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Our Reference
100124714-MMD-PL-RP-25

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**PLANNING APPLICATION FOR THE INSTALLATION OF PARKING
EQUIPMENT AT AVEBURY NATIONAL TRUST CAR PARK,
BECKHAMPTON ROAD, SN8 1RF.**

13 May 2026

Dear Sir/Madam,

Mott MacDonald has been instructed by the National Trust to prepare and submit a planning application under the provisions of the Town and Country Planning Act 1990 (as amended) for full planning permission for the installation of parking equipment at Avebury National Trust Car Park, SN8 1RF, shown on the accompanying site location plan (Ref:100124714-MMD-00-XX-DR-A-1052).

This letter acts as a planning statement to explain and justify the proposed development in relation to national and local planning policy and other material considerations and concludes with a planning balance.

The National Trust

The National Trust is a charity founded in 1895 by three people who saw the importance of the UK's heritage and open spaces and wanted to preserve them for everyone to enjoy. More than 130 years later, these values are still at the heart of everything they do.

With staff, members, volunteers and supporters, the National Trust is now the biggest conservation charity in Europe. They look after the UK's coastline, historic sites, countryside and green spaces, ensuring everyone benefits.

Nature and the historic environment are under threat. They are essential to everyone, they enrich people's lives and are part of the fabric of society and they urgently need more care.

As well as looking after the places in the National Trust's care, they work with communities and partners across the UK to protect nature, beauty and history in towns, cities, villages and countryside.

The National Trust is a registered charity (Registered Charity Number: 205846), completely independent of the Government and therefore relies totally on the generosity of its members, visitors and other ad hoc supporters in order to continue this important work.

The National Trust owns and operates car park payment terminals across their visitor locations in England, Wales and Northern Ireland. The National Trust are undertaking a project to replace the terminals and deliver a reliable and industry-standard set of solutions at car parks across their visitor locations.

Site context

The car park that is the subject of this application is located adjacent to Avebury Cricket Club, along Beckhampton Road, east of Avebury Trusloe. The car park is accessed via a singular entrance point off Beckhampton Road. The main car park is of small/medium size, surfaced with gravel and comprised of marked bays. The overflow car park to the north is comprised of grass and unmarked bays.

Description of development

The Trust has worked with a supplier to decide on the best hardware solutions for different sites based on factors such as size, environmental constraints, staffing and data connectivity.

At Avebury National Trust Car Park, the most appropriate solution is the installation of:

- Replacement of existing terminal with 1 x (black in colour) Solar payment contactless & coin terminal, measuring 1860mm in height (4G data connection), with the installation of a conversion plate;
- Replacement of existing terminal with 1 x (black in colour) Solar payment contactless terminal, measuring 1860mm in height (4G data connection), with the installation of a conversion plate;
- 1 x installation of a 4m column with a solar panel and a mini starlink satellite attached. An associated GRP cabinet will be installed adjacent to the column. An above ground conduit will run 3m from the GRP cabinet to the parking terminal bases;
- Existing parking terminal removed and ground made good (terminal base will remain);
- 3 x terms and conditions (T&Cs) sign post, measuring 1600mm in above ground height, 300mm in width, and 100mm in diameter; and
- 1 x parking welcome sign post, measuring 1700mm in above ground height, 300mm in width and 100mm in diameter.

Planning policy context

National Planning Policy Framework 2024

The Government published the National Planning Policy Framework (NPPF) on 27 March 2012, and it has been subject to a series of subsequent revisions and updates, most recently being updated in December 2024. It sets out the overarching policy for planning and planning-related decision-making in England. The NPPF must be taken into account in preparing development plans and is a material consideration in planning decisions.

The 'presumption in favour of sustainable development' is one of several fundamental principles disclosed in the NPPF and Para. 8 defines this 'presumption in favour of sustainable development' as a mutual pursuance of three 'overarching objectives' which will help achieve sustainable development:

- Economic
- Social
- Environmental

Paragraph 11 continues and stipulates: where development will accord with an up-to-date and adopted development plan, such development should be approved, without delay, unless material considerations indicate otherwise. Furthermore, Paragraph 12 explains that the use of an adopted development plan as the 'starting point' for decision-makers should be unchanged despite this 'presumption in favour of sustainable development'.

The National Planning Policy Framework (NPPF) contains several policies relevant to this application.

Paragraph 115

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a. sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b. safe and suitable access to the site can be achieved for all users;
- c. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code

Paragraph 135

Planning policies and decisions should ensure that developments:

- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁵¹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 207

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 215

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Local Plan policy

Wiltshire Core Strategy 2015 – 2026

The Wiltshire Core Strategy (2015 – 2026) looks to protect and conserve Wiltshire's distinctive landscape and environment.

The site works will likely have neutral effect on the environment and accessibility, due to the scope and scale of the project works proposed. The following policies lay out the local areas plans with regards to development.

Core Policy 3: Infrastructure requirements

All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new

development. In ensuring the timely delivery of infrastructure, development proposals must demonstrate that full regard has been paid to the council's Infrastructure Delivery Plan and Schedule and all other relevant policies of this plan. Joint working with adjoining authorities will be encouraged to ensure that wider strategic infrastructure requirements are appropriately addressed.

Core Policy 41: Sustainable construction and low-carbon energy

New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer.

Core Policy 48 Supporting rural life

Proposals which will focus on improving accessibility between towns and villages, helping to reduce social exclusion, isolation and rural deprivation, such as transport and infrastructure improvements, will be supported where the development will not be to the detriment of the local environment or local residents.

Core Policy 50: Biodiversity and geodiversity

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

All development should seek opportunities to enhance biodiversity.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided
- ii. are reduced as far as possible
- iii. are outweighed by other planning considerations in the public interest
- iv. iv. where appropriate compensation measures can be secured through planning obligations or agreements.

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

Core Policy 51 Landscape

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. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following

aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.
- ii. The locally distinctive character of settlements and their landscape settings.
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- iv. Visually sensitive skylines, soils, geological and topographical features.
- v. Landscape features of cultural, historic and heritage value.
- vi. Important views and visual amenity.
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.
- viii. Landscape functions including places to live, work, relax and recreate.
- ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs¹) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty. Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

Core Policy 57: Ensuring high quality design and place shaping

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)
- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)

¹ Area of Outstanding Natural Beauty (AONB)" is an outdated designation. As of November 2023, AONBs were formally renamed **National Landscapes**. Therefore, the correct name for the area is now the **North Wessex Downs National Landscape (NL)**

- viii. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- ix. taking account of the needs of potential occupants, through planning for diversity and adaptability
- x. the use of high standards of building materials, finishes and landscaping

Core Policy 59: The Stonehenge, Avebury and Associated Sites World Heritage Site and its Setting

The Outstanding Universal Value (OUV) of the World Heritage Site will be sustained by:

- i. Giving precedence to the protection of the World Heritage Site and its setting.
- ii. Development not adversely affecting the World Heritage Site and its attributes of OUV. This includes the physical fabric, character, appearance, setting or views into or out of the World Heritage Site.
- iii. Seeking opportunities to support and maintain the positive management of the World Heritage Site through development that delivers improved conservation, presentation and interpretation and reduces the negative impacts of roads, traffic and visitor pressure.
- iv. Requiring developments to demonstrate that full account has been taken of their impact upon the World Heritage Site and its setting. Proposals will need to demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the site and its OUV. Consideration of opportunities for enhancing the World Heritage Site and sustaining its OUV should also be demonstrated. This will include proposals for climate change mitigation and renewable energy schemes.

Core Policy 67 Flood Risk

Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice. All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

Planning considerations

Principle of Development: The development is restricted to within the boundaries of the car park and is supporting the established land-use. **Policy 3** supports development which will help enhance or improve facilities across Avebury. The proposed development would be considered an overall enhancement and modernisation of facilities across Avebury and therefore should be supported and backed in principle. Furthermore **Policy 48** supports transport infrastructure improvements *“where the development will not be to the detriment of the local environment or local residents.”*

Design and Appearance: The proposed Strada S4 Terminals will be of a simple scale and modern appearance and will be finished in all black. The proposed starlink/solar column will be located upon a black column which is 100mm in diameter at its widest point. The tallest proposed sign post is 1700mm tall and made of wood. Given the neutral colours proposed and innocuous nature of the proposed development it can be considered in compliance with **Policy 57**.

Landscape: Given the small scope and scale of the development there should be no significant impacts on the North Wessex Downs National Landscape, including both construction and operational impacts. The proposed development will conserve the natural landscape and therefore comply with **Policy 51**.

There will be no change to character, appearance, settings and views in or out of the World Heritage Site therefore preserving its special qualities and outstanding universal value, complying with local planning **Policy 59**.

Sustainability and Construction: The proposed parking terminals will both continue to be solar powered, and more efficient than the existing terminals.

The construction approach associated with the proposed development will have a minimal impact on the existing operations of the car park because all construction activities and excavation will be temporary. The proposed development will therefore comply with **Policy 41**.

Impact on Amenity: The proposed development will see no adverse harm or unacceptable loss of residential or business amenities. There is no noise, or pollution, or excessive emissions associated with the proposed development.

Access and Safety The equipment will be installed in locations that do not obstruct pedestrian or vehicle movement, and payment terminals will be accessible to disabled users.

Ecology: The Site comprises an active main car park and overflow car park. The main car park is dominated by hardstanding with minimal vegetation around the edges and the overflow car park is dominated by managed grassland, with a small area of hardstanding, and scattered trees. Given the low ecological value of the area within the red line boundary and low-impact nature of the works, which will involve minimal loss of existing habitats, no ecology site visit has been undertaken. Instead desk-based information including site photographs and existing reporting (where available) has been reviewed and is considered sufficient to inform an assessment of potential ecology impacts and recommendations.

Statutory sites: There are eight Sites of Special Scientific Interest (SSSI), one Special Area of Conservation (SAC), one National Nature Reserve (NNR) and one Local Nature Reserve (LNR) located within 10km of the Site. Any effect on any habitats adjacent to the Site are considered highly unlikely as the works will take place on existing hardstanding within the car park, with three of the new signs being installed on managed grassland on the edge of the hardstanding. The proposed development is not considered to risk a Likely Significant Effect (LSE) on the SAC due to the minimal works that are proposed and the distance of the SAC (4.89km) from the car park, such that no impact pathways to the designated interest features are anticipated. The following standard pollution control measures will be implemented to prevent any damage or disturbance to neighbouring habitats:

- All works will be carried out in accordance with the Pollution Prevention & Control Act 1999.
- Any generators and other equipment will be stood on drip trays or spill mats.
- Safe storage procedures for oil, fuel and chemicals.
- Spill kits will be kept on-site and staff trained in their use.
- All old equipment, tools, litter, etc will be immediately removed from site following the completion of the works.
- All works vehicles will be parked on hard standing areas only.
- The work will take place on a gravel/ hardstanding area and amenity grassland, outside any tree root protection zones. No other habitats will be affected by the works.
- The works will take place outside the main nesting season (usually March to August inclusive) to avoid any disturbance to nesting birds.
- Biosecurity measures will be put in place – equipment and footwear will be checked, cleaned and dried thoroughly, before and after site visits.

Given the minimal nature of the works in the context of the existing use of the Site as a car park, it is not considered likely that the works trigger a requirement for SSSI assent from Natural England.

Priority and notable habitats: The Site is an active car park with minimal vegetation. No priority habitats are known to be present within or directly adjacent to the Site. As such no adverse effects are anticipated on habitats.

Protected and priority species: It is highly unlikely that the replacement of the terminals would impact any protected or priority species, as long as the precautionary pollution control measures listed above are implemented. Due to the highly disturbed nature of the Site, which is in continuous use as a car park, risk to any protected species such as slow worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*) is considered to be negligible.

Invasive non-native species (INNS): No records of INNS are known within or adjacent to the Site, and none have been identified from the photos reviewed. Furthermore, the presence of any INNS is considered to be highly unlikely as the car park is regularly managed and maintained by the National Trust. If any such species, including Japanese knotweed (*Reynoutria japonica*) or Himalayan balsam (*Impatiens glandulifera*) are found on site, further ecological advice will be sought and an appropriate management plan implemented.

Biodiversity Net Gain (BNG): as the proposed development only includes the installation of new terminals and signage on hardstanding and on the edge of managed grassland adjacent to the hardstanding, a minimal amount of habitat (<25m²) would be lost or degraded. This development would therefore be subject to 'de minimis exemption' (negligible impact) according to UK Government guidelines on BNG. No BNG would be required for this development.

Due to the minimal impact of the proposed works, the effects on the ecology of the Site and the wider vicinity are considered likely to be negligible. A precautionary approach outlined above will be followed to ensure that there will be no negative effects on any neighbouring habitats. This therefore complies with **Policy 50** as it confirms that despite being within the vicinity of Nature 2000 and local nature sites, no adverse effects will occur.

Arboriculture: An Arboricultural Survey has not been undertaken and the associated Arboricultural Impact Assessment not produced. This is due to the minimal level of impact on arboricultural features posed by the proposed works.

A desk-based study assessment has been undertaken to identify the statutory designations associated with the site. An email from Wiltshire council has confirmed that there are no Tree Preservation Orders impacting the sites, but it should be noted that the overflow car park is located within the Avebury Conservation Area.

A check of DEFRA's MAGIC Map Application has confirmed that there are no designated areas of ancient woodland within or adjacent to the site. There are no designated priority habitat areas (deciduous woodland, traditional orchard, wood pasture and parkland) within the site. The Woodland Trust's Ancient Tree Inventory has confirmed that there are no ancient, veteran, or notable trees within or adjacent to any of the site boundaries. There was one veteran willow 90m SW of the car park. Due to the distance from the tree, there is no arboriculture impact associated with the works.

The three existing terminals are to be removed. One of the existing terminals will not be replaced, but the base will stay in place. This is on hard ground, and the existing base will not be dug out. There are no arboricultural impacts anticipated with these works. The two new terminals will be located next to each other in the centre of the car park. This is the same location as the two previous terminals and will make use of existing hardstanding. There is no likely arboriculture impacts anticipated.

In the centre of the car park, a cabinet and column-mounted satellite antenna and starlink dish will be installed adjacent to the new terminals on the existing concrete pad. Three metres of above ground conduit will be installed between the cabinet and payment terminal bases. Due to hard gravel ground, coupled with the distance from trees, there is no likely arboricultural impact anticipated.

Heritage/Conservation

The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, and the National Planning Policy Framework (2012, updated 2025) set out the importance of the historic environment and the need to consider potential impacts to it when planning new development. The Levelling Up and Regeneration Act 2023 includes a statutory requirement for decision-makers to have 'special regard' to the desirability of preserving or enhancing certain heritage assets — including World Heritage Sites. This section assesses the potential for the proposed installation of replacement car parking terminals, associated GRP cabinet, column-mounted equipment, and signage to impact upon the historic environment.

A desktop study has been conducted to identify nearby heritage assets and determine the potential for the proposed development to impact the historic environment. The study utilised the National Heritage List for England (NHLE), the National Trust Heritage Records Online (NTHRO), and Google Earth Pro to gain a high-level understanding of the historic environment in the area surrounding the car park. Due to the site's location within the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS) (NHLE: 1000097), the Wiltshire Historic Environment Record (HER) was consulted, with data received on the 27 February 2026.

Consultation was undertaken with the National Trust Archaeologist for the Stonehenge and Avebury World Heritage Site, the County Archaeologist at Wiltshire Council, and Historic England. A site visit was undertaken on Monday 13 April 2026 by two Mott MacDonald heritage consultants, in order to identify the setting of the car park, the WHS and nearby designated heritage assets, and assess what impacts, if any, the proposals make to the significance of the WHS and the setting of nearby designated heritage assets.

This letter is supported by an appended Setting Assessment, which should be read in conjunction with the following paragraphs. The Setting Assessment evaluates the significance of five scheduled monuments within the vicinity of the site, including the contribution that setting makes to their significance, and assesses whether their significance will be altered by the proposed development.

Designated Heritage Assets

The site is contained within the Stonehenge, Avebury and Associated Sites WHS (NHLE: 1000097) and within Avebury Conservation Area. Otherwise, the site does not contain any listed buildings, registered park and gardens, registered battlefields, or scheduled monuments.

Stonehenge, Avebury and Associated Sites WHS (NHLE: 1000097) comprise two areas of chalkland that hold a concentration of Neolithic and Bronze Age funerary and ceremonial monuments, centred around Stonehenge, the most architecturally sophisticated prehistoric stone circle in the world, and Avebury Henge and stone circle (NHLE: 1015546), the largest standing prehistoric stone circle in the world. A landscape of prehistoric monuments is located in the surrounding area and some are among the best-known examples of their type, such as the Silbury Hill Neolithic monumental mound (NHLE: 1008445), the Windmill Hill causewayed enclosure (NHLE: 1008446), the West Kennet long barrow (NHLE: 1010628) and the Sanctuary (NHLE: 1014563). The WHS encompasses a unique landscape that is rich in both upstanding and belowground remains from the Neolithic and Bronze Age periods, that survive remarkably well and to an unprecedented extent.

Within 500m of the site are a further 65 designated assets, comprising:

- Four scheduled monuments;
- Avebury Conservation Area;
- Three Grade I listed buildings;
- One Grade II* listed building; and
- 55 Grade II listed buildings.

Located 180m north-east of the site is Avebury Henge (NHLE: 1015546), a scheduled monument and one of the focal points of the WHS and of Avebury Conservation Area. It dates to the late Neolithic period and comprises an earthen bank and internal ditch, a large stone circle, and two smaller stone circles. The scheduled monument also includes a series of medieval and later field and property boundaries and a section of ancient trackway which at one time formed the London to Bath Road.

Located approximately 130m west of the site is the scheduled Shrunken medieval village site E of Avebury Trusloe (NHLE: 1004692), the site of the medieval village, whose eastern border is formed by the River Kennet.

Approximately 320m east of the site is the scheduled West Kennet Avenue and an earthwork bank east of West Kennett Farm (NHLE: 1015547), an avenue that connects Avebury Henge scheduled monument with the site of stone and timber circles located at a distance of 2.3km south. The West Kennet Avenue is formed of two rows of standing sarsen stones that date back to circa 2,400BC. A scheduled Round barrow cemetery 400m south of Avebury Henge monument on Waden Hill (NHLE: 1008216) is located approximately 350m south-east of the site.

Avebury Conservation Area is designated for its historic, architectural and archaeological interest associated with the village and the area of the scheduled Avebury Henge.

Overall, the conservation area contains 48 listed buildings, comprising three Grade I listed buildings, one Grade II* listed building, and 44 Grade II listed buildings. The Grade I listed Church of St James (NHLE: 1193084) is located 250m north of the site and dates from the 10th, late 12th, 13th, 14th and 15th centuries and 1812. Grade I listed Avebury Manor (NHLE: 1033785) is located approximately 280m north of the site and was constructed in circa 1551 for William Dunch, auditor of the Royal Mint, and also dates from 1601, circa 1730, and circa 1907. Associated with it is the Grade II* listed mid-16th century dovecote (NHLE: 1286437), which is located 300m north of the site. A Grade I listed late 17th century thatched barn, the Great Barn (NHLE: 1286423), is located approximately 330m north of the site. The Grade II listed buildings in this area comprise residential and commercial buildings and assets associated with Avebury Manor and the church, the closest of which is located approximately 165m north of the site.

Within the study area are a further four Grade II listed buildings located outside of the conservation area, which are located to the west of the site. One of these, Trusloe Manor (NHLE: 1033758), dates from the early 16th century, while the others are 17th and 18th century cottages and agricultural buildings.

Non-designated Heritage Assets

The HER records two non-designated heritage assets within the site. In the north, an area of the site overlaps the site of a sunken Saxon Grubenhaus (HER: MWI7817), excavated in 1985. In the north-east the site overlaps recorded remains of the medieval settlement of Avebury (HER: MWI9073), which extend over an area of 1km square across the car park, the current village, and into Avebury Henge. The asset denotes an area of probable Medieval settlement remains, and the site of a small Benedictine priory from 1113-1378AD, which was located in an unknown location at Avebury (NHLE: 1033785) approximately 280m north of the site.

Remains are recorded adjacent to the site, within the car park. The car park was the site of a Saxon settlement (HER: MWI7816), that has been excavated in relation to its development into a car park (HER: EWI10587). There was a fortified settlement established on the western side of Avebury Henge during the 9th century. A sub-square area, internally divided into regular plots, is evident aligned along a central street, with individual plots perpendicular to the main street.

Consultation

Consultation was undertaken with the National Trust Archaeologist for the WHS, the County Archaeologist at Wiltshire County Council, and Historic England, in order to identify constraints and gain advice on the proposals.

Consultation with the National Trust Archaeologist for the WHS advised on the archaeology of the site and the visual contribution the site made to the WHS and the setting of designated assets in the WHS, particularly Waden Hill, the site of a scheduled Round barrow cemetery (NHLE: 1008216) which overlooks the car park from the south. Consultation recommended an assessment of the Outstanding Universal Value of the WHS and how the above-ground proposals, particularly the 4m column with starlink and solar panel, would affect this, including assessment of views between monuments and tangential views. They strongly recommended against using reflective finishes on above-ground installations, recommending recessive finishes instead. Consultation identified the site as the location of a 6th century pagan Saxon settlement which had undergone previous archaeological investigation in relation to the development of the car park. It was also established that the top 15cm of the car park had been resurfaced. It was recommended that archaeological monitoring took place during ground works, the scope of which should be set out in an approved Written Scheme of Investigation (WSI).

Consultation with the County Archaeologist at Wiltshire County Council found that, despite the '*relatively small scale*' of the works, the site had '*very high archaeological potential*' so recommended that '*any groundworks are monitored by a qualified archaeologist*,' using an approved WSI.

Consultation with Historic England stated that the updates to parking terminals and signage were '*welcome*', but that they had concerns about the height of the 4m-tall column, in particular the visual impact this would have on the WHS and on the setting of nearby designated heritage assets. It was recommended that mitigation of impact was undertaken, and that the column be painted in a recessive colour.

Summary of significance/Outstanding Universal Value

The following section provides a summary of the heritage significance and, where applicable, Outstanding Universal Value, of heritage assets that have the potential to be impacted by the proposed works. For an assessment of the scheduled monuments, refer to the appended Setting Assessment. Where assets are not included in either the below paragraphs or the Setting Assessment, it should be assumed that no harm will arise to the heritage significance of these assets.

Stonehenge, Avebury and Associated Sites WHS (NHLE: 1000097)

The WHS possesses Outstanding Universal Value (OUV) for the exceptional engineering and sophisticated architectural design of Stonehenge and Avebury, and for the unprecedented survival of prehistoric monuments and sites which, with their setting, form a landscape without parallel. It is a unique resource for understanding Neolithic and Bronze Age society, technology, and mortuary and ceremonial practices, with the monuments and sites in the WHS being of great personal and collective significance during these periods and

demonstrating a profound and extended effort by their builders. It demonstrates the use and shaping of the landscape over more than 2,000 years and has had enormous cultural significance since then.

The Avebury area of the WHS contains 74 scheduled monuments and 418 known archaeological sites, while the Stonehenge area contains 174 scheduled monuments. Each area comprises around 25km square, and captures the relationship between the monuments as well as their landscape setting.

The landscape of the WHS is characterised by its openness, the dominance of the sky, and the long-ranging views over the undulating landform, featuring upstanding archaeological features, plantations, and roads. At Avebury the landscape features ridges and high points both within and outside the WHS that are visually important for providing long views to and from monuments. The landscape displays its development and continued use over time, evident in historic villages and the agricultural use of the land. Its setting comprises a rural, open landscape formed of valleys, water features such as the River Kennet, and prominent ridge lines and open plains that field long-distance views.

There are visually intrusive modern developments in the landscape that interrupt the openness and long-ranging views that characterise the WHS. These include roads and traffic that run adjacent and through monuments, detracting from their prominence, and modern buildings such as grain stores, masts and pylons.

The present car park site has a limited visual impact on the WHS. Although representing a modern intrusion in the WHS, it is generally screened from the wider landscape by surrounding trees, which limits its visual impact. It was also noted during the site visit that the car park is situated within a slight 'dip' in the landscape, further lessening visual impact. It has a slight negative impact on the OUV of the WHS due to the intrusion of modern infrastructure within a sensitive prehistoric landscape close to several upstanding archaeological features. This negative impact is mitigated by the siting of the car park away from the historic core of Avebury, the substantial screening provided by trees on the car park boundaries and the minimal car parking infrastructure present.

Avebury Conservation Area

Avebury Conservation Area is of considerable historic, architectural and archaeological interest. The area contains a unique mix of archaeology and living landscape, with the juxtaposition of the village with the Henge bringing together the prehistoric past and post-medieval village in a very special way. The buildings which line the High Street are of various ages, styles and heights providing distinct variety which contributes positively to the special architectural character of the area. Views out over the surrounding landscape are notable, especially from the banks of the Henge. The conservation area appraisal for Avebury suggest that the car park has limited visual impact on the conservation area.

Assessment of Impact

This section sets out the potential impacts of the proposed works on the heritage significance of identified heritage assets, as outlined above.

It is anticipated that proposals to replace and update current parking meters and signage will not harm the significance or OUV of any designated assets either directly or through changes to their setting. This is because the updated infrastructure will result in no perceptible change to the existing signage and parking meters which are currently in place. The following assessment of impact to designated assets will therefore focus on impacts arising from the installation of a 4m-tall column and mounted equipment within the site.

Mitigation by design

Initial proposals featured the 4m-tall column in a location closer to Avebury Henge (NHLE: 1000097). It was recommended that the column was moved to within the modern car park, in order to reduce the intrusion of modern built elements within the rural setting of Avebury Henge and the WHS, and into an area with a tree-lined boundary, in order to increase screening. Initial proposals also included the 4m-tall column being silver in colour. Consultation advice from Historic England and the National Trust Archaeologist for the WHS recommended that a non-reflective finish in a recessive colour is used. Current proposals are therefore that the column is brown in colour to blend in with the surrounding trees including during the winter months when foliage is reduced.

The possibility of reducing the height of the 4m-tall column has been explored, however, due to the requirement for satellite coverage, solar power and the risk of vandalism this has not been possible.

Stonehenge, Avebury and Associated Sites WHS (NHLE: 1000097)

Proposals to install a 4m-tall column and equipment within the site have the potential to impact the OUV of the WHS by introducing a modern feature into the landscape, which has the potential to be perceptible in the periphery of significant long-ranging views within the landscape. However, it should be noted that the site of the column is not within the direct line of sight between the prehistoric monuments of the WHS. The location of the site was historically chosen to avoid landscape impacts. Its location, in a topographically low point within the landscape as well as tree planting along its boundaries and the A4361 Beckhampton Road, all aids in this. These aspects of the column location will also help to reduce any impact on long ranging views. Furthermore, the slim nature of the column and its brown nonreflective finish mean that where the column is visible in long range views its perceptibility will be minor.

A detailed assessment of the scheduled monuments within the WHS has been undertaken and is presented in the *Heritage Setting Assessment: National Trust Carpark Avebury* for further detail of the assessments. Further details on the two designated scheduled monuments is provided below.

Overall, it is anticipated that the proposals from the introduction of a 4m-tall column and equipment will result in no harm to the OUV of the WHS as this represents a very small part of the overall site which is only slightly altered. The equipment is also easily removed, and the impact reversible.

Designated scheduled monuments

Proposals to install a 4m-tall column have the potential to harm the significance of nearby scheduled monuments through change in setting. These could include: Avebury henge and stone circles (NHLE: 1015546) and Round barrow cemetery 400m south of Avebury henge monument on Waden Hill (NHLE: 1008216). The potential harm to the significance of these two assets is further assessed in a report by Mott MacDonald, *Heritage Setting Assessment: National Trust Carpark Avebury* (April 2026). Please refer to *Heritage Setting Assessment: National Trust Carpark Avebury* for further detail of the assessments.

This found that a minimal change to the setting of the two scheduled monuments would arise from the introduction of the 4m-tall column and equipment. This would result in less than substantial harm to the Avebury henge and stone circles (NHLE: 1015546) and no harm to the Round barrow cemetery 400m south of Avebury henge monument on Waden Hill (NHLE: 1008216).

Avebury Conservation Area and listed buildings

Proposals to install a 4m-tall column and equipment have the potential to harm the significance of the conservation area and associated listed buildings by introducing additional modern infrastructure. However, given the location of the site, away from the historic core of the village of Avebury Conservation Area, and the screening provided by tree planting it is anticipated that the column will not affect the special architectural and historic character of the conservation area or alter the setting of its listed buildings. Therefore, no harm is predicted.

No harm is predicted to the other four listed buildings outside the conservation area due to the intervening distance between the proposed development and their setting.

Archaeology

Despite the limited nature of the required ground works there remains the potential for unknown buried archaeological remains to be encountered within the site. Archaeological monitoring should be undertaken during groundworks, the scope of which is to be agreed in a WSI to be approved by the Wiltshire County Archaeologist and the National Trust WHS Archaeologist.

Conclusion

The proposals represent no harm to the OUV of the Stonehenge, Avebury and Associated Sites WHS (NHLE: 1000097), no harm to the scheduled monuments which make up the WHS and no harm to the Avebury Conservation area and listed buildings.

The exception is Avebury Henge and stone circle (NHLE: 1015546) which would be subject to the lowest level of less than substantial harm due to changes in its setting. In accordance with NPPF Policy 215 this harm should be weighed against the public benefits of the proposal, including continuing income generation

to the National Trust to support its work to protect and care for the WHS and Scheduled Monuments at Avebury and enabling them to maintain public access.

Flood Risk Statement: This statement has been produced with reference to the National Planning Policy Framework (NPPF)² and the associated Planning Policy Guidance (PPG)³. It assesses the risk of flooding to the site of the proposed development from range of flood risk sources and where applicable the possible impact of the proposed development at this site on flood risk elsewhere. Mott MacDonald has followed accepted procedure in providing the services, but given the residual risk associated with any prediction and the variability which can be experienced in flood conditions, Mott MacDonald takes no liability for and gives no warranty against actual flooding of any property (client's or third party) or the consequences of flooding in relation to the performance of the service. This Flood Risk Statement has been prepared for the purposes of supporting a planning application for proposed development at Avebury only.

Table 1.1 presents a summary of the flood risk at the proposed development site.

Table 1.1: Assessment of flood risk

Source of flooding*	Flooding Risk	Comments	Source	Date Accessed
Fluvial / Tidal	Low	The whole of the site is shown to be in Flood Zone 1 with allowance for climate change up to 2125, meaning a less than 0.1% annual probability of flooding in any year.	EA, 2026a ⁴	January 2026
Surface Water	Low	The whole of the site is shown to have a flood risk below the 0.1% annual exceedance probability event.	EA, 2026a ³	January 2026
Groundwater	Potentially at risk	The EA long term flood risk portal states "This location is outside of a groundwater flood alert area... There may still be a risk of groundwater flooding.".	EA, 2026b ⁵	January 2026
Canals and manmade waterways	Low	The site is not located near to any canals or manmade waterways	Canal and Rivers Trust, 2026 ⁶	January 2026
Reservoirs and Large Waterbodies	Low	The whole of the site is not shown to be at risk of reservoir flooding.	EA, 2026c ⁷	January 2026

*An assessment of flooding from sewers has not been undertaken due to a lack of available information.

Source: As stated in table.

² UK Government, 2024, 'National Planning Policy Framework', https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf.

³ UK Government, 2025. PPG, <https://www.gov.uk/guidance/flood-risk-and-coastal-change>. Last access January 2026.

⁴ EA, 2026a, EA Flood Map for Planning, <https://flood-map-for-planning.service.gov.uk/>.

⁵ EA, 2026b, check-long-term-flood-risk.service.gov.uk/postcode

⁶ Canal & River Trust, 2026. 'Our canal & river network', <https://canalrivertrust.org.uk/canals-and-rivers>.

⁷ EA, 2026c, EA Reservoir Flood Dataset, UK Gov 2026, <https://environment.data.gov.uk/dataset/d81646cf-37e5-4e71-bbcf-b7d5b9ca3a1c> and <https://environment.data.gov.uk/dataset/c66ee97f-49d2-454e-9a19-d48a47bd22ad>

NPPF (Footnote 63) and the associated EA guidance⁸ for flood risk assessments outlines the criteria under which a site-specific Flood Risk Assessment (FRA) is required to support a planning application. Based on the flood risk information presented in Table 1.1 and given the proposed development site is less than one hectare in size, it is concluded that further assessment of flood risk through a site-specific FRA is unlikely to be necessary in this instance.

Documents Submitted:

The following accompanying documents and plans have been submitted alongside and in support of the planning application for the installation of 2 solar powered parking terminals, associated solar power set up and 3 wooden sign posts.

- Completed Application Forms
- Ownership Certificate and Agricultural Land Declaration
- This letter which acts as a planning statement
- Community Infrastructure Levy Form
- Heritage Setting Assessment
- Site Location Plan at 1:1250 (Drawing Ref. 100124714-MMD-00-XX-DR-A-1052)
- Existing Site Plan and Proposed Site Plan both at 1:500
 - Existing Site Plan (Drawing Ref. 100124714-MMD-00-XX-DR-A-1053)
 - Proposed Site Plan (Drawing Ref. 100124714-MMD-00-XX-DR-A-1054)
- Proposed Equipment Detail
 - Solar Powered Strada S5 Terminal with conversion plate (Drawing Ref: 100124714-MMD-00-XX-DR-A-2020)
 - GRP Cabinet (Drawing Ref: 100124714-MMD-00-XX-DR-A-2026)
 - Column with Starlink Mini and Solar Panel (100124714-MMD-00-XX-DR-A-2025)
 - Solar Power Set up including column, solar panel and mini starlink (Drawing Ref: 100124714-MMD-00-XX-DR-A-2027)
- Proposed Signage Detail
 - Sign Post T&C's (Drawing No. 100124714-MMD-00-XX-DR-A-2017)
 - Sign Post Welcome Sign (Drawing No. 100124714-MMD-00-XX-DR-A-2018)

I trust that the enclosed information is sufficient for validation and assessment. Should you require any further details or clarification, please do not hesitate to contact me.

Yours faithfully,

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⁸EA, 2026c. <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>. Last access January 2026.