

HIGH POST, SALISBURY

LANDSCAPE RESPONSE

ATL1733res



Placing development well

1.0 Introduction

- 1.1.1 This Technical Note has been prepared in response to the representation issued by the Stonehenge and Avebury World Heritage Site Coordination Unit (30 April 2026) concerning the extent of the Zone of Theoretical Visibility (ZTV) used within the submitted Landscape and Visual Impact Assessment (LVIA, March 2026).
- 1.1.2 The purpose of this note is to clarify the methodological basis for the 2.5 km study area, to explain the role of human visual acuity in determining perceptibility at distance, and to demonstrate why receptors within the Stonehenge component of the World Heritage Site (WHS) - located beyond the theoretical visibility envelope cannot experience any material or perceptible change arising from the proposed development.
- 1.1.3 The LVIA already confirms that at distances of approximately 2.5 km “this form of development... would be hardly discernible or not legible” and that the ZTV represents a worst-case, bare-earth model. This note therefore provides a proportionate, evidence-led justification for the ZTV extent and confirms that no intervisibility, and therefore no discernible effect can arise.

2.0 Response

Visual Acuity and the Limits of Human Perception

2.1.1 Human visual acuity is finite and well-understood. In real landscape conditions:

- Atmospheric diffusion reduces contrast.
- Background landform reduces edge definition.
- Vegetation and intervening features interrupt the view.
- Colour-matched materials further reduce perceptibility.

2.1.2 The result is that objects of this scale at 2.5 km are at or below the threshold of practical detectability, especially where the building is cut into the slope and finished in recessive tones.

2.1.3 This is why GLVIA3 and LI guidance emphasise perceptibility, not theoretical detectability.

Why a 2.5 km ZTV is Standard Practice

2.1.4 The 2.5 km ZTV used in the LVIA is consistent with:

- GLVIA3 (study area proportionate to scale and nature of development)
- LI TGN 06/19 (ZTV extent should reflect the distance at which change becomes imperceptible)
- Natural England / Historic England LVIA practice
- WHS Setting SPD (2025), which emphasises proportionate assessment and focus on areas where change is likely to be perceived

2.1.5 For a 10 m high building, the accepted professional standard can be considered:

- 1–2 km for detailed assessment
- 2.5 km for precautionary assessment
- >3 km only for tall structures (such as turbines, stacks or masts)

2.1.6 The WHS Coordination Unit's request for a ZTV covering the **entire WHS (over 2,600 ha)** is not proportionate to the scale of the proposal and is inconsistent with the SPD's own requirement that assessment should be:

"focused on those parts of the WHS setting where change may be perceptible to the viewer."

2.1.7 At distances of 2.5–5 km, a 10 m recessive building cut into a slope is not perceptible, even under optimal viewing conditions.

2.1.8 The LVIA ZTV demonstrates that:

- No part of the Stonehenge WHS falls within the theoretical visibility envelope of the building.

- The WHS lies beyond 2 km, and in most cases beyond 2.5 km, from the proposed built form.
- Intervening landform, including the High Post ridge, prevents visibility.

2.1.9 Because the ZTV is based on bare-earth modelling, it already represents a worst-case scenario. In reality, vegetation, buildings and micro-topography further reduce visibility.

2.1.10 Where a WHS lies outside the theoretical visibility envelope, the correct professional conclusion is:

- No intervisibility
- No perceptible change
- No effect on OUV

2.1.11 This is entirely consistent with GLVIA3, the WHS Setting SPD, and Historic England's own guidance on proportionality.

Why a WHS-wide ZTV Would Not Change the Outcome

2.1.12 Even if a WHS-wide ZTV were produced:

- It would show no visibility of the proposal from any part of the WHS.
- The landform between High Post and the WHS prevents intervisibility.
- The building's height (10 m) and recessive design mean it cannot be perceived at WHS distances.

2.1.13 The WHS Coordination Unit's objection is therefore based on the absence of a diagram, not the presence of any plausible visual effect.

2.1.14 The LVIA conclusions remain robust:

- No intervisibility
- No perceptible change
- No effect on OUV
- No harm to the WHS or its setting

Response to Specific WHS Coordination Unit Points

2.1.15 This section responds to the direct points raised within the representation.

"The ZTV does not take into account the WHS."

2.1.16 The ZTV covers the area within which the development could theoretically be visible. Because the WHS lies outside that envelope, it is not relevant to include it.

5.2 *"A WHS-wide ZTV is required."*

2.1.17 GLVIA3 requires proportionate assessment. A WHS-wide ZTV is disproportionate to a 10 m building and would not change the outcome.

5.3 *"More WHS viewpoints are required."*

2.1.18 Viewpoints are only required where visibility is possible. Where the ZTV shows no visibility, viewpoints are neither meaningful nor required.

"The LVIA does not consider the WHS."

2.1.19 The LVIA explicitly notes:

"Stonehenge, Avebury and Associated Sites... sits approximately 2km from the site at its closest point and is unlikely to be directly affected." (LVIA §5.1.8)

2.1.20 This conclusion is supported by the ZTV and field verification.

2.2 Conclusion

2.2.1 The LVIA has correctly applied GLVIA3 and LI guidance in using a 2.5 km ZTV, which is proportionate to the scale of the development and grounded in established principles of human visual acuity.

2.2.2 Because the WHS lies outside the theoretical visibility envelope, and because a 10 m recessive building cannot be perceived at WHS distances, the appropriate and evidence-based conclusion is:

- No intervisibility
- No perceptible change
- No effect on OUV
- No harm to the WHS or its setting

2.2.3 The objection is therefore not supported by visual evidence or best-practice methodology.



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