AONB): but the report remains open to the possibility that local designation – which is still possible within PPS7 (7) – or more rigorous criteria-based policies, could achieve the same result.

2.0 LANDSCAPE CHARACTER ASSESSMENT

2.1 LCA as a planning tool dates from the mid 1990s, formalised by the Landscape Character Map of England in 1996 (8), though its origins go back at least to the late 1960s when there were serious reservations about landscape quality assessments which tended to miss the point that landscapes could have values that were not necessarily related to implied concepts of 'beauty'. The essential principle of LCA is that all landscapes matter, and landscape assessment should be based on whether the character of any given area is one that should be conserved and enhanced on the one hand, or is amenable to – or in some case would positively benefit from – changes in character.

2.2 LCA is broadly a two stage process, firstly identifying the characteristics that give all landscapes their distinctive character; secondly, making judgements on 'what matters and why' (9) in an area of a given character, as a basis for decisions on management of that landscape for whatever purpose. LCA invariably involves classification into landscape character areas, each of which has consistent features, natural and man-made, which define its essential character and differentiate each character area from other character areas.

2.3 There are two inherent problems in defining landscape character areas:

- Scale: At one extreme, all of Britain is classified as temperate broadleaf forest at a world scale; at the other, a boggy patch in a field has a different character from the rest of the field. In principle LCA allows for classifying areas at different scales appropriate to the purpose of the LCA, but this opens up the possibility of using the wrong scale in any given context, in particular using an existing LCA which was designed for a different purpose
- Boundaries: These can too easily be read as break points in landscape character, whereas in reality they are transition zones between areas of differing character. Again this is recognised in LCA methodology, but the danger is that *"a scanning process that observes the world bit by bit soon persuades its user that the world is a great collection of bits, and these he calls separate things or events"* (10). It is often the case that landscape entities straddle character area boundaries

2.4 The landscape assessment of the Wellhead Valley for the Eastern Bypass came unstuck on both counts. In both the County (2005) and District (2007) LCAs the Wellhead Valley was included in wider 'Greensand Terrace' character areas, said to be in only moderate condition due to fragmentation by main roads and other detractors. This is clearly incorrect for the valley itself where a strong element of its character is the absence of roads with motorised traffic. Also, the valley straddles the boundary between the chalk escarpment and the greensand terrace, so the possibly unique landform entity of a valley ***along*** the foot of an escarpment was not recognised. The consultant landscape architect for WCC at the inquiry went so far as to suggest that the SLA boundary should have followed the character area boundary at the foot of the escarpment, as it was the chalk landscape that was the object of designation and the dominant chalk character was in any case weaker at the edge of the character area because it was diluted by the presence of other landscape types!

2.5 LCA guidance was last updated in 2002. It has been under review since 2009, to bring it up to date with numerous changes in context, in particular:

- The adoption by the UK of the European Landscape Convention (ELC), which was ratified by the UK government in 2006 and has been 'binding' since March 2007 (11)
- Changes in the planning context, in particular the need to develop landscape strategies and policies for the new Local Development Frameworks (LDF)
- New techniques, including greater use of GIS mapping
- The desire for convergence with new Guidance on Landscape and Visual Assessment (GLVIA) techniques

2.6 From correspondence in September 2010 (12) it appeared that no major changes in methodology are envisaged and the new guidance would be published by April 2011, but it has not yet appeared.

2.7 The ELC considerably reinforces LCA. It commits signatory governments to a formal policy undertaking *"to establish and implement landscape policies aimed at landscape protection, management and planning"* (ELC Article 5b: the promotion of landscape protection, management and planning being the core aim under Article 3). It provides in Article 1 concise definitions of landscape – *"an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"* - and the associated terms of landscape policy, quality objectives, protection, management, planning. Although not using the actual words "all landscapes matter", this is clearly a core premise in both the Convention[1] and its Explanatory Report (13).

2.8 Natural England has the remit to lead action under the ELC, and produced a framework document for England in 2009, and an Action Plan 2008-09 subsequently revised 2009-10 (14, each setting out a 5-10 year ELC implementation strategy. The main aim was stated in the 2008-09 action plan (section 5: vision and outcomes) to be "*to place landscape and people at the heart of social, economic and environmental decision making"*: to which was added *"so that future generations inherit the highest quality landscape possible*" in the 2009-10 action plan.

2.9 This aspiration to put landscape (in its widest sense, not just visual) and people at the heart of decision making[2] is key to understanding the 'what matters and why' of place, and should be key to decision making for the Wellhead Valley. The next section outlines the current LCAs covering the Wellhead Valley and their drawbacks, and section 4 proposes an alternative LCA for the valley.

[1] ELC Preamble: "landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas;"

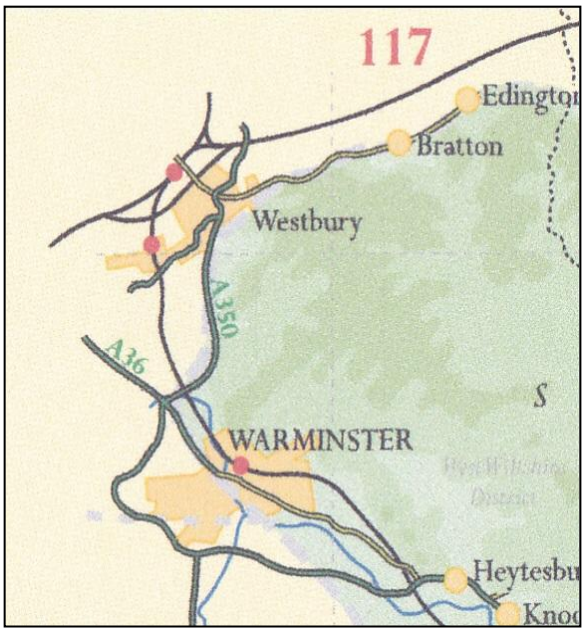
[2] The NE aim is an interpretation of ELC objectives, but its validity is underscored by the key section II of the ELC Explanatory Report, Aims and Structure of the Convention, in particular para 21 *"Europe's populations want policies and instruments affecting national territory to take account of their wishes regarding the quality of their surroundings...this quality to some extent has to do with the feelings aroused in them by contemplating the landscape... the quality and diversity of many landscapes are deteriorating as a result of a wide variety of factors and that this is having an adverse effect on the quality of their everyday lives."*: and para 23 *"Landscape ... plays an important role in the well-being of Europeans who are no longer prepared to tolerate the alteration of their surroundings by technical and economic developments in which they have had no say. Landscape is the concern of all and lends itself to democratic treatment, particularly at local and regional level."*

3.0 EXISTING CHARACTER ASSESSMENTS

National character map

3.1 The Wellhead Valley and the area northwards to Bratton Road are included in National (formerly 'Joint') Character Area 132 (Map 1) of the National Character Map (2005 update of original 1996 map), Salisbury Plain and West Wiltshire Downs. In the vicinity of Westbury, it takes the A350 and Bratton Road, and the urban edge between the two, as the boundary of the chalk landscape of Salisbury Plain, with the areas to the west and north included in Area 117, the Avon Vales.

3.2 In other words, the national character map associates the area at the base of the scarp with the chalk landscape of area 132 rather than the clay vale landscape of area 117. This is contrary to the larger scale more local LCA exercises which associate them with the greensand terraces, which are otherwise identified more closely with the clay vale at the national level.

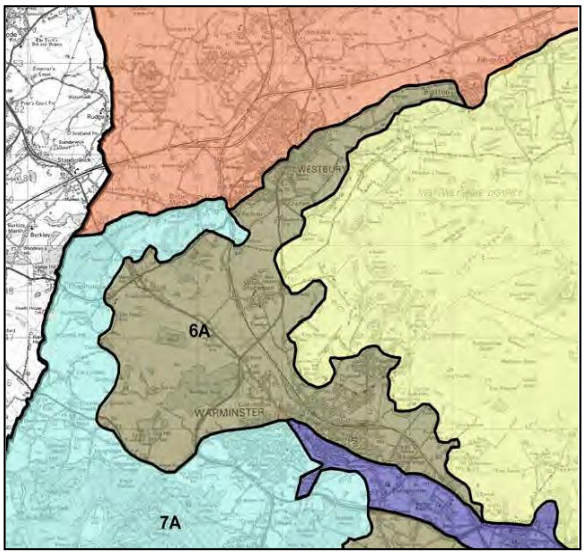


MAP 1: NCA 132 (Westbury area)

3.3 Somewhat paradoxically, I find myself more in agreement with the national character map for its characterisation of the Wellhead Valley than with the local assessments. This is surprising, since it would be expected that larger scale mapping would be better at picking up local detail and identifying character more accurately.

Wiltshire County Council LCA 2005

3.4 The county-wide LCA placed both the Wellhead Valley and the area up to Bratton Road within character area 6a Warminster Terrace (Map 2), one of three areas described as Greensand Terrace. The centre of gravity of area 6a is to the west of the A350 and beyond the A36, but with narrow arms stretching along both the southern and northern flanks of Salisbury Plain.



MAP 2: WILTSHIRE CC LCA 2005 (Westbury Area)

3.5 The key landform characteristics are outlined as:

- Flat aprons of land from which the dramatic chalk escarpments and hills rise.

- Large geometric fields and open skies contrast with the smaller scale, enclosed landscape of the adjacent *Wooded Greensand Hills*.

This description fits the core area west of the A350, but not the Wellhead Valley, least of all the section upwards from Wellhead Springs which is essentially enclosed and secluded. It also does not really fit the area along the escarpment between Westbury and Bratton, which although more open than Wellhead is a narrow strip of quite steeply falling ground down to the clay lowland.

3.6 As already discussed, area 6a is also characterised as being fragmented by major transport corridors and affected by the urban edges of Westbury and Warminster:

Two major roads cross the area which along with a railway line entailing large scale cuttings and embankments (sic)*. The slightly more varied landscape, the proximity of settlement and the busy transport corridors make this area less rural and more fragmented than others in the type*

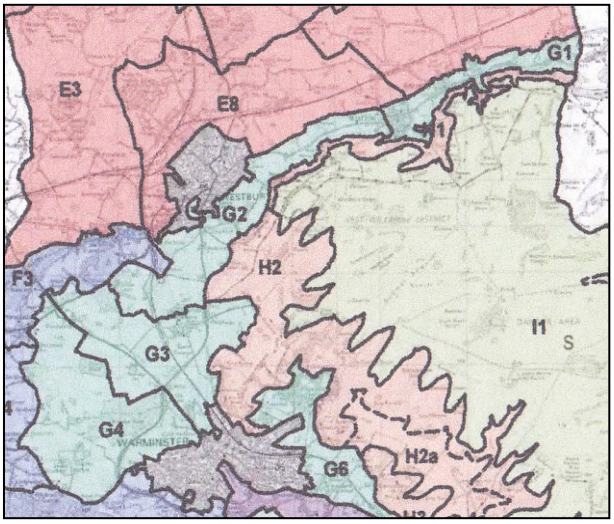
This generalisation is perhaps reasonable for the core area straddling the A36, but the description does not hold for the Wellhead Valley up from Wellhead Springs. The valley is remarkable for being completely free of roads and deeply rural in character in spite of being only 400m or so from the urban edge of Westbury.

3.7 As part of a county-wide LCA done as a desk study at 1:50000 scale, there would not necessarily be an expectation to subdivide a character area to identify differences within landscapes of essentially similar character. However, even if it were to be accepted that the Wellhead Valley is essentially similar in character to the Greensand Terraces, the generalised area description of a less rural and more fragmented landscape would still result in a highly misleading assessment of the particular landscape tract that is the Wellhead Valley.

West Wiltshire LCA 2007

3.8 This district-wide LCA at 1:25000 scale (Map 3) contains the most detailed definition of character areas, generally reflecting the county-wide character areas but subdividing them further and sometimes varying the boundaries. The greensand terraces are represented as landscape type G, and the Warminster Terrace (6a in the county-wide LCA) is subdivided into four areas:

- G1: foot of northern escarpment east of Bratton
- G2: Bratton westwards, through Wellhead Valley and beyond A350 and rail line, apparently using the low ridge from Upton Scudamore to Chalcot Lane as a western boundary
- G3: from G2 boundary to just beyond A36, probably using the plantation woodlands SW of A36 as a boundary
- G4: area W of Warminster surrounding and including Cley Hill



MAP 3: WEST WILTS DC LCA 2007 (Westbury Area)

3.9 The logic of this subdivision, in particular area G2, is not clear. Given that WCC area 6a does not really merit being a single LCA at the county level, it is useful to subdivide it, but the natural break points in the landscape are:

- Beggar's Knoll, where there is a marked 'watershed' between north and south, at the head of Wellhead Valley: to the north there are wide views across the open sloping foreground down to the clay lowland, whereas to the south is the more enclosed view into the Wellhead Valley.
- A350, where the Wellhead Valley meets the outside world in the form of a main road and traffic, and the close landscape relationship with the escarpment comes to an end

Area G2 crosses both these boundaries, so includes parts of three character sub-areas within the so-called 'Warminster Terrace'.

3.10 This said, it is notable that the judgement stage on landscape management for area G2 is strongly oriented towards conservation of existing character (ref 6, section 4.8 pp 117-118):

The overall strategy for the area is to conserve the existing landscape pattern and dramatic open views to the adjacent Chalk Downland Edge and enhance the landscape setting of Westbury. Specific management objectives are to:

- *Seek to resist any development that would affect the open views across the terrace to the chalk uplands*
- *Conserve open views to the Westbury White Horse as a distinctive landmark*
- *Conserve and enhance the current field pattern and hedgerows with careful management and restoration (where necessary) with species appropriate to local landscape character*
- *Conserve the existing sparse settlement pattern and avoid larger developments that would be out of scale and character within the existing situation*
- *Promote appropriate management of the woodland clumps in the area*
- *Seek to encourage ecological management of the arable fields by keeping an unploughed margin around the fields to promote wildlife*
- *Conserve and enhance the landscape setting of Westbury*
- *Conserve and manage the setting of earthworks/archaeological sites within the area.*

None of these landscape management policy recommendations suggest that the Eastern Bypass would have been an acceptable and compliant development within this landscape character area, which raises questions over the effectiveness of such criteria-based policies drawn from LCA.

4.0 LCA OF WELLHEAD VALLEY

Key characteristics

- Strong visual envelope contained by the escarpment of Salisbury Plain, the hill between the valley and Westbury, and the 'col' at Beggar's Knoll (photo 2)
- Very unusual geomorphology of valley following the base of a chalk escarpment (photo 2)
- Dramatic terraced hillside of the escarpment contrasts with the flowing farmland in the valley bottom (photo 1)
- High degree of seclusion and tranquillity up the valley from Wellhead Springs (photo 4)
- Very low levels of road and traffic impact except at the west end alongside the A350
- Largely uninhabited except on periphery at the western end and Beggar's Knoll
- Woodland at White Scar Hanging and Wellhead Springs frames views of lower part of the valley: uninterrupted flow of space along the valley (photo 2)
- Important biodiversity interests, habitat for protected species including bats and dormice
- Wellhead Springs are a historically important water resource to the present day, and both reflect and express the geology and landscape of the valley
- Dense footpath network makes area highly accessible for recreational use, especially for residents of Westbury (photo 4)

Visual character

4.1 Although embracing two contrasting landscape types– the wild chalk upland of the edge of Salisbury Plain and the gentle farmland of the greensand terrace[3] (Photo 1) – the disparate elements are unified by the valley landform, especially above Wellhead Springs. This creates a tight enclosed space flowing along the base of the escarpment (Photo 2). It is unusual, if not unique, for a valley to follow a chalk escarpment. In most cases there is either a relatively uniform and very open basal slope down to the clay vale, as immediately north of the Wellhead Valley (Photo 3): or there are indented, heavily dissected valleys within the escarpment as at Bratton and Edington.

4.2 The escarpment face is the most significant and dramatic feature, especially in the open section between the woods at Beggar's Knoll and White Scar hanging. Here, the steep hillside is rumpled in dozens of small terraces dotted with scrub hawthorn, giving a distinctive, almost exotic visual quality (Photo 1). The cause of these terraces is a matter for debate – they may be geomorphological in origin, or the product of sheep grazing on such a steep face, or possibly a combination of the two. Whatever the case, the contrast between this wild rough hillside and the flowing, expansive arable fields literally just over the fence, all held within the unifying visual envelope of the valley, is the essence of the distinctive character that makes Wellhead so special.

4.3 The visual character is enhanced by the degree of seclusion created by the containing landform, which gives high levels of tranquillity to most of the valley in spite of the proximity of urban settlement and major roads. Above Wellhead Springs there is no traffic, only distant traffic noise, and no visually intrusive elements to impinge on the deeply rural character.

[3] The name may be something of a misnomer, as the area is depicted as 'Lower Chalk' on the 1:50000 Geological Survey map, but is used here for consistency with the existing LCAs.

PHOTO 1: Contrast of wild escarpment and flowing farmland landscape

PHOTO 2: Distinct valley form following the escarpment

PHOTO 3: Contrast of typical escarpment base landform with Wellhead Valley

PHOTO 4: Accessible tranquillity on the drove road bridleway

4.4 At the same time, the valley is easily accessible by footpaths and bridleways, and no more than a few hundred metres from the urban edge of Westbury (Photo 3). There is a choice of routes, either along the valley bottom or up the escarpment to several high level paths on the edge of Salisbury Plain. The experience can go from the intensely enclosed landscape of the valley to the endless views from the Wessex Ridgeway or Imber Range perimeter path, in a matter of minutes.

4.5 Landscape character changes in several ways at and to the west of Wellhead Springs:

- The escarpment becomes wooded (White Scar Hanging)
- The valley form dissipates as the hill next to Westbury falls away south-westwards: the valley itself becomes smaller as it cuts into the greensand ridge, and goes away into the urban area of Westbury
- The western end is more affected by the A350 and visual and noise impacts of traffic, and is fringed by the last few houses at the edge of Westbury

4.6 A case could be made for subdividing the character area at Wellhead Springs, or along the line of the bridleway from Chalford to White Scar Hanging. This area has some common character with the area west of the A350 at least as far as Biss Brook, and could be defined as a separate sub-area at 1:25000 scale of assessment. I would argue against this, for three reasons:

- Although the valley form loses the exceptional clarity of the area east of Wellhead Springs, the flow of the rural landscape remains strongly NE to SW along the escarpment (see photo), and contained on the north side partly by the urban edge and partly by the more subtle landform of the greensand ridge.
- The close visual relationship between the escarpment and the agricultural land at its base remains strong right up to the A350, but changes quite abruptly at the A350 as the escarpment turns southwards and becomes markedly less steep.
- The A350 is in itself a landscape boundary line, partly because of its location as a routeway historically responding to topography at the west end of Salisbury Plain, partly as a pathway likely to feature in most people's mental map of the area, partly because it is the point at which the road and traffic are experienced at first hand.

Historic environment

4.7 The landscape of the Wellhead Valley does not present strong evidence of historic associations, though the bridleway along the valley, known as a drove road, is understood to be an ancient routeway probably located to pass the Wellhead Springs which give the valley its name (and the present day pumping station). Bratton Camp and the Westbury White Horse are more overt in their historic character, but are not within the visual envelope of the valley itself. The area has important historic reference values in relation to King Alfred and the battle of Ethandun

Biodiversity

4.8 Wellhead Valley provides habitat for important protected species. Although the agricultural land is intensively farmed it provides valuable foraging areas for bats. The woodlands at White Scar Hanging and Wellhead Springs are of considerably greater biodiversity value, and the hedgerows across the valley provide important connectivity although currently in relatively poor condition.

4.9 The area was identified during the Eastern Bypass inquiry as exceptionally important for bats. Twelve of the 16 native species were recorded in the area, including all four Annex II species of bat, those which can be qualifying interests in the designation of a Special Area of Conservation (SAC) in the European Habitats Directive. It has also been established that some of the species recorded here are commuting from the Bath and Bradford-on-Avon Bats SAC, to forage in the Wellhead Valley and on Salisbury Plain: and the importance of the nearby Clanger Wood SSSI for bats became better understood during the inquiry. All native bat species are protected under the Habitats Directive (Annex IV), and loss of foraging areas and severance of commuting paths are critical but often underplayed aspects of bat protection.

4.10 Although disputed in the years before the inquiry, it has now also been established that there is a population of dormice in the Wellhead Valley, evidenced by two dormouse nests found in the valley, in the hedgerow between White Scar Hanging and the drove road near Bere's Mere farm. Dormice are also protected under Annex IV of the Habitats Directive. They have fairly specialised habitat requirements and generally small populations at any one location, so all dormouse colonies are both important and vulnerable.

Current condition

4.11 The landscape condition of the area is good. The farmland is intensively managed, as arable land but increasingly as pasture for horses towards the northern end of the valley. The farmland has limited biodiversity, but cannot be described as in any way neglected or degraded. The hedgerows are less intensively maintained, irregular in height and spread, and some gaps are beginning to appear. It is a moot point whether this detracts from current landscape character – perhaps the farmed landscape would be too pristine if the hedgerows were as intensively managed as the fields – but there is a need to maintain connectivity for wildlife, in particular the hedgerow between White Scar Hanging and the Wellhead Springs woodland adjacent to the pumping station. Maintenance in accordance with DEFRA guidance would improve the connectivity of these hedgerows. The woodland of White Scar Hanging is mature and makes a positive contribution to the landscape. The open escarpment is under very little land use pressure and largely exhibits an appearance of natural regeneration, though it would require long-term management to retain the desirable quality of openness in the face of scrub colonisation.

Inherent landscape sensitivities/ key landscape changes

4.12 The most sensitive aspects of the landscape character of the Wellhead Valley are:

- Tranquillity, including absence of visual detractors and resulting intensely rural character
- The balance between wild and farmed land, between dramatic and serene, in the juxtaposition of the escarpment and the valley bottom, which depends for its survival on land management practices including farming regimes
- Biodiversity value, especially in the woodlands and connecting hedgerows
- Public accessibility, in the existence and condition of rights of way which are well used

4.13 The core sensitivity is that the character would be significantly and irreversibly changed by the incursion of development into the valley, whether the Eastern Bypass or an extension of the urban area of Westbury over the hill which so crucially separates the two at present.

4.14 Other key changes that would affect existing landscape character are corollaries of the sensitivities. Loss of woodland would result in loss of biodiversity; loss or deterioration of hedgerows would affect connectivity; conversion of farmland from arable to pasture would reduce the contrast between it and the escarpment; neglect of rights of way would result in loss of accessibility. All are important facets of landscape and landscape character.

4.15 The main management choice (assuming that none of the above are regarded as desirable outcomes to be actively selected!) is whether to retain and enhance the existing open character of the central part of the escarpment, or allow natural regeneration to take its course. I would argue that this section of the escarpment is essential to the composite picture that makes this landscape so special. A completely wooded escarpment would still be attractive, but part of what elevates the Wellhead Valley beyond 'attractive' would have been lost.

4.16 There is considerable discussion in the field of LCA about landscape sensitivity to climate change. The scientific consensus is that the planet is warming, and there is widespread recognition that the incidence of extreme weather conditions is increasing, but at present it is difficult to do more than generalise over the likely landscape consequences, especially at such a local level of LCA. In biodiversity terms, there is clear evidence of a northward migration of plant and animal species, but no specific information is available for the Westbury area.

4.17 In terms of the visual landscape, there are grounds to suggest that the pattern of vegetation and land use is less vulnerable to climate change than in other areas of Britain, for two reasons:

- The geology, landform, soils, and agricultural land use are broadly similar to areas further south, in particular parts of northern and eastern France, which indicates that a somewhat warmer and drier climate might not result in significant landscape change. This is in contrast to eastern England, where it is considerably drier and somewhat warmer and therefore more vulnerable (the vulnerability to extreme drought is evidenced by the spring of 2011)
- Geology and soils are a very dominant factor in creating the distinctive chalkland landscape character, and this would act as a strong counterpoint to changes in climate compared with other, less dominant geological contexts[4]

4.18 These are no more than tentative observations, and subject to the large caveat that any conclusions on the likely effects of climate change on landscape character depend on the precise nature and extent of climate change as it unfolds.

[4] For example, the karst landscape of parts of the Yorkshire Dales derives its name from areas of the same limestone geology in Dalmatia, and areas of almost identical physical landscape character and land use are to be found in parts of Croatia and Bosnia with self-evidently different climate – the main difference in landscape character is only to be found in building forms

Management strategy and objectives

4.19 As discussed in section 3.10, the strategy proposed in the West Wiltshire LCA for area G2 is broadly acceptable for the Wellhead Valley, with modifications to exclude elements that are not applicable to the valley itself. The following proposals are based on the text quoted in 3.10 above:

The overall strategy for the area is to conserve the existing landscape pattern, with its dramatic juxtaposition of the Chalk Downland Edge and the flowing greensand terrace, and enhance the landscape setting of Westbury. Specific management objectives are to:

- Seek to resist any development that would adversely affect the character area as a result of introducing discordant or urbanising features out of scale and character in this deep rural landscape
- Conserve and enhance the current woodland and hedgerows with careful management and restoration (where necessary) with species appropriate to local landscape character, to conserve and enhance the important biodiversity of the area
- Seek to encourage ecological management of the arable fields by keeping an unploughed margin around the fields to promote wildlife
- Conserve and enhance both the landscape setting of Westbury and the valuable resource of an accessible area of unspoilt countryside directly on the urban fringe of the town.

4.20 As 'criteria-based policies' these would appear adequate to provide the level of protection needed to ensure the maintenance of the exceptional landscape character of the area. However, since they have already failed to do so once in the four years since the West Wiltshire LCA was produced, this question needs further review, in the next section.

5.0 LANDSCAPE PROTECTION

5.1 The presumption against development detrimental to the character of the SLA, which had been in place since the early 1990s, did not prevent Wiltshire CC from seeking to promote the Westbury Eastern Bypass for a period of ten years from 1999 to the SoS decision to reject the scheme in July 2009. This is not necessarily a criticism of WCC, since most planning issues involve balancing competing objectives, and there is a standard argument for going against conservation policies if there is overriding public interest in proceeding with a given development. In this case, however, WCC clearly got it wrong in the eyes of the inquiry inspector, who found that the Council had significantly understated the landscape value of the SLA area and overstated the scheme benefits.

5.2 The worrying aspect of this is that without a concerted body of objection to the scheme by WHA and others there could well never have been a planning inquiry, and without significant private fundraising the WHA would not have been able to field professional witnesses at the inquiry to ensure that the best quality of evidence was available to the inspector.

5.3 There are two general problems that occur repeatedly in assessments of road schemes:

- It is relatively easy for a promoting authority to play the 'balance of probability' card, arguing that need outweighs harm. Since need and harm are almost always valued in different currencies, this assertion can be readily used to justify promotion of the scheme, without going too deeply into the issues at stake.
- EIA methodology aims to identify impacts of development on environmental 'receptors', but does not explicitly ask for professional judgement on whether a given level of impact is acceptable. A professional landscape architect can reach a conclusion that a road scheme will have a large adverse impact on an important landscape (however defined), but thereafter there is a gap in which a professional opinion on the acceptability of the impact purely in landscape terms is not sought. The decision to accept a large adverse landscape impact – which is almost invariably the decision reached, except in the rare cases like Westbury where an inquiry inspector intervenes - is justified as the balance of competing objectives.

5.4 The second problem is magnified when professionals are being employed by scheme promoters to present their case in the best possible light. In the case of the Eastern Bypass, the consultant landscape architect representing WCC at the inquiry concluded a 'moderate' adverse landscape impact on the SLA area, but conceded at the inquiry that it was actually a 'large' adverse impact. She then claimed that the road would only make the landscape different, not worse. This was an impossible claim, purely in terms of the definitions of moderate or large adverse impacts in WebTAG[5].

5.5 This brief discussion provides a context for a discussion on landscape protection for the Wellhead Valley, and indeed the SLA northwards to Bratton Road. WHA is concerned that even the SLA

[5] See Westbury Bypass Inspector's report 8.88: *"As well as disagreeing with the Council's conclusion of 'moderate adverse' after 15 years I simply do not understand how even that conclusion could lead to their suggestion that 'this does not mean that the landscape would be less attractive, only that it would be different from existing. A moderate adverse impact is itself characterised by quite substantial negative impacts..."*

designation was able to be rather casually overridden by a local authority determined to build the road. Current planning policy (PPS7) is moving away from SLA-type designations to criteria-based policies emerging from LCA. There is sound reasoning behind this, based on the central tenet of LCA that 'all landscapes matter' and designation creates a perception that non-designated areas do not 'matter': but research undertaken in 2006 (15) found that local authority officials and members found designations easier to understand and use, both in making and defending planning decisions.

5.6 The misgivings over the past history of the Eastern Bypass (and the possibility, which cannot be excluded, that the proposal may at some point reappear in a different guise) have led WHA to conclude that the possibility of incorporating the Wellhead Valley area into an AONB should be seriously investigated. Failing this, a case should be made to continue with the SLA designation – which is still permitted under PPS7, though it has to be justified (16) – and incorporate it into the emerging Local Development Framework. Failing that, a robust set of protection policies based on LCA should be written into the LDF, accurately reflecting the exceptionally strong character of this area and its importance both to the town of Westbury and to the perimeter of Salisbury Plain (which by any standards is a landscape of national if not international significance).

AONB designation

5.7 The history of designation assessments in the 1940s and early 1950s was investigated for the Eastern Bypass inquiry, based initially on anecdotal evidence that Salisbury Plain would have been designated an AONB, and possibly even a National Park, but for the extent of land owned by the MoD (see Appendix 1). It was found that the perimeter of the Plain, covering the escarpment and its base on the north, west, and south sides, was identified as a prospective designated area, and local planning authorities were required to consult with the National Parks Commission over any developments within the prescribed area prior to confirmation of whether or not it would be formally designated. In the event the designation did not proceed, possibly because it was a relatively narrow sliver of land, but the fact that it was considered intrinsically worthy of designation was established.

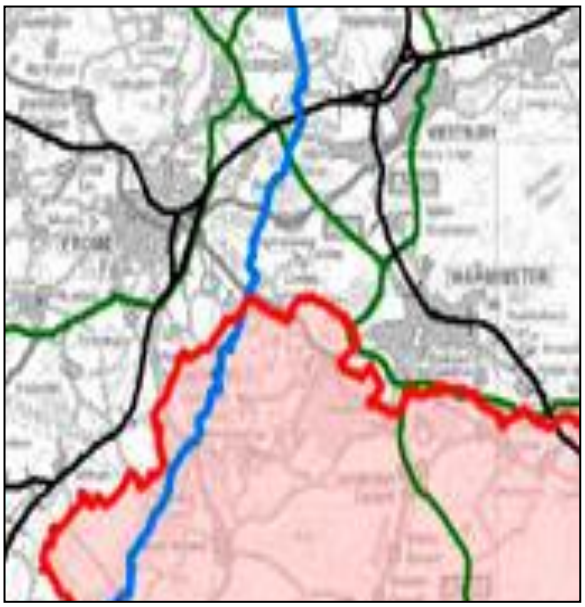
5.8 The Wellhead Valley right up to the then urban edge of Westbury, and the area up to Bratton Road including the escarpment at the White Horse/ Bratton Camp, were all included in the prospective area mapped in the early 1950s. The LCA in section 4 of this report supports and amplifies the reasons why this area would in my view meet the requirements for AONB designation. The Wellhead Valley is possibly a unique landform in England, and the escarpment at this point is especially distinctive and dramatic. The White Horse and Bratton Camp are an iconic landscape with historical associations of national significance (as arguably is the village of Edington, as described in the West Wiltshire LCA).

5.9 The main problem with making the case for AONB designation is that the argument against creating a separate sliver of an AONB around the MoD would be as likely to be rejected now as it was 60 years ago. AONB designation could almost certainly only occur as an extension to one or other of the nearby AONBs, or by rethinking the question of designation of the whole of Salisbury Plain. For the latter, it is beyond the scope of this report to do more than float the idea of revisiting designation, although it may be observed that large chunks of designated landscapes elsewhere are in MoD ownership (notably Northumberland National Park, the North Pennines AONB, and in Dorset

where the MoD is also responsible for sections of the World Heritage Site of the Jurassic Coast). Also, the MoD is nowadays recognised as taking its conservation responsibilities seriously in important areas of its estate, so the conflict between MoD ownership and AONB designation may be less acute than it was 60 years ago.

5.10 As far as extending adjacent AONBs, there are two options:

- The Cranborne Chase and West Wiltshire Downs (CCWWD) AONB (Map 4) extends generally to the A36 around Warminster, but actually includes the escarpment of Salisbury Plain further east around Codford St Mary. It is perhaps surprising that having crossed the A36 at this point the AONB does not include the rather more spectacular escarpment between Heytesbury and Warminster. From there it is a short step along the escarpment to reach the Westbury area (I would not be unduly worried about including the Warminster Training Centre within the AONB, as it is well wooded and well maintained. Alternatively, the AONB could be extended throughout the SLA area west of Warminster, leaving Warminster as an enclave with the AONB on all sides (akin to Glossop or Buxton in the case of the Peak District National Park).



MAP 4: CCWWD AONB (NW corner)

- North Wiltshire Downs AONB reaches the Salisbury Plain escarpment at Chilton, near Devizes, and could at a pinch be extended from there along the escarpment to Westbury. This is however a less natural extension than the above: it would remain a long sliver away from the main body of the AONB, and it is doubtful whether a case could be made to extend the AONB across the clay vale to the north to give it more critical mass.

5.11 It is not in the gift of Wiltshire Council to designate an AONB. It would however be possible for WC to make the case to Natural England. It would also perhaps be possible to include a statement in the LDF that WC recognises that the landscape of the area fully merits AONB status but is denied it because of accidents of geography and land ownership.

SLA designation

5.12 The main case for continuing the SLA designation is an extension of the case that it would be an AONB but for circumstances beyond the control of Wiltshire Council. This would enable the council to frame policies for the area in much the same terms as for AONBs, albeit without the status that goes with formal national designation.

5.13 Notwithstanding the case made in PPS7 for criteria based policies, the added advantage of continued SLA designation is the clear signal that the area is in principle off-limits for certain types of

development. Individual policies for LCAs across a range of issues inevitably dilute the message, even if in principle they afford the council much the same powers to resist developments.

Criteria-based policies

5.14 The types of policies to be adopted are set out in 4.18 above. It is in my view essential for these policies to be written into the LDF, at least for key areas such as Wellhead which require high levels of protection, rather than some statement to the effect that policies will be drawn up as supplementary guidance for the various character areas of Wiltshire.

6.0 CONCLUSIONS

6.1 The first draft of this report was written in October 2010, but has been held in abeyance awaiting the reported publications of new LCA guidance and a new landscape designation reported to be in preparation as part of the localism agenda. Given the continuous flow of relevant new policy at the present time, and the timescale for the WC LDF, it has been decided not to delay any further.

6.2 The draft was discussed with Wiltshire Council Landscape Officer Maxine Russell at a meeting at Madbrook Farm (the southern end of the proposed bypass) on 28 October 2010. There was a large measure of agreement on the findings of the draft report, in particular that the distinctive qualities of the Wellhead Valley had not been captured in the existing LCAs, the 2007 LCA being especially anomalous in its sub-division of the Warminster Terrace. Ms Russell's view of the WCC 2005 LCA was that it was reasonable for a county-wide 1:50000 assessment, which would not have been expected to capture distinctiveness at the scale of the Wellhead Valley.

6.3 Ms Russell broadly favoured retention of the local SLA designation, for the practical reasons outlined in the report, notwithstanding the case for criteria-based policies. Extension of the CCWWD AONB was in principle feasible, especially as WC has input into AONB management, but not practicable in the timescale for preparation of LDF core policies. WHA would however support the LDF at least flagging up a longer-term commitment to seek extension of the AONB, and both the Westbury Town Council and the Westbury Area Board have expressed support for extending the AONB.

6.4 It is understood that Wiltshire Council proposes to hold open the possibility of retention of the SLA designation in the LDF, possibly for some very special landscapes such as the Wellhead Valley where it is felt that an additional layer of protection is needed over and above that incorporated into character-based criteria (17). This could and should include setting both the criteria-based policies and the SLA policy in the context of a county landscape strategy that embraces the principles of LCA and draws on the national policy commitment to the principles and objectives of the European Landscape Convention.

6.5 If the spirit of the ELC can be incorporated into the LDF landscape policies of Wiltshire Council, there could be a degree of confidence that lasting and meaningful protection of the SLA landscapes including the Wellhead Valley can be achieved. This involves putting landscape and people at the heart of decision making. From the bypass inquiry process and outcome, there can be little doubt that, to quote the Explanatory Report of the ELC, people in the Westbury area "*are no longer prepared to tolerate the alteration of their surroundings by technical and economic developments in which they have had no say"*. Of course, people having their say does not automatically achieve consensus, but it does mean that grand overarching plans should not be imposed by 'local' authorities with minimal consideration of local impacts or respect for local perceptions.

6.6 The discussion embodied in this report is taking place at a time of considerable change, and not a little confusion, in the evolution of planning policy. The dominant thrust of national planning policy appears to be towards facilitating economic growth and development as the primary function (almost duty) of planning, with ostensibly due regard to the principles of sustainable development but with little apparent room for doubt that development takes precedence. The draft National

Planning Policy Framework (NPPF) published by the government-appointed Practitioners Advisory Group in May 2011 (18), advocates that:

"*Enabling the delivery of the homes, infrastructure and work places that the country needs in a sustainable way, is the principal function of the planning system. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. This means that the Government expects the planning system to pro-actively encourage growth to meet the needs of business; to increase the supply of housing that the country needs; and to ensure the timely provision of necessary infrastructure. Planning must operate to encourage growth and not act as an impediment. This must start from a positive assumption about development, to create certainty and confidence for national and local investment."*

6.7 It is difficult to see how this is compatible with the ELC undertaking *"to place landscape and people at the heart of social, economic, and environmental decision making"*. It is equally difficult to see how it is compatible with the thrust of the report, published on the day this report is finalised, of the National Ecosystem Assessment (19). The NEA report is described by the Environment Secretary Caroline Spelman as "*a vital step forward in our ability to understand the true value of nature and how to sustain the benefits it gives us*". Add to this the tension between national frameworks and the emerging Localism Act, and it is fair to say that planning is currently in a melting pot, or perhaps a mess!

6.8 The protection of the Wellhead Valley and indeed other areas around the perimeter of Salisbury Plain, must somehow steer a course through these choppy waters. It is a huge responsibility for Wiltshire Council to rise to the task, but this report aims to provide a foundation to help secure this vital achievement.

Alan James
June 2011