

ATLAS

PLANNING GROUP

PLANNING STATEMENT

Kamatan Acres

Larkhill Road

Durrington

Wiltshire

SP4 8BH

October 2025

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INTRODUCTION

- 1.1 This Statement has been prepared by Atlas Planning Group to accompany a full planning application for the redevelopment of land at Kamatan Acres, Larkhill Road, Durrington, Wiltshire, SP4 8BH.
- 1.2 The proposed application is for the siting of 5 moveable camping pods on the site just north of the dwellinghouse at the site, to be used as holiday lets for local tourists, and the conversion of an existing outbuilding into a sixth holiday let. This development represents a positive opportunity to help contribute to the vitality of the area and ensure that the Wiltshire local economy is better able to harness some of the benefits of having the UNESCO World Heritage Site at Stonehenge on its doorstep.
- 1.3 This planning statement sets out how these positive benefits can be achieved whilst complying with the guidance set out in the National Planning Policy Framework (NPPF) and all relevant local planning policy.

SITE DESCRIPTION

- 2.1 The site is located at the southwest corner of the town of Durrington, at the intersection of Larkhill Road and Countess Road, just outside the town's settlement boundary. The site benefits from a sustainable location, being an easy walking distance from Durrington High Street some 600 metres to the northeast, and a wide variety of services immediately on its doorstep, including the public house 'The Stonehenge Inn' directly opposite the site and a post office, a convenience store, several restaurants, cafes and takeaways within 15 minutes' walk.
- 2.2 The site also benefits from excellent public transport links, with the bus stop directly outside the site being served by three buses an hour to Salisbury, two buses an hour to Larkhill and one bus an hour to Swindon.
- 2.3 The site is bounded to its north, east and west by a row of mature trees, which shield the site from the highways lie just beyond the edge of the site; Larkhill Road; Countess Road; and the roundabout which connects them. The town of Durrington lies opposite the site to its north, whilst to its east and west lie arable fields. To the site's south is a private dwellinghouse owned by the applicant, Kamatan Acres, with a driveway and private garden. Beyond Kamatan Acres to its south lies a small campsite licenced for five units of overnight accommodation.
- 2.4 The site benefits from an existing vehicular and pedestrian access onto Larkhill Road, which also serves Kamatan Acres and the existing campsite. At present, the site is used as part of the residential garden of Kamatan Acres, although it should be noted that the property will retain a garden space as a significant section of the garden to the south of the house (approximately 300m²) will remain unaffected by this development.
- 2.5 The site is located at the very edge of the Stonehenge and Avebury World Heritage Site (WHS), a large area some 5.5km wide and 6.5 km high which covers the wider setting of the henge. It should be noted that this is a large and diverse area and is not by any means a development-free zone – the southern half of the town of Larkhill, as well as smaller villages such as West Amesbury, Wilsford and Lake are all located within this site, as well as working farms, Ministry of Defence compounds, existing overnight tourist accommodation and significant transport infrastructure in the form of the A303 which bisects the site. Stonehenge itself is located approximately 3.5km away from the site and is not visible at all from the proposed development, as several hills, significant vegetation and a significant portion of the town of Larkhill lie between it and the site. Nonetheless, the protection of Stonehenge and its setting should be afforded particular importance in this location.

- 2.6 The site is also located approximately 45 metres to the east of the Durrington Walls and Woodhenge scheduled monument, an area covering the site and setting of the Neolithic and Bronze Age monument of the same name. Whilst not of the same international significance and fame as Stonehenge, this is still an important site whose historic significance should be respected.
- 2.7 The nearest listed building is Hollyhurst, a Grade II listed thatched cottage in Durrington some 760 metres northeast of the site.
- 2.8 The site is located in Flood Zone 1, which designates areas at the lowest risk of flooding. The nearest watercourse is the River Avon, which flows some 400m southeast of the site.
- 2.9 There are no Ancient Woodlands or Special Protection Areas (SPAs) within 500 metres of the site, although it does lie within the Salisbury Plain SPA Mitigation Zone, an area designed to protect the stone curlew population present in the region. The River Avon which flows 400m southeast of the site is classified as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The site also lies within the catchment area of the Hampshire Avon, meaning phosphate mitigation will be required to ensure the development demonstrates nutrient neutrality.
- 2.10 There are no public rights of way (PRoWs) immediately adjacent to the site. The nearest PRoW is a footpath approximately 100 metres to the north of the site (reference number: DURR21). The site is not directly visible from any of the PRoWs in the vicinity due to the mature trees which encircle the site.

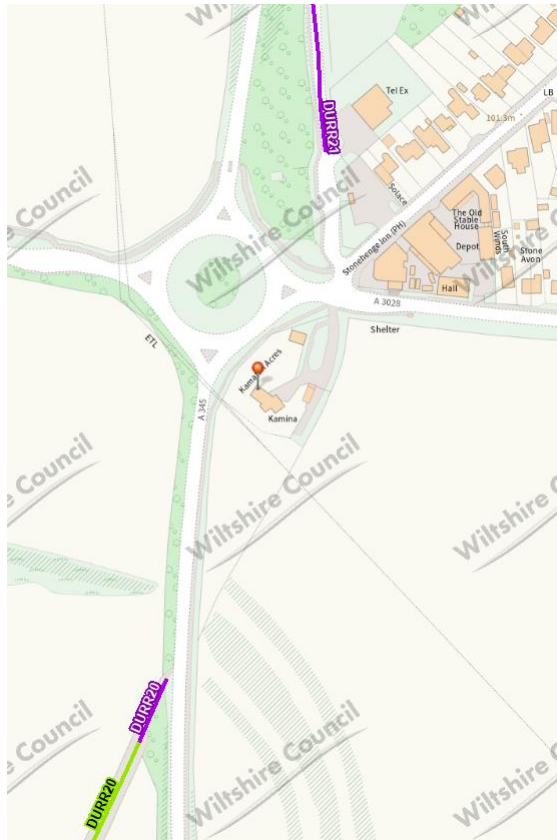


Figure 1: a map showing the PROWs around the site.

PLANNING HISTORY

3.1 The relevant planning history of the site is as follows:

APPLICATION REFERENCE: S/1984/1210

3.2 In October 1984, an application was received by Salisbury District Council for the demolition of the bungalow and air raid shelter on the site and its replacement with a new dwelling.

3.3 The application was approved and the new dwelling (now known as Kamatan Acres) was constructed.

APPLICATION REFERENCE: 19/08062/FUL

3.4 In August 2019, an application was received by Wiltshire Council for the erection of a conservatory on the existing dwelling at the site.

3.5 The application was approved, and the conservatory was constructed.

THE PROPOSAL

- 4.1 The proposal is a full planning application for the siting of five moveable camping pods on the site and the conversion of the existing outbuilding into a holiday let, with associated landscaping and works.
- 4.2 The pods are modest in size and design – 3m x 2.5. They each have space for a maximum of two occupants, and contain no bathrooms; toilet and washing facilities will be provided by the existing toilet block which currently serves the campsite to the south of the Kamatan Acres (also owned by the applicant). The pods are on wheels, so are moveable structures.



Figure 2 - One of the proposed pods

- 4.3 The existing outbuilding will be converted into a one bedroom unit.
- 4.4 The current access off Larkhill Road will be maintained, and parking will be provided at a ratio of one space per unit on the existing tarmac area.

PLANNING CONSIDERATIONS

- 5.1 The Wiltshire Core Strategy (2015) (WCS) is the local planning authority's local plan, and as such applications for planning permission should be judged against it, unless material considerations determine otherwise, as stated in paragraph 48 of the National Planning Policy Framework (NPPF).
- 5.2 The NPPF (2024) itself is also a material consideration in every planning application, which all decisions on planning applications should accord with nationwide.
- 5.3 Given the site's location within the Stonehenge and Avebury WHS, the application takes note of the Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan (2015) (SAASWHSMP), which sets out how the site should be best protected and conserved.
- 5.4 The policy and guidance contained within the statutory Development Plan Documents and all other relevant material considerations have been reviewed to determine if the proposal is an appropriate form of development for the application site.

PRINCIPLE OF DEVELOPMENT

- 5.5 Core Policy 1 and Core Policy 2 of the WCS define a settlement hierarchy for conurbations in the county and set out which forms of development are appropriate in which locations.
- 5.6 As the site lies just outside the settlement boundary of Durrington, it is technically classified as 'open countryside'. However, it is not isolated, being located directly over the road from the settlement boundary of a sizeable conurbation (Durrington is listed in Core Policy 4 of the WCS as a Market Town).
- 5.7 Core Policy 39 of the WCS 'Tourist Development' states that *"outside the Principal Settlements and Market Towns, tourist and visitor facilities should be located in or close to Local Service Centres or Large and Small Villages and, where practicable, be located in existing or replacement buildings"*. The site is located directly next to a local service centre with several local tourist facilities within close proximity, and the new holiday let building will be located in an existing outbuilding on the site.
- 5.8 Core Policy 39 goes on to state that *"Proposals for camping and touring caravan sites (including extensions) will be supported where they can be accommodated without adverse impact on the character and appearance of the landscape and meet criteria iii) to v) above"*. Those criteria are as follows:

- iii. *“The scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.*
- iv. *The building is served by adequate access and infrastructure.*
- v. *The site has reasonable access to local services and a local employment base.”*

- 5.9 This proposal would not have an adverse impact on the character and appearance of the landscape (see ‘Landscape Impact’) and its scale and design are modest, making it compatible with the local area and thus compliant with condition iii).
- 5.10 The site is well served by an adequate access which already serves as an entrance for an existing campsite, demonstrating its adequacy. The site is also already served by a shower and toilet block which provides sufficient infrastructure to comply with condition iv).
- 5.11 Finally, the site’s access to local services and an employment base is better than just reasonable, as it is located right on the edge of the town of Durrington and a bus stop with frequent services to Salisbury, Swindon and Larkhill. There are a variety of services within an easy walking distance of the site including pubs, restaurants, cafes, takeaways, a convenience store and a post office. It is therefore compliant with condition v), and with Policy CP39 as a whole, demonstrating that the principle of development is secured.
- 5.12 It should be made clear, however, that this proposal is not only technically compliant with the guidance in the WCS, but represents a positive opportunity to fulfil many of the stated aims of the Council’s planning policy. The WCS lists *“targeting growth in the tourism sector”* as a key part of delivering its Strategic Objective 1: Delivering a Thriving Economy. Policy 9.4 of the SAASWHSMP describes how the WHS has the potential to bring major benefits to the local communities which surround it, something which has too often eluded these communities, as visitors have not stayed overnight in the area. The tourists who stay in these holiday lets are likely to spend time and money in local establishments in Durrington, including the public house directly opposite the site, the restaurants, cafes and takeaways in the town and the local convenience store, as well as facilities like laundromats and supermarkets, the nearest of which can be found in Amesbury. This proposal represents an opportunity to bring more of the tourism and wealth that the WHS attracts to the local community, at a scale which is appropriate for and respectful of the local area.

HERITAGE AND ARCHAEOLOGICAL IMPACT

- 5.13 As described in Policy 59 of the WCS ('The Stonehenge, Avebury and Associated Sites World Heritage Site and its setting') and at length in the SAASWHSMP, Stonehenge has qualities which are unique on a global level and afford it outstanding universal value. The protection of the site and the conservation of its setting are therefore of paramount importance.
- 5.14 Core Policy 57 of the WCS 'Ensuring high quality design and place shaping' outlines how all new development should *"enhance[e] local distinctiveness by responding to the value of the natural and historic environment [and] relat[e] positively to its landscape setting and the existing pattern of development"*. The site's location at the edge of the Stonehenge WHS and just outside the Durrington Walls and Woodhenge scheduled monument means its design must respond to and reflect the heritage value of the area in which it is located. As such, the proposed camping pods are modest in size and design in order to draw as little attention as possible and allow the focus of the area to remain on the cultural heritage sites which define it.
- 5.15 The site is not visible from Stonehenge, which is located approximately 3.5km away, and is also not visible from the Durrington Walls scheduled monument on account of the dense vegetation shielding both sides of the A345, which separates the scheduled monument from the site. It therefore has no direct impact on the setting of either of these sites; its impact is limited to the modest increase in overnight accommodation in the vicinity of the site.
- 5.16 This provision of new overnight accommodation should be seen as a positive influence on the area as a whole, but in terms of the heritage impact on the site, it will not have any detrimental effects. The provision of five new camping pods and a single new holiday let will not create an adverse amount of noise, traffic or disruption around these sites that would detract from their heritage, particularly given the prior existence of a licenced campsite directly to the south of the site, which demonstrates that overnight accommodation is viable and not disruptive in the area.
- 5.17 It should also be noted that Wiltshire Council has previously set a precedent for approving applications for overnight tourist accommodation within the Stonehenge WHS. A recent application (reference number: 17/05896/FUL) permitted the conversion of existing buildings on a site within the WHS to tourist lets, with the case officer, heritage officer and WHS consultee raising no objection to the provision of such accommodation within the WHS. Consequently, the impact of such accommodation on local heritage assets can confidently be described as non-objectionable.
- 5.18 Given its proximity to sites of international archaeological significance, the site has some archaeological potential. However, the specific nature of this development, which includes the siting of moveable

camping pods, which sit entirely above the ground and have no foundations, and the conversion of an existing outbuilding, mean that no groundworks would be required as no new foundations would be required for any part of the development. Consequently, a detailed archaeological survey for the site was not deemed to be necessary in this case.

LANDSCAPE IMPACT

- 5.19 Core Policy 51 of the WCS ('Landscape') states that *"Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures"*. The site is located in an area of great landscape value and consequently the protection, conservation and enhancement of its landscape features are particularly important.
- 5.20 The impact of the proposal on the surrounding landscape will be extremely minimal. The site is bounded by mature trees on three sides and a two-storey dwelling on the fourth, which effectively screen it from all but glimpse views from the roadways and public rights of way. Further vegetation around the site to screen them from view completely can be secured by condition if this is deemed prudent by the local authority.
- 5.21 The local landscape would not be demonstrably worsened by the addition of five more pods in a secluded location where they are all but invisible from local highways and PROWs.

HIGHWAYS IMPACT

- 5.22 Core Policy 61 of the WCS states that *"New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives."* The site's sustainable location and excellent bus connections means it easily fulfils this criterion.
- 5.23 Paragraph 116 of the NPPF states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."*
- 5.24 The development will use the existing access off Larkhill Road to provide vehicular access for its occupants. Six parking spaces are proposed to serve the development on existing hardstanding.
- 5.25 The roads around the site, Larkhill Road and Countess Road, are large A-roads capable of handling high volumes of traffic. The development consists of the creation of 6 new units of tourist accommodation and consequently its impact on the local highway network will be modest and easily absorbed by the

local roads. Given this, the highways impact of the development would not be 'severe', meaning it complies with Paragraph 116 of the NPPF.

ECOLOGY

- 5.26 Core Policy 50 of the WCS ('Biodiversity and Geodiversity') states that all development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
- 5.27 In accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), the development is required to demonstrate a 10% uplift in biodiversity net gain (BNG). However, the development benefits from the de-minimis exemption on the basis that less than 25sqm of habitat is impacted by the proposals.
- 5.28 The site lies within the Salisbury Plain SPA, and consequently mitigation may be needed to ensure the development does not have a net harmful effect on the native stone curlew population. This mitigation can be secured via Community Infrastructure Levy payments, to be determined by the local authority.
- 5.29 The site lies within the catchment of the Hampshire Avon SAC. SACs are protected under The Conservation of Habitats and Species (Amendment) Regulations 2019. They are a network of sites designated for supporting habitats or species of high nature conservation importance in a European context. Any activity that has a detrimental effect on these European sites is made an offence under the regulations.
- 5.30 As this site falls within the catchment of the River Avon SAC, the proposal has the potential to cause adverse effects alone or in combination with other developments through the discharge of phosphorus in wastewater. The phosphate calculation for the scheme, has set out the total annual phosphorous load to mitigate as 0.14 TP/yr to and 0.56 TP/yr pre-2030. The Council's nutrient strategy was approved by Cabinet in February 2024, and this now offers a pathway for planned development to achieve phosphorus neutrality within the catchment area. As the site does not offer the potential for on-site mitigation, the development would have to offset its phosphorus effluent through a strategic nutrient offset credit scheme, to be secured via a legal agreement.
- 5.31 These values were determined using a bespoke occupancy rate of two occupants per dwelling, as the pods have a strict maximum occupancy of two overnight guests and the converted outbuilding has a maximum occupancy of two. The land use type has not been changed on the nutrient calculator, to reflect the fact that the camping pods sit on wheels above the ground, rather than on the ground itself,

and the existing outbuilding is being converted with no change to its footprint. Consequently, the ground at the site will remain entirely greenspace following the development.

IMPACT ON RESIDENTIAL AMENITY

- 5.32 Paragraph 135 of the NPPF states decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places which promote health and well-being, with a high standard of amenity for existing and future users.
- 5.33 Core Strategy Policy 57 (*'Ensuring High Quality Design & Space Shaping'*) requires development to ensure the impact on the amenities of existing occupants/neighbours is acceptable and ensure that appropriate levels of amenity are achievable within the development itself.
- 5.34 The only property whose amenity is likely to be affected by the development is Kamatan Acres, which sits approximately 10 metres to the south of the nearest proposed camping pod. Kamatan Acres is currently occupied by the applicant, but nonetheless it is important to ensure the residential amenity of that property is not diminished by the proposed scheme.
- 5.35 The camping pods each have only one aperture; a door and window on the front of the pod. The proposed arrangement of the pods ensures that none of them overlook the existing property at Kamatan Acres in a harmful way, and likewise the windows of the pods will not be directly overlooked from Kamatan Acres. The pods are only c.2.6 metres tall, meaning they will not overshadow the windows of the neighbouring property. Similarly, the conversion of the existing outbuilding will not create any overlooking or overshadowing issues, given it is located 30 metres away from the nearest point of the house.
- 5.36 At present, the residential garden of Kamatan Acres extends around the property, encompassing the application site and a further area to the south of the building. The proposed scheme would change the use of the area to the north of the building to tourist accommodation and remove it from the residential curtilage of Kamatan Acres, but the southern section of the garden would remain as residential amenity space for the residents of the house. This garden area, which is still very substantial (approximately 300m²), is shielded from the proposed pods by the house itself, so the addition of these new pods will not impinge upon the residents' enjoyment of their residential garden amenity space.
- 5.37 The patrons of the new pods will use the toilet and shower facilities associated with the existing campsite to the south of Kamatan Acres. The toilet and shower block is located approximately 20 metres to the south of the nearest pod and is therefore easily accessible from the new holiday lets. The shower and toilet block is already in place and does not cause unacceptable harm to the residents of Kamatan

Acres in terms of noise or smells, so there is no reason to believe that a modest increase in patronage of this block would damage their residential amenity any further. The converted outbuilding will have its own toilet and shower facilities provided.

- 5.38 The proposal will result in a modest increase in noise from patrons of the holiday lets arriving, leaving and generally using the site. However, this is not expected to be detrimental to the amenity of the residents of the existing property, especially given the site's location at the intersection of two busy roads, which are reasonably loud, meaning any additional occasional noise would not be inappropriate.
- 5.39 The British Standards Institution standard BS823, which is concerned with desirable levels of sound insulation and ambient noise inside residential dwellings, states that noise in dwellinghouses should ideally not frequently exceed 30-40dB. World Health Organisation guidelines state that internal regular noise levels should not exceed 45dB. Standard BS823 goes on to state that *"For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments"*. It is considered highly unlikely that the proposed holiday lets would result in an ambient noise level of more than 30-45dB inside the house or 50-55dB in the outside garden area of Kamatan Acres. Consequently, the proposal is deemed to be acceptable on noise grounds.
- 5.40 Whilst the site is well-served by public transport, it is likely that many of the patrons of the holiday lets will arrive by private vehicle, particularly as Stonehenge itself, the most prominent visitor attraction in the area, is poorly served by public transport from anywhere other than Salisbury City Centre. It is reasonable to assume that the converted outbuilding and pods will mostly be occupied by one family/group travelling in one car rather than several, and that occupancy will be substantially reduced outside of peak holiday periods. Consequently, vehicle movements are expected to be fairly low, and it is highly unlikely that there will be more than 6 vehicles associated with the development on site at any one time. Given the parking provisions outlined in the 'Highways and Parking' section, these vehicle movements are not expected to have a material impact on the safety or comfort of the other residents of the site.
- 5.41 The amenity of the occupants of the camping pods and converted outbuilding is not covered by residential amenity regulations due to the temporary and transient nature of camping, but nonetheless the proposal has been designed to engender enjoyment of these facilities. The pods and outbuilding are sufficiently spaced out that they do not overlook each other or cause unacceptable levels of noise disruption, and should provide high-quality overnight accommodation for holidaymakers looking to see the sights of Wiltshire and the WHS.

5.42 Given the above considerations, the proposal can be said to provide an appropriate and comfortable level of amenity and comply with Policy CP57 of the WCS and Paragraph 135 of the NPPF.

CONCLUSION AND PLANNING BALANCE

- 6.1 This application seeks full planning permission for the siting of five moveable camping pods and the conversion of an existing outbuilding to a holiday let on the site of Kamatan Acres, Larkhill Road, Durrington, SP4 8BH.
- 6.2 The proposal represents an opportunity to provide tourist accommodation in close proximity to Stonehenge WHS and better harness the benefits of tourism to Wiltshire by ensuring visitors to Stonehenge and the surrounding area spend their money in the local community.
- 6.3 The principle of development is secured by Core Policy 39 of the WCS, and given the site's extremely secluded and shielded location, the heritage impact on the WHS and Durrington Walls is determined to be negligible and therefore acceptable. The landscape and highways impacts of the development are also expected to be negligible, and it is demonstrated that the scheme will not have a significant adverse impact on the residential amenity of its neighbours.
- 6.4 Given the compliance with all relevant policy and guidance and the clear tangible benefits that the proposal would bring to the local area, we commend this scheme to you and respectfully request its approval.