

# **AGENDA**

Meeting: Strategic Planning

Place: Antrobus House, Salisbury Road, Amesbury

Committee Room: The Edmund Hall

Date: Wednesday 20 January 2010

Time: <u>3.00 pm</u>

Please direct any enquiries on this Agenda to Roger Bishton, of Democratic and Members' Services, Monkton Park, Chippenham, direct line 01225 713035 or email <a href="mailto:roger.bishton@wiltshire.gov.uk">roger.bishton@wiltshire.gov.uk</a>

Press enquiries to Communications on direct lines (01225)713114/713115.

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Briefing Arrangements	Date	Time	Place
PARTY SPOKESMEN	Wednesday 20/01/10	1:00pm	Antrobus House

## Membership:

Cllr Andrew Davis (Chairman)
Cllr Jeffrey Ody
Cllr Christine Crisp (Vice-Chairman)
Cllr Philip Brown
Cllr Anthony Trotman

Cllr Peter Fuller Cllr Ian West

Cllr Russell Hawker Cllr Fred Westmoreland Cllr Chris Humphries Cllr Graham Wright Cllr Julian Johnson

#### **Substitute Members:**

Cllr Ernie Clark
Cllr Bill Douglas
Cllr Francis Morland
Cllr Nick Fogg
Cllr Mollie Groom
Cllr Leo Randall

Cllr John Knight

## **AGENDA**

#### Part I

Items to be considered when the meeting is open to the public

- 1. Apologies for Absence
- 2. **Membership Changes**
- 3. Attendance of Non-members of the Committee
- 4. Minutes of the Previous Meeting
- 5. **Declarations of Interest**

Councillors are requested to declare any personal or prejudicial interests or dispensations granted by the Standards Committee.

- 6. Chairmans Announcements
- 7. **Public Participation**

Members of the public who wish to speak either in favour or against an application on this agenda are asked to register in person no later than 5:50pm on the day of the meeting.

The Chairman will allow up to 3 speakers in favour and up to 3 speakers against an application. Each speaker will be given up to 3 minutes and invited to speak immediately prior to the item being considered. The rules on public participation in respect of planning applications are detailed in the Council's Planning Code of Good Practice.

8. Amesbury: Proposed Decommissioning of Existing Visitor Facilities and a Section of the A344; the Erection of a New Visitor Centre, Car Park, Coach Park and Ancillary Services Buildings; and Related Highways and Landscaping Works, for English Heritage (Application No. S/2009/1527). (Pages 19 - 240)

A report by the Case Officer is attached.

9. Amesbury: Stonehenge Visitor Centre - Proposed Listed Building Consent to Move the Cross at Airman's Corner (Proposed Development S/2009/1528). (Pages 241 - 248)

A report by the Case Officer is attached.

## Part II

<u>Item during whose consideration it is recommended that the public should be excluded</u>
<u>because of the likelihood that exempt information would be disclosed</u>



## STRATEGIC PLANNING COMMITTEE

MINUTES of a MEETING of the STRATEGIC PLANNING COMMITTEE held at COUNTY HALL, TROWBRIDGE on WEDNESDAY 16 DECEMBER 2009.

## PRESENT:

Cllr Andrew Davis (Chairman), Cllr Philip Brown, Cllr Christine Crisp, Cllr Bill Douglas, Cllr Peter Fuller, Cllr Russell Hawker, Cllr Julian Johnson, Cllr Jeff Ody, Cllr Mark Packard and Cllr Fred Westmoreland.

- 18. <u>Apologies</u> Apologies for absence were received from Cllr Chris Humphries, Cllr Tony Trotman and Cllr Graham Wright who was substituted by Cllr Bill Douglas.
- 19. Minutes of Previous Meeting

Resolved: To confirm and sign the minutes of the meeting held on 4 November 2009.

20. Marston Meysey: Round House Farm Quarry, Marston Meysey - Extraction and Processing of Sand and Gravel with restoration to Nature Conservation uses without compliance with conditions 2, 18, 19, 20 and 35 of Permission N.00.1105 dated 3 July 2003 (to amend the phasing sequence) for Moreton C Cullimore (Gravels) Limited (Application No. N.08.07010) The Committee received a presentation by the Case Officer which set out the main issues in respect of the application, it being noted that the application had been considered at the last meeting of this Committee and deferred pending further information requested from the applicant regarding timescales for completion of the operation.

The Committee then received statements from the following members of the public expressing their views against the proposal to which the Chairman responded:

Mr Anthony Murison, having a long-standing informal interest in local footpaths and towpaths in the Parish, objecting to the proposals.

Mr Derek Richards, a local resident objecting to the proposals.

Mrs Pam Davey, a local resident objecting to the proposals.

The following made statements in support of the proposals:

Mr Jim Meadowcroft, David Jarvis Associates, agent to the applicant. Mr Moreton Cullimore, the applicant.

The Committee also received:

- (a) a statement from Mr Andrew Brand, Chairman of the Marston Meysey Parish Meeting in which he stated that, whilst sympathising with the views expressed by the objectors, the Parish Meeting had withdrawn its objections to the proposals.
- (b) a letter dated 9 December 2009 from David Jarvis Associates confirming that mineral extraction and restoration within Phase 9 would be completed by 31 December 2013.
- (c) an email from Mr Saleem Shamash, on behalf of the Marston Meysey Parish Meeting, dated 15 December 2009 confirming that Marston Meysey Parish Meeting had withdrawn its objections to the proposals.
- (d) a photograph taken on 11 November 2009 showing flooding over the Round House Farm site.
- (e) photographs provided by Mr Anthony Murison.
- (f) an email from Cllr Peter Colmer, the local Councillor, in support of the application.

The Committee then considered the detail of a report by the Service Director, Development.

After discussion.

<u>Resolved</u>: To grant planning permission for the reasons and subject to the conditions as set out below:-

## **REASONS**

- (1) Having taken into consideration the environmental information, the Council is of the opinion that the proposed development gives rise to no material harm, is in accordance with the relevant Development Plan policies and that there are no material considerations that indicate the decision should be made otherwise. The Council has had regard to all other material considerations and, in particular, consider that the development is necessary for the site to maintain continuity of supply during periods when operations at the site are affected by flooding.
- (2) The policies relevant to this decision are Policy MCS7 of the Adopted Wiltshire and Swindon Minerals Core Strategy 2006 2026 Development Plan Document Adopted June 2009 and Policies MDC2, MDC3 and MDC5 of the Adopted Wiltshire and Swindon Minerals Development Control Policies Development Plan Document adopted September 2009.

## **CONDITIONS**

(1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Written notification of the date of commencement shall be sent to the Mineral Planning Authority within seven days of such commencement.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

(2) Working, restoration and aftercare of the site shall be carried out only in accordance with the working programme and phasing plan, drawing numbers 1771/SK3 E dated 9 April 2009; 1771/SK4 F dated 23 June 2009; 1771/SK5 E dated 23 June 2009; 1771/SK6 C dated 12 February 2009; 1771/SK7 C dated 12 February 2009; 1771/SK8 C dated 12 February 2009; 1771/SB/1 dated AUG 2009 and submitted in application no. N.08.07010 dated 15 April 2008 as subsequently amended by the applicant's letters dated 1 July 2009 and 28 August 2009. Restoration of Phase 9 shall be completed by 31 December 2013 as set out in a letter from David Jarvis Associates to the Council dated 9 December 2009.

Reason: To enable the Mineral Planning Authority to adequately control the development and to minimise its impact on the amenities of the local area.

(3) No topsoil, subsoil or overburden shall be exported from the site.

Reason: In the interests of the satisfactory restoration of the site and the amenities of the area.

(4) This permission shall be for a limited period expiring on 3 July 2018 at which time the development hereby permitted shall have ceased and the land reinstated to a condition suitable for nature conservation afteruse in accordance with submitted Drawing No 1771/SK8 C dated 12 February 2009.

Reason: To secure working and restoration within an acceptable timescale.

(5) Notwithstanding the provisions of the Town and Country (General Development) Order 1995 (or any Order revoking or re-enacting or amending that Order) no fixed plant or machinery, buildings, structures and erections, or private ways shall be erected, extended, installed rearranged, replaced or altered at the site without prior written approval from the Mineral Planning Authority.

Reason: To ensure that the development is carried out in a satisfactory manner in the interests of the amenities of the area.

(6) Except in the case of emergency to maintain safe quarry working (which shall be notified to the Mineral Planning Authority as soon as practicable), no operations or activities authorised or required by this permission shall be carried out and plant shall not be operated on the site other than during the following hours:-

0700 - 1800 Monday to Friday 0700 - 1300 Saturday

No working shall be carried out at any time on Sundays or Bank or Public Holidays.

Reason: In the interests of the amenity of local residents.

(7) Prior to commencing operations, details of fumes and dust suppression measures shall be submitted to and approved in writing by the Mineral Planning Authority. These details shall relate in particular to any access road, haul road, or other running areas used by vehicles which shall be watered or treated with an approved dust laying agent at such intervals as may be necessary to prevent the raising of dust from those areas in accordance with the approved details. These details should also include measures for minimising dust nuisance during the stripping/movement/replacement of soils and sub-soils.

Reason: To safeguard the local environment.

(8) No minerals except sand and gravel shall be removed from the site.

Reason: For the avoidance of doubt and to ensure that the development is carried out in a satisfactory manner in the interests of the amenities of the area.

(9) No development shall take place within the area of archaeological interest until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Mineral Planning Authority.

Reason: To afford the opportunity for archaeological study of the site prior to it being excavated.

(10) No movement of soils shall be carried out except where the full depth of soil to be stripped or otherwise transported is in a suitably dry condition such that the topsoil can be separated from the subsoil without difficulty. Such soils must be stripped, handled and stored separately and all stripping, handling and restoration must take place under dry conditions to minimise structural damage.

Reason: In the interests of the satisfactory restoration of the site.

(11) Surface water drainage works shall be carried out in accordance with details which have been submitted to and approved in writing by the Mineral Planning Authority prior to the commencement of development.

Reason: To prevent the increased risk of flooding.

(12) Prior to the commencement of development a ground level survey shall be carried out and submitted to the Mineral Planning Authority. There shall be no raising of existing ground levels on the site.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction of flood storage capacity.

(13) No spoil or materials shall be deposited or stored on that part of the site lying within the area of land liable to flood.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction of flood storage capacity.

(14) Any walls or fencing constructed within or around the site shall be designed to be permeable to flood water.

Reason: To prevent obstruction to the flow and storage of flood water, with a consequent increased risk of flooding.

(15) Before each new phase of development is commenced, a survey to establish the presence of water vole and other mobile species shall be undertaken by suitably qualified personnel. The development shall proceed in strict accordance with its findings and recommendations.

Reason: To ensure the development does not result in loss of, or damage to, the habitat of water voles.

(16) Before each new phase of development is commenced, a survey for the presence of crayfish shall be undertaken using full survey techniques including the use of refuge or baited traps as appropriate and hand searching by suitably qualified personnel. The development shall proceed in strict accordance with its findings and recommendations.

Reason: To ensure that the development does not result in loss of, or damage to, the habitat of crayfish.

(17) Any planting should use native species of local provenance and should reflect species currently found in the vicinity.

Reason: To ensure that no non-native species are introduced to this area.

(18) During phases 2, 3A, 3B, 4 and 5 de-watering operations shall discharge to the River Thames at the confluence of the Marston Meysey Brook; NGR SU 133 959.

Reason: To ensure that flows in the River Thames are not derogated and that full recirculation occurs.

(19) During phases 6, 7, 8 and 9A de-watering operations shall discharge to the most upstream point of the Marston Meysey Brook; NGR SU 127 965.

Reason: To ensure that flow is maintained in the Marston Meysey Brook.

(20) During phases 6, 7, 8 and 9A clay bunds shall be placed adjacent to the Marston Meysey Brook to prevent loss of flow from the Brook to the gravels. These bunds shall be retained after gravel extraction.

Reason: To ensure that flow is maintained in the Marston Meysey Brook.

(21) Any outfalls from the Marston Meysey Brook into the ponds created during restoration shall be at a suitably high level to ensure that water is able to migrate only at times of flooding and not at other times when flow in the Brook may be affected.

Reason: To ensure that flow is maintained in the Marston Meysey Brook.

(22) During the construction period no solid matter shall be stored within 16 metres of the banks of the tributary of the Thames and thereafter no storage of materials shall be permitted in this area.

Reason: To prevent solid materials from entering the River Thames and causing pollution.

(23) A buffer strip of 16 metres minimum adjacent to the Marston Meysey Brook shall be fenced off and kept free from development or any activity associated with the development.

Reason: To allow the watercourse to fulfil its function as a wildlife corridor.

(24) All effluents shall discharge via a sealed system to a suitably sized sealed tank.

Reason: To protect the groundwater environment.

(25) Any above ground oil storage tank(s) shall be sited on an impervious base and surrounded by a suitable liquid-tight bunded compound. No drainage outlet should be provided. The bunded area should be capable of containing 110% of the volume of the largest tank and all fill pipes, draw pipes and sight gauges should be enclosed within its curtilage. The vent pipe should be directed downwards into the bund.

Reason: To prevent pollution of the water environment.

(26) No sewage or trade effluent, including cooling water containing chemical additives, vehicle wash waters, steam cleaning effluent, or pressure wash effluent, should be discharged to the surface water system.

Reason: To prevent pollution of the water environment.

(27) There shall be no direct connection between the pits and any watercourse.

Reason: To prevent pollution of the water environment.

(28) Restoration materials shall be restricted to purely inert, uncontaminated soils and spoils generated from the site mineral workings.

Reason: To prevent the pollution of groundwater.

(29) The development hereby permitted shall not take access from or gain access to the C124 except by way of the new access provided as outlined on the approved drawing 200038/2 dated June 2001.

Reason: To safeguard highway safety.

(30) The development hereby permitted shall not be commenced until the new access to the site, as indicated on drawing number 200038/02 has been constructed in accordance with details which have been first approved by the Mineral Planning Authority. The access road approved shall be completed before any mineral is removed from the site and shall be the only access point used to serve the development.

Reason: To safeguard highway safety.

(31) Following the completion of mineral extraction from the site, the access road shall be downgraded as part of the site restoration works in accordance with details to be submitted to and approved by the Mineral Planning Authority.

Reason: To safeguard highway safety.

(32) Except for temporary operations, the free field equivalent continuous noise level at the noise sensitive premises nearest the extraction site, due to operations on the site, shall not exceed the relevant criterion limit specified in Schedule 1 (below) at each nominated site. Measurements taken to verify compliance shall have regard to the effects of extraneous noise and shall be corrected for any such effects.

Schedule 1	
Location	Criterion L Aeq T (1 hour)
Wetstone Cottage	47 dB
Round House Farm	47 dB
The Round House	47 dB
Caravan Park	47 dB

Reason: To safeguard the local environment.

(33) For temporary operations such as site preparation, soil stripping, screen bank formation and removal and final restoration, the free-field noise level due to work at the nearest point to each dwelling shall not exceed 70 dB L Aeq T (1 hour) expressed in the same manner as for condition 32 above.

Temporary operations shall not exceed a total eight weeks in any 12 month period for work close to any individual noise sensitive properties.

Reason: To safeguard the local environment.

(34)The operating company shall monitor noise levels from temporary operations at the commencement of the development of the site. Thereafter, the operating company shall monitor noise levels at six monthly intervals at up to five locations, when site equipment is operating normally. The duration of the sample measurements shall be 15 minutes unless the site noise level is at or above the relevant criteria agreed for the location, in which event a full one-hour sample shall be taken. The surveys shall exclude so far as possible extraneous noises such as passing traffic. The measurements shall be carried out in accordance with the provisions of BS4142:1997 and the LA 90 T and L Aeg T noise levels shall be reported, together with the weather conditions, and the sources of audible noise. On request, the operator shall without undue delay furnish the Mineral Planning Authority with the particulars of the noise measurements. The monitoring locations and frequency of sampling may be varied by agreement with the Mineral Planning Authority and it is envisaged that less sampling will be necessary if the results show consistently that noise levels are below the appropriate criteria.

Reason: To safeguard the local environment.

(35) Prior to the commencement of any works in Phases 3A and 3B full details shall be submitted to the Mineral Planning Authority for approval showing the proposed arrangements required to safeguard the pipeline which crosses the site, including the marking out of a 7 metre corridor centred on the pipeline. Development shall be carried out in accordance with the approved details.

Reason: To ensure the protection and safeguarding of the pipeline.

(36) Prior to the commencement of soil stripping in each phase of the development, a survey shall be undertaken to establish the existence or otherwise of important protected species of flora and fauna. Details shall be submitted to the Mineral Planning Authority for approval.

Reason: To safeguard the protected species on the site.

(37) Within one month of this permission being implemented a detailed landscape scheme shall be submitted to the Mineral Planning Authority for approval. The submitted scheme shall have particular regard to the need to protect the amenity of individual properties close to the site (e.g. Wetstone Cottage, Round House Farm, The Round House and the Second Chance Caravan Park) and the village of Marston Meysey and to the detailed phasing and programme of the works required and the timescale for each phase. Development shall be carried out in accordance with the approved details.

Reason: In the interests of safeguarding and enhancing the visual amenity of the area.

(38) The existing boreholes on the site shall continue to be monitored on a regular basis and the data collected submitted to the Mineral Planning Authority for information purposes.

Reason: In order to maintain a continuous record of regular water level readings taken at the site.

(39) Within one month of this permission being implemented details regarding the proposed programme of restoration work to be carried out in relation to the Thames and Severn Canal shall be submitted for approval.

Development shall be carried out in accordance with the approved details.

Reason: To safeguard the line of the canal and to ensure its restoration.

(40) Within one month of this permission being implemented a Management Plan shall be submitted to the Mineral Planning Authority indicating how it is proposed to control water levels during the various phases of mineral extraction and the proposed aftercare and management of the reed beds created on site. Development shall be carried out in accordance with the approved details.

Reason: To ensure that the site is restored and managed in accordance with details approved.

- (41) The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) dated 2 February 2009 compiled by GWP Consultants and supplemented by the letter from GWP Consultants reference nr010509.let.cl dated 1 May 2009 and the following mitigation measures detailed within the FRA:
  - a) Final restoration levels over the site will not exceed existing ground levels;
  - b) Storage of topsoil, subsoil and overburden shall be undertaken in accordance with the proposals outlined in Sections 4 and 5 of the FRA and Drawing Ref: RHFFRA0901 No. 11 Version A dated 21 January 2009.
  - c) The proposed bunds and their alignment referred to in b) shall be constructed in accordance with the details shown on Drawing No 1771/SB/1 dated August 2009 titled 'Proposed Screen Bund Sections'.

Reason: To ensure that there is no loss of floodplain storage and to prevent the increased risk of flooding due to the impedance of flood flows.

21. Amesbury: Plots C4 and C5, Solstice Park, Porton Road, Amesbury - Proposed data centre buildings (3) together with associated plant and machinery, electricity substation, landscaping, planting, fencing, engineering, car parking, pedestrian and cycle paths and vehicular circulation area, including proposed access onto Sun Rise Way. (Application No. S.2009.1445) On considering a report by the Service Director, Development,

Resolved: Subject to the completion of a supplemental Section 106 Agreement to apply the provisions of the Section 106 Agreement dated 20 January 2000 (as varied), to grant planning permission for the reason below, subject to the conditions stated:-

## **REASON**

The proposed development would be acceptable in principle, despite the phasing arrangements included within saved Local Plan policy E8A. This is because of the relatively short period of time until this phase of the Solstice Park site is released, the emerging policies in the South Wiltshire Core Strategy and the recent release of other post-2011 phase sites for employment use. The development would have an acceptable design and appearance, would not harm the amenities of nearby properties, would not harm highway safety, traffic or sustainability interests, the River Avon Special Area of Conservation (SAC), the Salisbury Plan SAC and the Salisbury Plain Special Protection Area (SPA) or any other material planning consideration.

It would therefore comply with saved policies G1, G2 (General Development Criteria), C10 (Nature Conservation), D1 (Extensive Development) and TR14 (Cycle Spaces) of the Adopted Salisbury District Local Plan, and national guidance in PPG4 (Industrial, Commercial Development and Small Firms) and PPS24 (Planning and Noise). It would also comply with the Draft Regional Spatial Strategy for the South West and Draft Planning Policy Statement 4 (Planning for Sustainable Economic Development).

## **CONDITIONS**

- (1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
  - Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990. AS amended by section 51 (1) of the Planning and Compulsory Purchase Act 2004.
- (2) No Development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The scheme shall also include details of how the scheme shall be maintained and managed after completion, and give due consideration of any above ground storage or potential overland flow routes.

Reason: To prevent the increased risk of flooding, to improve and protect water quality, and ensure future maintenance of the surface water drainage system.

Policy: G2

(3) Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from impermeable parking areas and hardstanding for vehicles, commercial lorry parks and petrol stations shall be passed through interceptors designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor.

Reason: To prevent petrochemical substances from car parking surfaces polluting the water environment.

Policy: G2

(4) No development approved by this permission shall commence until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details.

Reason: In the interests of sustainable development and prudent use of natural resources.

Policy: G2

(5) No development shall commence until the details of the security fence to be erected around each of the buildings has been submitted to and approved in writing by the local planning authority. The details shall include height, colour finish and texture. The approved detail shall not be subject to any variation unless otherwise agreed in writing by the local planning authority.

Reason: In the interest of visual amenity

Policy: G2

(6) The finished floor levels of the proposed buildings shall be in accordance with details to be submitted to, and approved in writing by, the Local Planning Authority before development is commenced.

Reason: To ensure the exact finished floor levels of the buildings.

Policy: G2

(7) No development shall take place until details of the treatment to all hard surfaces have been submitted to and approved in writing by the Local Planning Authority. The development shall accord with the details as so approved unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the amenity and the environment of the development.

Policy: G2

(8) No ground works or construction shall be undertaken outside of the following hours: Monday to Friday: 8.00am to 6pm; Saturday: 8.30 am to 1pm; Sundays & bank holidays: No construction or ground working. This condition does not apply to works of fitting out and decoration.

Reason: To protect the amenity of nearby residential property.

Policy: G2

(9) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended by the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008 (or any Order revoking or re-enacting or amending that Order with or without modification), the use of the site and buildings hereby approved shall be for a data centre, and for no other use (including other uses within Use Class B8).

Reason: The application has been considered on the basis on the proposal as submitted, and other uses (including as a distribution centre) would raise further planning considerations.

Policy: G2

(10) Notwithstanding the provisions of the Approved Master Plan for Solstice Park, a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, within the site shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development or any phase of the development, whichever is the sooner, for its permitted use. The landscape management plan shall be carried out in accordance with the timings and schedules of the landscape management plan.

Reason: To enable the Local Planning Authority to secure the satisfactory evolution, management and maintenance of landscape works, in the interests of visual amenity.

Policy: G2

(11) All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in strict accordance with the approved implementation programme and any trees or plants which within a period of 10 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of the amenity and the environment of the development.

Policy: G2

(12) The buildings hereby approved shall not be brought into use until full details of the noise mitigation methods as set out in the Acoustic Planning Report dated 16<sup>th</sup> July 2009, have be submitted to and approved, in writing, by the Local Planning Authority and implemented in accordance with the approved details before first occupation. The mitigation methods shall be retained and maintained in perpetuity.

Reason: in the interests of nearby residential properties, PPG24.

Policy: G2

(13) The development hereby approved shall be undertaken in accordance with the submitted Construction Method Statement (dated June 2009) and Lighting Strategy and Design (dated June 2009) unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of nearby residential properties and to safeguard against pollution.

Policy: G2, PPS14

(14) No development shall take place until full details of the proposed areas for cycle storage have been submitted to and approved, in writing, by the Local Planning Authority. The development shall not be brought into use until the cycle parking facilities have been provided and development shall be undertaken in accordance with the approved details unless otherwise agreed, in writing, by the Local Planning Authority.

Reason: In the interests of sustainable development.

Policy: G1, TR14

(15) The development shall not be first occupied until the access road, parking and turning areas hereby approved have been constructed in accordance with the details approved.

Reason: In the interests of highway safety.

Policy: G2

- (16) Prior to commencement of the development hereby permitted, the applicant shall provide full details of how they intend to comply with the existing approved Travel Plan for the site. The acceptability of these proposals will need to be agreed in writing by the Local Planning Authority. In complying with the existing Travel Plan the applicants will need to address the following issues:
  - (a) The identification of targets for trip reduction and modal shift;
  - (b) The methods to be employed to meet these targets;

- (c) The mechanisms for monitoring and review;
- (d) The penalties to be applied in the event that targets are not met;
- (e) The mechanisms for mitigation;
- (f) Implementation of the Travel Plan to an agreed timescale or timetable and its operation thereafter;
- (g) Mechanisms to secure variations to the Travel Plan following monitoring and review.

The agreed Travel Plan must be implemented and targets reviewed within 3 months of occupation and thereafter on an annual basis at the time of submission of the annual Travel Plan Report.

Reason: To ensure that the operation of the Strategic Highway Network is protected and that sustainable travel objectives for the site are met and maintained.

Policy: G2

(17) No development hereby permitted shall commence until a construction management plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include construction vehicle movements, construction operation hours, construction vehicle routes to and from the site, construction delivery hours, expected number of construction vehicles per day, car parking for the contractors, specific measures to be adopted to mitigate construction, impacts in pursuance of Environment Code of Construction Practice, and details of a scheme to encourage contractors to use alternative means of transport to the private motor vehicle. Construction works shall be carried out strictly in accordance with the Construction Management Plan.

Reason: In the interests of highway safety and the free flow of traffic on the trunk road network.

Policy: G2

(18) No development shall take place until a scheme for the provision of the footpath link to Porton Road has been submitted to and approved, in writing, by the Local Planning Authority. The development shall not be brought into use until the approved footway link has been provided in accordance with the approved details.

Reason: In the interests of encourage sustainable development.

Policy: G1

(19) No development shall commence until full details of the road/footway/cycleway construction to the extension to Sun Rise Way have been submitted to and approved in writing by the Local Planning Authority. The extension to Sun Rise Way shall be constructed in

accordance with these details at least to basecourse level before the first occupation of the development.

Reason: In the interests of highway safety.

Policy: G2

#### **INFORMATIVES:**

## **Condition 3 – advice from the Environment Agency:**

The following principles should guide this process. Surface water from car parking areas less than 0.5 hectares and roads should discharge via deep sealed trapped gullies. For car parks greater than 0.5 hectares in area, oil interceptor facilities are required such that at least 6 minutes retention is provided for a storm of 12.5mm rainfall per hour. With approved "by-pass" type of interceptors, flows generated by rainfall rates in excess of 5mm/hour may be allowed to by-pass the interceptor provided the overflow device is designed so that oily matter is retained. Lorry parks, scrap yards, off loading areas require full oil interceptor facilities and "by-pass" interceptors are not considered suitable.

## **Condition 4 – advice from the Environment Agency:**

The development should include water efficient appliances, fittings and systems in order to contribute to reduced water demand in the area. These should include, as a minimum, dual-flush toilets, water butts, spray taps, low flow showers (no power showers) and white goods (where installed) with the maximum water efficiency rating. Greywater recycling and rainwater harvesting should be considered.

The submitted scheme should consist of a detailed list and description (including capacities, water consumption rates etc. where applicable) of water saving measures to be employed within the development. Applicants should visit for detailed information on water saving measures. A scheme of water efficiency should be submitted in accordance with the information supplied on the website. The following may also be helpful - <a href="http://www.savewatersavemoney.co.uk/">http://www.savewatersavemoney.co.uk/</a>.

#### **Waste Management**

Although a waste audit has been submitted with the application, a site waste management plan is also required. In England, it is a legal requirement to have a site waste management plan (SWMP) for all new construction projects worth more than £300,000. The level of detail that your SWMP should contain depends on the estimated build cost, excluding VAT. You must still comply with the duty of care for waste. Because you will need to record all waste movements in one document, having a SWMP will help you to ensure you comply with the duty of care. Further information can be found at <a href="http://www.netregs-swmp.co.uk">http://www.netregs-swmp.co.uk</a>

#### **Plans and Documents**

This decision relates to documents/plans submitted with the application, listed below. No variation from the approved documents should be made without the prior approval of this Council. Amendments may require the submission of a further application. Failure to comply with this advice may lead to enforcement action which may require alterations and/or demolition of any unauthorised buildings or structures and may also lead to prosecution:

#### Plan References:

Landscape Strategy 100 Rev B, received 24<sup>th</sup> September 2009
Site Layout AL(07)001 Rev E, received 24<sup>th</sup> September 2009
Site Sections AL(07)002, received 24<sup>th</sup> September 2009
Roof Plan AL(07)003 Rev B, received 24<sup>th</sup> September 2009
Typical Building Layout and Elevation AL(07)007, received 24<sup>th</sup> September 2009
Site Location Plan AL(07)010 Rev B, received 24<sup>th</sup> September 2009
Contextual Site Layout AL(07)011, received 24<sup>th</sup> September 2009

## 22. **Next Meeting** On report by the Chairman,

Resolved: Provided that the planning application for a new Visitors' Centre at Stonehenge was ready for consideration, to hold the next meeting of this Committee, scheduled to be held on 20 January 2010, in Amesbury starting at 3.00pm with a site visit being held immediately prior to the meeting at 2.00pm.

(Duration of meeting: 10.30am – 11.30am)

The Officer who has produced these minutes is Roger Bishton, Democratic & Members' Services, direct line (01225) 713035 or e-mail <a href="mailto:roger.bishton@wiltshire.gov.uk">roger.bishton@wiltshire.gov.uk</a>
Press enquiries to Communications, direct line (01225) 713114/71311

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## **WILTSHIRE COUNCIL**

#### STRATEGIC PLANNING COMMITTEE

Date of Meeting	20 January 2010				
Application Number	S/2009/1527				
Site Address	Airman's Corner, Land South East Of the junction of the A360 and A344				
Proposal	Decommissioning of existing visitor facilities and a section of the A344; the erection of a new visitors centre, car park, coach park and ancillary services building; and related highways and landscaping works				
Applicant	English Heritage				
Town/Parish Council	1) Winterbourne Stoke (proposed visitor centre) & 2) Amesbury (existing visitor centre)				
Electoral Division		Unitary Members	1) Ian West, 2) Fred Westmoreland.		
Grid Ref	1) 409867 142906 2) 412185 142340				
Type of application	Full				
Case Officer	Adam Madge	01722 434380	Adam.Madge@Wiltshire.gov.u k		

Reason for the application being considered by Committee

The application by reason of the importance of the Stonehenge scheduled monument and the surrounding World Heritage Site, both regionally, nationally and worldwide is considered to be a strategic development and is therefore required to be considered by the Strategic Planning Committee.

## **Purpose of Report**

1. To consider the above application and to recommend that planning permission be APPROVED subject to conditions and the signing of a s106 legal agreement.

Members should note that this application is accompanied by an environmental statement as required under schedule 2 of the Town and Country Planning (Environmental Impact Assessment) England and Wales Regulations 1999 (as amended) paragraph 10 (b).

## **Main Issues**

- 2. The application is seeking permission for
  - The Construction of new visitor facilities, including car and coach parking, on land adjacent to the existing A360/A344/B3086 road junction at Airman's Corner and provision of a Visitor Transit System to transport visitors to the Stonehenge Monument along the route of the current A344 road;
  - 2) Construction of a New Roundabout junction at Airman's Corner, including realignment of the B3086 to its original (pre-1964) route where it joins the junction;
  - 3) Decommissioning and removal of the Existing Visitor facilities, including car parking, near the Stonehenge Monument leaving an operations facility and emergency toilets.

4) Decommissioning and removal of the A344 road between byway 12 and Stonehenge Bottom.

The movement of the existing Airman's Cross war memorial is also proposed as part of the overall proposals but this is subject to a separate listed buildings application S/2009/1528 LBC

The issues covered in the Environmental impact assessment are as follows:

- Planning Policy Context
- Consideration of alternatives
- Archaeology and the Historic environment
- Landscape character and visual amenity
- Nature conservation and biodiversity
- Noise and Vibration
- Geology and soils
- Water quality, drainage and hydrology
- Air quality and emissions
- Agriculture
- Socio- economic effects
- Recreation
- Conclusion

Other issues considered elsewhere in the planning application include -

- Design of the proposal
- Transport

#### **Site Description**

- 3. The application site is located in two main areas and includes the route between them.
- 3.1 The site of the new visitor centre is located at Airman's Corner in a field to the SE of the junction which is itself situated to the west of Amesbury and to the east of Winterbourne Stoke and Shrewton. The Stonehenge monument is located to the south east of the proposed site. The main visitor centre and car park is to be located in a field to the south east of the current Airman's Corner crossroads. This field is currently in agricultural use and is traversed by a dry valley which runs north east to south west across the site. It contains a pond close to its western boundary. The site rises more steeply on the southern side than the northern side of the valley.
- 3.2 The coach park will be located on the opposite side (north) of the existing A344 in an area of land currently occupied by the B3086 which itself is bordered on either side at right angles by a line of mature Beech trees.
- 3.3 The application site as well as this area for the main visitor centre, coach park and car parking also includes the route of the existing A344 from Airman's Cross to the existing visitor facilities and the facilities themselves which are located opposite the Stonehenge monument just to its North West and on the Northern side of the A344. The site includes the remaining part of the A344 down as afar as its junction with the A303 trunk road.

4.

## **Relevant Planning History**

No specific recent planning history associated with the Airman's Cross site, However there have been a number of proposals for new visitors centre facilities to replace the existing one. Most recently this was a proposal to site a visitor facility at Countess East with a land train to the stones. This was submitted in 2004 and resulted in a public inquiry and planning permission being granted in March 2007 subject to conditions.

This permission was tied to the dualing of the A303 in a tunnel past the stones. However this cannot be implemented because the government has decided not to fund the dualing of the A303. and therefore as this was tied into the planning permission this cannot now be implemented.

Droposal		

## 5. This planning application is made in full and includes proposals to close and remove part of the A344 between the A303 and Airman's Corner.

The proposal consists of three separate elements –

- A) The closure and removal of most of the existing visitor centre leaving only a hub
- B) The closure and part removal of the A344 road which runs past Stonehenge.
- C) The development of a new visitor centre, car parking and coach parking at Airman's Corner
- 5.1. It is proposed to remove most of the existing visitor facilities at the current site including the existing car park. It is intended that a security facility and emergency toilets will be retained. According to the applicants supporting statement this will be approximately 40% of the current footprint of structures (or 4% of the total existing developed area). The hub that remains will be below ground level with a grass roof and timber facade. There will be a visitor transit system drop off and pick up area at the stones.
- 5.2 It is intended that the A344 between its junction with the A303 at Stonehenge Bottom and Byway 12 will be decommissioned and grassed over with a reinforced grass surface. This will allow for service vehicles and pedestrians and cyclists to continue to use this part of the road. It is intended to formally extinguish this section of road through a separate application to the secretary of state under section 247 of The Town and Country Planning Act 1990.
- 5.3 The remaining section of the A344 will remain as a hard surface although will have vehicular highway rights as a formal road extinguished and will provide the route for a proposed land train between the new visitor centre and the stones.
- 5.4 The final part of the proposal is the visitor centre building which is to be built to the south east of the existing Airman's Corner staggered crossroads. The visitor centre building will consist of education, learning and interpretation facilities, ticketing, information, café and a souvenir shop. These will be housed in two separate 'cubes' one predominantly from glass and one clad from wood which are joined by an undulating roof form of non reflective sheet metal. The area between the two buildings would be open on two sides. The structure would be single storey and the exterior of the roof would be supported by metal columns
- 5.5 Also proposed to the east of the main visitor centre is an outdoor interpretation area consisting of several Neolithic huts based on archaeological discoveries at Durrington walls. These are each single storey structures. It is also intended to move the existing Airman's Cross memorial to a position just south of the proposed new visitor centre. (See application S/2009/1528)
- 5.6 A staff car park and visitor car park which provides 360 car parking spaces with an additional overflow car park to the south is also proposed. An internal access road will connect this from the A344. It is proposed to realign the existing A360/A344/B3086 junction and introduce a roundabout at Airman's Corner adjacent the new visitor facilities.
- 5.7 The final part of the proposal is to position an ancillary building and coach park to the North East of the proposed new roundabout which will contain the waste and water services, bins, shop storage and staff facilities. The ancillary building will be clad with a wood panelled finish and be single storey in height and of a linear nature. To the north of this behind the existing beech trees is positioned the coach park which will be hard surfaced and cater for 30 coaches. It is proposed to screen the coach park with new trees on three sides.

A land train is proposed to link the new visitor facilities with the Stonehenge monument.

#### 6.0 Consultations

**6.1 Forward/Spatial Planning** – Consider that the environmental and economic benefits to be gained, together with the lack of feasible alternatives and the fact that the proposals are in accordance with the requirements of the development plan, there is no planning policy objection to this proposal (see appendix 3).

- **6.2 Highways –** No objection subject to the signing of a legal agreement and conditions to cover the following issues.
  - A condition requiring the submission of details of the visitor transit system to be submitted.
  - A condition requiring drawings to be submitted showing how vehicles accessing the A344 can turn around and exit westbound to be submitted.
  - A condition requiring the submission and approval of a scheme for bollards and gating on the A344.
  - A scheme to be submitted showing how visitors can be accommodated during exceptional circumstances such as the summer solstice and afforded legal access.
  - Details of the pedestrian and cycle route along the whole of the A344 including crossing arrangements at Stonehenge Bottom and a scheme for reviewing such arrangements.

Prior to the opening of the visitor centre

- A scheme to upgrade the surface of byway 12 between the A344 and the Sustrans cycle route 45 shall be submitted and carried out by the applicant.
- A scheme and programme for cycle parking and storage provision at the eastern and western end of highway A344 shall be submitted.

The legal agreement to be signed shall cover the following matters

- 1) The construction of a new roundabout at Airmans corner along with lighting drainage and signage.
- 2) A Travel plan
- 3) Road traffic and Highway Orders
- 4) The provision of a tourist information display area within the visitor centre
- 5) Free access to local people to the stones
- 6) Scheme for Movement of the Airmans Cross monument
- 7) A requirement for using the stopped up part of the A344 for pedestrians and cyclists.

Copy of highways response enclosed as appendix 4

- **6.3 Environmental Health** Having reviewed the planning application in full I would like to submit no adverse comments on the application.
- **6.4 South Wilts Economic development team –** Stonehenge is a unique visitor attraction with WHS status as such it draws visitors to the south Wiltshire area from the regional, national and international communities. Visitor facilities at the site are limited and consequently the current visitor experience is not as fulfilling as it might be. The South Wiltshire Core Strategy document recognises that some tourist facilities are substandard and in need of improvement and specific reference is made to Stonehenge.
- 6.4.1 Having reviewed the application information, the key aspects from an economic development standpoint are that the proposal will-
- 6.4.2 Attract and provide for increase visitor numbers to the area;

Enhance the visitor experience thereby encouraging repeat/multiple visits;

Create potential local employment opportunities during the construction/implementation stage; Create the potential for local businesses and services to be engaged and have input during the construction/implementation stage; and

Increase the workforce requirements at Stonehenge-thereby creating new local permanent employment opportunities.

The local economic development team in South Wiltshire is supportive of the proposals.

**6.5 Wiltshire Council Archaeology-** The removal of existing facilities and the A344 in particular will significantly improve the setting of Stonehenge, The Avenue and other monuments in the vicinity. However the removal of the A303 should still be a long term aim to complete the improvements.

Agrees with the conclusion of the ES that the benefits of the scheme do outweigh the disbenefits. Considers the new facilities on the whole have been designed in a way to minimise their impact on the attributes of Outstanding Universal Value (OUV) of the World Heritage Site (WHS).

- 6.5.1 Suggest that a condition is imposed to secure a written programme of archaeological work.
- 6.5.2 Although the scheme has been designed to minimise adverse impacts on the attributes of OUV there will be some adverse visual impact on some key monument groups within the WHS in particular the Greater Curses and barrows, the lesser Curses and barrows and the barrows on the north side of the Winterbourne Stoke group.
- 6.5.3 The visual impact on the above monuments of what is a substantial structure needs to be mitigated further. The landscape setting and landscape strategy could be modified to reduce the impact of the new building. The potential impact on the setting of key monuments of proposed street lighting in the new car park and at the Long Barrow roundabout and at Airman's Corner needs careful consideration and mitigation.

#### 6.6 Wiltshire Council design forum

- 6.6.1 The forum met on the 17<sup>th</sup> November 2009. The panel felt that most of the comments it had previously made had been addressed. Whilst the design concept was similar to the pre application scheme, the random positioning of the columns made it look slightly less formal which was felt to be an improvement. The columns seemed to be more like a forest of trees which would give it a more elemental feel
- 6.6.2 Concern was expressed regarding the potential durability and longevity of the painted steel columns. The forum felt that the materials and finish for the columns was so critical to the design it deserved more consideration.

Design of ancillary buildings is also important.

- 6.6.3 In general the forum felt that much more thought had been put into the design since they had last seen it in July. The forum felt that the architects should be congratulated for the effort that they have put in a relatively short period of time and for designing a building which was very much of the 21<sup>st</sup> century.
- 6.7 Allington Parish Council- No objections
- **6.8 Amesbury Town Council-** Support, observation that the building design is not in keeping with the landscape.
- **6.9 Bulford Parish Council** The parish council does not support the proposal to site the Stonehenge Visitors Centre at Airman's Cross. The part of the A303 which runs between Longbarrow roundabout and Stonehenge bottom is already severely congested and the additional tourist traffic will exacerbate this.
- 6.9.1 The A360 provides an alternative route into and out of Salisbury and the obstruction at Airman's Cross will cause motorists to abandon this and revert to the A345. This will increase traffic through Amesbury and cause further problems at the Countess roundabout. This will cause further traffic through Larkhill and Shrewton. Considers any further increase in traffic is likely to make vehicles divert through Bulford village and the initial length of road into Bulford from Folly Bottom is a C class road and this is already a rat run.
- 6.9.2 Considers that the planning application should be refused at least until the A303 is developed into a dual carriageway throughout its length between the Countess and Long Barrow roundabouts. Also council sees no point in closing the A344 which is a useful route.
- **6.10 Chitterne Parish Council-** Consider that locating the visitor centre at Airman's Cross will exacerbate the existing traffic rat running that occurs along the B390. They consider that the

westbound exit must be closed so that traffic from the Stonehenge Visitor Centre (SVC) is directed down to the Longbarrow Roundabout and A303. Traffic from the south can go straight over the new Airman's Cross roundabout or can take a proposed new slip beginning well before the roundabout.

6.10.1 The closure of the A344 will increase the traffic activity at the Longbarrow roundabout. This becomes clogged at peak times and this will not be solved by adding extra lanes on the A303 approaches. The solution may include traffic lights or a flyover.

Signing should be clear for the new visitor centre and also to Bath.

- **6.11 Durrington Parish Council** Support subject to conditions, 1) a number of members of the public requested the existing tunnel is kept open as the view of Stonehenge from the tunnel exit is unique and should be retained.
- 2) Members of a local motor cycling association requested the byways in the WHS should allow motor cycle use as the closing of the WHS Byways would severely restrict their freedom of movement.
- **6.12 Orcheston Parish Council-** Make same initial point as Shrewton parish council (see below). Do not consider that the lanes on the Longbarrow roundabout provide sufficient capacity to meet the requirements of through traffic on the A303, visitors heading towards the visitors centre and local traffic from Amesbury heading towards the Till valley villages.
- 6.12.1 Similar comments as Shrewton Parish Council are made in respect to Airman's Cross and Rollestone crossroads.
- 6.12.2 Elston lane will be affected and cause danger to users of this lane. Some form of traffic calming needs to be introduced in the lower part of Elston lane and at the Elston lane, Whatcombe Brow junction.
- 6.12.3 Consider that stopping up a right of way that has been in existence for 5000 years sets a poor precedent for all other rights of way.
- **6.13 Shrewton Parish Council- Objects** to the planning application. Around 24600 vehicles use the A303 at present and the congestion at peak periods is already unacceptable and presents a real delay for emergency vehicles coming to incidents along the A360 and for local traffic trying to cross the A303 at Longbarrow. This is projected to increase to around 41,200 by 2027. The projected increase in vehicles rises from 5900 at present to 15600 along this route all of which is compounded by the closure of the A344 and inadequate provision of road management.

The proposals mean that there will be more congestion at the Longbarrow roundabout.

6.13.1 At the proposed Airman's Corner roundabout traffic will have to queue with the SVC visitors until they can turn left off the proposed roundabout at Airman's Cross. There should therefore be a left-hand filter lane built into the proposals.

Considers that Rollestone Crossroads will become much busier as traffic seeks alternative routes.

- 6.13.2 Whilst the desire to keep the Stonehenge site as clear as possible is recognized, Council objects to the proposal to close byways 11and 12 to vehicles.
- **6.14 Tilshead Parish Council –** Concern is expressed at the probable extra traffic at Longbarrow and Airman's Corner. Traffic already comes to a standstill on the A303 regularly.
- 6.14.1 The plans show that at Airman's Cross local traffic will have to wait until they can turn off the proposed roundabout. Question whether a filter lane could be built in to the roundabout so that local traffic can move more quickly.

- **6.15 Winterbourne Stoke Parish Council-** We are in agreement that a new visitor centre for Stonehenge is needed and long overdue, however, the proposed new visitor centre and access roads are situated in an undeveloped area of open countryside within the WHS. The creation of a new visitor centre and roads across the WHS leading to the car park is unacceptable. Consider that the proposal will not be temporary as has been suggested but will be a long term solution. 6.15.1 The parish council therefore oppose and object to the proposal.
- 6.15.2 However if minded to approve suggest that where the A360 runs close to the Longbarrow roundabout it should be linked directly to the A360 so that traffic exiting the car park can more easily return to the A303.
- 6.15.3 The introduction of a roundabout at Airman's Corner is necessary and welcomed but improvements at Longbarrow will make little, if any improvement.

#### STATUTORY CONSULTEE RESPONSES

- **6.16 English Heritage –** Confirm that the applications were subject of pre application discussions. Were considered against the standards we apply in advising on planning applications and are submitted with the corporate support of English Heritage They state that their view is represented in section 5.8.13 of the Environmental Statement which states that –
- 6.16.1 On balance, taking into account the benefits of the proposed development in sustaining the Outstanding Universal Value of the Stonehenge WHS, the overall cumulative effect of the scheme would have a large beneficial impact.
- **6.17 Environment Agency-** No objection to the proposals subject to conditions regarding water supply, Foul Drainage, Surface Water Drainage and pollution prevention and control.

Second e-mail received 8/01/2010 stating -

"I would like to confirm the following in respect of the proposed visitor centre at Stonehenge. The Environment Agency's view is that every effort has been made to make the development as environmentally sensitive as possible from an abstraction viewpoint. All fixtures and fitting are highly water efficient, down to the choice of vacuum toilets over low flush alternatives. Through an analysis of visitor numbers and efficiency of the site, the consultant has identified that any new borehole at the site will be required to provide less that 20M3/d of potable water. This abstraction is therefore outside of the abstraction licence consenting procedure as it is less than the minimum volume which would require licensing, namely over 20M3/d.

If one temporarily ignores the fact that this is outside of our control, we believe that in balance, the borehole option is the least environmentally damaging way of supplying water to this site. The site is also a considerable distance from the nearest consented abstraction and therefore no derogation or indeed impact should occur. Talking to our groundwater teams, we believe that the level of change would be undetectable by groundwater loggers, should they be placed in these consented boreholes, and would be masked by logger error.

In terms of the Avon SAC, as stated above the scale of this abstraction means that any fluctuation on the Till or other designated water course would be undetectable and therefore would not give rise to any in-combination concerns."

"I hope that this clarifies our position on the abstraction and is of some assistance in the development of the HRA."

**6.18 Highways Agency-** The agency supports the application as proposed subject to conditions. The agency makes comments as regards to needing a rights of way strategy that is not included in the transport assessment. The agency also has concerns regarding the form and nature of pedestrian and cycle movements along the former A344 and the impact that this may have on the safe operation of the A303. The conditions that the Agency wish to see imposed cover —

- 1) A rights of way strategy
- 2) Details of the pedestrian/cycle route along the A344 to be submitted.
- 3) Stopping up of A344 and opening of visitor centre to not occur until Longbarrow roundabout modifications have taken place.
- 4) No development to take place until a travel plan has been produced incorporating the outline travel plan.
- 5) Monitoring of the travel plan to take place
- 6) No occupation of the development until a construction management plan has been submitted.
- **6.19 Wiltshire Fire and Rescue-** General comments have been made on the need to comply with fire and building regs and that access to the site for the purpose of firefighting is adequate for the size of the development. Also consideration is to be given to ensuring adequate water supplies are available at the site.
- **6.20 Ministry of Defence-** Confirm that the MOD has no safeguarding objections to the proposal.
- **6.21 Natural England** (Initial letters) Natural England expects high standards of site restoration around the stones and in many respects application has achieved this. The landscape around the stones will be significantly improved by the removal of the existing visitor facilities. Consider that thought should be given to alternative materials for pedestrian access as artificial green finishes can look very artificial.

Welcome the logical selection to site planning and site selection. Consider that the Coach park, car park and access road fit well with the landscape context. Not so sure about the building as its canopy increases its perceived height. A model of the building to scale in the context of the landscape would assist in these judgements. Consider building does not relate strongly to the landscape. Proposed design appears to relate to a more benign climate than can be expected in the vicinity of Salisbury Plain. The paved areas to the building are very rectilinear as opposed to the more organic nature of paths proposed elsewhere. A more organic natural character could be reinforced by the use of some selective scrub vegetation planting in the vicinity of the building and the car park. With regard to visitor centre building, were other design options use of sustainable green materials considered?

Planting adjacent the coach park should be carried out so that it is sympathetic with the landscape. Support the concept of producing a detailed landscape management plan.

Proposals for decommissioning of the existing visitor centre car park have been well designed and will make a tremendous benefit to the landscape around and the setting of the stones at Stonehenge. Consider it would be better to remove the existing tarmac surface on the former A344 rather than just topping with topsoil.

Consider that lighting should be considered in detail and before determination of the application.

A construction and environmental management plan should be agreed in advance Further information is required from the draft Construction Mangement statement this information will be required before a planning decision can be made.

Ecological Monitoring and Management plan (EMMP) support the production of this document if planning approval is given this should be subject to implementation of the plans.

Support the proposed visitor management strategy. Should be secured through legally enforceable condition.

Welcome the use of SUDS system for drainage and other measures to prevent water pollution and to minimise water consumption. Natural England agrees with the measures that should be taken in regard to lighting.

Consider that there should be no likely significant effect on the SAC/SPA providing mitigation measures set out in the ES are followed. Details of the required mitigation measures should be agreed as part of the integrated visitor management strategy.

Consider that the information in the ES is however currently insufficient to fully assess the likely significance on the River Till and lists further information required.

#### (second letters)

Natural England agrees with the conclusions of the HRA and Appropriate Assessment and is now satisfied that under Regulation 48(3) of the Habitats Regulations 1994, the development either alone, or in combination with other plans or projects, would not be likely to have a significant effect on the important interest features of the River Avon Special Area of Conservation (SAC), or any of the features of special scientific interest of the River Avon System Site of Special Scientific Interest. We can therefore remove our objections to the application with regard to the River Avon SAC.

Following a meeting with the applicants agents where the various issues we raised were clarified and following consultation with the environment agency we withdraw our holding objection. Natural England have no objection to the proposals subject to the inclusion of suitably worded legally enforceable planning conditions or management agreements to ensure that the proposed final mitigation measures are implemented as suggested in our previous response, clarified in the CBA response dated 18 December 2009.

Members should note that UNESCO was consulted on this planning application but no response was received.

#### NON STATUTORY RESPONSES

- **6.22 The National Trust-** Consider the most critical issues to be the World Heritage Site and special landscape area designations and interpretation of policies relating to them.
- 6.22.1 Consider one of the biggest issues to be whether the proposed building and parking is in keeping with the world heritage site. Arguably as the building situated on edge of WHS and not visible from the stones impact is minimal although inevitably there will be impact on the Cursus.
- 6.22.2 The trust takes the view that, while any building in the area with associated parking etc, will have some visual impact, the OUV of the WHS is not significantly compromised as a result of the proposals and the chosen site is better than any of the other available options. Consider the net benefit to be strongly positive, taking into account the improvements at the Stones themselves and improved visitor experience which more than offset the landscape losses that come with new visitor facilities.
- 6.22.3 There remain areas of uncertainty in the current application with regard to how elements of the scheme will operate. The trust considers these important matters that are confident will be resolved in discussion with English Heritage
- 6.22.4 The Trust is not raising an objection to planning application number S/2009/1527 which it strongly supports.
- **6.23 The South West RDA- (Regional development agency)** The proposals will ensure an improved visitor experience at Stonehenge. They are likely to increase visitor spend and dwell time at the attraction and at tourist locations across Wiltshire and the South West. This will help to support the tourism section of the economy and will result in an increased number of direct, indirect and induced jobs.
- 6.23.1 Makes the point that tourism is worth over 9 billion a year to the local economy, (South West) employing more than 250,000 people and attracting over 26,000,000 visitors a year. A replacement

- visitor centre that surpasses the offer of the current facility, has the potential to encourage visitors to spend more time there and to integrate their trips with visits to other parts of Wiltshire and the South West is considered an improvement.
- 6.23.2 Also support the decommissioning of the existing visitor facility and the A344 highway where it borders Stonehenge. Landscape reinstatement will play an important role in enhancing the setting of, and visitor experience at the world heritage site.
- 6.23.3 Various other comments are made with regard to the tourism potential of the proposed new facilities.
- **6.24 South Wiltshire Economic Partnership (SWEP)-** It is a fundamental objective of the SWEP strategy to support the creation of a world class visitors centre at Stonehenge in order to attract inward investment into the local community. Any concerns we have are based on the transport strategy however understand there are plans to improve the infrastructure surrounding the development. SWEP also keen to identify opportunities for local businesses to be engaged with the Stonehenge visitors centre in particular the development and construction phase.
- **6.25 CABE** Welcome the renewed efforts to improve visitor facilities for Stonehenge. Whilst recognising the challenge faced by the design team in responding to the sensitivities and constraints of the World Heritage Site, we have concerns about both the strategic and detailed approach to both landscape and architecture which we feel need to be addressed before planning permission is granted.
- 6.25.1 Support the strategic moves to cut short the A344 and de-clutter the site, locate visitor centre and car park south of the A344 and to separate the coach park and supporting building from the visitor facilities. However would like to see evidence of a landscape approach to integrate buildings, parking and visitor access at strategic and detailed level. Consider arrival sequence should be considered as part of whole visitor experience of landscape eventually leading to stones. Consider that there should be a logical sequence to the placing of the buildings in the landscape. Would like to see a more integrated approach to this.
- 6.25.2 Support principle of arranging visitor centre accommodation into two simple boxes united by a simple canopy roof However consider analogy of forest is not particularly strong. Consider that the random arrangement of columns and the way that they meet the thin edge of the roof canopy will fall short of the robust integrity that would be expected of a building like this. Appealing aspect of the proposal is the delicacy of canopy roof. However concerned that the demands of supporting a paper thin canopy on slender columns in an exposed environment will require a highly engineered solution that may compromise the visually delicate structure. Question whether the roof will tend to channel wind and rain under it rather than offer the level of protection visitors expect. Consider this should be further tested.
- 6.25.3 Need for new visitor facilities is undisputed are glad to see such a thorough proposal for the whole site. Our questions are about the extent to which the scheme fulfils its potential to support and intensify the visitor experience of a visit to the stones. Feel that more work is needed before the critical potential is achieved.
- **6.26 ICOMOS- (International Council On Monuments & Sites)-** ICOMOS –UK welcomes the chance to comment on the application which it sees as substantial progress towards providing much needed improved visitor reception arrangements at Stonehenge.
- 6.26.1 ICOMOS is happy that the A344 is to be closed where it passes the stones some 23 years after initial assurances were given that this would be the case.
- 6.26.2 Consider the scheme must provide substantial cultural as well as environmental benefits. At present the scheme is said to have cultural disbenefits, as it impacts adversely on the Outstanding Universal Value but that these are said to be outweighed by benefits for visitors. Do not consider that such disbenefits are acceptable and moreover do not consider they are necessary if the scheme is modified.

- 6.26.3 ICOMOS considers that a major intervention within the WHS largely funded by public funds, should contribute major cultural and environmental benefits. Consider that the proposed VC should deliver cultural benefits related to major landscape improvements in relation to the monumental and visual attributes of the WHS, to major access benefits for visitors to the wider landscape and to better visitor management. Also consider it is essential it does not cause disbenefits in terms of adverse impact on the attributes of OUV.
- 6.26.4 Consider the first benefit can only be achieved with considerable modifications to overall design of the building, car park and screening; in essence a down grading of the scheme so that it is lower key and sits well in the landscape and does not impact adversely on the attributes of OUV. The second and third benefits need to be achieved through the way the centre operates in terms of it being more than a service provider. The disbenefits can be removed by changes to design and landscaping.
- 6.26.5 Consider that with early consultations the adverse impacts on OUV of the proposed visitor centre could have been avoided. Also consider that an overall access strategy that relates the proposed visitor centre to enhanced access and understanding of the whole WHS should now be developed.
- 6.26.6 Consider it essential that the landscape proposals for all three elements of the site-visitor centre, car and coach parks should be inter related and related to a landscape Strtategy, which should now be developed.
- 6.26.7 ICOMOS uk supports the concept of a Visitor Centre being sited at Airman's Corner subject to modifications to its design and landscape arrangements.
- 6.26.8 Consider that the current designs for the proposed building, car park and roundabout will impact adversely on the attributes of OUV. Consider that these adverse impacts could be avoided by changes to the design of the proposed centre, car and coach parks and roundabout. These changes would limit the height of the building, the light spill from it, screening of the visitor centre and car park and lighting on the roundabout.
- 6.26.9 Consider current building is unsuited to the landscape and creates a disturbing interception of the gentle valley. Consider the two buildings should be roofed separately and reflect the idiom of farm buildings sitting low in the landscape. Consider the height of the building should be reduced so that it does not impinge on views of the Curses or on views from the major visual axis between the northern Winterbourne Barrows group and the henge site south of the curses and on views between the northern Winterbourne barrows and the lesser curses and barrows. Also the colour should be amended to ensure it is not light or reflective.
- 6.26.10 Considers that the side to the car park could be permeable and with limited light spill but side facing stones should be as blank as possible with no light spill as should the two other sides. Also consider that the building should be surrounded by chalkland shrubs and small trees. Do not wish to see the landscape polluted by light spillage.
- 6.26.11 Consider that the screening for all areas should be merged to create a low thicket typical of chalk downland.
- 6.26.12 Also consider that the remaining part of the A344 should be narrowed to allow grass to grow at edges and that white lines and signage should be removed. The surface should be coated with a gravel coated resin.
- 6.26.13 Consider the ground around the hub should be relandscaped so that the perimeter fence is not seen from the Avenue.
- 6.26.14 Consider an access strategy should be developed which includes links with local museums, other tourist attractions, transport providers and the national trust.

- 6.26.15 Icomos Uk asks the planning committee not to approve the current application and to request the applicants to make modifications to the scheme in order to mitigate its adverse impacts and deliver an exemplary approach.
- **6.27 The Stonehenge Alliance** Broadly welcome the proposals to improve the surroundings around the stones including the closure of the A344/A303 junction however considers Airman's corner is not an appropriate site for proposed visitor facilities and therefore object to the proposals. Applicants consider it would have an adverse effect on the OUV of the World Heritage Site. Considers that the scheme departs from planning policy and guidance including the World Heritage Site Management Plan policies 1c and 1e also quotes paragraph 14.5.26 which states that the location and design of any visitors facilities including car parking areas should ensure that they avoid adverse impact on the WHS, its setting and the attributes of its Outstanding Universal Value as well as various other paragraphs.
- 6.27.1 Also considers that it departs from Policy CN24 and CN20 of Salisbury District local plan, Policy HE1 of the Wiltshire and Swindon Structure Plan, Govt circular 07/2009 in particular paragraph 8 and 10 which outline that the Outstanding Universal Value of a WHS indicates its importance as a key material consideration, that planning authorities must have regard to and that the main objective should be protection of each WHS through conservation and preservation of its OUV
- 6.27.2 Considers that the proposal is in conflict with various policies including -The World Heritage Convention Article 4, Unesco guidelines for the implementation of the World Heritage Convention (2008) Guidelines 8,49,96,97,98,99,108,109,112 and 119. CLG Circular 07/2009 on the protection of World Heritage Sites (various paragraphs) Planning policy Statement 1, PPG16 Archaeology and planning (various paragraphs, Regional planning guidance 10 policy EN3, Good practice guide on planning for tourism, Delivering a sustainable transport system supported by local transport plan 3 guidance. Also consider there is a conflict with the European Convention on the protection of the Archaeological Heritage
- 6.27.3 They consider that it is clear from the planning framework including the management plan that improvements to one part of the WHS cannot be offset by damage to another part. New facilities for visitors ought to be located and designed in such a way as to not compromise the special qualities for the site.
- 6.27.4 Considers the scheme is directly in conflict with the WHS and OUV Considers there is an overwhelming case for advertising the scheme as a departure from planning policy. Consider that the application should be called in for a public enquiry because of this.
- 6.27.5 Points out that the impact on archaeology is just as important in considering the impact on the attributes of the OUV that make up the world heritage site. Considers that the groundwork's for the site would leave an imprint on the ground in archaeological terms where there is none at present. Which in their opinion means the structure would be neither sustainable nor truly reversible.
- 6.26.6 Considers the siting of the building so far away from other built form means that the visitor centre will not be sustainable.
- 6.27.7 Considers the application lacks information in respect of the position of lighting columns at Longbarrow and Airman's Corner
- 6.27.8 Positions of exterior lighting at the visitor centre building, the walkways, the car and coach park, and at the hub at Stonehenge are not marked.
- 6.27.9 Considers that photomontages of the scheme give a complex and misleading impression of the impact of parked vehicles.
- 6.27.10 Query what elements are missing from the scheme as per paragraph 4.5 of the D and A
- 6.27.11 Not clear whether a bore hole will be a viable option or not if a pipeline is required for water to the new visitor centre it is queried where this will go and how this will affect the archaeology in the area.

- 6.27.12 Note that aspects of surface and waste water drainage are still subject to EAs approval.
- 6.27.13 No appropriate assessment with the application documents. Consider this should be submitted as part of the application.
- 6.27.14 Consider that the pedestrian route along the A344 should have some form of protection to protect pedestrians from the land train.
- 6.27.15 Wonder whether sufficient space has been allowed for the visitor-transit vehicles to turn.
- 6.27.16 Considers that a green travel plan should have been submitted which should also address the lack of adequate provision for cyclists and walkers including safe A303 crossing points.
- 6.27.17 Consider that they should have been given more time to consider the proposal.

#### 6.28 CPRE (Campaign to Protect Rural England Wiltshire Branch)

- 6.28.1 Considers that the application is a departure from the safeguards put in place for the WHS. It is further considered that the size, unnecessarily prominent flagship design and lighting of the proposed visitor-centre, together with the impact of the associated works, including the highly visible car and coach parks, and the improved roundabouts, would be such as to severely damage the OUV of the WHS including the setting of the site and its monuments. Considers the lighting in particular would be insensitive.
- 6.28.2 Would be prepared to accept the Airman's corner site on a temporary basis providing the building were more sympathetically designed low key and single storey, better screened parking arrangements, coach and overflow parking is removed to another, less visible location such as Greenland farm and there is no highway illumination and reduced other lighting.
- 6.28.3 Considers information is missing as per the letter above from the Stonehenge alliance. Also considers detail concerning the entrance doorways for the timber faced pod should be submitted. Further information on how much of the hub building may be seen in the wider landscape.
- 6.28.4 Makes comments regarding appropriate assessment that should be carried out and that further information is required to do so.
- Consider either amendments should be made to the scheme or it should be called in for a public enquiry.
- **6.29 Wiltshire archaeological and natural history society-** There are a number of aspects to the scheme that we welcome and support including the closure and grassing over of the A344, the removal of visitor facilities and car parking from Stonehenge, The proposal for a new visitor transit route that will not require the construction of new roads, the closure to certain motorised vehicles of byway 12.
- 6.29.1 They consider the scheme is in conflict with a number of policies in the Unesco operational guidelines for the implementation of the World Heritage Site, also in DCLG Circular 07/2009, the district local plan and the WHS management plan.
- 6.29.2 However they have a number of concerns and make suggestions that they consider will improve the scheme including Additional screening of the VC. Reduction in height of the VC building, minimising the long term impact of the visitor centre by retaining existing slopes and minimising light pollution.
- **6.30 COBDO (Council of British Druid Orders)** Support the closure of the A344 and the movement of the visitor centre to Airman's Corner. However wish to be assured that it will still be possible to walk to the stones free of charge and that there are no fences directly adjacent to the stones. Also wish to see Byway 12 remain to be open to the public at the time of the various solstices.

### 6.31 Council for British Archaeology

- 6.31.1 CBA is strongly in support of improvements to the experience of visitors to the Stonehenge WHS it supported the choice of Airman's Corner. However make points regarding archaeology which is acknowledged appears to be relatively limited however asks that further consideration is given to reducing the impact of the main visitor building consider that further consideration is given to the scope for designing the building the building to sit lower in the landscape with less visual impact. Also the impact of the car parking areas, associated lighting and new highway lighting should be considered. Design to reduce the level of lighting and introduce more planting is essential.
- 6.31.2 The above impacts can be balanced with the undoubted benefits that will be achieved by the closure of the A344, the removal of the unsightly intrusive elements of the current visitor facilities close to the stones and the treatment of the former A344 road to remove the section between Stonehenge Bottom and Byway 12
- 6.31.3 Considered that the proposals respect the aim that development should be in accordance with principles and best practice for sustainable development and construction. More attention, however, should be given to sustainable travel and access particularly for cyclists and pedestrians not arriving by car
- 6.31.4 CBA gives it's support to the planning application but considers the above matters should be addressed.

# 6.32 CBA Wessex (council for British Archaeology)

- 6.32.1 Similar comments as above but also consider the building does not look temporary nor low key and will be visible from the western end of the Cursus. Therefore believe design should be modified so that it is less prominent and introduce an improved planting scheme. None the less acknowledge that the new proposals represent a significant improvement on the present facilities and therefore do not intend to raise an objection to the planning application.
- 6.32.2 Also additional matters that should be addressed and could be addressed in a post decision phase. Screening-the landscape strategy should be increased to incorporate more screening into the proposal. Also a travel plan should be introduced. Wish to see more detailed proposals for the transport of passengers. Consider that the retained section of the A344 should be recovered green to prevent visual intrusion. Consider that the redundant portion of the A3444 should be removed in its entirety together with as much of the road foundations as is practicable. Considers that there is no justification for more lighting at the proposed new roundabout at Longbarrow.
- **6.33 Corridor Alliance** Concern is expressed that the planning application creates further traffic growth. Concern is expressed that this creates a large car park in the WHS and an opportunity has been missed to have a modern, pleasant, healthy sustainable and efficient access policy at the site.
- 6.33.1 Concern is expressed that to add massively to the car parking of an attraction and then to take measures to attempt to persuade motorists not to use it is the wrong approach.
- 6.33.2 To move the visitor centre further west is to move it further away for those visitors who choose to come by sustainable transport modes (walkers, cyclists) via Salisbury or Grately.
- **6.34 Avebury Society-** Considers the application should be advertised as a departure. Concerned that the application is being entertained by English Heritage who have expressed concern over its adverse impact. Considers that local plan policy CN24 which seeks to protect the archaeological landscape has been ignored. Also Article 4 of the World Heritage Convention should be considered. Similarly the government guidance CLG 07/2009 is a material consideration. Whilst agree with the closure of the A344 and removal of existing facilities do not agree with making another 'eyesore' at Airman's corner. Consider the protective framework must not permit this to happen. Object to the scheme in principal and in detail.

- **6.35** The Amesbury Society Consider that they have not had enough time to comment and therefore have restricted themselves to the bat and breeding bird surveys. Considers that the idea of building a visitor centre on a green field site on chalk, agricultural downland will have a devastating effect on the flora and fauna of the area extending a long way from boundaries of the site. This will also have a devastating effect on the habitat of the birds listed. Considers that bats also are likely to be affected.
- **6.36 Sustrans** Object to the proposal. Support the development of a new visitor centre but consider the stopping up of the A344 at Stonehenge bottom without the provision of a similar or better alternative route does not comply with local plan policy R17. Consider more details should be provided of the surface of this route. Wish to see details of the gating arrangements at either end of the A344 prior to planning approval being granted.
- 6.36.1 Object to there not being any measures for cyclists to cross the A 344 at this point and consider that crossing the A344 will be more dangerous.
- 6.36.2 Consider that a detailed travel plan should be developed before planning permission is granted.
- 6.36.3 Consider that the applicant has failed to comply with parts of PPG13 and policies G1, G2, G9, and TR1. TR12 and TR13 of the saved policies of the adopted local plan. Object therefore on the grounds that the applicants have not provided a detailed travel plan which enables visitors to travel safely to Stonehenge on foot, by bicycle, by mobility scooter or by wheelchair.
- **6.37 Hampshire cycling C2C** Object on similar grounds to Sustrans above. Concerned about the closure of the A344 and the adequacy of a right of way for cyclists at this junction. Consider that any route for cyclists over this bit of the former A344 should be a designated byway. Consider that the proposal will severe access rights into the WHS contrary to policies that bind both Wiltshire council and the highways agency.
- 6.37.1 Concern is expressed that there is no safe crossing place at Stonehenge bottom and the idea of a tunnel for cyclists under the road is suggested. Concern is also expressed that the Highways agency is blocking the implementation of a central refuge at this point.
- 6.37.2 Various options for crossing the 303 at the point where it connects with byway 12 are suggested including a tunnel, a bridge and traffic lights all of which could be considered. A 40mph zone could also be introduced. Improvements to other rights of way in the WHS should be made.
- 6.37.3 Suitable bike parking facilities should be provided at the stones drop off point

#### 6.38 Cogs - cycling opportunities group for Salisbury

- 6.38.1 Object to the proposal for the following reasons. The surfacing proposed on the grassed over section of the A344 has not been specified. Bridleway or byway status would be appropriate to secure the interests of cyclists. The access gate must be open at all times.
- 6.38.2 Considers that the issue of accessing Stonehenge bottom from local centres of population has not been considered in the application. Consider that stopping up the A344 will increase traffic flow and therefore danger at Stonehenge Bottom where horseriders and cyclists are most likely to cross. Similarly crossing the A303 at its junction with byway 12 will be an issue. Considers application should be refused until these issues are addressed.
- 6.38.3 Suggests a controlled crossing of the A303 for pedestrians, cyclists etc. upgrading of the footway from Stonehenge road to a shared use cycle and footway up to Stonehenge Bottom.

  40mph limit along this section of the A303. Also suggest an extension of the shared use path to byway 11 and a permissive path joining it to Byway 12 with a controlled crossing or tunnel at the byway 12 junction. A 40mph speed limit between the end of the dual carriageway and Longbarrow roundabout. Wish to see further cycle parking provide as C2c above.

6.38.4 Consider that the outline travel plan submitted with the application is not exemplary and that a new travel plan should be submitted before the planning application is granted.

### 6.39 Campaign for better transport

- 6.39.1 Considers Airman's corner to be a poor choice of location as it is within the open landscape considers this to be contrary to a number of policies including policy N24 of the local plan. Also considers as the proposal is further away from Amesbury it conflicts with PPS1. Considers alternative sites such as Solstice Park or the centre of Amesbury should have been considered.
- 6.39.2 Considers that more local interpretation centres should have been used rather than one large visitor centre. Could be an explorebus link between these and cycling and walking links could be developed.
- 6.39.3 Considers that there is a failure to put green travel planning at the heart of the application rather it is just an add on. Considers that the applicant has failed to comply with guidance on the production of travel plans by stating that a full travel plan will be implemented when the visitor facility is up and running. Consider that 100% of visitors should arrive by public transport, walking and cycling.
- 6.39.4 Considers that the siting of the visitor centre 2km away from the existing visitor centre makes it even less accessible than the original centre. It fails to comply with PPG13
- 6.39.5 Raises the same issues as Cogs, C2C and Sustrans in relation to the crossing of the A303 at Stonehenge bottom and byway 12/A303/ (see above)
- 6.39.6 Considers the transport assessment to be unsound as it appears o show that there would be capacity problems with the A303 even if no new visitor centre was built therefore the improvements to the Longbarrow roundabout would have taken place anyway. It is not possible from the assessment carried out to evaluate what the contribution of the visitor centre relocation to congestion levels will be.
- 6.39.7 Support the closure of the A344/A303 junction however consider that the failure to provide a green travel plan are not in accordance with policy 5a of the management plan.
- 6.39.8 Considers application is a departure from the local plan as it doesn't comply with PPG1, PPG13 Local plan policy TR12, CN24, CN20 and he World heritage site management plan.
- 6.39.9 Consider an appropriate assessment needs to be undertaken.
- 6.39.10 Consider it a mistake to try to finish this project by the 2012 Olympics consider that in the short term an exemplary green travel plan should be developed for existing facilities and that the A344 at Stonehenge bottom should be closed. Introduce a speed limit of 40mph in the WHS along the A303 and upgrade the existing visitor facilities within the existing footprint.
- **6.40 Wiltshire Wildlife Trust-** Wiltshire Wildlife Trust is happy to support the proposal, it does not deliver as much as a more ambitious scheme to underground the road infrastructure might have done but given the financial constraints this proposal represents a significant step forward.
- 6.40.1 Pleased with the sustainable and energy efficient design for the visitor centre and the use of chalk grassland seed mixes also welcome the removal of recreational vehicle traffic from the Byways in the area which will add significantly to the tranquility and the opportunities offered to visitors to fully experience the chalk grassland.
- **6.41 Berengaria Order of Druids** Consider that parking would not be adequate at the summer solstice and other Solstices including the winter one. The Drove is currently used for parking and concern is expressed that if this was closed, there would be nowhere for people to park and

particularly those people with disabilities. Concern is expressed that people will not walk or cycle to the stones. What provision for the elderly and disabled is being planned? What first aid facilities will be available at the new site? Queries how the archaeology is to be conserved?

How are protected species to be conserved? Will there be any signposts for walking? Will there be any educational facilities for children.

**6.42 Trail Riders Fellowship** – The fellowship lodges a formal objection to the application on the grounds that an order to prevent motorised traffic using the two byways is unnecessary. If this element were withdrawn from the scheme the fellowship would be prepared to withdraw its objection.

# 7. Publicity

- 7.1 The application was advertised by site notice, press advert and neighbour consultation.
- 7.2 144 letters of response have been received. The following are responses that differ from comments made above from the groups above..
  - Question whether tourists will use such a facility. It is too far from the stones
  - Concerned at the proposed TRO and the closure of Byway 12 to vehicular traffic
  - Concerned there is no equality and diversity assessment
  - No disability impact assessment submitted
  - Concerned there is no traffic impact report
  - Concern of increased risk to pedestrian, horse, cycle and wheelchair users.
  - Concerned the proposal is contrary to various articles of the European convention.
  - Proposal should not be rushed through to meet the 2012 Olympics deadline.
  - Considered that car park is oversize and an intrusion in the landscape
  - Existing visitor centre could be 'redone' at little cost
  - The Hub should be less visible than presently shown
  - Airman's Cross is open and should remain so
  - Light pollution should be mitigated.
  - Considers that a site between Durrington Down Farm buildings and the Cursus is the preferred location.
  - Colour of visitor centre roof will be intrusive
  - Don't consider beech hedge round Coach Park will be effective.
  - Promises on duelling the area around Stonehenge have been forgotten
  - Visitor centre should be built near the Countess roundabout
  - Birds of Prey may be frightened away
  - The Green travel plan should be part of the submission of the application
  - Concerned about the length of time for consultation.
  - Concern expressed about stock fencing around the stones.
  - Development will interfere with religious right as a pagan druid to attend ceremonies
  - Suggest wind testing of proposed design for vc building be undertaken
  - Need to make sure visitor centre does not oscillate in high winds.
  - Stonehenge VC should have a planetarium with scale model of Stonehenge
  - Consider TRO's are just a further way of commercialising Stonehenge.
  - Is the car park big enough for busy periods?
  - Consider that vehicles with low CO2 emissions should be used to transport passengers or possibly horse drawn vehicles.
  - Consider that the cost of the project is too high
  - Consider that new application is an improvement on current facilities.
  - Needs to be a safer way to cross the A303 than at present suggest tunnel or bridge
  - Consider that current visitor facility represents a significant visual intrusion in the landscape
  - Integrated transport white paper requires a reduction in traffic where its environmental damage is worst.
  - Considers a non polluting rail link to Stonehenge should be developed.
  - Consideration should be given to terrorism and the potential for it at the VC.
  - Consideration should be given to the climate change act, 2008, The transport Act 2000, The Energy Act 2008, the Planning Act 2008 and their implications
  - VC Is being built in the wrong place resulting in more emissions than if it was built at Countess East.
  - VC site worsens carbon dioxide emissions.

# 8. Planning Considerations

- 8.1.1 The planning policy context for this report has been set out in appendix five in the planning policy response from the spatial planning department at Wiltshire Council. This sets out clearly the local planning authority's requirement to consider the planning application in accordance with the relevant policies. Spatial planning state -
- 8.1.2 "Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires this application to be determined in accordance with the adopted development plan unless material considerations indicate otherwise. The Planning System is a plan led one and there must be a rigorous analysis of the proposals to test whether they are in accordance with the development plan. Only then should all other material considerations be taken into account to evaluate the suitability of the proposals.
- 8.1.3 If any application is contrary to policy then they should properly be refused unless other material considerations raise exceptional circumstances that merit setting them aside. Similarly if the application can be demonstrated to comply with policy then this introduces a strong presumption to recommend approval for the proposals unless again that is outweighed by other material planning issues."
- 8.2 Consideration of the proposal against policy
- 8.2.1 The documents at appendix 2 are the main material policies and documents that this planning application needs to be judged against. Whilst to write in detail about each of these documents and policies in this report would make the report too lengthy the council has given careful consideration to each of these documents and policies.
- 8.2.2 International policy and guidance -
- 8.2.3 The Convention Concerning the Protection of the World and Natural Heritage contains the type of natural and cultural sites which are considered for conclusion within the world heritage list. In signing this convention in 1972 Britain pledged to conserve its national heritage and those world heritage sites situated within Britain.
- 8.2.4 The response from the council's spatial planning department considers that –

"While it may be the case that the proposed solution put forward to solve the problems within this planning application has not met with universal support (see Appendix x, page x, comments of neighbours), from the amount of time, resource and research that has been expended to bring this project to fruition, as well as the extensive documentary evidence supplied to support this application there is no doubt that this application has been formulated to make a significant contribution to the aims of the Management Plan. It has overriding aims of restoring Stonehenge to a more respectful setting, free of obtrusive 20<sup>th</sup> century developments, with improved access, improved interpretation and understanding and encompasses a long-term vision for securing the future existence, enhancement and enjoyment of this iconic site. As such the application unequivocally complies with the obligation the Convention places on the UK."

- 8.2.5 In terms of complying with the convention therefore it is considered that this project does so. The aims of the project in terms of removing much of the existing visitor centre and partial removal of the A344 along with the traffic associated with it can certainly be said to comply with international guidance. The introduction of a new visitor centre well away from the existing monument with its improved visitor facilities and interpretation areas further helps the knowledge and understanding of the monument and world heritage site in line with the objectives of the convention.
- 8.2.6 National and regional policy and guidance –

The proposal needs to be tested against national policy as contained within the PPG's and PPS's outlined above and also against the newly published circular 07/2009 (Protection of World heritage sites).

Circular 07/2009 states the following "The outstanding universal value of a World Heritage Site indicates its importance as a key material consideration to be taken into account by the relevant

authorities in determining planning and related applications and by the Secretary of State in determining cases on appeal or following call in. It is therefore essential that policy frameworks at all levels recognise the need to protect the outstanding universal value of World Heritage Sites. The main objective should be the protection of each World Heritage Site through conservation and preservation of its outstanding universal value. "(Circular 7/2009 P2)

8.2.7 Outstanding universal value' means cultural and/or natural significance which is so exceptional as to transcend national boundaries.

"The Secretaries of State for Communities and Local Government and for Culture, Media and Sport expect planning authorities to treat relevant policies in management plans as key material considerations in making plans and planning decisions, to take them fully into account when devising core strategies and other development documents, and to give them due weight in their other actions relating to World Heritage Sites." (Circular 7/2009, P4)

- 8.2.8 It is clear from this that the areas that make up the World Heritage Site and its features of Outstanding Universal Value are important to the consideration of this application and to any management plan devised. (see below). The circular emphasizes the need to protect the World Heritage site and for this to be a significant material consideration along with all the other documents and plans referred to above.
- 8.2.9 In considering whether the proposal complies with national and regional planning guidance the councils spatial planning department has concluded that –
- 8.2.10 "The planning application is considered, in principle, to comply with national and regional planning guidance. Its design and siting is based on the principle of sustainable development, while there is in landscape terms a significant net benefit of removing inappropriate 20th century clutter from the World Heritage Site. It will undoubtedly bring both direct and indirect benefits to Amesbury and the district."
- 8.2.11 In reaching this conclusion and taking into account the relevant planning policies it is concluded that the principle of creating a visitor centre at Airman's Corner represents the most acceptable solution in terms of maintaining the integrity of the world heritage site.
- 8.2.12 "Finally, it is important to evaluate whether the application can be considered to enhance the local environment. Whilst the scheme is leading to new development at Airman's Corner, it is also leading to the removal of both the A344 and the existing facilities immediately adjacent to Stonehenge within the central core of the World Heritage Site. This can only be considered a net gain in environmental terms. The removal of the 20<sup>th</sup> century incursion so close to Stonehenge will contribute to returning the Scheduled Ancient Monument to a more respectful setting fitting of its international status and value. Furthermore the design and layout of the facilities are of an extremely high quality and subtle design, which seeks to keep their impact minimal."
- 8.2.13 It can be seen from the above that the Councils spatial planning team when analysing the application consider that the removal of the existing facilities and the removal of part of the A344 road past the monument significantly enhance the setting of the Stonehenge monument. They also consider that the applicants have identified there will be some negative effect on the World Heritage site, however the net gain from the proposal would be a significant enhancement of the World Heritage Site as a whole.
- 8.2.14 It is the officer view that the removal of the A344 and the removal of most of the existing visitor's facilities and car park will have a significant positive effect on the World Heritage site. The introduction of new visitor facilities alongside this complies with the management plan as can be seen below and it is therefore considered that the proposal complies with both National and regional policies.
- 8.2.15 Local policy and guidance-
- 8.2.16 The principal of development has to be considered against two major policies of the local plan these being saved policies C2 and T3

8.2.17 Policy C2 - "Development in the countryside will be strictly limited and will not be permitted unless it would benefit the local economy and enhance the environment."

Policy T3- "It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site."

- 8.2.18 Officers consider that the proposal would comply with policy C2 of the local plan in that a much enhanced visitor centre would benefit the economy as it is likely that visitors would stay longer at the Stonehenge site and spend more locally. There is likely to be spin offs in terms of locally sourced trade and other benefits to tourism in the area. As already stated it is considered that the removal of the old visitor facilities will enhance the environment around Stonehenge and no objections from statutory consultees have been raised as regards the effects of the new visitor centre. It is considered therefore that the proposal complies with this fundamental policy of the local plan.
- 8.2.19 Policy T3 of the saved policies of the local plan states that a new visitor centre will be provided for the Stonehenge World Heritage Site. This is supported by the Council, as such this application provides such a visitor centre and therefore the application complies with this.
- 8.2.20 Policy C12 of the Wiltshire and Swindon structure plan has again been considered by the councils spatial planning team and it states
- 8.2.21 "Local Planning Authorities will protect the best and most versatile agricultural land from non-agricultural development. Exceptionally, where there is an overriding need for development on best and most versatile agricultural land, which cannot be met elsewhere."
- 8.2.22 In considering this part of the scheme the spatial planning department have stated that –
- 8.2.23 "The final point of principle is that with the Wiltshire Structure Plan, policy C12, which basically states that the best agricultural land needs to be protected from development. The 'best and most versatile land' is classified as grades 1, 2, and 3. The construction of the new visitor facilities at Airman's Corner will result in the loss of 6.7 ha of agricultural land, which includes 2.7 ha classified as best and most versatile agricultural land (sub-grade 3a). The supporting text with the policy makes it clear that this land should only be developed if there is an overriding need that cannot be met elsewhere. The need for a new visitor centre to serve Stonehenge has long been accepted as an exceptional need as expressed through policy T3 of the Salisbury Local Plan and the setting.
- 8.2.24 The exceptional need for the new visitor centre being established, it must be examined whether alternative sites are available that would help safeguard the best agricultural land. The detailed analysis of site selection and consideration of alternatives is contained in section 3 of the Environmental Statement. In summary, the preferred options are considered to be an optimal response to the Stonehenge WHS Management Plan 2009 policies for conserving and enhancing the outstanding universal value of the WHS, while maximizing opportunities for improved understanding and enjoyment for all visitors. The environmental assessment of alternative sites is compelling and taking a view of all land use constraints the Airman's Corner site does emerge in planning terms as the most acceptable site.
- 8.2.25 The Environmental Statement states *The Airman's Corner site was selected as the preferred site as it would:*
- -Minimise as far as practicable adverse impact on the WHS, its setting and the attributes of its Outstanding Universal Value;
- -Minimise as far as practicable adverse impacts on the character of the landscape;
- -Avoid constraining opportunities for improvements to the setting of Stonehenge and other monuments and sites in the WHS landscape as far as practicable;
- -Make use of land which has been previously disturbed by development the section of the B3086 to be removed;
- -Make use of existing infrastructure so enabling new infrastructure (including access roads and transit routes) within the WHS to be kept to a practical minimum.

- 8.2.26 Therefore in relation to policy C12 the proposals are considered to accord with its provisions as exceptional need that cannot be elsewhere has been demonstrated."
- 8.2.27 It can therefore be concluded that the proposal in relation to the development plan (regional and local policies) accords with the development plan in principle.
- 8.2.28 In addition to the principal of the development the detail of the development needs to be considered and this is contained within the spatial planning response at appendix 5. It is not intended to reiterate what is said there again at this point as these individual issues will be covered later in this report (see below). None the less officers agree with the views of the spatial planning department that as well as being acceptable in principal the development complies with the detailed requirements of the development plan policies.
- 8.2.29 Is the proposal a departure from the local development plan?
- 8.2.30 Representations have been received stating that objectors to the application consider it to be a material departure from the development plan. Officers do not conclude this. In order to be a departure the proposal would have to conflict with one or more policies of the development plan as is shown above and in the spatial planning response it is not considered that the proposal conflicts with the development plan and is not therefore a departure from it.
- 8.2.31 It should be noted that even if the proposal were a departure, since new legislation which was brought into force on the 20<sup>th</sup> April this year, such applications which are considered as departures do not need to be referred to the secretary of state.
- 8.2.32 Emerging Regional spatial strategy and South Wiltshire Core strategy
- 8.2.33 The emerging regional spatial strategy for the south west and the emerging south Wiltshire core strategy are at an advanced stage and include the policies as listed above.
- 8.2.34 The South Wiltshire Core strategy
- 8.2.35 The South Wiltshire Core strategy was submitted to the secretary of state in mid November 2009 and includes similar policies to that which are in the existing local plan but also contains policy 13 which states that-
- 8.2.36 New Visitor facilities will be permitted where they:
- -Return Stonehenge to a more respectful setting befitting of its World Heritage Site status
- -Include measures to mitigate the negative impacts of the roads
- -Introduce a greatly enhanced visitor experience in a high quality visitor centre
- -Implement an environmentally sensitive method of managing visitors to and from Stonehenge
- -Include a tourist information element, which highlights other attractions and facilities on offer in the surrounding area and raises the profile of Wiltshire
- 8.2.37 This policy along with the requirements of the emerging RSS have been summarized as follows-
- -Infrastructure New development to be supported by infrastructure
- -High quality design In terms of urban form and sustainability criteria
- -Sustainable Construction
- -Natural and Historic Environment To be protected and enhanced. Priority to preservation and enhancement of sites of international or national landscape, geological, archaeological or historic importance.
- -Nature conservation Distinctive habitats and species of South West to be maintained. Protection and enhancement of region's network of ground, surface and coastal waters and associated ecosystems.
- -Sustainable tourism and the economy/ Realising the potential of cultural and heritage assets /

- -Decentralised energy to supply new development
- -Waste Controlling, re-using and recycling waste in development.
- 8.2.38 Again these parts of the emerging RSS and local development framework are similar to the existing policies and will be considered in the individual parts of the report.
- 8.2.39 Stonehenge World Heritage Site Management Plan
- 8.2.40 As stated above the World Heritage site management plan is an important document in protecting the world heritage sites features of outstanding universal value, the following is the spatial planning response to that document in the context of the current application-
- 8.2.41 "The Government has made it clear that the revised Stonehenge World Heritage Site Management Plan provides the framework within which the Project must be implemented. On 15 July 2009 Wiltshire Council's Cabinet resolved to "endorse the Stonehenge World Heritage Site Management Plan 2009 as supplementary guidance and a material consideration in determining planning applications that affect the Stonehenge WHS, and as a replacement for the 2000 Stonehenge WHS Management Plan previously adopted by Salisbury District Council as Supplementary Planning Guidance." As such, the revised Management Plan 2009 provides the overarching guidance and policy context for the development of the Project.

The Project will help deliver the Vision for the WHS that is set out in the revised Management Plan 2009. It will enhance the visitor experience by providing improved New Visitor Facilities and interpretation, which will assist in achieving a number of the revised Management Plan's aims related to conservation of the WHS, sustainable tourism and visitor management, and sustainable traffic management and transportation.

The Management Plan represents the Government's recognition of this obligation under the UNESCO World Heritage Sites Convention and summarises proposals to prevent damage to Stonehenge and its setting and to ensure its survival for future generations. The Management Plan also goes far beyond the obligation and crystallizes the Government's vision as originally set out in the Stonehenge Master Plan for the enhancement of the World Heritage Site and Stonehenge.

The Management Plan has been prepared following guidelines prepared by the International Committee on Monuments and Sites (ICOMOS): the expert body that advises UNESCO in providing objectives for the future management of the Site. In accordance with ICOMOS guidelines, the Management Plan has been drafted to establish a strategic framework for management based on analysis of the Sites significance.

The Management Plan identifies and acknowledges the importance of a wide range of mechanisms, both statutory and non-statutory, which already exist for the protection and/or management of the World Heritage Site. In this way it co-ordinates all of these instruments into one document in a manner that will provide an invaluable source of reference and cohesive cross-organisational approaches. Therefore the Management Plan includes the statutory planning policy framework, which exists to protect and manage the World Heritage Site as well as the roles of many organisations and individuals who are actively involved in managing the landscape. In this manner the Plan provides guidelines to direct management towards clear priorities and helps to encourage and enable others to take similar action. Furthermore this partnership approach helps to ensure that objectives defined in the Plan are achievable given the constraints of law and practices carried on within the World Heritage Site."

8.2.42 It is as a result of the Stonehenge management plan that the current planning application is being submitted. The current management plan seeks the solution to the current outdated visitor facilities whilst still respecting the features that make the World heritage site what it is, as will be shown below it is considered that this has been achieved and that having regard to the policies and aims contained within the world heritage site management plan the proposal complies with these. It is considered that the proposal has avoided impact on the features of outstanding universal value.

8.2.43 Conclusion on development plan policies and the principle of development

8.2.44 From the spatial planning response and from the above it is clear that both government policy and regional/local policy have the same common objectives for the world heritage site, these are the protection of the world heritage site whilst removing as much as possible of the existing twentieth century development close to the stones. They also have the objective of providing a new visitor centre that will meet the educational and informational needs of those visiting the stones. It is considered that in principal this development will meet those objectives and go a significant way to securing the objectives of the WHS management plan and other documents.

## 9.0 Consideration of alternatives

9.1 Before the selection of the Airman's corner site was made a number of other alternatives were looked at and dismissed. The applicants EIA submitted with the planning application outlines that the main alternatives were –

Option 1 The current visitor site

Option 2 Durrington Down farm

Option 3 Fargo

Option 4 Airman's corner junction

Option 5 Rollestone Camp junction

- 9.2 Various sites at these places were considered and discounted. Option 1 (The current visitor facilities) was considered and discounted relatively early on in the process because of the traffic and environmental considerations. Similarly Durrington Down farm was dismissed for the same reasons (option 2) as was Rollestone camp (option 5).
- 9.3 This left Options 3 and 4 which were Fargo and Airman's corner. There were then considered in detail. Following archaeological advice over the archaeological sensitivity of the Fargo site, Airman's corner would therefore be the most widely supported and was chosen as the final site.
- 9.4 In addition to choosing the area itself for the new visitor centre various sites at Airman's corner were also considered; including an alternative for a single building on land in the South East quadrant at Airman's corner. This was dismissed as it was felt that the currently proposed option minimized the visual impact of the visitor centre buildings in the landscape.
- 9.5 Similarly options were pursued for both the car parking and coach parking before the current layout of the site was pursued.
- 9.6 Following on from this various options in relation to the existing visitor facilities and the A344 were looked at in terms of the scale of removal of the existing visitor facilities. The aim was to reduce the existing visitor facilities to a minimum whilst retaining the necessary facilities for security and other essential utilities. Similarly the aim of removing the A344 was to reduce its impact on the stones and other attributes of OUV within the world heritage site.
- 9.7 Similarly the highway improvements at Stonehenge Bottom and Airman's Corner had a number of options that were for consideration with them and these were assessed in relation to their environmental impact, the highways requirements and cost. It was after consideration against these criteria that the current designs and options were pursued.
- 9.8 In summary the applicants considered that the Airman's Corner site offered the best balance in terms of environmental impact, deliverability and visitor benefits and they considered them to be an optimal response to the Stonehenge WHS management plans 2009 policies for conserving and enhancing the Outstanding Universal Value of the WHS whilst maximizing opportunities.
- 9.9 Officers have assessed the options that the applicants have stated that they have considered during the appraisal process leading up to the submission of the planning application and have concluded that the approach taken to the options and their discounting at this stage of the process is a reasoned and logical

approach. Given the numerous constraints and considerations at this stage of the process officers consider that the final layout and site chosen is both reasonable and optimal.

### 10.0 Design of the proposal

- 10.1 The reasons for the siting of the proposal are considered under the section on consideration of alternatives. This section therefore assesses the design in terms of architectural merits of in particular the new visitor centre, but also of the reduced hub facility (existing visitor centre) and also of the car parking areas and ancillary building.
- 10.2 The main reasons for the siting of the Visitor centre building at Airman's corner in brief summary were –

Good accessibility from the A303

The location is remote from residential property

The immediate area is relatively free of archaeological remains

The choice of this site enables car and coach parking to be restricted to the perimeter of the site well away from and out of site of the stones.

- 10.3 The Airman's Corner site
- 10.4 The car park for the new visitor centre has been placed on the south side of the dry valley in the field in which it is to be situated. In order that visual intrusion across the wider landscape is minimized, being positioned on a slope like this will not only entail less excavation, but will also mean that views of the car parking from the south and east will be more restricted in the WHS as a whole.
- 10.5 It is intended that the ancillary building and coach parking are to be screened behind the existing row of beech trees at the site. New trees are to be added to complete the screening from views to the north and east. It is intended that new roads and water treatment tanks are placed on top of the soil to avoid disturbing potential archaeology and separated by geotextile layers to enable future reversibility. The size of the visitor centre has been kept to the minimum requirement to cater for visitor numbers up to a maximum 850 visitors per hour.
- 10.6 The applicants have stated that "The visitor centre is sensitively designed to sit lightly in the landscape" The aim of the project has been reversibility so that in the future at the end of its lifespan the existing visitor centre could be removed and the land restored to its current state. The centre has been designed from lightweight materials which require minimal substructure.
- 10.7 The applicants have stated that "the building is a simple yet distinctive architectural composition deferential to the Stones and the World Heritage Site. A conscious decision was taken that the building should not directly reference the Stonehenge monument in its form, material or alignment. "The height of the visitor centre which has been criticized during consultation on this application is comparable to the height of the tallest Trilithons at the henge and this applicants explain is so that the centre does not diminish the impact of the scale and experience of the stones.
- 10.8 It is intended that the building proposed will be robust enough to withstand anticipated visitor numbers whilst having a low carbon footprint and a high BREEAM rating using local, recycled and renewable materials where possible.
- 10.9 It is also proposed to provide a number of small Neolithic huts which will be based on an interpretation of huts found recently nearby in Durrington.
- 10.10 The hub facility

- 10.11The majority of the buildings and built structures at the existing visitor facility will be removed (see description of development above). However a small underground facility will remain for essential staff that manage the facility at night and during the day. New and retained pedestrian pathways are to be surfaced with grey/green bound gravel to reduce their visual intrusion.
- 10.12 Concerns have been raised most notably by CABE to the design of the proposed new visitor facilities -
- 10.13 Support principle of arranging visitor centre accommodation into two simple boxes united by a simple canopy roof However consider analogy of forest is not particularly strong. Consider that the random arrangement of columns and the way that they meet the thin edge of the roof canopy will fall short of the robust integrity that would be expected of a building like this. Appealing aspect of the proposal is the delicacy of canopy roof. However concerned that the demands of supporting a paper thin canopy on slender columns in an exposed environment will require a highly engineered solution that may compromise the visually delicate structure. Question whether the roof will tend to channel wind and rain under it rather than offer the level of protection visitors expect. Consider this should be further tested.
- 10.14 They have stated that they consider the principle of arranging the columns in a random fashion like a forest to be not a particularly strong feature and yet Wiltshire Council's own design forum when presented with an earlier version of the proposal specifically requested that the columns were laid out in a more random fashion and as can be seen from the Wiltshire Design Forum's comments they consider these to be much better. Given that the Wiltshire Design Forum had seen the designs at an earlier stage and know the site far better than CABE (living as the members do in the local area) It is considered their comments should be afforded more weight in these circumstances. The other structural aspects of the scheme that CABE comment on are matters which have been carefully considered by the applicants and are known to work.
- 10.15 CABE's comments about wishing to see a logical reasoning for positioning the buildings in the landscape is already explained and covered in the first half of this section and in the site choice selection.
- 10.16 Wiltshire's Design Forum have concluded that they felt the architects should be congratulated for the effort that they have put in, in a relatively short period of time and for designing a building which was very much of the 21<sup>st</sup> century.
- 10.17 It is officers view taking into account the policies above contained within the policy section of this report, and the analyses of the design policies provided by spatial planning in combination with the comments of groups and individuals, that the building that has been produced for Airman's corner is a distinctive, robust and environmentally friendly building which whilst not intended to blend with the landscape, none the less sits comfortably within it, and will create a place that visitors will want to stay at and be attracted to. Its lightweight design and two 'pod' structure with its interesting oversailing roof is considered by officers to represent an architecturally sound proposal that will provide enhanced visitor facilities for the interpretation and education of the whole World Heritage Site.

# 11.0 Transport

11.1 Transport and the implications for it are a crucial part of the current proposal for the WHS. Transport issues have been assessed by the applicants in a transport assessment dated September 2009.

Policies at a national level appropriate to the consideration of the transport issues are –

The future of transport white paper (2004)

PPS1: Delivering Sustainable Development (2005)

Supplement to PPS1 planning and climate change (2006)

PPS4 Planning for Sustainable Economic Growth (2009)

## **PPG13 Transport**

- 11.2 The statutory development plan policies include the Regional Planning Guidance note 10, The Wiltshire and Swindon Structure Plan 2016 (WSP) and the saved policies of the adopted Salisbury District Local Plan (SDLP). The South West Regional Spatial Strategy (RSS) and the emerging Salisbury local development framework (LDF).
- 11.3 Other relevant policies can be found in the Wiltshire local transport plan, the Wiltshire rights of way improvement plan, The tourism strategy for South Wiltshire and the Stonehenge Management plan.
- 11.4 The general thrust of these documents is to encourage the fullest use of sustainable travel wherever possible, and the fullest possible choice for sustainable travel should be made available and promoted wherever possible. There should also be integration and interchange between the different transport modes as set out in both the RSS and RPG10.
- 11.5 PPG13 sets out the view that development which includes employment and leisure facilities should offer a realistic choice of access by public transport, walking and cycling although it does recognize that this may be less achievable in some areas.
- 11.6 Structure plan policy TR5 and LTP2 state that measures should be provided to encourage walking and cycling, and improve safety of these modes of transport in order to offer alternatives to the private car
- 11.7 Local plan policy TR12 states that -
- 11.8 Permission will not be granted for major new development unless provision is made in the layout for:
- 11.9 Facilities giving priority to and allowing access by, buses, cycleways and footpaths; and direct and sustainable links to adjoining developments and urban centres, particularly those links giving priority to public transport, walking and cycling
- 11.10 It can therefore be seen that there is considerable emphasis in current guidance on the need to ensure that developments provide green modes of travel.
- 11.11Parking policies encourage maximum guidelines such as saved local plan policy TR11.
- 11.12 Structure plan policy T12 sets out proposals for an A303 Stonehenge trunk road improvement scheme (the tunnel). A public inquiry was held into this scheme and the inspectors report supported this proposal. The Secretary of State for Transport latterly announced that the tunnel did not represent value for money and therefore the scheme has not been commenced. Whilst a scheme similar to the tunnel does not form any part of this application. It does not prevent it from taking place in the future.
- 11.13 The proposed highway changes are as follows -
- 11.14 A key aim of this scheme and indeed 5b of the World Heritage Site Management Plan is to close the A344/A303 junction to vehicular traffic so that it is diverted via the A360 and A303. It is intended to close this junction and landscape it retaining the existing crossing point with a gated access on the north side into the National Trust land.
- 11.15 It is intended to stop up the A344 between the A303 and byway 12
- 11.16 It is intended to replace the current junction at Airman's Corner with a roundabout. This would include a realignment of the B3086 to the north and give better access to the visitor centre.
- 11.17 An improvement scheme is intended at Longbarrow roundabout which moves the roundabout away from the Longbarrow and provides improved entry capacity at the A360north and the A303east.

- 11.18 It is also intended as part of separate TRO applications to prevent vehicular traffic using byways 11 and 12.
- 11.19 Traffic modeling has been carried out by the applicants taking into account the works to be carried out and in particular the stopping up of the A344/A303 junction. Traffic modelling included taking account of the August peak levels of traffic which are currently experienced on the A303 and predicting these in the future.
- 11.20 The results from the traffic modeling show that the main changes that will occur with the closure of the A344/A303 junction will be at the Longbarrow roundabout and Airman's Corner which will both see increases in the level of traffic. Whilst Countess roundabout, Durrington Walls roundabout and Rollestone Camp crossroads were considered as part of the traffic modeling the results for these junctions were found to be negligible with smaller increases of traffic at these points. There was however shown to be increased traffic along the Packway as a result of driver diversion.
- 11.21 Both the applicants and the local authority's highways department have concluded that the proposed capacity improvements at Longbarrow roundabout will compensate for the loss of the route along the A344 to the degree that congestion on the A303 is not increased to a level that would result in significantly increased use of the A345 Countess Road north.
- 11.22Using an analysis of personal injury data the applicants have concluded that the improvements to both the Longbarrow roundabout and to the Airman's Corner junction would result in a net reduction in accidents at these junctions.
- 11.23 Car parking was assessed using both 2002 and 2008 visitor numbers to the existing centre. The maximum predicted parking was 348 cars and 20 coaches. The currently proposed parking s for 500 cars and 30 coach parking spaces, this includes taking into account the longer visitor stay anticipated as part of the new visitor proposals.
- 11.24 Existing pedestrian access to the site will be maintained at the junction of the A344 and A303 at Stonehenge bottom. Highways have asked for a condition that requires the applicants to submit a scheme to show how crossing arrangements at Stonehenge bottom will be achieved.
- 11.25 As is outlined in the section on recreation (below) cyclists will be given access along the former line of the A344 and the highway condition that requests details of arrangements of access across the A344 will apply to cyclists as well as pedestrians. Although the applicants have stated that a suitably reinforced surface for cyclists will be provided, the highways condition requires details of this to be provided so that the local authority can ensure adequate access for cyclists is maintained. A further condition has been suggested by highways that requires further details of bike storage at both the new visitor centre and the drop off point close to the stones to be submitted, so that cyclists are catered for and encouraged to cycle to the stones.
- 11.26 Horses will not be affected by the proposals although the condition for crossing details at Stonehenge bottom would apply to horses too as they also need to be considered.
- 11.27 Green travel plan
- 11.28 Given the thrust of current national regional and local planning policy and the need as specified in policy 5d of the World Heritage Site Management Plan for an exemplary green travel plan it is important that such a plan is produced and the applicants have outlined what it is intended that the contents of the plan will be- these include –
- 11.29 The appointment of a travel plan coordinator to ensure that the plan is adhered to and to promote both the travel plan and the policies and targets contained within it.
- 11.30 Suitable travel information will be provided on sustainable methods of travel to the visitor centre this will provided for both staff, and visitors and will be provided at the site and on the website.
- 11.31 There will be promotion of car sharing and promotion of the Wiltshire car sharing website.

- 11.32 Cycling is a key mode of transport and the green travel plan sets out to promote cycling at the site by offering discounts to staff who wish to purchase a bicycle, staff lockers and changing will be provided for those who wish to cycle to the site. The travel plan coordinator will promote the beneficial health effects of cycling.
- 11.33 The travel plan coordinator will work to ensure that visitors have suitable information available on walking routes to access the stones and the surrounding landscape
- 11.34 A current tour bus serves the existing visitor centre from Salisbury and this is intended to continue to serve the new visitor centre. This is the only bus service that runs passed the site at present and although highways have suggested bus stops outside the visitor site there is little point in this as there are no services that run via Airmans Corner at present.
- 11.35 Reduced price ticket admission is to be considered for those who arrive by sustainable means of transport this is something that has been in operation at the national trusts Tyntesfield estate at Wraxell near Bristol since it opened a few years ago and is something that will be considered by English Heritage at the Stonehenge site.
- 11.36 These are some of the main points that will be considered in the green travel plan that is to be secured by legal (s106) agreement.
- 11.37 Given all of the above, the consideration of local national and regional policies and the lack of objection to the scheme from the statutory consultees including both the local highways authority and the Highways Agency it is considered that the proposal given the implementation of a thorough green travel plan as outlined by the applicants and agreed with the local highways authority, will not produce significant highway effects that would warrant refusal of the application and will produce a development that serves the needs of the visitor well whilst promoting green travel methods.
- 11.38 A number of alternatives to the current site were considered prior to the submission of this application and these are outlined in the applicants Environmental Impact Assessment along with the reasons that they were chosen and dismissed and the reason that this particular site was eventually used. One of the reasons that the applicants outline that they chose The Airman's corner site was to minimise as far as practicable adverse impacts on the WHS, its setting and the attributes of its Outstanding Universal Value.
- 11.39 The management plan for the WHS seeks the removal or screening of inappropriate structures or roads and in particular the A344.

# 12.0 Archaeology and the Historic environment

- 12.1 Archaeological surveys were carried out at the site that sought to identify any buried remains within the site and the method of construction has been developed in conjunction with the archaeological working group to ensure the preservation in situ of any archaeological remains. The results of the archaeological surveys carried out indicate that there are no significant remains within the site.
- 12.2 Wiltshire Council's archaeologist has commented on the application and her views are set out above in the consultee section of the report. She has stated that she considers the new facilities on the whole have been designed in a way to minimise their impact on the attributes of OUV of the WHS. In particular it is considered that the closure and removal of the road (A344) between Stonehenge bottom and Byway 12 would bring significant benefits for the character and setting of Stonehenge and immediately related monuments as it will restore the link between Stonehenge and the Avenue and also bring improvements to the setting of Stonehenge and the Heel stone. It is intended that where this section of road is restored to grass, works will minimise any impact on archaeology.
- 12.3 Similarly the decommissioning of the existing works at Stonehenge would be restricted to the existing footprint of facilities and would not affect any known archaeological remains.

In terms of the impact that the Airman's Corner site would have on the WHS and its features of Outstanding Universal Value the new development would be visible from monuments that express attributes of Outstanding Universal Value however in most cases these would be at distances of over 1km distant. It is considered that the visitor car park may present a visible intrusive element because of vehicle movements and in particular reflections of light from windows and the car surfaces. However when not in operation, it is considered that the car park would be minimally intrusive.

- 12.4 At present traffic on the A344 is a highly visible intrusion in the landscape, therefore the removal of this traffic would be beneficial to both the setting of Stonehenge and to the safeguarding of the OUV of the WHS as well as delivering policy 5b of the Stonehenge Management Plan.
- 12.5 Policy 3i of the Stonehenge Management Plan which seeks where possible to improve the visual character of the landscape would be achieved with the removal of the existing visitor facilities. At present parts of the existing visitor facilities including the car parks and coach parks are highly visible from key monument groups in the WHS including the Curses, the curses barrows and the King barrows. Therefore this would be a significant improvement to features of Outstanding Universal Value.
- 12.6 The construction of the new roundabout at Longbarrow crossroads although not part of this application will also allow the setting of the Longbarrow to be improved although there would also be adverse effects due to increased traffic movements and the loss of the trees. This is a finely balanced issue however given that the increase in traffic is as a direct result of the closure of the A344 which itself is a significant benefit to the WHS and a stated aim of the WHS management plan it is considered that on balance this is acceptable.
- 12.7 The applicants have assessed the overall proposal in the context of the following features of Outstanding Universal value
- 1 Stonehenge itself as a globally famous and iconic monument.
- 2 The physical remains of the Neolithic and bronze age funerary and ceremonial monuments and associated sites
- 3 The siting of Neolithic and bronze age funerary and ceremonial sites and monuments in relation to the landscape.
- 4 The design of Neolithic and bronze age funerary and ceremonial monuments in relation to the skies and astronomy
- 5The siting of Neolithic and bronze age funerary and ceremonial monuments in relation to each other: 6 The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without
- 7 The influence of the remains of Neolithic and Bronze age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.
- 12.8 Having assessed these in relation to the proposal they have concluded that the overall cumulative effect of the scheme would have a large beneficial impact.
- 12.9 It is clear that the new scheme would have substantial beneficial effects on the setting of the Stonehenge monument and that the siting of the new visitor centre has been chosen to minimise impacts on the features of outstanding universal value. Given this and given the already considered policy implications including the complete fulfilment by this proposal of several of the WHS management plan policies it is considered that the proposal is acceptable in terms of archaeology and the impact it has on it both above and below ground and it would be a large beneficial effect.

# 13.0 Landscape character and visual amenity

- 13.1 One of the most important aspects to the Stonehenge scheme is clearly going to be its impact on the landscape and its visual amenity. The World Heritage Site is listed as such for its features of Outsanding Universal Value, these are listed in the World Heritage Site Management Plan as –
- 1. Stonehenge itself as a globally famous and iconic monument.

- 2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.
- 3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.
- 4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.
- 5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.
- 6. The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel.
- 7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.
- 13.2 The applicants have stated that the aim of the proposed scheme is to -

Deliver substantial beneficial effects to visual amenity and to the current landscape character and quality of the study area through the removal and concealment of intrusive built elements in the vicinity of the stones and the removal of traffic from the A344.

It is also to minimise the adverse effects on visual amenity and on the current landscape character and quality of the study area through appropriate siting, design and operation of the Visitor Facilities at Airman's Corner and changes at Longbarrow Roundabout.

- 13.3 The applicant's assessment considered two particular impacts that come from the construction and operation of the scheme. These were
- 1) Changes to the physical fabric, current landscape character and quality of the countryside considered within the context of broadly defined landscape character areas.
- 2) Changes to the visual amenity of people (i.e. residents, recreational users, road users etc along with the cumulative effects which are also considered.
- 13.4 At present the landscape around the existing visitor centre and the Stonehenge monument as well as the proposed site of the visitor centre is characterised largely by rolling chalk downland which has a number of dry valleys. It is mainly an open landscape where long views are possible in most directions. These views are sometimes impeded by tree belts and tree clumps (such as the beech tree belt to the north of the new visitor site).
- 13.5 Clearly one of the major benefits of this scheme is the enhancement to the area around the existing visitor centre by the removal of the car park and much of the adjacent visitor facilities leaving only a small underground building coupled with the restoration to grassland of the section of the A344 between Stonehenge Bottom and Byway 12.
- 13.6 It will be necessary as part of the proposal to introduce 9.8m high lights at the new roundabout at Airman's Corner, which, because of the sensitivity of the environment would have cut-off lanterns to prevent light spillage beyond the highway and the lanterns would be dimmable during late night hours. A condition on lighting proposed as part of the proposal is suggested as condition at the end of this report.
- 13.7 The applicants assessment of the overall impact of the scheme, is that although there would be adverse effects during construction, and in particular major adverse impacts from the coach parking facilities in the first year, (before tree and shrub screens have had the opportunity to establish themselves) There would overall be slight beneficial impacts for landscape character and quality because of the changes being made at the existing visitor facility, which is so poorly screened and so visible to the stones.
- 13.8 Landscape policies (which are covered in detail in the initial policy section) require any proposal in general not to have an adverse impact on the landscape of the world heritage site.

- 13.9 Policy 1e states Development which would impact adversely on the WHS its OUV or its setting should not be permitted.
- 13.10 Policy 1a states Government departments, agencies and other statutory bodies responsible for making and implementing national policies and for undertaking activities that may impact on the WHS and its environs should recognise the importance of the WHS as a whole and its need for special treatment and a unified approach.
- 13.11 Given that there will clearly be short term adverse effects to the World Heritage site and its landscape before trees and other newly established landscaping has had the opportunity to grow and ameliorate effects from the new visitor centre and parking it is important to note that policy 1a of the World Heritage Site Management plan (which has been endorsed by Wiltshire Council) states that statutory bodies responsible for implementing national policies within the WHS "should recognise the importance of the World Heritage site as a whole" That is to say that it is not appropriate to consider just the area around the stones by itself or the area around Airman's Cross on its own It is important to consider the effects of any new development in the WHS as a whole. When looked at from this perspective the significant positive gains from the beneficial removal of part of the A344 and the existing visitor centre and car parking must weigh heavily against any adverse effects from the proposed new visitor centre.
- 13.12 The spatial planning team has commented that -
- "It is important to take a balanced look at the overall aims of this scheme. While the scheme leads to new development at Airman's Corner, it is also leading to the removal of both the A344 and the existing facilities immediately adjacent to Stonehenge within the central core of the World Heritage Site. This can only be considered a net gain in environmental terms. The removal of the 20<sup>th</sup> century incursion so close to Stonehenge will contribute to returning the Scheduled Ancient Monument to a more respectful setting fitting of its international status and value."

"Furthermore the design and lay out of the facilities are of an extremely high quality and subtle design, which seeks to keep their impact minimal. Therefore with regard to the second key test the application is considered compliant with policy C2. (of the saved policies of the adopted local plan)"

13.13 Officers therefore agree with the view of the applicants taken in the ES that the scheme overall would have a slight beneficial impact on landscape character and quality as well as for the visual amenity of recreational users.

### 14.0 Nature conservation and biodiversity

- 14.1 Nature conservation and biodiversity are important in the context of this proposal because of a number of important habitats situated close to the application site.
- 14.2 The area generally falls within the South Wessex Downs Natural Area as defined by Natural England. This is characterised by rolling downland, river valleys, woodlands and wetlands. The key nature conservation resources in the area are Chalk grassland, Neutral grassland and Chalk Rivers and streams.
- 14.3 At a more local level directly to the North is the Salisbury Plain SPA/SAC/SSSI which supports a number of important species of birds most importantly is that the SAC supports 10% of the British breeding population of stone curlew as well as 1% of the wintering population of hen harrier. It also contains a number of important habitats and a rare species of butterfly (The marsh fritillary).
- 14.4 The project is also within the vicinity of the river Till which itself is part of the river Avon SSSI/SAC which is designated as such for a number of species that live within the river.
- 14.5 In addition there are two non-statutorily designated sites that are within the vicinity of the application site.

- 14.6 Stonehenge Down Site of nature conservation interest, which consists of the triangle of land within which the stones are situated and is classified because it has not been subject to significant agricultural improvement by the application of artificial fertilisers or herbicides.
- 14.7 There is also an RSPB reserve at Normanton Down south of the A303 which is 2.25km south east of the site for the visitor facilities. The RSPB are developing this site in terms of creating habitat suitable for Stone Curlew.
- 14.8 It can be seen from this that the area directly surrounding the site has a number of important designations in nature conservation and wildlife terms that need to be considered as part of this application.
- 14.9 The applicants have assessed a number of protected species as part of this application including carrying out surveys and updated surveys of the following —Terrestrial Macro-Invertebrates, Badgers, Bats, Deer, Birds, Brown Hare, Barn Owl and Stone Curlew and Reptiles. These surveys have found that an increase in people in the relatively open landscape between Airmans corner and the Stonehenge monument could effect ground nesting birds, and mammals such as brown hare and deer. However mitigation can be provided by controlling visitor numbers through a visitor management plan. (See conditions below). Translocation of reptiles may be required at the Longbarrow roundabout but the applicants have stated that they will be carrying this out and as the Longbarrow roundabout does not fall within the application site and such reptiles are protected under separate wildlife legislation it is not considered necessary or correct to condition this element. Having considered the impact on protected species officers are of the opinion that subject to conditions there would be no significant adverse effect on protected species.
- 14.10 Under the Habitat Regulations 1994, any development with the potential to affect a Special Area of Conservation and its designated species must be subject to strict scrutiny by the decision maker, in this case the LPA. The same is true for a Special protection area (SPA) The Authority should not permit any development, which would have an adverse effect on the integrity of the Stonehenge SAC/SPA, or River Avon SAC alone or in combination with other developments, unless certain tests are met.
- 14.11 Officers have assessed this proposed development by itself and in combination with other developments both proposed and under construction. Having considered these developments in combination with those of the proposal, the subject of this application, Officers concluded that an appropriate assessment was required to be undertaken in relation to this application. Officers considered that the proposals in combination had the potential to have an effect on the SAC/SPA and as such an appropriate assessment was required.
- 14.12 Officers have carried out an appropriate assessment of the proposal in combination with other developments in the area and concluded that the construction and operation of the Stonehenge visitors centre at Airman's corner will not adversely affect the integrity of the River Avon SAC either alone or in combination provided that the following measures are required as planning conditions:
- -Surface water drainage strategy to be submitted and agreed with the planning authority before works begin on site.
- -Scheme for water efficiency measures to be submitted and agreed with the planning authority before works begin on site.
- -Construction Environment Management Plan and Ecological Construction Monitoring and Management Plan to be submitted to and agreed by the planning authority before works begin on site
- -A scheme for the disposal of waste water to be submitted and agreed with the planning authority before works begin on site.
- 14.13 In addition conditions are needed for a visitor access management strategy and a final lighting design in order to protect the Salisbury Plain SAC as discussed in the likely significant effects test above.

- 14.14 It is therefore considered that the proposal will not either by itself or in combination with other proposed developments including those developments in the South Wilts Core strategy proposed submission document and proposals put forward as part of the Salisbury Super Garrison project have a significant adverse cumulative impact upon the SAC/SPA and its objectives and habitats.
- 14.15 Similarly to the local planning authority the applicants have concluded that the scheme would have no significant adverse effects on the integrity of the River Avon Special Area of Conservation (SAC) River Till SSSI or Salisbury Plain SAC/Special Protection Area/Ramsar/SSSI.

#### 15.0 Noise and Vibration

- 15.1 The effect on Greenland Farm, visitors and public rights of way users has been considered by the applicants in relation to noise and vibration from both construction of the new visitor centre and associated development and from the new visitor centre and closure of the roads when it occurs and they are operating.
- 15.2 Local plan policy G2 is of relevance here in that it requires avoidance of unduly disturbing, interfering, conflicting with or overlooking adjoining dwellings or uses to the detriment of existing occupiers;
- 15.3 It has been assessed that there are no noise sensitive receptors in the immediate vicinity of the works (the nearest being Greenland Farm 950m away) and therefore there is unlikely to be any significant effect on visitors or rights of way users although there may be some noise and vibration when the works take place although this is unlikely to be significant.
- 15.4 Noise and vibration when the scheme is up and running has also been assessed and in the vicinity of the stones and the old A344 road the impact of noise and disturbance is likely to be less than at present so producing a beneficial impact. It is not considered that the change in traffic level noise or the new transit system would produce a significant noise impact. Indeed policy 5a of the world heritage site management plan looks to reduce the impacts of roads and traffic on the WHS something that would be achieved in terms of noise and disturbance from the removal of the A344.
- 15.5 The environmental health officer of the council has raised no objections in respect of this aspect of the scheme and as such it is considered that the development as proposed in respect of noise and vibration is acceptable and that there would no significant impacts.

# 16.0 Geology and Soils

- 16.1 The environmental statement submitted with the planning application at chapter 9.0 assesses the current ground conditions in relation to soils and geology in the area and then goes on to assess the potential impacts of any development upon the current ground conditions as set out in the baseline information. The ES considers as in other sections of the EIA the impact of both construction effects and longer term effects on the ground conditions in the area. It concludes that the proposal would have limited significant adverse impact on geology and soils in the area. The reason for this conclusion is as follows-
- 16.2 There would be limited excavation and filling in of ground levels at the site of the proposed new visitor facility.
- 16.3 In surveys carried out at the site (visitor centre and ancillary building) groundwater was only encountered at depths of between 21 and 36 metres.
- 16.4 Earthworks at the visitor centre site would make use of the existing valley sides to limit excavation work.
- 16.5 In relation to the repositioning of the B3086 on the north side of Airman's Corner roundabout this makes use of a previous roadline to minimise any fresh excavation work required.

- 16.6 Works to reposition and improve the Longbarrow roundabout will involve a 15m movement from the roundabout centre.
- 16.7 Overall with the exception of excavated material from the disused existing car park and some road surfacing material, there would be little exporting of materials.
- 16.8 Whilst the management plan for Stonehenge does not contain a specific policy for the conservation of geology and ensuring there are no adverse effects to it from development none the less policy 1e does state that –
- 16.9 "Development which would impact adversely on the WHS its outstanding universal value or its setting should not be permitted"
- 16.10 This is echoed in Policy CN 24 of the saved policies of the adopted local plan which states that

#### 16.11 CN24

Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted.

16.12 It is considered that this development would not adversely impact on the WHS for the reasons outlined above (because the impact of the scheme in geology and soils terms will be so minimal) and as such in geology and soils terms the impact of this development is considered as acceptable. Although as there remains the possibility of contamination of soils during construction the effect has been assessed some limited significant adverse effects.

### 17.0 Water quality, drainage and hydrology

- 17.1 Water quality, drainage and hydrology is an important aspect of this scheme with a number of consultees commenting on the proposal in this respect including the environment agency and natural England.
- 17.2 There are a number of policies that affect this aspect of the development (see section on policies above.) In particular at a regional level policies RE1 and RE2 of the regional spatial strategy are significant as is policy C5 of the Swindon and Wiltshire structure plan and policies G3 and G5 of the local plan which state at appendix 2

G3

Development will not be permitted which would increase the requirement for water unless adequate resources already exist, or will be provided in time to serve the development, and without detriment to existing abstractions, water environment, both quality and quantity, fisheries, amenity or to nature conservation.

G4

Development will not be permitted if:

(i) It would be at risk itself from flooding; (ii) it would increase the risk of flooding: by reducing the capacity of, or increasing flows within, a flood plain; or through the discharge of additional surface water; or by harming flood defences.

- 17.3 The policies are in place to ensure that there is no increased risk to water sources from the development (both during and after construction) and to ensure that there is no increased risk of flooding.
- 17.4 The proposal has therefore considered the effects of –

Changes in the quantity and quality of surface water and groundwater resources and upon public and private supply abstraction dependant on those resources.

Changes to the river Till SSSI (which is part of the river Avon SSSI)

Alterations in flooding and drainage patterns.

- 17.5 It is intended by the applicants to make the proposed visitor centre building as self sufficient as possible in terms of water supply and foul drainage. It's remote location means that at present there is no mains water supply or foul drainage available and to provide such, would involve a lot of pipe work through potentially archaeologically sensitive areas. Therefore it is intended that the visitor centre will be self sufficient. It is intended that drainage to the new car parks and to the adjacent Airman's Corner roundabout would be provided by a SUDS system which would go into a series of swales before finally discharging into the existing dew pond. The coach parking area would have a closed drainage system which would discharge to a separate soakaway point.
- 17.6 The discharge of waste on site would also be achieved via a treatment plant (subject to consent from the environment agency). After it had been treated it would be directed to swales before reaching the final soakaway field.
- 17.7 The site is located in flood zone 1 which is the least likely to flood of the three zones set out by the Environment Agency and the applicants having assessed the effects on the floodplain of the river Till consider that the effect of the proposal would be negligible. The Environment Agency has raised no objections in respect of flooding issues.
- 17.8 Finally, it is also intended that rainwater from the roof areas of the new buildings would be used to add to the non potable water supplies and treated wastewater from the proposed waste treatment plant and used for toilet flushing etc. It is intended therefore that the overall demand for potable water supply would be reduced to a minimum and it is intended to supply this water by the introduction of a borehole of less than 20m3 per day.
- 17.9 The applicants have concluded that the introduction of these measures at the new visitor site would have negligible or minor adverse impacts on water quality, drainage and hydrology.
- 17.10 The Environment Agency has raised no objections to the proposals but they have asked that a number of conditions be imposed to cover water supply, foul drainage, surface water drainage and pollution prevention and control.
- 17..11 Natural England initially asked for clarification of a number of matters including predicted usage of the water at the visitor centre, the waste water strategy and its overall effects on interests of nature conservation. Following a meeting with Natural England the applicants have clarified this matter and it is understood that subject to appropriate conditions regarding water issues, Natural England are satisfied with these aspects of the proposal.
- 17.12 In view of the fact that the proposal complies with local and regional policies and presents a very efficient and green use of water supplies that could be seen as an exemplar within Wiltshire. It is considered that effects on water would be negligible and therefore the effects on water interests are acceptable.

#### 18.0 Air Quality & emissions

- 18.1 The applicants have assessed air quality as part of the environmental statement submitted with this planning application. They have studied an area 200 metres around the new visitor centre and the surrounding roads including the A360 and the A303. Additionally the effects during the construction phase are also considered. The study considers the scope of the operation of the scheme over the next 13 years.
- 18.2 There are a number of national and international targets with regard to air quality that need to be considered. These at an international level include, The European Union (EU) directive on ambient Air quality Assessment and Management. Directives following this are intended to set specific targets including 1999/30EC.
- 18.3 At a national level The National Air Quality Strategy 2000 introduced targets to improve air quality by 2010. Revised air quality objectives have been published including objectives contained within the first addendum in 2003. In addition PPS23 which covers planning and pollution control provides guidance on how to assess pollution in relation to planning applications

- 18.4The Environment Act of 1995 requires the local authority to carry out a review and an assessment of local air quality which s done in 3 stages as outlined in the applicants EA. Salisbury district council have carried out a review of air quality in the area of the development and have concluded that at present national air quality targets are unlikely to be exceeded.
- 18.5 Three potential pollutants were considered as part of this application
- 1) Any potential increase in exhaust emissions due to increases in traffic onto the local highway network, and air quality impacts from the visitor transit system vehicles.
- 2) Air pollutant emissions associated with building services at the new visitor facility
- 3)Dust and airborne particle emissions associated with the construction of the development.
- 18.6 Clearly the removal of much of the traffic from the A344 (with the exception of the transit system) will remove vehicle borne pollutants from that particular area (albeit mostly to surrounding roads).
- 18.7 The analysis of the data collected for the increase in traffic levels, the new building and the construction phase of the development, shows that any effects for the purposes of the EIA would be insignificant and that the scheme would have no significant adverse impact on sensitive receptors such as homes or work places. The councils environmental health officer has stated that he has no objection to the scheme and as such and taking into account the above officers consider that it complies with policies on pollution and that no objection to this aspect of the scheme should be raised as the proposal would have no significant adverse impacts.

# 19.0 Agriculture

- 19.1 Planning policy statement 7 (Development in rural areas) and policy C12 of the Wiltshire and Swindon structure plan (see policy section above) are important in considering the loss of agricultural land and these are both similar in their approach to safeguarding the most important agricultural land which is defined as grades 1 and 2 and subgrade 3a. Similarly it is also important to consider soil as distinct from agricultural land and in relation to the World heritage site management plan soil resources should be balanced against the need to conserve archaeology.
- 19.2 The total area of agricultural land take at the new visitor centre site is about 6.1 hectares, existing use of the visitor centre land is arable the amount of this land in sub grade 3a would be 2.4 hectares with a further 0.3 hectares used for highway development. The agricultural soils under the new visitor centre would not be removed but would be compacted prior to having the new visitor centre placed upon it. The decommissioning of the existing visitor facilities would create 0.8 hectares of agricultural land for the National Trust landholding and 0.5 hectares for English Heritage's Stonehenge Guardianship Area.
- 19.3 In terms of policy as already assessed under the policy section of this report it is not considered that the loss of 2.4 ha of agricultural land in policy terms is contrary to policy C12 as it represents exceptional need where other sites have already been assessed. It is therefore considered that the proposal complies with local and national policy in terms of agricultural loss of land and the scheme would have no significant impacts on agricultural resources.

## 20.0 Socio economic effects

- 20.1 The ES submitted with the planning application assesses two issues -
- 20.2 The range of economic, social and community benefits

  The measures to mitigate any potential disbenefits and maximise the potential benefits
- 20.3 The assessment considered the effects (both positive and negative) on the surrounding area including the villages of Bulford, Amesbury, and Durrington and the wider area.
- 20.4 The assessment considered the potential effects from the development in social-economic terms against current baseline conditions. It considered these in two separate categories these being –

20.5 Construction effects and Operational effects

20.6 The main policy documents considered are -

The regional Economic strategy for the South West England 2006-2015 Integrated Regional strategy- just connect! 2004

Single regional strategy-2011-2012

Tourism strategy-towards 2015: shaping tomorrow's tourism 2005-2015

South West England Legacy Strategy for the 2012 Games, 2007

Wiltshire and Swindon Economic Strategy, 2003-2008

Wiltshire Core strategy Development plan document (adoption August 2011)

Wiltshire and Swindon Structure Plan 2016

Salisbury district saved policies of the adopted local plan 2003

South Wiltshire Core strategy

Salisbury and South Wiltshire Economic Development Strategy 2002 -2020

Tourism strategy for South Wiltshire, 2006

Salisbury District Council Tourism Policy

Sustainable Community Strategy for Wiltshire 2007-2016

Local Area agreement for Wiltshire June 2008

20.7 The South Wiltshire economic development team (Wiltshire Council) have commented as follows -

Having reviewed the application information, the key aspects from an economic development standpoint are that the proposal will-

Attract and provide for increase visitor numbers to the area;

Enhance the visitor experience thereby encouraging repeat/multiple visits;

Create potential local employment opportunities during the construction/implementation stage; Create the potential for local businesses and services to be engaged and have input during the construction/implementation stage; and Increase the workforce requirements at Stonehenge-thereby creating new local permanent employment opportunities.

20.8 In addition have the South West RDA have stated (in summary) that-

The proposals will ensure an improved visitor experience at Stonehenge. They are likely to increase visitor spend and dwell time at the attraction and at tourist locations across Wiltshire and the South West. This will help to support the tourism section of the economy and will result in an increased number of direct, indirect and induced jobs.

It makes the point that tourism is worth over 9 billion a year to the local economy, employing more than 250,000 people and attracting over 26,000,000 visitors a year. A replacement visitor centre that surpasses the offer of the current facility, has the potential to encourage visitors to spend more time there and to integrate their trips with visits to other parts of Wiltshire and the South West is considered an improvement.

20.9 The South Wiltshire Economic Partnership have stated that –

It is a fundamental objective of the SWEP strategy to support the creation of a world class visitor's centre at Stonehenge in order to attract inward investment into the local community. Any concerns we have are based on the transport strategy however understand there are plans to improve the infrastructure surrounding the development. SWEP also keen to identify opportunities for local businesses to be engaged with the Stonehenge visitors centre in particular the development and construction phase.

20.10 There is clearly therefore strong support for the proposal as it currently stands because it is considered from an economic point of view that the proposal will attract further inward investment to the area

- 20.11 The ES concludes on construction effects that the new visitor facility will have a minor beneficial increase in the level of local employment from construction taking place in the local economy.
- 20.12 The longer term effects are considered under operational effects and it is considered that 17.5 full time direct permanent jobs would be supported by the visitor centre. The employment expenditure in terms of salaries will increase as a result of the visitor facility and it is therefore considered that there will be a net benefit when this salary is spent in the local region.
- 20.13 In addition to the increased income that is likely to be generated by this scheme it also needs to be borne in mind that the facility will produce additional education and learning benefits.
- 20.14 Overall there are significant tangible and intangible effects in a socio economic sense from the movement of the visitor centre to Airman's Corner and the upgrade of the facilities both at the visitor site and further afield. The proposal complies with the tourism policy T3 of the saved policies of the adopted local plan which provides for a new visitor centre at Stonehenge and as such it is considered that the proposal in socio-economic terms is acceptable as it is considered it would have no significant adverse impacts.

#### 21.0 Recreation

- 21.1 A considerable number of representations have been received with regard to the closure of Byway 12 and whilst this is subject to a separate order under highway legislation as it is connected with the overall development scheme it is important to consider it here along with other recreational and access issues that are brought up as part of the application. In this respect the applicant's environmental statement addresses these in chapter 14.
- 21.2 The applicants ES consider the following aspects-
- -Access provision for pedestrians in relation to public footpaths, bridleways, byways and roads and national trust permissive paths and open access land.
- -Access provision for cyclists in relation to bridleways, byways and roads and promoted on road and off road cycle routes.
- -Access provision for equestrians (horse riders/carriage drivers) in relation to bridleways byways and roads.
- -Access provision for motorised vehicles (4x4/s/motorbikes) in relation to recreational use of byways and roads.
- -Opportunities for other informal countryside recreation activities.
- 21.3 The development would affect existing pedestrian routes to Stonehenge via the closure of the A344 including removing the road surface and removing the legal right of access for pedestrians between Stonehenge bottom and byway 12. This would however be provided for via a route on reinforced drained grass within the footprint of the A344, which would mean pedestrians would still have access to Stonehenge during normal hours of operation.
- 21.4 Potential risks to pedestrians crossing the road at Stonehenge bottom could increase from the closure of the A344 and therefore the Highways Agency and Wiltshire Council have agreed a condition that requires the submission of a scheme for the crossing of this road to be submitted should planning permission be granted. Any scheme will have to be agreed with the council before development takes place and the scheme will need to be in place before the development is occupied.
- 21.5 It is also intended that pedestrians would continue to be able to walk along the section of the A344 between byway 12 and Airman's Corner alongside the new transit system. Given the likely

number and speed of transit vehicles it is not considered that there will be any significant safety implications arising from both pedestrians and transit vehicles using the same stretch of road as this would be a considerable reduction on the traffic currently using this road which pedestrians also can use.

- 21.6 It is also intended that those less able bodied visitors would be able to use the transit system from the new visitor centre to the monument which will have a minimum of 2 wheelchair places. There will then be a DDA compliant path connecting the transit stop at the stones with the existing path around the monument.
- 21.7 Cyclists too will be affected in a similar way to pedestrians by the closure of the A344 at Stonehenge bottom. It is intended that cyclists will also have access to a drained and reinforced grass route between Stonehenge bottom and byway 12. It is not proposed that a hard access is provided as this would essentially just reintroduce part of the road that has been removed and would be contrary to one of the main aims of the project in removing such hard surfaces close to the stones. It is intended that there would be a gated access at Stonehenge bottom for cyclists open during the hours the stones are open. This is scheme is conditioned below so that details can be agreed with the local highway authority.
- 21.8 Horse riders will also be affected by the closure of the A344 at Stonehenge Bottom and will not be allowed to continue to use this crossing point as it is considered this would be incompatible with the archaeology and management of visitors in the area. However an alternative crossing point further west across the A303 does exist to Byway 12 and this can be utilised by horse riders and they can continue to use that part the A344 which extends from byway 12 to Airman's corner as at present.
- 21.9 The use of existing byways 11 and 12 within the WHS would be affected by the proposed development. As stated above it is intended to restrict the use of byways 11 and 12 by the use of a traffic regulation order under separate highway legislation. This particular aspect of the proposal complies with policy 5c of the WHS management plan 2009 which supports restricting vehicular access with the exception of emergency, operational and farm vehicles) This is in order to reduce the impacts on the features of Outstanding Universal Value of the WHS. The existing use of the byway by motorised vehicles has damaged some barrows close to the track through widening of the Byway. The closure of the byways will therefore help comply with policy.
- 21.10 The construction of the proposal as a whole is considered to have temporary effects and impacts on recreational routes in the area. However these would be temporary and it is not considered that they would be so adverse as to require further mitigation during the construction period.
- 21.11 At present local people living in villages immediately around the stones have free access to the monument when they wish. It is intended to continue this and therefore it is proposed that this be included in the legal agreement.
- 21.12In conclusion it is considered that the scheme would have a major beneficial effect on the amenity of most users of the recreational routes (Cyclists, pedestrians and equestrians) and on visual amenity by removing the lines of cars parked on the byway during the summer months. It would have a major adverse impact on a relatively small group of motorised vehicle users of byways within the WHS. It is considered by officers that the displacement of this group of recreational users of the byways would be far outweighed by the improvement to the environment for other users of the route including ramblers/pedestrians and horse riders by the reduction in noise and disturbance and the reduced impact on the barrows lying close to the byway. It is therefore considered that the proposals for recreational users of the area are acceptable and would have beneficial impacts.

### 22.0 Any other issues

22.1 Icomos comments

- 22.2 Icomos have raised a number of comments about this application, the majority of which are covered in the various sections above. They do however, raise points about the design of the roof of the proposed visitor centre and the fact that they consider that the building could sit lower in the landscape. The building is single storey and the roof which has a gently curving and undulating design mirrors the undulating nature of the surrounding landscape. The only way to make this building sit in any other way in the landscape would be to reduce the height of the roof. This however would detract from the architectural integrity of the building in trying to hide it in the landscape. A balance has to be struck between architectural form and landscape form and officers consider that the proposal is acceptable in this respect.
- 22.3 There are a number of issues raised by third parties that are not covered above these include-

Will tourists use the facility as it is considered too far from the stones?

22.4 It is considered by officers that tourists will use this facility as it is an iconic monument known worldwide which tourists will wish to visit. The visitor centre has been positioned as close to the monument as it can reasonably be without having a significant adverse effect on features of OUV.

Concerned there is no equality and diversity assessment

22.5 An equality and diversity assessment is not a requirement for the processing of this application. Although it is necessary for the applicant and local authority to assess that adequate facilities are available for those with disabilities. This has been assessed by the applicant and is covered in this report at section 21.0 (recreation). The actual visitor centre will need to be DDA complaint which is covered under building regs. It is intended that out of hours at special occasions such as Solstices, disabled access will be allowed down the former A344. During visitor opening hours the land train will make access available to less able bodied visitors as it will make provision for them (see conditions).

Concern is expressed that the proposal is being rushed through to meet the Olympic deadline

22.6 Whilst it is the applicant's intention to enable the visitor centre to be open by the 2012 Olympics. The proposal is not being rushed through. The applicants have looked at the site in depth and looked at all the alternative sites. They have spent considerable time consulting with groups and individuals before submitting a planning application. The planning application outlines the proposals in depth. The planning application has been assessed in depth as is evidenced in the report and has taken longer than the governments target for such applications. It is not considered to be the case that the planning application is being rushed.

Promises on duelling the area around Stonehenge have been forgotten

22.7 The duelling of the A303 is not part of this proposal and is not part of the Assessment of the application. Both the highways department and The Highways Agency consider that the proposal can go ahead without the duelling of the A303 subject to changes to be carried out to the Long barrow roundabout under separate legislation. This does not mean that the duelling of the A303 cannot take place at a later date when the funding is available.

Concerned about the length of time for consultation.

22.8 Residents were given the statutory three weeks to view this application. Following the omission of a couple of documents from the initial planning submission a further two weeks on top of the initial three weeks were given. Following this anybody who asked for more time to write in was given it and in practice officers have continued to accept letters of representation up until the date of the committee. Officers consider enough time has been given for third parties and consultees to consider and comment on this application.

Development will interfere with religious right as a pagan druid to attend ceremonies

22.9 It is not the intention of the application to interfere with rights to visit the stones. English Heritage is currently looking at special arrangements for the various equinoxes and Solstices to ensure that

access is not denied to the stones. A condition requires details of a scheme to be submitted to the local planning authority (see conditions below).

Consider that vehicles with low CO2 emissions should be used to transport passengers or possibly horse drawn vehicles.

22.10 Whilst horse drawn vehicles are unlikely to be practical to transport the number of anticipated visitors, the applicants are looking at the scheme of vehicles to be used between the Stones and the visitor centre and will consider the issue of lower polluting vehicles. It is proposed to condition the transit system such that the local authority has details of it prior to the visitor centre coming into use. See conditions below.

Considers that the cost of the project is too high

22.11 The cost of the project is not a material planning consideration

Considers that a non polluting rail link to Stonehenge should be developed

22.12 Similarly to the duelling of the A303 this is not part of the planning application. The highways authorities do not consider it necessary in order to approve the planning application.

#### 23.1 Conclusion

- 23.2 It is clear from the information submitted that this is a very thoroughly thought out proposal. The consideration of alternatives chapter of the ES sets out clearly a structured and logical selection process for the choosing of the final Airman's corner site, which included public consultation. The Airman's corner site has it is considered the best advantages of all the preferred sites taking into account the very considerable constraints and barriers to development that exist within the WHS.
- 23.3 The final chosen site at Airman's Corner has, in officer's opinion, the least overall effect on the WHS (taking into account other constraints from other considered sites) and will provide a visitor centre that befits a landscape of the quality of the Stonehenge WHS. It will provide the solution to the ongoing issue of a new visitor centre at Stonehenge and fulfil a key policy of the Wiltshire Council endorsed World Heritage Site Management Plan. It will provide new interpretation and education facilities much lacking at present, in a building which the Wiltshire Design Forum have stated is "fit for the 21st century"
- 23.4 Inevitably the final scheme has some negative aspects including the fact that closure of the A344 will mean that traffic that would usually use the A344 particularly to Shrewton and villages beyond will inevitably have a longer journey to the Longbarrow crossroads and around using the A303. Similarly the visitor centre as proposed will be visible within the World heritage site though not from Stonehenge itself
- 23.5 These in parts however need to be balanced with the significant improvements to the setting of the stones that would be achieved from the removal of the existing visitor centre and car park and the removal of the A344 between byway 12 and Stonehenge bottom including the fulfilment of WHS management plan policies that these achieve.
- 23.6 It has been shown above that the proposal achieves national, regional and local planning policy objectives and it is against this background that the proposal should be judged. Officers consider that the proposal is the optimum solution for this site and it is for this reason that the planning application is recommended for approval.

#### 24.0 Recommendation:

Planning Permission be Granted following completion of a section 106 legal agreement.

Reason for approval

It is considered that the proposal for the removal of much of the existing visitor centre and all the current parking provision will bring significant improvements to the environs of the Stonehenge monument and comply with policy 3i of the World Heritage Site management Plan. In addition the closure of the A344 would fulfill policy 5b of the World Heritage site management plan in that it would remove a significant amount of traffic from directly opposite the Stonehenge monument and therefore improve substantially the setting of the monument and the negative effect the road is currently having on the features of Outstanding Universal Value.

The new visitor centre at Airmans corner would bring a significant improvement to the current visitor attractions creating greater understanding of the World Heritage Site via improved interpretation and education facilities much lacking at the moment and as such would comply and fulfill policy 4J of the World heritage site management plan as well as saved local plan policy T3.

It is considered that the proposed visitor centre and its associated buildings and structures will sit well within the landscape and although will be visible, have, it is considered, been positioned in the most appropriate part of the World heritage site with the least effect on features of Outstanding Universal Value. It is therefore considered in combination with the implementation (subject to conditions) of the full details of the application and the environmental statement and when having had regard to all relevant planning considerations in particular saved local plan policies from the adopted Salisbury district local plan and the World Heritage Site Management plan that the proposal is considered acceptable.

# The section 106 agreement shall cover the following issues-

- 1. The construction of a new roundabout at Airmans corner along with lighting drainage and signage.
- 2.A Travel plan
- 3. Road traffic and Highway Orders
- 4. The provision of a tourist information display area within the visitor centre
- 5. Free access to local people to the stones
- 6.A Scheme for Movement of the Airmans Cross monument and its ongoing maintenance and a scheme to move and reinstate the milestone adjacent the cossroads.
- 7 A requirement for using the stopped up part of the A344 for pedestrians and cyclists.

#### For the following reasons

- 1.To ensure that there is adequate highway capacity to deal with the increased traffic at Airmans Corner as a result of moving the visitor centre and closing of the A344.
- 2.To ensure that sustainable methods of transport are developed and maintained to the visitor centre in order to reduce individual car borne journeys.
- 3.In order to ensure that the highway improvements and alterations proposed as part of this development are carried out and in accordance with the relevant highway legislation.
- 4.To ensure that the Stonehenge 'gateway' is used to promote other destinations within Wiltshire and to promote tourism which will benefit the local economy.
- 5.At present local people within surrounding villages have free access to the stones this requirement therefore is to ensure that, such free access continues and that locals are not disadvantaged by this development.
- 6.A scheme for the movement of the Airmans Cross monument is required in order to ensure that the monument is restored and if the accompanying listed building application is approved that it is moved to a new setting within the ownership of English Heritage.
- 7 In order to ensure that pedestrians and cyclists continue to have rights to walk and cycle up this route and to ensure that they do not have to detour on a longer route.

#### And subject to the following conditions -

1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.

Policy G1 – General principles for development

2) The development shall be carried out in strict accordance with the approved schedule of materials and finishes to be used for the external walls and roofs of the proposed development and all other built structures hereby permitted, or with such other details as may subsequently be submitted to and approved in writing by the Local Planning Authority. As development progresses and where materials and finishes have not been agreed prior to commencement of development, these (and where so required samples or sample panels of such materials and finishes) shall be submitted to and approved in writing by the Local Planning Authority before their use. The works shall be carried out in accordance with the approved details.

Reason: To secure a harmonious form of development and for the avoidance of doubt.

Policy D1 Extensive development

Policy D2 Infill development

3) No development hereby approved shall commence until there has been submitted to and approved in writing by the Local Planning Authority a plan indicating the positions, design, materials and type of boundary treatment to be erected. The boundary treatment shall be completed before the visitor centre building is occupied and in accordance with a timetable agreed in writing with the Local Planning Authority. Development shall be carried out in accordance with the approved details. Reason: To enable the Local Planning Authority to secure the satisfactory treatment of the boundaries in the interests of visual amenity and securing adequate standards of privacy for occupants of the neighbouring premises.

Reason: To enable the local Planning Authority to secure the satisfactory treatment of the boundaries in the interests of the visual amenity of the world heritage site.

Policy CN24 Stonehenge World Heritage site

# 4) Landscaping Scheme

The development hereby approved shall not commence until details of the landscaping scheme including site clearance and a statement of the methods of its implementation shall be submitted to and approved in writing by the local planning authority.

The scheme must include details of the proposed planting including a plan, details of species, stock sizes and numbers/densities where appropriate, and including a timetable for its implementation. If any plant dies, becomes diseased or fails to thrive within a period of 5 years from the date of planting, or is removed, uprooted or destroyed, it must be replaced by another plant of the same kind and size and at the same place, unless the Local Planning Authority agrees to a variation beforehand in writing.

The landscaping must be carried out in accordance with the agreed scheme and statement, unless the Local Planning Authority has given its prior written consent to any variation.

Reason: To comply with the duties indicated in Section 197 of the Town and Country Planning Act 1990 so as to ensure a satisfactory appearance to the development

# Retention of Existing Trees and Shrubs:

No tree, shrub, or hedge which are shown as being retained on the approved plans shall be cut down, uprooted, wilfully damaged or destroyed, cut back in any way or removed other than in accordance with the approved plans and particulars, without the written approval of the Local Planning Authority. All tree works approved shall be carried out in accordance with British Standard Recommendations for Tree Work (B.S.3998: 1989).

If any tree, shrub or hedge shown to be retained in accordance with the approved plans and particulars is removed, uprooted or destroyed, or dies, or becomes severely damaged or diseased within 5 years of the completion of the development, another tree, shrub, or hedge shall be planted at the approximate same place, and that tree, shrub, or hedge shall be of such a size specification, and species, and should be planted at such time as may be specified in writing by the Local Authority. If within a period of five years from the date of planting any replacement tree is removed, uprooted or destroyed, or dies or becomes seriously damaged or defective another tree of the species and size as that originally planted shall be planted at approximately the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To comply with the duties indicated in Section 197 of the Town and Country Planning Act 1990 so as to safeguard the amenity of the existing trees and to ensure a satisfactory appearance of the development.

Policy C9 Landscape conservation

#### 5) Submission of Tree Protection Statement:

No development shall take place on site, including site clearance, tree works, demolition, storage of materials or other preparatory work, until all details relevant to the retention and protection of trees, hereafter called the Arboricultural Method Statement, have been submitted to the Local Planning Authority and approved in writing. Thereafter the development shall be undertaken only in accordance with the approved details, unless the Local Planning Authority has given its prior written consent to any variation.

The Arboricultural Method Statement shall show areas, which are designated for the protection of trees, shrubs and hedges, hereafter referred to as Tree Protection Zones. Unless otherwise agreed, the Tree Protection Zones will be fenced, in accordance with British Standard Guide for Trees in Relation to Construction (BS5837: 1990) and no access will be permitted to the Tree Protection Zone for any development operation. Tree protection zones shall be provided for all trees to be retained on the site and also to take account of the root spread into the site of trees on adjoining sites.

The Arboricultural Method Statement shall also include all other relevant details, such as changes in levels, methods of demolition and construction, the materials, design and levels of roads, footpaths, parking areas and of foundations, walls and fences, placement of service runs i.e. BT, water, gas, sewage, electric etc. It shall also include the control of potentially harmful operations, such as

burning, the storage, handling and missing of materials, the movement of people and machinery across the site, where these are within ten metres of any designated Tree Protection Zone. The Arboricultural Method Statement shall indicate the specification and timetable of any tree works, which shall be in accordance with the British Standard Recommendations for Tree Works (BS3998, 1989).

The Arboricultural Method Statement shall include the provision for the supervision and inspection of tree protection measures on a regular basis throughout the different phases of construction. Reports produced as a result of these inspections shall be forwarded to the Local Authority Arboricultural Officer. The fencing, or other protection which is part of the approved Statement shall not be moved or removed, temporarily or otherwise, until all works, including external works and soft landscaping have been completed and all equipment, machinery and surplus materials removed from site, unless the prior approval of the Local Planning Authority has been given in writing.

Reason: To comply with the duties indicated in Section 197 of the Town and Country Planning Act 1990, so as to ensure that the amenity value of the most important trees, shrubs and hedges growing within or adjacent to the site is adequately protected during the period of site clearance and construction.

Policy C9 Landscape conservation

6)No development on the Visitor Transit System pick up and drop off points shall commence until, details of the Visitor Transit System have been submitted to and approved by the local planning authority; such details to demonstrate the efficacy of the turning and waiting facilities proposed, at both operational ends of the site, and in the overnight parking area. Such a visitor transit system shall have at least two places on each train/unit to accommodate users in wheelchairs or other mobility impaired passengers and shall be brought into use concurrent with the opening of the visitor centre.

Reason: To ensure that the proposed layout can properly accommodate the operational requirements of the VTS trains and to ensure visitors who are mobility impaired can continue to access the Stonehenge monument.

Informative: The VTS will be running on a public highway. It must therefore comply with all necessary legislation related to such vehicles.

Policy G2(i) General criteria

7)Notwithstanding the details of gating arrangements shown on the submitted drawings, the applicant shall, prior to the commencement of the development, obtain approval from the local planning authority to further detailed drawings showing how vehicles accessing the A344 can turn around and return westbound in forward gear, including all points where access is restricted by proposed gating.

Reason: In the interests of highway safety and to avoid the inconvenience otherwise caused to larger vehicles that might need to gain access for highway maintenance or other purposes.

Policy G2 (i) and (ii) General criteria for development.

8)No development shall commence on the A344 and byway 12 until the applicant has submitted to and secured the written approval of the local planning authority of a scheme demonstrating how any gating or bollarding measures on the A344 are to be operated, their legal status, and what provisions are to be made for vehicles reasonably requiring access to the public highway and, beyond, to the stopped up section of A344 between Byway 12 and Stonehenge Bottom. Gating arrangements shall only be provided and operated in accordance with the approved scheme.

Reason: To demonstrate that a managed scheme will allow for the requirements of all proper vehicular users of the highway at all times of the day and night throughout the year.

Policy G2 (i) and (ii) General criteria for development.

9)Prior to the commencement of the development the applicant shall submit to and secure approval of the local planning authority to an interim scheme demonstrating how visitors during 2011 Summer Solstice, will be accommodated, and afforded access to their temporary parking facilities via the A344.

Prior to the occupation of development the Applicant shall submit to and secure approval of the local planning authority to a permanent scheme demonstrating how visitors during exceptional circumstances, such as summer solstice, will be accommodated, and afforded access to their temporary parking facilities via the A344. Parking arrangements shall be implemented in accordance with the approved scheme.

Reason: To ensure that local road congestion is not caused at the proposed Airman's Corner roundabout junction during exceptionally high levels of visitation, and in a circumstance where enforcement of a traffic regulation order could otherwise cause access difficulties.

Policy G2 (ii) General criteria for development

10) No development shall commence of the visitor centre hereby approved until a visitor management strategy as detailed in section seven of the environmental statement shall be submitted to and approved in writing by the local planning authority. The development shall operate in accordance with the approved scheme unless otherwise agreed in writing by the local planning authority.

Reason: In order to ensure that there is no adverse effect on the Salisbury Plain SAC

Policy C10 Nature conservation

11) No development shall commence until (i) details of the pedestrian and cycle route along the whole of the A344, including crossing arrangements at the A303 (Stonehenge Bottom) and (ii) a scheme for reviewing such access and crossing arrangements, have been submitted to and approved (in consultation with the Highways agency) in writing by the local planning authority. The development shall not be occupied until the agreed works have been completed. Any changes shall be implemented in accordance with the approved scheme.

Reason: To accommodate and facilitate the inevitable future local pedestrian and cyclist demand travelling the route between the Stones and west Amesbury, and provision of a safe crossing point on the A303 when the right turn facility currently in place is removed.

Informative: For the avoidance of doubt, the scheme for reviewing the access and crossing arrangements shall have regard to Design Manual for Roads and Bridges HD19/03 Stage 4 Safety Audit 12 and 36 month post-scheme recommendations for remedial action. It shall detail how recommended remedial action will be funded and implemented, including arrangements to provide for alternative crossing points on the A303 and associated access links.

Policy TR12 (ii) Cycling

12) The visitor centre hereby approved shall not be open for public use, until the developer has upgraded the surface of Byway 12 between the A344 and the Sustrans National Cycle Route 45.

Reason: In order to facilitate the objectives of the travel planning requirements for the site insofar as they relate to encouraging pedestrian and cycle transport.

# Policy TR12 (ii &iii) Cycling and pedestrians

13) No development shall commence until, a scheme and programme for cycle parking and storage provision at the western end of the retained A344 and for cycle parking at the eastern end has been submitted for approval to the local planning authority. The facilities shall be provided in accordance with the approved scheme and programme.

Reason: In order to facilitate the objectives of the travel planning requirements for the site insofar as they relate to encouraging pedestrian and cycle transport, and to discourage random parking of cycles within the vicinities of the Stones and the proposed Visitor Centre.

Policy TR12 (ii&iii) Cycling and pedestrians

14) The development hereby permitted shall not be occupied nor will the closure of the A344/A303 junction (which will be the subject of a stopping up order under section 247 of the TCPA 2000) take place unless and until the scheme for modification of Longbarrow roundabout broadly shown on preliminary design drawing MP-A-G100-P-02 (rev i) shall be implemented and completed to the satisfaction of the highways agency.

Reason: To ensure that the scheme for Longbarrow roundabout is designed and constructed to appropriate standards enabling the A303 to operate effectively, following the closure of the A344/A303 junction in accordance with circular 02/07 planning and the strategic road network.

Policy G2 (ii) General criteria for development

15) The development shall not commence until a construction management plan has been submitted to and approved in writing by the local planning authority, (in consultation with the secretary of state for transport). The plan shall include details of the number and frequency of construction vehicle movements, construction operation hours, construction vehicle rates to and from the site with distance details, construction delivery hours, car parking for contractors, specific measures to be adopted to mitigate construction impacts (including infrastructure improvements if appropriate) a construction workers travel plan and a detailed traffic management plan to control traffic during the construction phases.

Reason: To mitigate the impact of construction traffic during the construction period and in the interests of highway safety on the local and strategic road network.

Policy C10 Nature conservation

16) The development hereby approved shall not commence until there has been submitted to and approved in writing by the Local Planning Authority, a landscape management plan.

The landscape management plan shall contain a statement for the long-term effective maintenance of the agreed landscape scheme and full details of all management and establishment operations over a ten-year period, unless otherwise agreed in writing by the Local Planning Authority. It shall also include details of the relevant management, and supervisory responsibilities.

The landscape management plan shall also include the provision for a review to be undertaken during the course of the plan with a final review being undertaken before the end of the ten-year period. A revised landscape management plan shall be submitted for the agreement of the Local Planning Authority before the ten years has expired. The revised details shall make similar provisions for the long-term maintenance and management of the landscape scheme. The revised scheme shall also make provision for future revision and updating.

The provisions of the landscape management plan and subsequent revisions shall be adhered to and any variation shall have been agreed beforehand in writing by the Local Planning Authority. No trees, shrubs, hedges or other plants shall be removed for the duration of the landscape management scheme or its revisions, without the prior written approval of the Local Planning Authority. Management of the landscape scheme in accordance with the landscape management plan or their agreed revisions shall not cease before the duration of the use of the development unless agreed in writing by the local Planning Authority.

Reason: To comply with the duties indicated in Section 197 of the Town and Country Planning Act 1990, so as to ensure that the amenity to be provided by the new landscaping is achieved and safeguarded, and to ensure satisfactory appearance to the development.

Policy C1 The rural environment

17) The visitor centre shall not commence commercial operation until the approved car parks have been constructed, surfaced and drained in accordance with the approved plans

Reason: To ensure that the development hereby permitted is provided with adequate facilities for the parking of vehicles.

Policy TR11 Parking

18) The visitor centre shall not commence commercial operation until the transit route and drop off points have been provided within the site in accordance with the approved plans.

Reason: To ensure adequate access to Stonehenge is provided for visitors.

Policy G2 (i) General criteria for development

19) The Visitor Centre shall not be brought into commercial operation until such time that a system of internal pedestrian footpaths, within the visitor centre site itself, has been completed in accordance with detailed drawings to be submitted to and approved by the Local Planning Authority

Reason: to facilitate pedestrian movement on identified desire lines.

Policy TR12 (ii) Cycleways and footpaths

20) No development shall be commenced until such time as a scheme to provide details of water supply, water efficiency measures (in line with the principles within the water and waste strategy appendix A10.1 of the Environmental statement) and mechanisms for monitoring water use has been submitted to and approved in writing by, the local planning authority. Any such scheme shall be supported by detailed information relating to water efficiency measures which will be included, revised calculations on predicted water use and how water use will be monitored. The scheme shall be fully implemented prior to the opening of the visitor centre in accordance with the scheme, or any changes as may be subsequently be agreed in writing by the local planning authority.

Reason: The site is located on a major aquifer within the catchment of the River Avon SCA/SSSI. The South Wiltshire core strategy proposed submission document July 2009; policy 19 includes the requirement for non-residential development to include water efficiency measures.

Policy G3 Water environment Policy C10 Nature conservation

21) No development shall commence until a detailed scheme for the disposal of foul drainage has been submitted and approved by the local planning authority. Details should include whether discharge is to ground or surface water, location of discharge, details of emergency storage proposals and emergency arrangements for tinkering off-site. The scheme shall be completed in accordance with the approved plans before development of the site begins.

Reason: The site is located on a major aquifer within the catchment of the River Avon SCA/SSSI. Appropriate drainage arrangements will ensure groundwater is protected.

Policy G3 Water environment

22) No Development shall commence until the detailed design of the surface water drainage scheme for the site, based on sustainable drainage and pollution control principles and an assessment of the hydrological and hydrogeological context of the development has been submitted to and approved in writing by the local planning authority.

The scheme shall subsequently be implemented in accordance with the approved details before the development is completed and shall also include details of how the scheme shall be maintained and managed after completion.

Reason: To prevent the increased risk of flooding to improve and protect water quality, improve habitat and amenity and ensure future maintenance of the surface water drainage system.

#### Informative

The applicant should be aware that any works offering an obstruction to flow within an ordinary watercourse will require prior flood defence consent from the environment Agency in accordance with S23 of the land drainage Act 1991. Further guidance is available from the Environment Agency development and flood risk officer- Daniel Griffin (01258 483351)

Policy G3 Water environment

23) No development approved by this permission shall be commenced until a detailed construction Environmental Management plan, incorporating the pollution prevention measures identified within the outline construction construction environmental management plan, has been submitted to and approved by the local planning authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

Reason: The site is located on a major aquifer with the catchment of the river Avon SCA/SSSI. Appropriate pollution prevention arrangements during construction will ensure groundwater and surface water are protected.

Policy C10 Nature Conservation

24) No development shall commence until details of all lighting proposals, including street lighting, lighting for the car and coach parks, lighting for footpaths, lighting at the drop off points, including intensity of the lighting and design for the light column shall be submitted to and approved in writing by the Local Planning Authority prior to the development hereby permitted commencing. All the works shall subsequently accord with the approved plans.

Reason: To ensure that the lighting scheme respects the overall design qualities required from the development and to minimise impact of the lighting scheme upon both the World Heritage Site and wider landscape and nature conservation interests.

Policy C10 Nature Conservation Policy C1 The rural Environment

25) The retail unit within the visitor centre hereby permitted shall not commence trading until details of the broad range of goods to be sold have been submitted to and agreed by the Local Planning Authority. The shop shall not sell goods outside of the agreed range, other than as a minor and ancillary part of the stores operation without the prior written approval of the Local Planning Authority.

Reason: To enable the Local Planning Authority to exercise adequate control over the kind of goods which are sold from the premises, in the interests of maintaining the vitality and viability of Amesbury town centre.

Policy S4 Out of centre Retail Development

26) No development shall commence within the application area until:

- a) A written programme of archaeological investigation, which should include on-site work and off site work such as the analysis, publishing and archiving of the results has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.

Reason: To ensure that artefacts of archaeological importance are properly recorded and evaluated.

Policy CN22 Ancient monuments and Archaeology

27) The new visitor centre building hereby permitted may be used occasionally for evening functions such as fundraising and corporate entertaining. On each occasion English Heritage must submit the request in writing, outlining the nature of the function and times, and shall not commence without the written approval of the Local Planning Authority. Such a request should be submitted to the local authority at least 14 days prior to the function taking place. If no response is received from the local planning authority within the 14 days the function or event may take place.

Reason: To control extra-curricula use of the building.

Policy G2 (ii) General criteria for development

28) The development hereby permitted shall not commence until a waste audit, to include measures to deal with littering has been completed in accordance with the supplementary planning guidance to the Wiltshire Structure Plan and been submitted to and approved by the Local Planning Authority.

Reason: in the interests of achieving a sustainable development

G2 (viii) General criteria for development (pollution)

Appendices:	<ol> <li>List of local plan policies</li> <li>List of all relevant policies and documents for the consideration of this application</li> <li>Wiltshire Highways response</li> <li>Copies of consultee responses</li> </ol>
	5) Copy of Spatial Planning response
	Environmental Statement (including appendices) Dated September

Background	2009
Documents Used in	Design and Access statement (Denton Corker Marshall)
the Preparation of this	Bat Survey dated
Report:	Breeding Bird Survey dated
_	Transport Assessment dated
	Statement of Community involvement dated
	Plan no's as specified in Appendix A of the applications design and access statement.

# **BRAD FLEET**

Service Director, Development

# Appendix 1 - List of local plan policies

G1

In accordance with the principles of sustainable development, priority will be given to ensuring that development proposals:

- (i)achieve an overall pattern of land uses which reduce the need to travel and support increased use of public transport, cycling and walking;
- (ii) promote the vitality and viability of local communities;
- (iii) conserve both the natural environment and cultural heritage of the District; and
- (iv) make effective use of land in urban areas, particularly on previously developed sites.

G2

New development will be considered against the following criteria:

- (i)a satisfactory means of access and turning space within the site, where appropriate, together with parking in accordance with the guidance at Appendices V and VI of the Local Plan;
- (ii) avoidance of placing an undue burden on existing or proposed services and facilities, the existing or proposed local road network or other infrastructure;
- (iii) a minimum loss of disturbance to forestry land and the best and most versatile agricultural land, and avoid the severance of holdings;
- (iv) respect for existing beneficial landscape, ecological, archaeological or architectural features and include measures for the enhancement of such features and the landscaping of the site where appropriate;
- (v) avoidance of the loss of important open areas, a gap in a frontage or natural or built features (such as trees, hedges or other habitats, wall, fences and banks), which it is desirable to retain;
- (vi) avoidance of unduly disturbing, interfering, conflicting with or overlooking adjoining dwellings or uses to the detriment of existing occupiers;
- (vii) avoidance of locations which are liable to environmental problems due to their proximity to incompatible development;
- (viii) avoidance of detriment to public health or pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, effluent or vibration; and incorporation of energy efficient design through building design, layout and orientation.

G3

Development will not be permitted which would increase the requirement for water unless adequate resources already exist, or will be provided in time to serve the development, and without detriment to existing abstractions, water environment, both quality and quantity, fisheries, amenity or to nature conservation.

G5

Development requiring water services will only be permitted where adequate water supplies, drainage, sewerage and sewage treatment facilities are available or where suitable arrangements are made for their provision. In sewered areas new development will be expected to connect to main drainage. New sewers will be expected to be constructed to a standard adoptable by the appropriate water company.

G9

Where as a direct consequence of a proposed development, additional infrastructure or facilities are required within a development site, the Local Planning Authority will seek to negotiate with the developer to secure an appropriate level of provision. Equally, contributions towards off-site infrastructure, education provision and other facilities, or measures to assist public transport, cyclists or pedestrians will also be sought where needed.

Planning permission will be refused for any proposal that does not make satisfactory provision for infrastructure or facilities which are directly required and necessary for the development to go ahead.

D1

Where as a direct consequence of a proposed development, additional infrastructure or facilities are required within a development site, the Local Planning Authority will seek to negotiate with the developer to secure an appropriate level of provision. Equally, contributions towards off-site infrastructure, education provision and other facilities, or measures to assist public transport, cyclists or pedestrians will also be sought where needed.

Planning permission will be refused for any proposal that does not make satisfactory provision for infrastructure or facilities which are directly required and necessary for the development to go ahead.

#### **CN20**

Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features, or their settings will not be permitted.

#### **CN21**

Where an application for development may affect a known or potential site of archaeological interest, as defined on the Plan as an Area of Special Archaeological Interest, the Local planning Authority will request an archaeological evaluation to be carried out before the planning application is determined.

# CN22

The Local Planning Authority will also seek the preservation of archaeological remains that are of regional and local importance, whether they are currently known or discovered during the lifetime of the Plan and there will be a preference to preserve them in situ and to protect their settings.

Development that does not achieve acceptable mitigation of adverse archaeological effects will not

be permitted. Where development is permitted and preservation is situ is not appropriate or possible, the Council will require suitable investigation and recording to take place. These measures will be sought by means of legal agreement or the use of conditions.

#### **CN23**

Within the historic settlements of Salisbury, Amesbury, Downton, Hindon, Mere, Old Sarum, Shrewton, Tilshead and Wilton, the Local Planning Authority will seek to establish, prior to determining planning applications, the archaeological implications of all development, will wish to be informed of all requirements for archaeological work, and will continue to seek the provision of adequate facilities for archaeological site investigation, particularly by use of agreements where appropriate, or by conditions on planning approvals where necessary.

#### CN24

Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted.

C2

Development in the countryside will be strictly limited and will not be permitted unless it would benefit the local economy and maintain or enhance the environment.

C6

Within the Special Landscape Area, proposals for development in the countryside will be considered having particular regard to the high quality of the landscape. Where proposals which would not have an adverse effect on the quality on the landscape are acceptable, they will be subject to the following criteria:

- (i) the siting and scale of development to be sympathetic with the landscape; and
- (ii) high standards of landscaping and design, using materials which are appropriate to the locality and reflect the character of the area.

C8

in order to maintain the quality and variety of the countryside new development which would result in the loss of trees, hedges or other features that contribute to the character of the landscape will only be permitted where provision is made for replacement planting and the creation of new landscape features.

C13

Proposals for development which are acceptable under other policies in this Local Plan should retain and enhance as far as possible any existing value of the site as a wildlife habitat. Sympathetic siting of development, suitable planting and seeding, and appropriate site management will be required.

C12

Development which would have a significant detrimental effect on non-statutory sites or areas such as Areas of High Ecological Value, County Wildlife Sites, or other non-statutory sites which are of local rather than national or international wildlife or geological importance, will only be permitted where the importance of the development outweighs the local nature conservation interests present. Where permission is granted, conditions will be used to ensure that harm to wildlife or geological interests is minimised and to secure replacement value for any lost habitats or features. This will be particularly important where the habitat or species is subject to a Biodiversity Action Plan.

C17

The conservation and enhancement of the rivers and other watercourses, river corridors and associated wetlands will be promoted within the District.

C18

Planning permission will not be given for development which would adversely affect the water quality, amenity, visual quality or public enjoyment of a river or floodplain or its value as a wildlife habitat.

Approval will not be granted for the culverting of watercourses unless there is a demonstrable need for granting an exception

Bank protection works, which will only be permitted where property or statutory rights of way are threatened, should involve the use of appropriate materials and should protect nature conservation interests.

C19

The best and most versatile agricultural land (Grades 1, 2 & 3a) will be protected from development. Where either sufficient land in lower grades is unavailable, or lower-grade land has an environmental value recognised by a statutory landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations, the best and most versatile agricultural land may be used for development. If such land does need to be developed, and there is a choice between sites in different grades, development will be directed towards land of the lowest grade.

TR11

The provision of off-street car parking spaces, on the basis of the guidance given at Appendix V to this Local Plan, will be sought in respect of all new development proposals.

#### **TR12**

Permission will not be granted for major new development unless provision is made in the layout for:

- (i) facilities giving priority to, and allowing access by, buses;
- (ii) cycleways and footpaths;
- (iii) direct and sustainable links to adjoining developments and urban centre, particularly those links giving priority to public transport, walking and cycling; and
- (iv) measures to achieve safe traffic speeds and secure a pleasant and safe environment.

#### **TR13**

Proposals to improve and extend the footpath, cycleway and bridleway network will be permitted provided they:

- (i) are integrated with existing routes;
- (ii) take into account the needs of agriculture;
- (iii) are located and designed to reduce opportunities for criminal behaviour;
- (iv) have regard to the needs of people with impaired mobility; and
- (v) have regard to the needs of other users of the route and network.

# **TR14**

Secure bicycle parking spaces will be sought in new developments in a manner acceptable to the Local Planning Authority and in accordance with the guidelines given in Appendix VI.

#### **TR16**

Existing bus and rail services should be retained and expanded where appropriate to provide an attractive alternative to the use of the car.

#### **R17**

The Local Planning Authority will encourage the improvement and increased use of the public rights of way network. Proposals to close or divert existing rights of way will not be permitted unless an alternative route is available which is as attractive and is not significantly longer than the original route. Wherever possible, local extensions and improvements to rights of way will be sought as part of development proposals.

**R18** 

The Local Planning Authority will, where it is considered appropriate, seek the expansion of public access to the countryside through the creation of new paths and publicly accessible areas and extensions to existing facilities.

T1

The development of new tourist attractions or facilities, or the improvement of existing tourist attractions or facilities, will be permitted within the physical limits of settlements.

T2

In the countryside, outside the New Forest, proposals for the development of new tourist attractions or the improvement of existing ones, will be considered against the following criteria:

- (i) where a proposal affects a Site of Special Scientific Interest, an Area of High Ecological Value, a Scheduled Ancient Monument or an Area of Special Archaeological Significance, the development will be permitted only if there will be no adverse impact on the designated area;
- (ii) within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty or the Landscape Settings of Salisbury and Wilton, proposals will be permitted only where they are small in scale and would be compatible with the special landscape quality of the area;
- (iii) otherwise proposals will be allowed provided they do not entail the erection of large buildings or structures.

Т3

It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site.

# Appendix 2

# Relevant planning policies

The Regional Spatial Strategy (RSS)

Policy EN2 – Air quality

Policy RE1 – Water resources and water quality

Policy RE2 - Flood risk

Policy VIS2 - Principles for future development

Policy SS1- Regional spatial strategy

Policy SS3 – The sub-regional strategy

Policy EN1 – Landscape and biodiversity

Policy EN3 – The historic environment

Policy EC1 – Economic development

Policy TCS1 - Tourism

Policy RE5 – Management and transportation of waste

Policy TRAN2 - Strategic and Inter-Urban and Inter-Regional transport networks

Policy TCS2 – Culture, leisure and sport

The adopted Swindon and Wiltshire Structure plan which runs until 2016 contains the following policies relevant to this application -

DPI (Priorities for Sustainable Development)

DP2 (Infrastructure)

T2 (Public Passenger Transport)

T4 (Cycling and Walking)

T5 (Parking)

T7 (Transport Provision for New Developments)

T11 (A303 Stonehenge Transport improvements including Flyover at Countess Roundabout)

C1 (Maintenance and enhancement of nature conservation resources)

C2 (Protection of Areas of Nature)

C3 (Protection of Areas of Nature)

C5 (the water environment)

C9 (Special Landscape Area)

C12 (Protection of best agricultural land)

HE1 (Protection of the World Heritage Site)

HE5 (Protection of World Heritage Sites and scheduled ancient monuments)

HE7 (Safeguarding architectural and historic heritage)

RLT1 (Provision of recreation and leisure facilities)

RLT2 (Improving informal countryside recreation)

RLT8 (Proposals for new and improved tourist attractions)

W1 (Waste management; reducing, re-using and recovering waste)

W2 (Provision of recycling facilities)

At a local level consideration needs to be given to the saved policies of the adopted local plan. This is the Salisbury District Local Plan

Relevant saved policies include:

G1 (General principles for development)

G2 (General criteria for development)

G3 (Protection of the water environment)

G5 (Water supply and mains drainage to new development)

G9 (Planning obligations)

D1 (Design criteria)

CN20 (Ancient monuments and archaeology)

CN21 (Archaeological evaluation of development sites)

CN22 (Preservation of archaeological remains)

CN23 (Archaeological investigation prior to development)

CN24 (Protection of the World Heritage Site)

C2 (Control of new development within the countryside)

C6 (Special landscape Area)

C8 (Replacement of landscape features lost during development)

C13 (Retention and enhancement of existing wildlife habitat)

C12 (Protected species)

C17 (Conservation of river habitats)

C18 (Protection of water quality)

C19 (Protection of best agricultural land)

TR11 (Off street car parking provision)

TR12 (Transportation provision for new major developments)

TR13 (Extension to footpath, cycleway and bridleway network)

TR14 (Secure cycle parking)

TR16 (Retention and expansion of existing bus and rail services)

R17 (Improvement and increased use of public rights of way network)

R18 (Expansion of public access to the countryside)

T1 (Development of new tourist attractions)

T2 (Development of new tourist attractions in the countryside)

T3 (New visitor centre for Stonehenge).

Finally also to be considered are relevant policies of the Wiltshire and Swindon Waste and Minerals plans Those policies being –

The Wiltshire and Swindon Waste Core Strategy - adopted July 2009

The Wiltshire and Swindon Minerals Core Strategy – adopted July 2009

The Wiltshire and Swindon Waste Development Control policies – adopted September 2009

The Wilshire and Swindon Minerals Development Control policies – adopted September 2009

In addition to these documents there are a number of emerging documents that have a degree of weight in the planning decision. These are –

The emerging Regional Spatial Strategy for the South West including policies -

Development Policy D - Infrastructure

Development Policy E – High Quality Design

Development Policy G – Sustainable construction

ENV1 – Protecting and enhancing the Region's Natural and Historic Environment

ENV4 – Nature conservation

ENV5 – Historic Environment

TO1 – Sustainable Tourism

RTS 1 – Corridor Management

RE5 – Decentralised energy to supply new development

RE6 - Water resources

W4 – Controlling, re-using and recycling waste in development

The emerging South Wiltshire Core Strategy including policy 13 which covers new visitor facilities in relation to Stonehenge.

National Planning guidance is contained within the following documents –

- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 7: Sustainable Development in Rural Areas
- Planning Policy Statement 22: Renewable energy
- Planning Policy Statement 23: Planning and Pollution Control
- Planning Policy Statement 9: Biodiversity and Geological Conservation
- Planning Policy Statement 10: Planning for Sustainable Waste Management
- Planning Policy Guidance 13: Transport
- Planning Policy Guidance 15: Planning and the historic environment
- Planning Policy Guidance 16: Archaeology and planning

- Planning Policy Guidance 17: Planning for open space, sport and recreation
- Planning Policy Guidance 24: Planning and Noise

Planning Policy Statement 25: Development and flood risk

And circular 07/2009 The protection of world heritage sites

Other guidance for the consideration of this application is set out in

- Future Foundations: Building a Better South West A Sustainable Construction Charter for the Region (Sustainability South West)
- A Sustainable Future for the South West: A Regional Sustainable Development for the South West of England (South West Regional Assembly/sustainability South West).
- Supplementary Planning Guidance for Waste Audits issued by Wiltshire County Council.
- Creating Places design guide produced by the former Salisbury District Council.
- The Good practice guide on planning and tourism.

One of the most important documents in the consideration of the application is the Stonehenge World Heritage Site Management Plan. Wiltshire's cabinet has resolved to endorse the Stonehenge management plan as supplementary planning guidance and as such this provides the basis for determining any planning application.

Finally UNESCO (The United Nations Educational, scientific and Cultural Organisation) has a convention adopted in 1972 that seeks to protect the World Cultural and Natural Heritage. This is the Convention concerning the protection of the world cultural and natural heritage. Unesco guidelines for the implementation of the World Heritage Convention (2008) explain this in more detail.

# Appendix 3 - Highways consultation response

Department for Transport, Environment & Leisure
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Adam

# Re: Planning Applications S/09/1528 (Listed Building Consent – Airmans Cross) and S/09/1527, Proposed new Stonehenge Visitor Centre, Airmans Corner, Winterbourne Stoke

I refer to my consultation response letter dated 5<sup>th</sup> November, and the subsequent correspondence you have received from the Department. I apologise for any confusion caused as a result of conflicting requirements, and would ask that all previous correspondence be superseded by this letter. It hopefully addresses the inconsistencies in the transport and highways correspondence to date, and reflects the discussions at our recent (8<sup>th</sup> December) meeting with the applicant, the National Trust and the Highways Agency. In particular it clarifies the local highway authority position in relation to the proposals at Stonehenge Bottom, and future access to that part of the A344 which is to be subject to an application for a (s247) stopping-up order.

Having considered both of the above proposals, I make the following response to the consultation in respect of transport and highways considerations:

#### S/09/1528 - Airmans Cross, LB Consent

This proposal relates to the relocation of the Airmans Cross to a new site within the curtilage of the proposed Stonehenge Visitor Centre.

The proposal is fully supported by the highway authority. No objection is raised, if the arrangements are subject to a planning obligation to provide, inter alia, for i) the temporary storage of the cross ii) the proper cleaning and restoration prior to its relocation to the proposed site, and iii) an undertaking from English Heritage to maintain the Cross in good order whilst in their care. (Ownership of the Cross is uncertain, but there is a view that the Council, as highway authority has a claim to the Cross. It is recommended that the Cross be transferred into the care of English Heritage in perpetuity)

# My recommendation is:

No objection subject to the consent being withheld until an appropriate planning agreement has been completed.

# S/09/1527 - Proposed Stonehenge Visitor Centre

The proposal is supported in principle, but there are concerns that need to be addressed.

The County Council (and, by association, the highway authority) previously agreed in principle to the closure of the A344 to motorised vehicles in order to facilitate objectives of the Stonehenge Master Plan, and the provision of the proposed Visitor Centre. (Ref: Wiltshire County Council Cabinet Report 21<sup>st</sup> October 2008, Minutes appended hereto). In particular resolution numbers (ii) and (iv) guide this response.

The submitted Transport Assessment identifies the impacts associated with the closure of the A344, and I accept that the transport implications for the local highway network are not sufficient to warrant a recommendation of refusal, despite forecast increased traffic flows on the Packway. There will be added difficulties on the A303, especially on the link between Stonehenge Bottom and Longbarrow, but again these are not regarded as sufficient to justify a refusal of the application, given the benefits of junction improvements proposed at Longbarrow.

The proposal to provide a roundabout junction at Airmans Corner is supported. The proposed junction should materially improve safety at the junction, and there are no forecast capacity issues here.

There are several proposals on the drawings that require modification:

The gating of the A344 at the location shown (immediately to the east of the proposed roundabout) is not acceptable in road safety terms. Any gating arrangements will be covered under the provisions of a planning agreement, and will be required to ensure that vehicles confronted by a gate on the A344 can turn to approach the roundabout in forward gear.

The coach park exit onto the B3089 should be laid out so as to provide for, but not encourage, right turn movements. The current kerbing arrangement is overly engineered, and could encourage such movements.

I believe these two points can be addressed via detailed drawings to be approved under the provisions of a planning agreement

Access to the site by sustainable modes needs to be considered within the framework of the Stonehenge Management Plan. This access is currently poor, with the A303 to the south acting as a major severance. There are several policies which relate to sustainable access, the key ones are:

**"Policy 4d** Access and circulation to key archaeological sites within the WHS landscape should be encouraged (taking into account archaeological and ecological needs) to increase public awareness and enjoyment.

Action:

Develop circular routes linking archaeological sites for walkers and cyclists"

**"Policy 5d** Measures should be taken through an exemplary Green Travel Plan to encourage access to the Site other than by car. Actions:

- Develop a Green Transport Plan for the whole WHS.
- Encourage a decrease the % of visitors arriving at Stonehenge by car
- Produce a sustainable transport plan for the new visitor facilities covering access to and within the WHS
- Increase and promote public transport to Stonehenge and the WHS, in particular bus links from Salisbury train station
- Encourage cycling in the WHS and long distance cycling routes".

The TA explains why a refuge (for pedestrians and cyclists) has not been proposed in the carriageway of the A303 at Stonehenge Bottom. However, pedestrians and cyclists will inevitably arrive (as they do now) at Stonehenge Bottom and need to cross the road at that point. There is scope to consider other measures which might include encouraging users of this route to cross at more appropriate points along the A303. The path from Old Stonehenge Road to Stonehenge Bottom is generally acceptable to accommodate the pedestrian and

cycle traffic that might be anticipated to use the route, although some minor changes in relation to precise crossing points need to be considered at detailed design stage. I suggest, below, a condition that allows for performance of any crossing arrangement to be assessed and monitored through established safety audit techniques.

Sustainable access to the WHS site as a whole must be addressed and agreed during this stage of the process as there will be a number of physical measures which must be undertaken, it will not be acceptable to leave it until the production of the Green Travel Plan. The following modifications to the existing rights of way and road network will be required in order to provide sustainable access to the visitor centre and the wider WHS:

- 1) The surfacing of Byway 12 from the A344 up to Fargo Road (Dealt with by condition below)
- 2) Upgrading of the National Trust permissive footpath between Byways 12 and 11 to Restricted Byway status (This issue is not appropriate to condition, but EH should be encouraged to accede to the request, in order to avoid potential conflict on the A303 between its junctions with the two byways).
- 3) An off-road cycle link beginning just south of the coach park exit on the east side of the B3086, passing round the corner and along the north side of the existing A344, finishing at the cycle parking. This would avoid cyclists bound for the B3086 having to negotiate the roundabout.\*
- 4) Bus stops on the A360 and connecting paths are required to facilitate passengers using those services unable to enter the site.\*
- \* These issues will be addressed through the detailed drawings required under the provisions of the planning agreement

Securing future pedestrian and cycle access to that part of the A344 south east of Byway 12 will be dealt with in the planning agreement.

# My recommendation is:

No objection subject to:-

Consent being withheld until a planning agreement, generally in accordance with the travelling draft (available), has been completed, and the following conditions:

 Prior to the commencement of the development, details of the Visitor Transit System shall be submitted to and approved by the local planning authority; such details to demonstrate the efficacy of the turning and waiting facilities proposed, at both operational ends of the site, and in the overnight parking area.

Reason: To ensure that the proposed layout can properly accommodate the operational requirements of the VTS trains.

Informative: The VTS will be running on a public highway. It must therefore comply with all necessary legislation related to such vehicles.

 Notwithstanding the details of gating arrangements shown on the submitted drawings, the applicant shall, prior to the commencement of the development, obtain approval from the local planning authority to further detailed drawings showing how vehicles accessing the A344 can turn around and return westbound in forward gear, including all points where access is restricted by proposed gating.

Reason: In the interests of highway safety and to avoid the inconvenience otherwise caused to larger vehicles that might need to gain access for highway maintenance or other purposes.

• Prior to the commencement of the development the applicant shall submit to and secure the approval of the local planning authority a scheme demonstrating how any gating or bollarding measures on the A344 are to be operated, their legal status, and what provisions are to be made for vehicles reasonably requiring access to the public highway and, beyond, to the stopped up section of A344 between Byway 12 and Stonehenge Bottom. Gating arrangements shall only be provided and operated in accordance with the approved scheme.

Reason: To demonstrate that a managed scheme will allow for the requirements of all proper vehicular users of the highway at all times of the day and night throughout the year.

 Prior to the commencement of the development the applicant shall submit to and secure approval of the local planning authority to a scheme demonstrating how visitors during exceptional circumstances, such as summer solstice, will be accommodated, and afforded legal access to their temporary parking facilities via the A344. Parking arrangements shall be implemented in accordance with the approved scheme.

Reason: To ensure that local road congestion is not caused at the proposed Airmans Corner roundabout junction during exceptionally high levels of visitation, and in a circumstance where enforcement of a traffic regulation order could otherwise cause access difficulties.

• Development hereby permitted shall not commence until (i) details of the pedestrian and cycle route along the whole of the A344, including crossing arrangements at the A303 (Stonehenge Bottom) and (ii) a scheme for reviewing such access and crossing arrangements, have been submitted to and approved (in consultation with the Secretary of State for Transport) in writing by the local planning authority. The development shall not be occupied until the agreed works have been completed. Any changes shall be implemented in accordance with the approved scheme.

Reason: To accommodate and facilitate the inevitable future local pedestrian and cyclist demand travelling the route between the Stones and west Amesbury, and provision of a safe crossing point on the A303 when the right turn facility currently in place is removed.

Informative: For the avoidance of doubt, the scheme for reviewing the access and crossing arrangements shall have regard to Design Manual for Roads and Bridges HD19/03 Stage 4 Safety Audit 12 and 36 month post-scheme recommendations for remedial action. It shall detail how recommended remedial action will be funded and implemented, including arrangements to provide for alternative crossing points on the A303 and associated access links.

Before the proposed visitor centre is open for public use, the developer shall upgrade
the surface of Byway 12 between the A344 and the Sustrans National Cycle Route 45.
 Reason: In order to facilitate the objectives of the travel planning requirements for the
site insofar as they relate to encouraging pedestrian and cycle transport.

 Prior to the commencement of the development, a scheme and programme for cycle parking and storage provision at the western and eastern end of the retained highway A344 shall be submitted for approval to the local planning authority. The facilities shall be provided in accordance with the approved scheme and programme.

Reason: In order to facilitate the objectives of the travel planning requirements for the site insofar as they relate to encouraging pedestrian and cycle transport, and to discourage random parking of cycles within the vicinities of the Stones and the proposed Visitor Centre.

Yours sincerely,

Phil Tilley Head of Service Transport Development

Direct Line: 01225 713441 Fax Number: 01225 713207 Email: phil.tilley@wiltshire.gov.uk Extract of Minutes of Cabinet Meeting held on 21st October 2008

#### 109. Stonehenge World Heritage Site Management Plan and Environmental Improvements

The Cabinet considered the report of the Director of Environmental Services in relation to the most recent proposals for Stonehenge put forward by English Heritage and which requested agreement of the County Council's response to the consultation.

Additional correspondence from Mr West, County Councillor, Winterbourne Stoke Parish Council and Durrington Town Council were also circulated to members.

The Leader referred to the consultation event that had been held in Amesbury at which English Heritage had presented their detailed proposals. The consensus from that meeting was that sites X and Y, as referred to within the plan circulated with the officer's report, were preferred and there was little, if any, support for sites W or Z.

The Cabinet Member for Environment, Transport and Economic Development moved the recommendations contained within the report and suggested that site X should be put forward as the preferred option. This was the closest site to the actual Stones themselves and would reduce the demand for park and ride facilities. The Cabinet Member emphasised that the Council would continue to press the Government for improvements to the A303.

The Cabinet Member for Culture agreed that sites X and Y were the strongest candidates but pointed out that site X was the most archaeologically sensitive site. If this site were chosen as the preferred option it would be important that archaeological matters were considered with regard to the specific location of the visitor centre within the overall site.

The Cabinet Member for Staffing and Customer Care spoke as local Member for the Durrington and Bulford electoral division. As far as the residents of Larkhill were concerned they could not support a visitor centre at site W as this would be directly adjacent to a working farm and residential houses.

The Leader agreed that site X should be put forward as the preferred option but also suggested that the campaign for improvements to the A303 should be continued with Government.

Mr West the local member for the Wilton and Wylye electoral division referred to his letter dated 14 October 2008 and the enclosure which had been circulated to members of the Cabinet. The enclosure was the report of the Public Inquiry into the A303 Stonehenge Improvement which concluded that the closure of the A344 independently of the proposed improvement of the A303 would not be justifiable and that it would lead to increased congestion on the A303 and elsewhere within the local road system. He emphasised that nothing had changed since then and local people would feel let down if the closure of the A344 proceeded without the associated improvements to the A303.

It was acknowledged that the Highways Agency probably would have the power to close the junction at Stonehenge Bottom without the prior consent of the County Council.

In response the Cabinet Member for Environment, Transport and Economic Development pointed out that the closure of the A344 would make the pressure on the A303 more obvious and highlight the problems.

#### Resolved:

- (i) To support the Objectives and Aims of the Management Plan, particularly Aim 7, and to adopt the relevant parts as a Supplementary Planning Document in due course.
- (ii) To support the Stonehenge Environmental Improvements, with Option 3A (site X) being the preferred site for the new visitor facilities subject to archaeological considerations being taken into account before the specific location within that site is agreed.
- (iii) To agree that whilst site X would minimise the need for park and ride facilities, English Heritage be asked to consider a park and ride service for those visitors who wished to use it, from the final location chosen for the visitor facilities to a drop off point at the existing Stonehenge car park.

- (iv) To raise no objection to the closure of the A303/A344 junction at Stonehenge Bottom, together with the closure of the A344 from Stonehenge Bottom to Byway 12 subject to junction improvements at the A303/A360 Longbarrow Roundabout and A360/A344/B3086 Airman's Corner.
- (v) To advertise Traffic Regulation Orders under the Road Traffic Regulation Act 1984 prohibiting motorised vehicles from using the A344 between Airman's Corner and Byway Amesbury 12 and byways within the World Heritage Site at the appropriate time.
- (vi) To remind English Heritage of UNESCO's concern that no progress has been made with the implementation of the A303 Stonehenge Improvement, the need to find an appropriate solution compatible with the Outstanding Universal Value of Stonehenge and to ask for English Heritage's support to achieve the required improvements.
- (vii) To send a copy of the Council response to the consultation to the Minister for Transport stressing the need to solve the problems of the A303 in the vicinity of Stonehenge, reluctantly accepting the closure of the A344 and stating the Council's intention to monitor the local road network for adverse effects.

#### **Reason For Proposal**

The Stonehenge WHS Management Plan needs to be revised to reflect changing circumstances. The present visitor facilities at Stonehenge are inadequate. New facilities would provide better interpretation of the WHS along with a café, a larger shop and improved visitor amenities. All the options for the site of the new facilities have advantages and disadvantages but on balance, the preferred options are those indicated.

The closure of the A303/A344 junction at Stonehenge Bottom and the A344 as far as Byway 12 would bring substantial improvements to the environment of Stonehenge and would reunite the monument with the ancient processional Avenue. The closure of the junction would also improve road safety, provided that improvements were made at the Longbarrow Roundabout and Airmen's Corner.

# Appendix 5 Consultee response from spatial planning

**Proposal:** S/2009/1527/FULL – Decommissioning of existing visitor facilities and a section of the A344; the erection of a new visitors centre, car park, coach park and ancillary services building; and related highways and landscaping works.

**Location:** Airmans Corner, land south east of the junction of the A360 and A344, Salisbury and land south east of the junction of the A360 and A344 near Shrewton/Larkhill, Salisbury.

# 1. Background

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires this application to be determined in accordance with the adopted development plan unless material considerations indicate otherwise. The Planning System is a plan led one and there must be a rigorous analysis of the proposals to test whether they are in accordance with the development plan. Only then should all other material considerations be taken into account to evaluate the suitability of the proposals.

If any application is contrary to policy then they should properly be refused unless other material considerations raise exceptional circumstances that merit setting them aside. Similarly if the application can be demonstrated to comply with policy then this introduces a strong presumption to recommend approval for the proposals unless again that is outweighed by other material planning issues.

# 2. The Current Development Plan

# 2.1 Regional Planning Guidance 10

This is the current RSS and forms part of the development plan for the purposes of determining planning applications in the South West until replaced by the emerging RSS. It has statutory force under the Planning and Compulsory Purchase Act 2004.

Relevant policies include:

Policy EN2 - Air quality

Policy RE1 – Water resources and water quality

Policy RE2 - Flood risk

Policy VIS2 - Principles for future development

Policy SS1- Regional spatial strategy

Policy SS3 – The sub-regional strategy

Policy EN1 – Landscape and biodiversity

Policy EN3 – The historic environment

Policy EC1 – Economic development

Policy TCS1 - Tourism

Policy RE5 – Management and transportation of waste

Policy TRAN2 – Strategic and Inter-Urban and Inter-Regional transport networks

Policy TCS2 - Culture, leisure and sport

# 2.2 Swindon and Wiltshire Structure Plan 2016

The Wiltshire and Swindon Structure Plan 2016 was adopted in 2006 and will eventually be replaced by the new South West Regional Spatial Strategy (RSS). In accordance with the Planning and Compulsory Purchase Act (2004), the Structure Plan was only in place until April 2009. However, an application was made to the Secretary of State to 'save' those policies that need to be retained until the new RSS and/ or a new Wiltshire Core Strategy is in place. Of those saved policies, those relevant to this proposal include:

DPI (Priorities for Sustainable Development)

DP2 (Infrastructure)

T2 (Public Passenger Transport)

T4 (Cycling and Walking)

T5 (Parking)

T7 (Transport Provision for New Developments)

T11 (A303 Stonehenge Transport improvements including Flyover at Countess Roundabout)

C1 (Maintenance and enhancement of nature conservation resources)

C2 (Protection of Areas of Nature)

C3 (Protection of Areas of Nature)

C5 (the water environment)

C9 (Special Landscape Area)

C12 (Protection of best agricultural land)

HE1 (Protection of the World Heritage Site)

HE5 (Protection of World Heritage Sites and scheduled ancient monuments)

HE7 (Safeguarding architectural and historic heritage)

RLT1 (Provision of recreation and leisure facilities)

RLT2 (Improving informal countryside recreation)

RLT8 (Proposals for new and improved tourist attractions)

W1 (Waste management; reducing, re-using and recovering waste)

W2 (Provision of recycling facilities)

#### 2.3 Salisbury District Local Plan (adopted June 2003)

The Salisbury District Local Plan 2011 was adopted in June 2003. In September 2007, most of the policies were 'saved'. They will remain in place until replaced by policies in new DPDs, particularly the Wiltshire Core Strategy.

#### Relevant saved policies include:

- G1 (General principles for development)
- G2 (General criteria for development)
- G3 (Protection of the water environment)
- G5 (Water supply and mains drainage to new development)
- G9 (Planning obligations)
- D1 (Design criteria)
- CN20 (Ancient monuments and archaeology)
- CN21 (Archaeological evaluation of development sites)
- CN22 (Preservation of archaeological remains)
- CN23 (Archaeological investigation prior to development)
- CN24 (Protection of the World Heritage Site)
- C2 (Control of new development within the countryside)
- C6 (Special landscape Area)
- C8 (Replacement of landscape features lost during development)
- C13 (Retention and enhancement of existing wildlife habitat)
- C12 (Protected species)
- C17 (Conservation of river habitats)
- C18 (Protection of water quality)
- C19 (Protection of best agricultural land)
- TR11 (Off street car parking provision)
- TR12 (Transportation provision for new major developments)
- TR13 (Extension to footpath, cycleway and bridleway network)
- TR14 (Secure cycle parking)
- TR16 (Retention and expansion of existing bus and rail services)
- R17 (Improvement and increased use of public rights of way network)
- R18 (Expansion of public access to the countryside)
- T1 (Development of new tourist attractions)
- T2 (Development of new tourist attractions in the countryside)
- T3 (New visitor centre for Stonehenge).

#### 2.4 Wiltshire and Swindon Waste and Minerals Plans

The Wiltshire and Swindon Waste Core Strategy – adopted July 2009

The Wiltshire and Swindon Minerals Core Strategy – adopted July 2009

The Wiltshire and Swindon Waste Development Control policies – adopted September 2009

The Wilshire and Swindon Minerals Development Control policies – adopted September 2009

# 2.5 Analysis of the Proposals in relation to the Development Plan - Principle

Broadly the development plan policies relevant to this application can be divided into two categories; those which relate to the fundamental principle of allowing the development and then those which seek to control any development so that environmental protection is ensured and the social and technical infrastructure to support it are in place.

#### The Principle of Development

Key policy considerations are expressed in policies C2 and T3 of the Salisbury Local Plan (2003) and policy C12 of the Wiltshire Structure Plan.

#### Saved Local Plan Policy C2

"Development in the countryside will be strictly limited and will not be permitted unless it would benefit the local economy and enhance the environment."

#### Saved Local Plan Policy T3

"It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site."

#### Saved Structure Plan C12

"Local Planning Authorities will protect the best and most versatile agricultural landform nonagricultural development. Exceptionally, where there is an overriding need for development on best and most versatile agricultural land, which cannot be met elsewhere."

# Saved Local Plan Policy C2

C2 states that development in the countryside will be "strictly limited" unless it benefits the local economy and maintains or enhances the local environment. The supporting text (para. 7.6) makes it clear that exceptions can be made to this policy of constraint including for "limited" recreational and tourist development. The exceptional, unique nature of this project is that it is designed to enhance the World Heritage Site which is of international importance.

To comply with this policy the planning application must comply with both of the criteria of benefiting the local economy and maintaining/enhancing the environment.

# Benefiting the Local Economy

Chapter 13 of the Environmental Statement accompanying the planning application considers in detail the socio-economic effects of the scheme. It is estimated that the new visitor facilities at Stonehenge will directly support 64.4 FTE operational staff by 2014/15 (see Table 13.8). In terms of indirect employment effects, it is estimated that the new visitor facility will support a further 49.2 FTE. Table 13.9 summaries the direct, indirect and induced employment effects.

The ES concludes that the scheme will have no significant adverse impacts on the socio-economic conditions. The assessment has demonstrated that during the construction phase, the Scheme would have a minor beneficial effect on the local economy. The operational effects of the Scheme are considered to be moderately beneficial to the local and regional economy. The new visitor facilities would play an important role for local schools and adult learning groups, with dedicated educational space available. The scheme would also play a significant role for the wider region as a key visitor gateway and "hook" to attract visitors to stay longer in Wiltshire, and in the South West region as a whole. These wider effects, which stem from the investment in the new visitor facilities, would be of major benefit for Wiltshire and the South West region, and contribute to sustaining and enhancing the region's visitor economy.

Therefore, on the first test it is considered that there are definite and tangible economic benefits that this scheme will deliver, and in this respect, the scheme complies with Local Plan Policy C2.

# Maintaining / Enhancing the Local Environment

It is important to take a balanced look at the overall aims of this scheme. While the scheme leads to new development at Airman's Corner, it is also leading to the removal of both the A344 and the existing

facilities immediately adjacent to Stonehenge within the central core of the World Heritage Site. This can only be considered a net gain in environmental terms. The removal of the 20<sup>th</sup> century incursion so close to Stonehenge will contribute to returning the Scheduled Ancient Monument to a more respectful setting fitting of its international status and value.

Furthermore the design and lay out of the facilities are of an extremely high quality and subtle design, which seeks to keep their impact minimal. Therefore with regard to the second key test the application is considered compliant with policy C2.

# **Saved Local Plan Policy T3**

Policy T3 clearly identifies that the provision of a new visitor centre for the Stonehenge World Heritage Site is an objective which will be supported by the council. This policy when considered in conjunction with policy C2 examined above brings the logical conclusion that the application is in compliance with the Local Plan.

# **Structure Plan Policy C12**

The final point of principle is that with the Wiltshire Structure Plan, policy C12, which basically states that the best agricultural land needs to be protected from development. The 'best and most versatile land' is classified as grades 1,2,and 3. The construction of the new visitor facilities at Airman's Corner will result in the loss of 6.7 ha of agricultural land, which includes 2.7 ha classified as best and most versatile agricultural land (sub-grade 3a). The supporting text with the policy makes it clear that this land should only be developed if there is an overriding need that cannot be met elsewhere. The need for a new visitor centre to serve Stonehenge has long been accepted as an exceptional need as expressed through policy T3 of the Salisbury Local Plan and the unequivocal injurious impact the existing visitor facilities have on the Monument and its wider setting.

The exceptional need for the new visitor centre being established, it must be examined whether alternative sites are available that would help safeguard the best agricultural land. The detailed analysis of site selection and consideration of alternatives is contained in section 3 of the Environmental Statement. In summary, the preferred options are considered to be an optimal response to the Stonehenge WHS Management Plan 2009 policies for conserving and enhancing the outstanding universal value of the WHS, while maximizing opportunities for improved understanding and enjoyment for all visitors. The environmental assessment of alternative sites is compelling and taking a view of all land use constraints the Airman's Corner site does emerge in planning terms as the most acceptable site.

The Airman's Corner site was selected as the preferred site as it would:

- Minimise as far as practicable adverse impact on the WHS, its setting and the attributes of its Outstanding Universal Value;
- Minimise as far as practicable adverse impacts on the character of the landscape;
- Avoid constraining opportunities for improvements to the setting of Stonehenge and other monuments and sites in the WHS landscape as far as practicable;
- Make use of land which has been previously disturbed by development the section of the B3086 to be removed;
- Make use of existing infrastructure so enabling new infrastructure (including access roads and transit routes) within the WHS to be kept to a practical minimum.

Therefore in relation to policy C12 the proposals are considered to accord with its provisions as exceptional need that cannot be elsewhere has been demonstrated.

# 2.6 Conclusions on Principle of Development

The environmental and economic benefits to be gained, together with the lack of feasible alternatives all lead to the unavoidable conclusion that this planning application is in accordance with those provisions of the development plan, which will permit the principle of development.

#### 2.7 Analysis of Proposals in relation to Development Plan: Detail

Although the principle of this proposal in this specific location is in accordance with the Development Plan, as the supporting text to Policy T3 makes clear any scheme submitted will not automatically be considered acceptable and other policies of the development plan will need to be taken into account when evaluating its acceptability. Many of the policies listed above as being relevant to this application will be applied to specific facets of the application (e.g. access, landscape, sustainability etc) under the assessment of key planning issues. In considering each of the policy issues that follow, it should be borne in mind that there may be some overlap between similar issues under different policy groupings, particular those of the General Development Policies.

General Development Policies
RPG10, policies VIS2, SS1, SS3
Wiltshire Structure Plan, policies DPI and DP2
Salisbury Local Plan, policies G, G2, G3, G4, G5, G6, G9

These policies set out general criteria that planning applications should meet. In summary these criteria involve ensuring that development contributes to the objectives of sustainability, promote the vitality and viability of local communities, conserve both the natural and built environments, minimise environmental impacts and are supported by necessary infrastructure.

In summary, it is considered the scheme complies with the requirements of these policies. For example, it will contribute towards sustainability objectives through a number of measures, including the use of local, recyclable and renewable materials wherever possible. A sustainable, low-energy approach to heating and cooling allows a significant reduction in energy use and carbon emissions. Subject to Environment Agency approval, water supply will be drawn from the aquifer, a local and renewable resource. The Airman's Corner site will use on-site water collection and treatment for sustainability and to avoid intrusive trenching for connections to water and sewer mains.

The proposals also promote sustainable modes of transport, including provision for cyclists, pedestrians and public buses.

#### Design

Salisbury Local Plan, policies D1, D7

These policies require high quality design which respects the wider setting and is based on a concept that draws on the unique charter of its context should be brought forward.

The design of the new facilities minimises both visual intrusion in the landscape and below ground disturbance of archaeology, whilst creating an accessible and legible layout for visitors. The design of the Visitor Centre is deferential to the Stones, relating in height to the tallest Trilithons and avoiding obvious visual references to the monuments. The curved canopy mimics the undulating landscape of the site and creates a sense of openness to the building, embracing the wide, open landscape context. The north pod of the Visitor Centre is glazed, continuing a visual link to the external landscape, while other materials have been selected to minimize visual impact and complement the colours of the surrounding landscape.

The landscape proposals are designed to retain the character of the dry valley and open chalk downland landscape. The car park follows the natural topography of the site, minimising visual impact without the need for intrusive and inappropriate screen planting. New tall planting is grouped with existing tall planting and used to screen the most visually intrusive element of the scheme, the coach park.

#### Conservation

RPG10, policies EN3, EC1
Wiltshire Structure Plan, policies, HE1, HE5, HE7
Salisbury Local Plan, policies, CN20, CN21, CN22, CN23, CN24

The objective of these policies is to seek to protect those features, sites and settlements of the historical, architectural and archaeological interest which contribute to the District's and nation's character, whilst ensuring that where new development occurs, it respects and wherever possible, enhances the environment within which it is located.

Section 5 of the Environmental Statement considers the scheme in detail in terms of archaeology and the historic environment. Removing the A344 and existing facilities, and returning the area to grass, will return the Stones to a more respectful setting. As referred to above, the Airman's Corner site was selected as the preferred site as it minimizes as far as practicable adverse impacts on the World Heritage Site , its setting and character of the landscape.

The Natural and Rural Environment and Economy
RPG 10, policies EN1, EC1
Wiltshire Structure Plan, policies C2, C3, C5, C9, C12
Salisbury Local Plan, policies, C1, C2, C6, C8, C10, C13, C12, C17, C18, C19

Collectively these policies seek to strike a balance between preserving and enhancing the quality and character of the countryside in terms of the landscape and nature conservation, promoting a healthy, modern and sustainable rural economy and ensuring a high quality of life for rural communities. These policies also seek to protect and enhance the region's internationally important landscape areas, sustain economic growth, and maintain and enhance environmental and cultural assets to attract and develop business activity.

The Scheme will play a significant role for the wider region as a key visitor gateway and 'hook' to attract visitors to stay longer in Wiltshire, and in the South West region as a whole. These wider effects, which stem from the investment in the New Visitor Facilities, would be of major benefit for Wiltshire and the South West region, and contribute to sustaining and enhancing the region's visitor economy.

Overall, the Environmental Impact Assessment has demonstrated that the Scheme would have no significant adverse impacts on nature conservation and biodiversity. The risk of adverse impacts on the River SSSI and River Avon SAC would be mitigated through careful construction methods set out in a Construction Environmental Management Plan, and by implementation of an Ecological Monitoring and Management Plan to guide sensitive ongoing management of the New Visitor Facilities site.

Access by visitors to the World Heritage Site landscape would be managed through a Visitor Management Strategy that would be designed to limit disturbance to ground nesting breeding birds, bat roosts, brown hare, calcareous grasslands and invertebrates. There would be no significant loss of existing calcareous grassland (along short sections of roadside verge), which would be limited compared to the much larger new areas of grassland that would be created.

The assessment has demonstrated that restoration of the landscape to grass, combined with the closure of the A344 to motorized traffic, would achieve substantial benefits for the character and quality of the landscape around Stonehenge over a wide area. It would deliver similar benefits for the visual amenity of recreational users and those visiting the Stones, including improvements to the view of Stonehenge. While clearly the development of new visitor facilities at Airman's Corner will adversely impact on the landscape character and quality and visual amenity, this must be balanced with the positives of this scheme.

<u>Transportation</u>
RPG10 policies TRAN2
Wiltshire Structure Plan, policies T2, T4, T5, T7, T11
Salisbury Local Plan, policies, TR11, TR12, TR13, TR14, TR16

The underpinning idea of these policies is to seek a sustainable transportation and land use strategy which minimises the need to travel, reduces reliance on the private vehicle and encourages greater use of public transport, walking and cycling, whilst providing good accessibility and promoting economic vitality within the district.

The proposals promote sustainable modes of transport, including provision for cyclists, pedestrians and public buses. Appropriate changes to local road junctions will ensure that the transport network can accommodate the impact of the development. Transport infrastructure and vehicle movements are contained at the perimeter of the WHS, adjacent to the existing A360, maximising the extent of tranquil landscape.

Various measures for encouraging visitors to arrive by more sustainable means of transport such as cycle, public transport, foot and car sharing are outlined in chapter 5 of the Travel Plan. In summary, the key measures will be to appoint a member of staff as Travel Plan Coordinator, provide more information to the public regarding alternative ways of reaching the Visitor Centre and for the possible introduction of reduced ticket prices for those visitors arriving by bicycle, foot or public transport to be considered.

The Stonehenge Environmental Improvements Project incorporates several other proposals intended to achieve the aims of the World Heritage Site Management Plan and enable the delivery of the application scheme.

The A344 between Stonehenge Bottom and Byway 12 will be stopped up which will enhance the setting of Stonehenge and improve the visitor experience. This stopping up will require the closure of the A344/A303 junction and remodeling of the A303 in this location. Improvements to the A303/A360 (Longbarrow roundabout) will also be necessary.

A section of the B3086 north of the existing Airman's Corner junction will be realigned to facilitate the new roundabout junction arrangements (A303/A360 junction). Access by motorized vehicles on the A344 between Byway 12 and Airman's Corner will be restricted with exemptions for specified farm vehicles, emergency vehicles, the visitor transit vehicles and maintenance/security vehicles. Similarly, access on nearby Byways 11 and 12 (details in Design and Access Statement) for motorized vehicles will also be restricted.

One of the aims of World Heritage Management Plan 2009 is to prohibit the use of Byways in the World Heritage site by motorised vehicles (except emergency, agricultural, essential maintenance, security and operational vehicles). Wiltshire Council will make a TRO to create necessary restrictions.

#### **Tourism**

RPG10 policy TCS1 Wiltshire Structure Plan, policies RLT1, RLT2, RLT8 Salisbury Local Plan, policies, T1, T2, T3

The overall objective of this part of the development plan is to promote south Wiltshire as a tourist destination for all types of visitors, whilst recognising the need to protect the environmental quality of the District and the quality of life for its residents.

The Airman's Corner site will provide improved facilities appropriate for a World Heritage Site and international tourist attraction, in line with the requirements of with the World Heritage Site Management Plan.

The current visitor facilities are inadequate and opportunities for interpretation and education within World Heritage site are constrained. The proposed new visitor centre will incorporate education, learning and interpretation facilities, ticking, information, café and souvenir shop. The facilities will also include an outdoor interpretation area including recreations of Neolithic houses based on recent archaeological discoveries at Durrington Walls.

Waste and Recycling
RPG10 policies RE5, RE6
Wiltshire Structure Plan, policies W1, W2
The Wiltshire and Swindon Waste Local Plan, policies 10, 14

These policies seek to ensure waste is managed in a manner that seeks to protect the environment for current and future generations.

#### 2.8 Conclusions on detail - The Development Plan

It is therefore considered that, as well as being acceptable in principle when assessed against the Development Plan, the proposal also complies with the detailed requirements of the Development Plan policies.

# 3.0 Emerging Development Plan

Whilst the current development plan comprises those documents listed above, the emerging Core Strategy for south Wiltshire and RSS for the south west, once adopted, will replace these documents as the new development plan. Whilst these documents are not yet part of the statutory development plan, given their advanced nature, they hold significant weight and must be considered in the assessment of this proposal.

#### 3.1 Emerging Regional Spatial Strategy for the South West

Work on the new RSS has advanced to Proposed Changes by the Secretary of State, although there is currently no timetable for adoption of final RSS. Given the advanced stage of preparation, considerable weight can be given to Secretary of State's proposed changes. Once adopted, this will replace the current RPG10.

Relevant emerging RSS policies include:

Development Policy D - Infrastructure

Development Policy E - High Quality Design

Development Policy G – Sustainable construction

ENV1 - Protecting and enhancing the Region's Natural and Historic Environment

ENV4 - Nature conservation

ENV5 – Historic Environment

TO1 - Sustainable Tourism

RTS 1 – Corridor Management

RE5 – Decentralised energy to supply new development

RE6 - Water resources

W4 – Controlling, re-using and recycling waste in development

# 3.2 Emerging South Wiltshire Core Strategy

The emerging Core Strategy for South Wiltshire was submitted to the Secretary of State on 16 November, so whilst not yet an adopted plan, it has made significant progress and gives a strong indication of the direction of planning policy in south Wiltshire to 2026.

Within the Amesbury Community Area of the emerging Core Strategy, key issues include the need to identify a lasting solution for Stonehenge regarding adjacent roads and the cramped visitor centre; the limited visitor spin off benefits from Stonehenge for Amesbury and the surrounding areas; and the need for the dualling of the A303(T) alongside a bypass for Winterbourne Stoke.

The vision for the area includes working with English Heritage and The National Trust to realize a lasting solution for Stonehenge, which returns the monument to a setting more respectful of its status as an international icon.

Emerging Core Strategy Policy 13 is of particular relevance to this proposal, and states:

New Visitor facilities will be permitted where they:

- Return Stonehenge to a more respectful setting befitting of its World Heritage Site status
- Include measures to mitigate the negative impacts of the roads
- Introduce a greatly enhanced visitor experience in a high quality visitor centre
- Implement an environmentally sensitive method of managing visitors to and from Stonehenge
- Include a tourist information element, which highlights other attractions and facilities on offer in the surrounding area and raises the profile of Wiltshire

Strategic Objective 6 of the Core Strategy is "to enhance south Wiltshire's place as a retail centre that offers something different from the mainstream and to establish tourism as a major sector of the economy. One of the desired outcomes of this objective is to develop a new, world class visitor centre."

3.3 Analysis of proposals in relation to emerging Development Plan

As with the current saved Local Plan Policy T3, emerging Core Policy 13 establishes that the principle of new visitor facilities at Stonehenge is supported subject to meeting the 5 criteria listed in the policy. These criteria, along with the policy requirements set out in the emerging RSS, can be summarised as follows:

- Infrastructure New development to be supported by infrastructure
- High quality design In terms of urban form and sustainability criteria
- Sustainable Construction
- Natural and Historic Environment To be protected and enhanced. Priority to preservation and enhancement of sites of international or national landscape, geological, archaeological or historic importance.
- Nature conservation Distinctive habitats and species of South West to be maintained. Protection and enhancement of region's network of ground, surface and coastal waters and associated ecosystems.
- Sustainable tourism and the economy/ Realising the potential of cultural and heritage assets /
- Decentralised energy to supply new development

Waste - Controlling, re-using and recycling waste in development.

These issues are very similar to the requirements of the current Development Plan policies, and have already been considered above. As such, it is not necessary to repeat these considerations here and it is considered that the proposals are in compliance with the emerging Development Plan policies.

# 4.0 Other Material Planning Considerations

Having tested the proposal against both the development plan, and the emerging development plan, it is also necessary to consider all other material considerations and planning policy guidance at a local, national and international level.

# 4.1 Local Material Planning Considerations Stonehenge World Heritage Site Management Plan

The Government has made it clear that the revised Stonehenge World Heritage Site Management Plan provides the framework within which the Project must be implemented. On 15 July 2009 Wiltshire Council's Cabinet resolved to "endorse the Stonehenge World Heritage Site Management Plan 2009 as supplementary guidance and a material consideration in determining planning applications that affect the Stonehenge WHS, and as a replacement for the 2000 Stonehenge WHS Management Plan previously adopted by Salisbury District Council as Supplementary Planning Guidance." As such, the revised Management Plan 2009 provides the overarching guidance and policy context for the development of the Project.

The Project will help deliver the Vision for the WHS that is set out in the revised Management Plan 2009. It will enhance the visitor experience by providing improved New Visitor Facilities and interpretation, which will assist in achieving a number of the revised Management Plan's aims related to conservation of the WHS, sustainable tourism and visitor management, and sustainable traffic management and transportation.

The Management Plan represents the Government's recognition of this obligation under the UNESCO World Heritage Sites Convention and summarises proposals to prevent damage to Stonehenge and its setting and to ensure its survival for future generations. The Management Plan also goes far beyond the obligation and crystallizes the Government's vision as originally set out in the Stonehenge Master Plan for the enhancement of the World Heritage Site and Stonehenge.

The Management Plan has been prepared following guidelines prepared by the International Committee on Monuments and Sites (ICOMOS): the expert body that advises UNESCO in providing objectives for the future management of the Site. In accordance with ICOMOS guidelines, the Management Plan has been drafted to establish a strategic framework for management based on analysis of the Sites significance.

The Management Plan identifies and acknowledges the importance of a wide range of mechanisms, both statutory and non-statutory, which already exist for the protection and/or management of the World Heritage Site. In this way it co-ordinates all of these instruments into one document in a manner that will provide an invaluable source of reference and cohesive cross-organisational approaches. Therefore the Management Plan includes the statutory planning policy framework, which exists to protect and manage the World Heritage Site as well as the roles of many organisations and individuals who are actively involved in managing the landscape. In this manner the Plan provides guidelines to direct management towards clear priorities and helps to encourage and enable others to take similar action. Furthermore this partnership approach helps to ensure that objectives defined in the Plan are achievable given the constraints of law and practices carried on within the World Heritage Site.

# Supplementary Planning Guidance for Waste Audits

Adopted by Wiltshire County Council and Swindon Borough Council in March 2005.

This SPG specifically buttresses policies 10 and 14 of the Wiltshire Structure Plan and seeks to ensure that from the outset, new development is implemented with the principle of sustainable development at its core. It encourages the optimum use of resources through the demolition and construction process and for the waste resources generated by occupation and operation to be captured at source.

Specifically it requires that all new development be subject to a waste audit prior to commencement, which will establish volumes of waste the facility will produce and then identify opportunities for recycling and more efficient consumption. Section 22, page 51 of this report examines the sustainable credentials of the proposed building in detail.

#### Minerals and Waste

Supplementary Planning Guidance (SPG) for Waste Audits (Policy 10) and Provision for Recycling in New and Refurbished Developments (Policy 14) was adopted by the former Wiltshire County Council and Swindon Borough Council in March 2005, at the same time as the adoption of the Waste Local Plan (WLP).

The SPG provides advice to applicants for planning permission about how to comply with Policy 10 of the Waste Local Plan, by carrying out audits of waste generated by their development proposals. The guidance emphasises the need to minimise, re-use and recycle waste. Similarly, applicants are advised about how to comply with Policy 14, by incorporating facilities to encourage recycling of waste by the occupiers of their proposed developments.

These two policies apply to all forms of development, subject to thresholds to exclude relatively minor schemes.

# **Creating Places**

This was produced by the former Salisbury District Council and adopted as Supplementary Planning Guidance, which has been "saved" and is a south Wiltshire-wide design guide.

Creating Places supplements the design polices in the development plan and sets out detailed design criteria to both help developers achieve high quality designs appropriate to their specific context and criteria against which the council will scrutinise applications. The underpinning principles of the guide are that of removing some of the subjectivity regarding what constitutes good design, by adopting classically derived and government adopted criteria for appraising schemes (see Commission of the Built Environment). It also emphasises the need above all of securing designs which reflect the unique characteristics of any given place and do not seek standardised solutions. Applications must be accompanied by an adequate design statement which highlights the intellectual design concept for the proposals, including how it responds to the vernacular context.

The Design and Access Statement submitted with the application highlights in detail the philosophy and inspiration behind the scheme and is considered an appropriate one.

4.2 National and Regional Material Planning Considerations

National government policy on planning matters is expressed in Planning Policy Guidance (PPGs) or Planning Policy Statements (PPSs).

The guiding ideology that underpins all Government guidance is that decisions on development proposals should be based on sustainable development principles, ensuring an integrated approach to the consideration of:

- Social inclusion, recognising the needs of everyone;
- Effective protection and enhancement of the environment;
- Prudent use of natural resources; and
- Maintaining high and stable levels of economic growth and employment.

Of particular relevance to this planning application is the following guidance:

- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 7: Sustainable Development in Rural Areas
- Planning Policy Statement 22: Renewable energy
- Planning Policy Statement 23: Planning and Pollution Control
- Planning Policy Statement 9: Biodiversity and Geological Conservation
- Planning Policy Statement 10: Planning for Sustainable Waste Management
- Planning Policy Guidance 13: Transport

- Planning Policy Guidance 15: Planning and the historic environment
- Planning Policy Guidance 16: Archaeology and planning
- Planning Policy Guidance 17: Planning for open space, sport and recreation
- Planning Policy Guidance 24: Planning and Noise
- Planning Policy Statement 25: Development and flood risk

Key regional Planning Guidance is contained in:

- Future Foundations: Building a Better South West A Sustainable Construction Charter for the Region (Sustainability South West)
- A Sustainable Future for the South West: A Regional Sustainable Development for the South West of England (South West Regional Assembly/sustainability South West).

As with the analysis of the development plan carried out above, the principle of the planning application may be evaluated against national guidance, as well as specific details.

# Is the Principle of Development Supported?

Turning to the question of the principle of development, government and regional planning guidance is aimed at securing sustainable patterns of development, which are inclusive, environmentally sensitive, utilise natural resources prudently and contribute to economic growth and employment.

With regard to issues of sustainability and environmental protection, the principle of creating a visitor centre on the Airman's Corner site represents the most acceptable solution in terms of maintaining the integrity of the World Heritage Site. Furthermore and in line with PPS7, the selected site is in close proximity to Amesbury town centre, which would enable opportunities for local services and businesses to generate income from visitors exploring the area. Additional economic growth would be accrued from additional expenditure on goods and services by English Heritage and other organisations involved in the operation of the visitor centre, and the increase in average dwell times of the attraction will encourage visitors to make a day of their visit and hence increase the likelihood of a combined visit to Amesbury or Salisbury. It is considered that there are definite and tangible economic benefits that this scheme will deliver meaning in this respect the application complies with national and regional guidance.

In terms of social inclusion, the application does seek to address the needs of all sectors of society. A statement of community engagement shows that the applicants have made extensive arrangements for engaging with all groups including local residents, stakeholders and interest groups. The scheme includes measures to try and cater for the needs of all to provide equality of experience for all visitors through, for example, assisted access options to the Stonehenge monument. The proposed access arrangements make provision for assisted access to the Stones from the New Visitor Facilities for less able visitors. For example, the Provision of a Visitor Transit System that includes a Drop-off/Pick-up point within 200m of the Stonehenge Monument, to reduce the 2km walk from the New Visitor Facilities at Airman's Corner; Provision of Transit System Vehicles that can accommodate a minimum of 2 wheelchairs; Provision of a surfaced DDA compliant path connecting the Visitor Transit System interchange to the existing surfaced path at the Stonehenge Monument. In exceptional circumstances, and arranged in advance, dispensation for minibuses belonging to special needs groups to Drop-off/Pick-up severely physically disabled visitors at the Stonehenge Monument (accessed via the Visitor Transit System route along the A344 from Airman's Corner).

A sustainability appraisal has been submitted by the applicants to explain how they feel their scheme will address energy efficiency and the response use of natural resources. In broad terms, the measures they are proposing, such as prioritising the use of recycled and reclaimed constructional material and using low energy heating and lighting systems, all contribute to meeting the requirements of national policy.

Finally, it is important to evaluate whether the application can be considered to enhance the local environment. Whilst the scheme is leading to new development at Airman's Corner , it is also leading to the removal of both the A344 and the existing facilities immediately adjacent to Stonehenge within the central core of the World Heritage Site. This can only be considered a net gain in environmental terms. The removal of the  $20^{th}$  century incursion so close to Stonehenge will contribute to returning the Scheduled Ancient Monument to a more respectful setting fitting of its international status and value. Furthermore the design and lay out of the facilities are of an extremely high quality and subtle design, which seeks to keep their impact minimal.

#### Conclusions on compliance with national and regional policy

The planning application is considered, in principle, to comply with national and regional planning guidance. Its design and siting is based on the principle of sustainable development, while there is in landscape terms a significant net benefit of removing the inappropriate 20th century clutter from the World Heritage Site. It will undoubtedly bring both direct and indirect benefits to Amesbury and the district.

#### International Guidance

#### The Convention

The United Nations Educational, Scientific and Cultural Organization (UNESCO) seeks to encourage the identification, protection and preservation of cultural and natural heritage around the world considered to be of outstanding value to humanity. This is embodied in an international treaty called the <a href="Convention">Convention</a> concerning the Protection of the World Cultural and Natural Heritage, adopted by UNESCO in 1972.

#### What the Convention contains

The Convention defines the kind of natural or cultural sites, which can be considered for inscription on the World Heritage List. The Convention sets out the duties of States Parties in identifying potential sites and their role in protecting and preserving them. By signing the Convention, each country pledges to conserve not only the World Heritage Sites situated on its territory, but also to protect its national heritage. The States Parties are encouraged to integrate the protection of the cultural and natural heritage into regional planning programmes, set up staff and services at their sites, undertake scientific and technical conservation research and adopt measures which give this heritage a function in the day-to-day life of the community.

#### Conclusions on compliance with International Guidance

While it may be the case that the proposed solution put forward to solve the problems within this planning application has not met with universal support (see Appendix x, page x, comments of neighbours), from the amount of time, resource and research that has been expended to bring this project to fruition, as well as the extensive documentary evidence supplied to support this application there is no doubt that this application has been formulated to make a significant contribution to the aims of the Management Plan. It has overriding aims of restoring Stonehenge to a more respectful setting, free of obtrusive 20<sup>th</sup> century developments, with improved access, improved interpretation and understanding and encompasses a log-term vision for securing the future existence, enhancement and enjoyment of this iconic site. As such the application unequivocally complies with the obligation the Convention places on the UK.

# 5.0 Overall Conclusions

There are unique and exceptional circumstances related to this case, and an overwhelming international, national and local agreement that something needs to be done to improve the World Heritage Site and its setting. There are no claims that the Stonehenge project is a once and for all solution to the problems in this area but it is an important step forward in an ongoing process of trying to meet the objectives of the Management Plan. The proposal represents an opportunity to make some major progress.

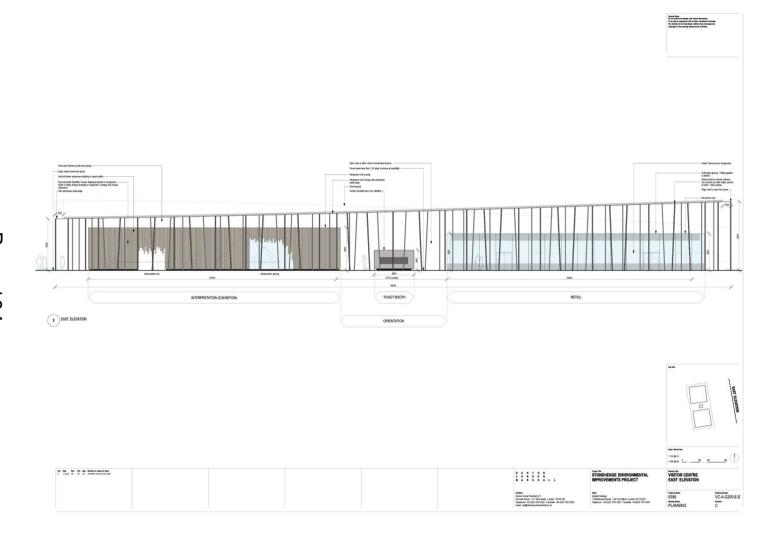
Given these considerations, the environmental and economic benefits to be gained, together with the lack of feasible alternatives and the fact that the proposals are in accordance with the requirements of the development plan, there is **no planning policy objection** to this proposal.

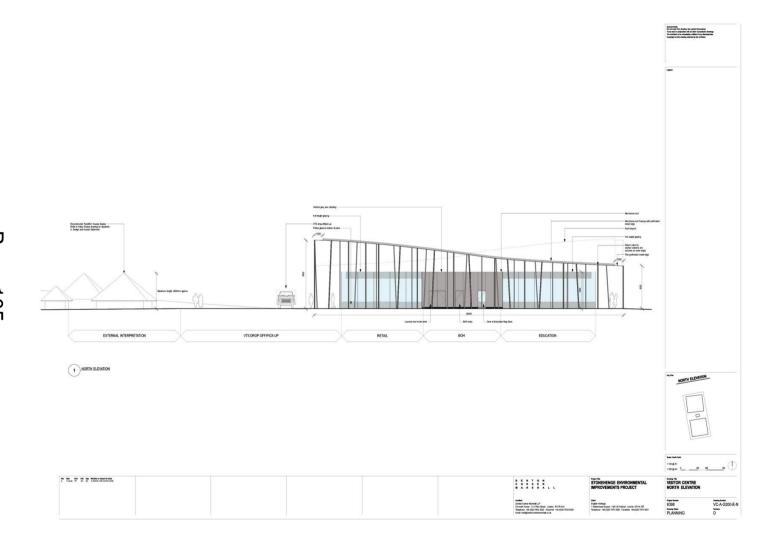
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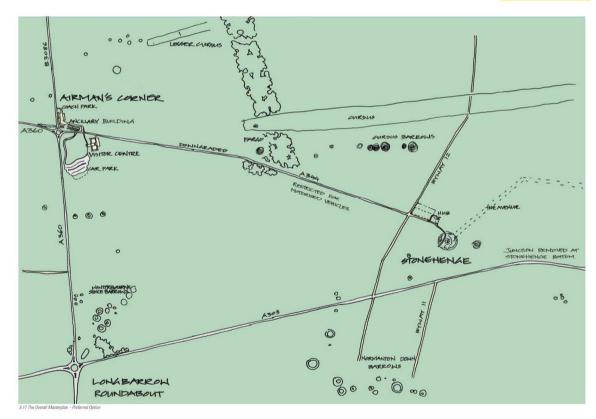






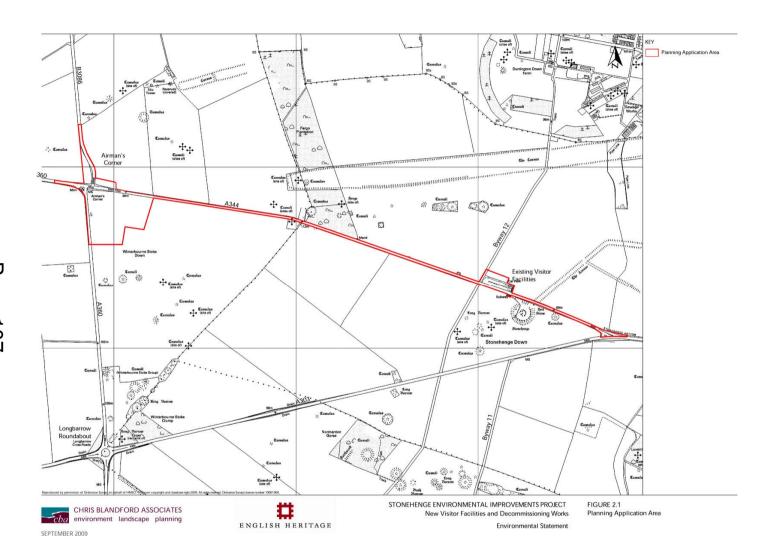






Denton Corker Marshall

architecture and urban design



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Appendix 4.	

Richard Romero Environmental health officer

Having reviewed the planning application in full I would like to submit **no adverse comments on the application.** 

Dear Ms Howles

S/2009/1527/FULL

Please accept my apologies for the late submission of Wiltshire Wildlife Trust's response, I have been out of the office a great deal in the last few weeks.

WWT is happy to support this proposal – it does not deliver as much as a more ambitious scheme to underground the road infrastructure might have done, but given the financial constraints this proposal represents a significant step forward.

We are pleased to see the attention paid to a sustainable and energy efficient design for the visitor centre, and the use of chalk grassland seed mixes and sward management for the new turf. We also welcome the proposed removal of recreational vehicle traffic from the Byways in the area which will add significantly to its tranquillity and to the opportunities offered to visitors to fully experience the chalk grassland environment.

I hope this is helpful

Yours sincerely

**Bill Jenman** 

Head of Biodiversity Wiltshire Wildlife Trust Elm Tree Court Long Street Devizes Wilts SN10 1NJ Direct Dial 01380 736061

# Berengaria Order of Druids Lyceum of Isis and Sekhmet of the Stars Flat 3, 20 St David's Rd, Southsea, Portsmouth, Hants, PO5 1QN

Judy Howles Area Development Manager Wiltshire Council 61 Wyndam Road Salisbury Wiltshire SP1 3AH

31st October 2009

Dear Ms Howles

# DECOMMISSIONING OF THE EXISTING VISITOR FACILITIES AT STONEHENGE

Further to my letter of 26<sup>th</sup> October 2009, I have the additional comments to make with regards to these above proposals:

- !) We have studied your proposed planning statement and policy statement in fine detail, despite the adverse effect on some ancestral monuments. We feel that in such an area of crowded archaeology, the proposed plans are reasonable.
- 2) However, we have noticed on the aforementioned plans, that there is only provision for parking/access for approximately 3-3,500 people. While during seven of the 8 specific holy days, this access would appear to be sufficient at present, it would be entirely inadequate to support the expected 30,000 worshippers who would wish to be to be at their temple for the occasion of the summer solstice.
- 3) How does English Heritage propose to accommodate the extra visitor numbers and supporting traffic on this most important holy day, which lies at the centre of millions of people's faith worldwide? We propose that a sensible solution would be the addition of extra parking facilities as currently provided by English Heritage on said holy day.
- 4) Remembering equality for access, provision for the disabled, elderly and infirm, it maybe that with the rapid growth of paganism as a whole worldwide and the fastest growing religion in the world, that future provision for coordinated parking access may be necessary on the other 7 holy days, notably the winter solstice, which is likely to be the first other religious holy day to overwhelm current proposed parking facilities.
- 5) Please note the Drove is currently used for parking, as it is the only parking facility available on the said 8 holy days, due to the fact that we are

locked out of the present parking facilities, bearing in mind that most of our ceremonies are outside of business hours.

Thank you once again for letting me act as a consultant on this project, and if I can be of any further assistance, please do not hesitate to get in touch.

Yours sincerely

Sarah Rooke, BA Archdruidess Priestess Hierophant

# Berengaria Order of Druids Lyceum of Isis and Sekhmet of the Stars Flat 3, 20 St David's Rd, Southsea, Portsmouth, Hants, PO5 1QN

Judy Howles Area Development Manager Wiltshire Council 61 Wyndam Road Salisbury Wiltshire SP1 3AH

26th October 2009

Dear Ms Howles

# DECOMMISSIONING OF THE EXISTING VISITOR FACILITIES AT STONEHENGE

Thank you for your letter dated 19 October and the associated CD Roms. Having reviewed them and looking at what is available on the website, I have the following comments to make:

- 1) Has this document had an Equality and Diversity Impact Assessment?
- 2) You make reference to people using more public transport like the trains and buses, how are these going to be improved? Are there going to be more buses or trains put on?
- 3) You make reference to people cycling or walking to the Stones. Are you serious???? Have you ever tried walking to the stones from Amesbury and counted the times almost been run over/landed in a ditch? And that's just during the daytime. Take that context to the solstices and equinoxes....And imagine a mother with children health and safety needs to be looked at here, otherwise the place will become a hotspot for accidents and probably fatalities.
- 4) Which brings me to how are the solstices and equinoxes going to be managed? I asked this question back in Oct 2004 and I still haven't had an answer. If you are on about blocking access to the Drove, where do you expect people to park?
- 5) What provision for the elderly or disabled is being planned? I see scant evidence of this and though it was mentioned, nothing has been said how it will be achieved again, it needs an Equality and Diversity Impact Assessment. Another question asked back in Oct 2004 6) What first aid facilities will there be on the new site? Again, another question from Oct 2004

- 7) How are you planning on conserving the archaeology? Since there is a lot of stuff of historical importance around the WHS of Stonehenge, and I don't just mean the Stones or Airman's Cross. Another question originally from Oct 2004
- 8) How are the species designated as national and scientific importance at the Site of Special Scientific Interest and Special Conservation Area going to be conserved— as there are some species indigenous to that area once again, this is a question from 2004
- 9) Are there going to signposts for those walking? If you expect people to walk, at least help them out here because I certainly wouldn't have a clue how to get from Woodhenge to Stonehenge on foot. Also it would do my back in, but that's another story...Another reason for an Equality and Diversity Impact Assessment
- 10) Will there be educational facilities and activities for children and visitors to learn about the past? I am thinking along the lines of interactive like what they have in the Mary Rose Museum that are both informative and fun.

Thank you once again for letting me act as a consultant on this project, and if I can be of any further assistance, please do not hesitate to get in touch.

Yours sincerely

Sarah Rooke, BA Archdruidess Priestess Hierophant

# WILTSHIRE FIRE & RESCUE SERVICE

Andy Goves MA MSC LLB (Hons) MIFireE Chief Fire Officer

John Miller Partnership

Suite 10

Christchurch House Beaufort Court Medway City Estate

Rochester ME2 4FX

FAO: Paul Stuart

Please ask for:

r: T Gray

Tel No: Email: (01722) 439300 salisbury.firesafety@wiltsfire.gov.uk

Our Reference: Your Reference:

S0302984/SR

Date:

07 October 2009

Dear Sir

The Building Regulations 2000 Proposed Visitor Centre, Stonehenge

I refer to your recent correspondence and plans regarding the above proposed premises and make the following comments-

- The access and water supply strategy appear to be satisfactory for the visitor centre and ancillary buildings.
- The access and water supply strategy for the Hub facility is not satisfactory. The distance from
  the nearest fire service vehicle access point is excessive, as is the distance from water supply to
  vehicle and then to the Hub. I would suggest that extending emergency vehicle access to a point
  adjacent to the proposed hydrant would be satisfactory. Consideration should also be given to a
  hammer head or turning circle area.

Yours faithfully

T Gray Community Safety Inspector



## WILTSHIRE AND SWINDON FIRE AUTHORITY

Group 3 Community Safety, Salisbury Fire Station . Ashley Road, Salisbury, Wiltshire SP2 7TN

Tel: +44 (0)1722 439300 Fax: +44 (0)1722 439309 Website: www.wiltsfire.gov.uk





Lansdowne House

Long Street
President: Mr J Bush OBE
Branch Chairman: Mr George McDonic MBE, BL, DIPLPT, FRTPI, DPA, FFB
Direct Dial: 0117 975 0663

Mrs Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road Salisbury Wiltshire SP1 3AH. 30<sup>th</sup> October 2009

Dear Mrs Howles,

Planning Application S/2009/1527/FULL: Decommissioning of existing visitor-facilities and a section of the A344; erection of a new visitor-centre and other associated works at Airman's Corner and Stonehenge

We are pleased to have been consulted on this application. As you will know, we have been involved in proposals for Stonehenge for over a decade and are currently represented on the Stonehenge Advisory Forum which helped to produce the Stonehenge Management Plan.

<u>CPRE</u> wishes to ask for more time in which to respond to the above application. Unfortunately, it is not possible for us to ensure full study of the extensive documentation or arrange for meetings and a draft response to be circulated to committee in the time at present available to us. We would like to ask for at least another two weeks, if not more, and hope that you will be willing to grant us this extension.

We hope that the Council is intending, in any event, to re-advertise the scheme as a departure application, owing to its obvious incompatibility with:

The World Heritage Convention (notably Articles 4 and 5);

UNESCO *Guidelines for the Implementation of the World Heritage Convention*, (notably Guidelines 96–99, 104 (even though Stonehenge has no buffer zone, the implication is that the setting of a WHS requires additional protective measures); 108, 109, 112, 119, etc., all dealing with 'Protection and management';

Structure Plan Policies HE 1 and HE5 (in relation to protection of the WHS and its

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monuments and their settings from development which by its scale, siting and design would have an adverse impact on them); *Structure Plan* Policy C9 (protection of the character and scenic quality of the Special Landscape Area); *Salisbury District Local Plan* Policies CN20 and CN24 (protection of the settings of Scheduled Ancient Monuments, the WHS landscape and its monuments); *Salisbury District Local Plan* Policy C6 (protection of the high quality landscape of the Special Landscape Area); and

Stonehenge WHS Management Plan Aims and Policies that deal with implementation of the primary purpose of the plan which is to protect effectively the WHS and its OUV and enhance the visual characteristics of the landscape setting of its monuments (Management Plan para. 1.3.1).

The Management Plan specifically states (para 14.5.26) that 'The location and design of any proposed visitor facilities must ensure that they avoid adverse impact on the WHS, its setting and the attributes of its OUV'.

The list of 'departures' outlined here is by no means exhaustive. We have sought to highlight in particular some of the constraints in planning for the new visitor facilities at Stonehenge, since 'The OUV of a WHS indicates its importance as a key material consideration to be taken into account by the relevant authorities in determining planning and related applications' (CLG Circular 07/2009 (on the Protection of World Heritage Sites), para. 8). The Circular underlines the *due weight* that should be placed on policies to protect a WHS (*Ibid.*, para. 12).

Our view is that the size, design and lighting of the proposed visitor-centre and associated works, including the highly visible car and coach parks, would be such as to severely damage the OUV of the WHS; indeed the applicant has admitted that the scheme would impact adversely on it (ES, para.5.7.27). Unlike the applicant, however, we believe that the obligations of the World Heritage Convention, and the aims of the Management Plan and planning policy for the WHS are not to make improvements in one part of the WHS to the detriment of other parts of it, rather that improvements are to be effected across the whole of the Site.

The choice of Airman's Cross for visitor-facilities, in the open countryside of the Special Landscape Area and the WHS, was not ideal: for obvious reasons, any new development here would need to be extremely low key and not impact upon the OUV of the WHS by adversely affecting views within it and into and out of it. We would like not only to see the application re-advertised as a departure application, but also to ask for it to be called-in for full examination in public, owing to its conflict with policy and the Management Plan for the WHS.

Information absent from the application documentation We believe that more information is needed on such matters as the siting of *external lighting* associated with the scheme; the practical *operation of the visitor-transit vehicles* (turning circles and sufficient room at road junctions appear to be lacking); the *possible pipe line required for mains water* at the new visitor-centre; and the *pedestrian route to the henge along the A344* that it is proposed would be shared with the visitor-transit vehicles.

Most important, however, we note that an <u>Appropriate Assessment</u> is required under European legislation in respect of the SAC associated with the River Till, and that this Assessment must be undertaken before

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determination of the application. We do not understand how this can be achieved without the necessary information regarding water abstraction/supply and waste and surface water removal that is still lacking (ES, 10.1.7–8; 10.3.22; 10.4.9, 10.4.33; etc.). In the interest of natural justice, we consider that the Appropriate Assessment should be available as a part of the application so that we may comment on it, if necessary. Discussion of the Appropriate Assessment and any Statement to Inform the Appropriate Assessment (also missing from the ES) might most helpfully be considered at a Public Inquiry – which would also draw out all the information needed to make a fully informed decision on the application.

We shall be copying this letter to the Government Office for the South West.

We look forward to receiving your reply.

Yours sincerely,

(Signed) John Blake

John Blake Secretary, CPRE Wiltshire Branch

Wiltshire Branch CPRE, Registered Charity No 211318, is working for a beautiful and living countryside It is active locally and membership is open to all

### Water supplies for firefighting

Adequate consultation is to be undertaken between the Fire Authority and the developer to ensure, that the site is provided with adequate water supplies for use by the fire service in the event of an outbreak of fire. Such arrangements may include a water supply infrastructure, suitable siting of hydrants and/or access to appropriate open water. Consideration should be given to the National Guidance Document on the Provision of Water for Firefighting and specific advice of the Fire Authority on location of fire hydrants.

## Sprinkler protection to Commercial premises

The nature of the proposal gives reason for the Wiltshire Fire & Rescue Service to strongly advise the consideration of appropriate sprinkler system protection for these premises. The advantages of automatic sprinkler systems are listed below.

#### 10 GOOD REASONS TO INSTALL SPRINKLERS

- 1 In the UK there has never been a fire death in a fully sprinklered building
- 2 They cost around 2%-5% of the total cost of a new build.
- 3 Ongoing maintenance costs are low and sprinkler systems are designed to last in excess of 50 years.
- 4 Fire damage is usually only 1/10th of that is an unprotected building
- 5 Chances of accidental discharge are 1 in 500,000 Heads (all causes)
- 6 Chances of an accidental discharge due to factory defect is 1 in 14,000,000 (factory defects)
- 7 Inclusion of sprinklers can allow relaxation of other traditional passive fire safety measures
- 8 Insurance costs can be drastically reduced
- 9 They use significantly less water to control a fire than the Fire Service
- 10 Greatly reduced business disruption due to the effect of fire.

Therefore we strongly urge you to include sprinklers in this project.

The above-mentioned recommendations are made without prejudice to the requirements or other standards proposed by the Planning or Building Regulations Authority.

Yours faithfully

M Bagnall Community Safety Inspecting Officer

> Group 3 Community Safety, Salisbury Fire Station Ashley Road, Salisbury, Wiltshire SP2 7TN

Response (OBJECTION) on behalf of the Cycling Opportunities Group for Salisbury (COGS) to planning application for construction of a new Stonehenge Visitors Centre at Airmans Cross (S/2009/1527FULL)

The application to resite visitors' facilities to Airmans Cross from the present location creates difficulties for those wishing to access them by cycle, on foot or horseback because the new centre will be further away from most local centres of population than at present. It is acknowledged in both the Transport Assessment (TA Sections 2.3.4, 4.4.1, 7.1.1, 7.1.2 and 7.1.3 and Table 2.1) and Outline Travel Plan (OTP Sections 4.3.2 and 4.3.4) that the A303(T) presents barriers to access at present and will continue to do so under the new proposals. As a general aim, the opportunity to improve access for sustainable means and vulnerable road users should be taken at the time of major developments and funding sought for this from the developer by the Planning Authority. These issues are not addressed or mitigated in the application and therefore we **OBJECT** to the proposals.

#### **Highways and RoW issues**

We welcome the proposals to remove motorised traffic (with exceptions) from the Rights of Way (RoW) in the World Heritage Site (WHS) and the maintenance of access for cyclists over the existing route of the A344 from Stonehenge Bottom to Byway 12 after the removal of the road surface. However, we are concerned that the status and replacement surfacing of the A344 course between Stonehenge Bottom and the existing visitors' centre has not been specified. Section 7.2.4 of the Transport Assessment (bullet point one) refers to unnamed partners who will be asked to agree to a permissive right of cyclists to use the A344 course. We would like reassurance that this will be forthcoming, but we also consider that an alternative to permissive rights is essential to preserve the right for cyclists in the future and that bridleway or byway status is more appropriate. This is of particular importance for cyclists approaching from Shrewton and the west who otherwise would have to use the A303(T), but is also a key route for cyclists, walkers and horseriders approaching from Amesbury or Salisbury. The access gate must be open at all times to allow use of the former A344 even when the Stones and Visitor Centre are closed. A reinforced grass surface is proposed (Transport Assessment 4.5.1). Since the terrain in this section is a moderately steep slope, this must be an all-weather surface suitable for

cycles with narrow tyres (road, touring and children's bikes) as well as off road cycles (MTB). This will also have the advantage of allowing good access for wheelchairs and prams from other parts of the WHS.

Notwithstanding the right of cyclists and pedestrians to access the Stones from Stonehenge Bottom, the problem of accessing this point from local centres of population and crossing the A303(T) is not addressed in the application. Closure of the junction of the A303(T) / A344 and realignment of the A303(T) is designed to ease traffic flow and speed between the Countess and Longbarrow roundabouts. Traffic density will be increased as a result of stopping up the junction at Stonehenge Bottom. These factors increase severance and decrease safety for cyclists, pedestrians and horseriders at the junction where they are most likely to cross if approaching the Stones/VC from Amesbury or Salisbury. At present, hatching in the road offers some refuge from traffic whilst cyclists and pedestrians attempt to cross the road, but the proposal is to remove this completely forcing people crossing having to negotiate both carriageways at once. Equally, access across the A303(T) at Byway 12 (acknowledged to be an important route for pedestrians through the WHS and access route from settlements to the north) and Byway 11 (a key off-road route for cyclists and walkers approaching via the Woodford Valley at Lake from Salisbury, but truncated at the A303(T)) will become more hazardous if traffic density and speed increases. Since one of the primary aims of the WHS Management Plan is to increase access for sustainable modes of transport and to increase accessibility for all visitors to all parts of the WHS, the application should be **REFUSED** until these severance issues are addressed.

We would propose the following to mitigate the increased severance caused by the changes at Stonehenge Bottom

- H a controlled crossing of the A303(T) for walkers, cyclists and horseriders
- H upgrading of the footway continuation from Stonehenge Road running alongside the southern curb of the A303(T) to a shared use cycle and footway up to Stonehenge Bottom
- H 40mph speed limit between the end of the dual carriageway to the east of the A303T/A344 junction and Longbarrow roundabout

Additionally to mitigate the effects of increased traffic and speed on the A303(T) at its junctions with Byways 11 and 12

H extension of the shared use path to Byway 11 and a permissive path joining it to Byway 12 with a controlled crossing or tunnel at the Byway 12 junction H 40mph speed limit between the end of the dual carriageway and Longbarrow roundabout

By these means the aims of improving access to all parts of the WHS to all users can be accommodated as well as fulfilling the obligations on the highways authority to promote sustainable transport, improve RoW where these are severed or truncated and comply with planning guidelines. In conjunction with the present application much is being proposed by the Highways Agency to improve conditions for motorised transport and it is scandalous that nothing has been proposed for improvements to sustainable modes, promoting modal shift or encouraging access for vulnerable users. This is a project that will be an international showcase and it is incumbent on the relevant authorities (Wiltshire Council, the Highways Agency and English Heritage) to make it an outstanding example of how to improve conditions for all. The lack of provision in this respect forms the basis of our objection to the application.

## **Cycle Parking**

Secure cycle parking is an important factor in determining peoples' transport choices and we welcome the inclusion of some spaces at the new Visitors' Centre. However, the minimum number consistent with the size of development seems to have been chosen. This needs to be increased by at least 100% to show commitment to sustainable travel. Additionally, if cyclists are to access the WHS via a crossing of the A303(T) at Stonehenge Bottom, provision of an further equal number of cycle parking stands at the residual facilities near the Stones is essential. In both cases the stands should be of an approved design and covered. Secure lockers will also be required at both locations so that touring cyclists' belongings can be stored.

## **Outline Travel Plan**

The present OTP is not compliant with the relevant policies and plans set out in Chapter 3 of the document and planning permission must be **<u>REFUSED</u>** until this is rectified. The

We welcome the recognition that an exemplary Travel Plan is necessary for this development. However, the Outline Travel Plan (OTP) submitted with the planning application **IS NOT** exemplary and it is very disappointing that Wiltshire Council officers have allowed such a weak document to form part of it. The Guidelines quoted in the OTP (p11) have been updated and reissued in April 2009

http://www.dft.gov.uk/pgr/sustainable/travelplans/tpp/goodpracticeguidelines-main.pdf

and must be used to guide the re-submission of a full Travel Plan before planning permission can be granted. The developers (EH) seem to think that a full Travel Plan is something that can be put in place after the Visitors' Centre is open (section1.1.6), but it should be part of the planning process without which permission should be refused, implemented in advance of the Centre opening and subject to monitoring and review from the day of opening. In addition default mechanisms need to be part of the planning obligations as a last resort if the outcomes are not delivered.



12 November 2009 Department of Community Services

Wiltshire & Swindon History Centre
Cocklebury Road
Chippenham
Wiltshire Head of
SN15 3QN

**Development Services** 

Development Services Your ref: S/2009/1527/FULL and 61 Wyndham Road S/2009/1528/LBC Salisbury Our ref: MPK/NJD/09MPK263 Wiltshire SP1 3AH **FAO: Mr Adam Madge** 

Dear Mr Madge

<u>With reference to:</u> Stonehenge Environmental Improvements Planning Applications S/2009/1527/FULL and S/2009/1528/LBC

Thank you for the consultations on these applications dated 19<sup>th</sup> October.

**General Comments** 

I understand that the scheme will deliver substantial environmental benefits for Stonehenge WHS and is in keeping with the aims and policies in the 2009 Stonehenge WHS Management Plan. The removal of existing facilities and the A344 in particular, will significantly improve the setting of Stonehenge, the Avenue and other monuments in the vicinity. However, the removal of the A303 should still be a long term aim to complete the improvements. I agree with the conclusion of the Environmental Statement that the benefits of the scheme do outweigh the 'disbenefits'. The new facilities on the whole have been designed in a way that minimise their impact on the attributes of Outstanding Universal Value (OUV) of the WHS.

An extensive phase programme of archaeological investigation has been undertaken across the areas of the site affected by the proposed scheme. This has included desk assessment and surveys. At Airman's Corner, this included trial trenching and hand dug test pits. The archaeological evaluation and investigations and the resultant Environmental Statement do provide the Archaeology Service with adequate information to make a response on the planning application.

## **Buried Archaeology**

An archaeological mitigation and recording strategy has been prepared as part of the Environmental Statement (Appendix A.5.8). The strategy identities a number of mitigation measures in various locations related to the construction phase of development works. The measures will include watching briefs, excavation and recording work. The mitigation strategy is adequate and will need to be implemented by means of a planning condition. A number of separate Written Schemes of Investigation for the mitigation measures will have to be approved by this Service prior to work commencing.

I suggest that Wiltshire Council condition WL26 is used:

No development shall commence within the application area until:

- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.

#### **Visual Impact on Extant Monuments**

Although the scheme has been designed to minimise adverse impacts on the attributes of OUV, there will be some adverse visual impact on some key monument groups within the WHS which express attributes of OUV. The visual envelope of the proposed visitor centre and car park at Airman's corner, the Greater Cursus and barrows, the Lesser Curses and barrows, and the barrows on the north side of the Winterbourne Stoke Group.

It is likely that the building will be present for the medium to long term. The visual impact on the above monuments of what is a substantial new building needs to be mitigated further. The landscape setting and landscaping strategy could be modified to reduce the impact of the new building. The potential adverse impact on the setting of key monuments of proposed street lighting in the new car park and at the Long Barrow roundabout and at Airman's Corner needs careful consideration and mitigation.

Yours sincerely

Melanie Pomeroy-Kellinger County Archaeologist

Direct Line: 01249 705511 Fax Number: 01249 705527 Email: melanie.pomeroy-kellinger@wiltshire.gov.uk



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Judy Howles Wiltshire Council **Development Services** 61 Wyndham Road Salisbury Wiltshire SP13AH



**Defence Estates Safeguarding** Statutory & Offshore

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KI

Your Reference: S/2009/1527/FULL

Our Reference: D/DE/43/2/101 & 43/2/14 (09/1664)

11/11/2009

**Dear Judy Howles** 

# MOD SAFEGUARDING - NETHERAVON, BOSCOMBE DOWN

Decommissioning of existing visitor facilities and section of the A344, the erection Proposal:

of a new visitors centre, car park, coach park and acillary services building, and

related highways and landscaping works

Airmans corner land south east of the junction of the A360 and A344 Salisbury SP3 Location:

**Grid Ref:** 

409867, 142906

Planning Ref:

S/2009/1527/FULL

Thank you for consulting the Ministry of Defence on the above proposed development which was received by this office on 05/11/2009. We can confirm that the Ministry of Defence has no safeguarding objections to this proposal.

Yours sincerely

Anna Langston DE OPS NORTH **Defence Estates Safeguarding** 

**Safeguarding Solutions to Defence Needs** 







**Atkins Limited** 

Anglo St James House 39A Southgate Street Winchester Hampshire SO23 9EH

winchester.enquiries@atkinsglobal.com www.atkinsglobal.com

Your Ref S/09/1527 Our Ref H/WC/2009/1527 Date 10/11/2009

Area Development Manager Wiltshire Council Development Services 61 Wyndham Street Salisbury Wiltshire SP1 3AH



Dear Sir

Decomissioning of existing visitor facilities and a sectin of the A344; The erection of a new visitor centre, Car park, Coach park and ancillary services building and related highways and landscaping works

Airman's Corner, South East of the junction of the A360 and the A344.

S/09/1527

Thank you for your letter of 19/10/2009

The development site is not located within Southern Water's statutory area for water supply and sewerage. Please contact Thames Water, the relevant statutory undertaker to provide water services to this development.

Yours faithfully

**David Nuttall** 

Senior Planning Engineer

Fax 01962 810296

E mail southernwaterplanning@atkinsglobal.com

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29 October 2009

# THE WILTSHIRE ARCHAEOLOGICAL AND NATURAL HISTORY SOCIETY

Ms Judy Howles
Area Development Manager
Wiltshire Council
61 Wyndham Road
Salisbury
Wiltshire
SPI 3AH

Plansing Took Smert

0.4 May 2009

Action
Action

Dear Ms Howles

# TOWN & COUNTRY PLANNING ACT 1990 APPLICATION Nos S/2009/1527/ FULL and S/2009/1528/LBC

Thank you for your letter of 19<sup>th</sup> October 2009 inviting us to make observations on the above planning applications by English Heritage. We appreciate your courtesy in providing details of the applications on the CDs enclosed with your letter.

Your letter states that our observations must be made within a period of 21 days from the date of your letter, indicating a deadline for responses of 9<sup>th</sup> November 2009. However, for some time now your website has given the deadline as 12<sup>th</sup> November, and we know that your colleague Adam Madge has assured the National Trust and other organisations that the deadline for observations is indeed 12<sup>th</sup> November 2009. We will therefore interpret your letter in the light of the information given on your website and in the light of Mr Madge's guidance, taking the deadline to be 12<sup>th</sup> November 2009.

However, these two applications relate to the construction of visitor facilities for an international public within the boundary of a World Heritage Site. This is a major development project and the two applications run to almost 900 pages of text. We regard a period of 21 days as not being sufficient for the proposed scrutiny of a dual application of this scale and international significance.

We therefore ask for the allowance of at least a further fourteen days after 12<sup>th</sup> November so that our specialist committee can formulate a properly considered response and that response can be endorsed by our governing body.

Yours sincerely	
W A Perry Chairman of the Board of	f Trustees
c c	

The Wiltshire Archaeological and Natural History Society
41 Long Street, Devizes, Wiltshire SN10 INS Telephone 01380 727369 Fax 01380 722150
e.mail wanhs@wiltshireheritage.org.uk
website www.wiltshireheritage.org.uk
Founded 1853 Company No. 3885649 Registered with Charity Commission No. 1080096 VAT No. 140 2791 91



31 October 2009

# WILTSHIRE HERITAGE

Mrs Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road Salisbury Wiltshire SP1 3AH



MUSEUM GALLERY LIBRARY

Dear Mrs Howles

## **TOWN & COUNTRY PLANNING ACT 1990** APPLICATION Nos. S/2009/1527/FULL

In the course of our consideration of this application we have come to realise that it represents a departure from the Local Plan in respect of policies that are specially designed for the protection of the settings of Scheduled Ancient Monuments and the Stonehenge World Heritage Site.

The relevant Policies of the Salisbury District Local Plan are:

- C20: Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features, or their settings will not be permitted; and
- C24: Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted.

We note that it is accepted by the applicant that the proposed scheme would have an adverse impact on the landscape and monuments of the World Heritage Site. It is stated, for example, at paragraph 5.7.27 of the Environmental Statement, that:

The proposed Scheme would have adverse effects on the OUV [Outstanding Universal Value] of the WHS due to impacts on the settings of a small part of the Stonehenge Cursus; the Lesser Cursus and associated Bronze Age barrows; the Winterbourne Stoke barrow group; and barrows to the north of the Winterbourne Stoke group; and on the visual inter-relationships between these key monument groups, as a result of construction and operation of the New Visitor Facilities and related traffic increases on the A360. The setting of 1 [one] long barrow outside the WHS boundary would also be adversely affected.

Should not the fact that the application would involve a departure from the Local Plan be advertised?

W A Perry Chairman



The Wiltshire Archaeological and Natural History Society 41 Long Street, Devizes, Wiltshire SN10 INS Telephone 01380 727369 Fax 01380 722150 e-mail: wanhs@wiltshireheritage.org.uk website: www.wiltshireheritage.org.uk Founded 1853 Registered Charity No. 1080096 A Company Limited by Guarantee Registered in England No. 3885649 VAT No. 140 2791 91



ACA was formed in 1993 to bring together groups opposed to the creation of a strategic highway from the M4 to the South Coast. It now includes the following groups:

| Friends of the Earth South West:
| Bath, Bristol, Somer Valley, West Wilts, North Wilts, Salisbury |
| Friends of the Earth South East:
| New Forest, Test Valley, Southampton, Hampshire Network |
| Council for the Protection of Rural England: |
| Wiltshire Branch and West Wilts and South Wilts local groups; Dorset Branch |
| CfBT: |
| Wiltshire, Salisbury, SW Network |
| Westbury Bypass Alliance

Ac A

Please reply to: 16, Upper High Street, Winchester, Hants SO23 8UT

Mr A Madge Wiltshire Council Development Control Planning Office 61 Wyndham Road Salisbury SP1 3AH

1<sup>st</sup> November 2009

Dear Mr. Madge



# S/2009/1527 - Stonehenge Visitors' Centre

Our group wish to submit comments on this application. The deadline for such comments is currently the 12<sup>th</sup> November.

In view of the size of the documentation and the importance of the proposal we feel this deadline will be difficult to meet with an adequately considered response. We would be very obliged, therefore, if the Planning Office would allow an extension of this deadline.

Yours sincerely

Christopher Gillham

. . /



Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road

Salisbury Wiltshire SP13AH Dear Judy,

10th November 2009

## Stonehenge Visitor Centre (Applications S/2009/1527/FULL & S/2209/1528/LBC)

Following the letter sent to you from Steve Wilson, South Wilts Economic Development Team, dated 5th November, the South Wiltshire Economic Partnership (SWEP), as a representative of the South Wiltshire business community, has decided to comment on the proposals directly.

It is a fundamental objective of the SWEP strategy to support the creation of a world class visitors' centre at Stonehenge, in order to attract inward investment into the local community.

Any concerns we have come from the transport strategy. However, we understand from the proposal that there are plans to improve the infrastructure surrounding the development. As the transport strategy for South Wiltshire develops, it would be our hope that the plans for the development at Stonehenge, and potential increase in visitor numbers, would be taken into account.

SWEP are also keen to identify opportunities for local businesses to be engaged with the Stonehenge visitors' centre and, more specifically, provide services for the development and construction phases of the project. On this basis, SWEP would be in a position to facilitate research within the local business community to provide feedback on the development, if that would help.

Our final point is that we would ask that SWEP be kept informed of the project's progress through due process.

Yours sincerely,

Jack Wills Chairman

CC: Steve Wilson Alan Creedy

Planning Department 1 1 NOV 2009

> South Wiltshire Economic Partnership 3 Rollestone Street, Salisbury, SP1 1DX

> > E: Info@southwiltshire.com www.southwiltshire.com

03 November 2009

Your Ref: S/2009/1527/FULL Our Ref: SO21531834

J Howles
Development Services Wiltshire Council,
61 Wyndham Road
Salisbury
Wiltshire
SP1 3AH



Dear Sir/Madam

Re: Relocation of Airman's cross memorial south junction A360 & A344 Salisbury

I refer to your letter received on the 10/26/2009 in which you request information with regard to our gas pipelines.

Your enquiry falls into an area of the country not covered by National Grid Distribution Network and as such has been forwarded to the relevant Network as indicated below:

Southern Gas Networks & Scotland Gas Networks Plant Location Department 95 Kilbirnie Street Glasgow G5 8JD

If I can be of any further assistance please contact me on the telephone number given below.

Yours faithfully

B.Harper Plant Protection Team National Grid

11

TRE



# TRAIL RIDERS FELLOWSHIP

Please reply to:

Bill Riley

141 Bath Road, Bradford on Avon, Wiltshire, BA15 1SS

BY FAX

FAO: MR. A. MADGE
Development Services
Wiltshire Council
61 Wyndham Road
Salisbury
Wiltshire
SP1 3AH

Your Ref: S/2009/1527/FULL

29 October 2009

Dear Mr. Madge,

## RE PLANNING APPLICATION, STONEHENGE

I note that the planning application includes a proposal to impose a Road Traffic Regulation Order prohibiting vehicular traffic from using the two long byways open to all traffic which traverse the World Heritage Site.

Although the TRO proposal is the subject of a separate consultation by Halcrow Group Limited, as it forms part of the planning application, it is necessary for the Fellowship to lodge a formal objection on the ground that such an Order is unnecessary. If this element is removed from the application, the Fellowship is prepared to withdraw its objection.

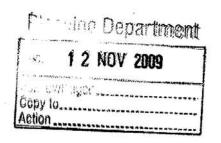
I am sending this letter by FAX due to postal uncertainties.

Yours sincerely,

Bill Biley

TRF, P.O. Box 196, Derby, DE1 9EY.
TRF Website http://www.trf.org.uk

FI SWR





11 November 2009

Mr A Madge
Development Services
Wiltshire Council
61 Wyndham Road
Salisbury
Wiltshire
SP1 3AH

Dear Mr Madge

**Proposed Development:** 

Decommissioning of existing visitor facilities and a section of the A344; the erection of a new visitors centre, car park, coach park and ancillary services building; and related highway and landscaping

works.

Location:

Airmans Corner, Land South East of the Junction of the A360 and A344, Salisbury, SP3 DX and Land South East of the Junction of the A360 and A344 near Shrewton/Larkhill, Salisbury, SP3 4DX

**Application Number:** 

S/2009/1527/FULL

I am writing in response to your formal consultation on the above planning application dated 19 October 2009. Thank you for consulting the South West of England Regional Development Agency (South West RDA) in relation to this proposed development.

You will be aware that the South West RDA is a member of the Project Implementation Group considering options for the future of the Stonehenge World Heritage Site and has contributed financially to the project's development. We are also a statutory planning consultee for major development proposals generating more than 50,000 visitors per year and it is within this context that we make the following response.

## Overview

The application proposes the replacement of a visitor centre for the World Heritage Site of Stonehenge with one of a modest, sustainable and reversible design, and with enhanced visitor facilities, which respects its landscape setting and is situated out of view of the stones site. In conjunction, decommissioning of a section of the A344, including the road's junction with the A303, and provision for access to the new visitor centre along the A360 is proposed and will enhance the setting of Stonehenge.

Sterling House, Dix's Field, Exeter, EX1 1QA

www.southwestrda.org.uk

SWR



South West RDA

The proposals will ensure an improved visitor experience at Stonehenge. They are likely to increase visitor spend and dwell time at the attraction and at tourist locations across Wiltshire and the South West. This will help to support the tourism sector of the economy, one of the key growth sectors in the region, and will result in an increased number of direct, indirect and induced jobs.

Consequently, the South West RDA supports the proposals.

#### Background

The Agency's response is set in the context of a strong planning policy framework that incorporates the department for Communities and Local Government's 'Good Practice Guide on Planning and Tourism' (2006), the draft Regional Spatial Strategy for the South West, the Wiltshire and Swindon Structure Plan, the Salisbury District Local Plan and the emerging South Wiltshire Core Strategy. However the application has been assessed on the ability of the proposals to help deliver the Regional Economic Strategy for South West England (RES) and it is within this context that our response should be considered.

### Delivery of the Regional Economic Strategy 2006 - 2015

Strategic Objective SO1:	Successful and Competitive Business
Regional Priority 1A: Delivery Activity 1A (All): Confirmed Activity:	Support Business Productivity Sector Activity Deliver additional targeted skills and business support in the identified priority sectors [including] tourism.

Tourism is worth over £9 billion each year to the regional economy, employing more than 250,000 people and attracting over 26,000,000 visitors a year. The tourism sector of the economy is therefore recognised as being one of the most important sectors to the region. It is important to support the most important business sectors in the South West in promoting sustainable growth and prosperity.

A replacement visitor centre for Stonehenge, that surpasses the offer of the current facility, has the potential to encourage visitors to spend more time there and to integrate their trips with visits to other parts of Wiltshire and the South West. Drawing on the appeal of the World Heritage Site, the proposed visitor centre offers a high quality platform from which to market other county and regional attractions. As such, we would urge English Heritage to work with local and regional tourism structures to maximise the economic benefits of the project to Wiltshire and the South West through marketing and integration with other attractions.

Strategic Objective SO3:	An Effective and Confident Region
Delivery Activity 3B.3:	Develop and promote regional attractions and events that will deliver significant and sustainable economic benefits.

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www.southwestrda.org.uk



Confirmed Activity:

South West RDA

Encourage the development and marketing of regional 'icons' to maximise economic benefits to the localities and wider region, including Stonehenge.

RES Strategic Objective 3B.3 seeks to maximise the economic benefits of regional 'icons', including Stonehenge, with the aim of promoting what is best about the region. South West Tourism and the South West RDA have jointly produced a strategy to develop a high quality sustainable tourism industry in the South West, 'Towards 2015: Shaping Tomorrows Tourism'. The strategy seeks to enhance the value of visitors to the region rather than just their volume. It promotes high quality customer experiences and identifies brand clusters in bringing relevant businesses, organisations and attractions together.

Stonehenge certainly falls within the 'Living Heritage' cluster. It is a tourism gateway to the South West that attracts around 900,000 visitors per year. An improved visitor centre will be important not only in attracting visitors to the site but also in encouraging wider heritage experiences that encompass attractions across Wiltshire and the South West, and support growth therein. With an enhanced visitor experience, it is anticipated that visitors will be more likely to stay for longer and spend more on site and elsewhere, augmenting the overall heritage spend in Wiltshire.

Annual Gross Value Added (GVA) attributable to Stonehenge is expected to rise by £710,000 as a result of the proposed visitor centre. The creation of 25 direct full time equivalent jobs is also anticipated to benefit the local and regional economy, with many more indirect and induced job opportunities expected.

Strategic Objective SO3:	An Effective and Confident Region
Regional Priority 3A:	Improve Transport Networks
Delivery Activity 3A.1	Enhance connectivity providing access to markets and tackling peripherality.
Proposed Activity	Implement improvements to the second strategic road and rail routes (A30/A303/A358 and Exeter to London Waterloo rail line).

The South West RDA supports the proposed decommissioning of the existing visitor centre and the A344 highway where it borders Stonehenge. Landscape reinstatement there will play an important role in enhancing the setting of, and visitor experience at, the World Heritage Site.

We note the Transport Assessment that accompanies the application and its modelled consideration that the proposed enhancements to Longbarrow Roundabout and Airman's Corner will mitigate material traffic and re-routing implications of A344 closure. The Agency welcomes the proposed highway reconfigurations where they will not result in highway over-capacity. The resilience and reliability of the A303, as a second strategic route between London and the South West, is particularly

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South West RDA

important. The proposals should not preclude future enhancements to the trunk road.

The capacity of the proposed coach park appears to be appropriate. We welcome the incorporation of a coach and local bus service drop-off point whose proposed location is adjacent to that of the new visitor centre.

Strategic Objective SO3: An Effective and Confident Region

Regional Priority 3B: Promote and enhance what is best about the region. Build on existing strengths to develop the South West as the leading region for sustainable development.

Confirmed Activity: Promotion of sustainable construction techniques

for new developments in the region.

The South West RDA promotes the use of sustainable construction techniques for new developments with a view to positioning the South West as the leading region for sustainable development. The Agency notes that the proposed visitor centre is unlikely to achieve a BREEAM Excellent or Outstanding classification primarily for reasons of Stonehenge's remoteness. However, the project offers the potential to serve as an exemplar of sustainable design, construction and resource conservation at a high profile location. We welcome the design's health and wellbeing credentials, the local sourcing of building materials and water, and its proposed renewable heating and cooling solutions.

Should you wish to discuss this matter further, please do not hesitate to contact me or Jessica Potter, (interim) Planning Manager.

Yours sincerely

Fergus Pate Planning Adviser

Sterling House, Dix's Field, Exeter, EX1 1QA

www.southwestrda.org.uk

Ashley, Katherine

From:

Roger UPFOLD

Sent: To: 12 November 2009 22:32 Development Control

Cc:

**:**:

Planning application number S/2009/1527 STONEHENGE VISITOR CENTRE

Attachments:

Subject:

Hampshire Cycling CTC response to EH PlanApp NOV09.pdf; ATT00001.txt; Hampshire Cycling CTC response to TRO NOV09.pdf







Hampshire Cycling ATT00001.txt (67 Hampshire Cycling CTC response... B) CTC response...

Please find attached copies of two letters, one directly concerning the above planning application, the other provided for information being a copy of a letter recently sent to Wiltshire Council Transport Department on the closely linked matter of the proposed TRO for routes within the WHS.

E:mail acknowledgement of receipt would be appreciated.

Roger Upfold, Hampshire Cycling, CTC

This email has been scanned by the MessageLabs Email Security System. For more information please visit http://www.messagelabs.com/email

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Hampshire Cycling CTC c/o 7 Ruffield Close WINCHESTER Hampshire SO22 5JL

12 November 2009

working for cycling

Wiltshire Council
Development Control
Planning Office
61 Wyndham Road
Salisbury
SP1 3AH

Dear Sir/Madam

# Planning Application S/2009/1527 STONEHENGE VISITOR CENTRE

I am writing to you on behalf of Hampshire Cycling CTC representing the interests of Hampshire cyclists in this matter, and with reference to the related proposals for a permanent Traffic Regulation Order (TRO) on routes within the World Heritage Site (WHS) Ref: THSTON 11 (the subject of my letter of 6 November 2009 addressed to Wiltshire Council and others, a copy of which is attached).

We are obliged to formally object to the above planning application as it stands because the legitimate needs and current rights of cyclists will not be met or adequately maintained. Improvements are being made for motorised users whereas the result of the application as it stands would be a deterioration in the situation and an increase in the severance for a group that both central and local government say they wish to encourage.

However, we can see a number of ways in which the planning application and any related TRO(s) could be modified to meet our concerns, such that we could be prepared lift some or all of our objections. Furthermore, we are prepared as before to enter into constructive discussion with all relevant parties with a view to resolving these issues.

## STOPPING UP OF PART OF THE A344

We understand that as part of the overall planning application English Heritage is seeking a "stopping up" order under Section 247 of the Town and Country Planning Act 1990 for that length of the A344 from Byway 12 to its junction with the A303. The Transport Assessment suggests only permissive access: "agreement will be secured (with partners) to access by cyclists and pedestrians (24/7) over this land".

We see no Right-of-Way for cyclists being offered in exchange for the loss of existing highway rights in either this application or the related TRO. The current alternative routes are significantly longer in distance with poor surfaces that are not currently

24/7 safe for all types of cyclist. Even the shortest alternative route additionally requires use of about 1 km of the existing derestricted speed single carriageway A303 (which the application acknowledges as a very hostile environment for cyclists).

Our position is that the rights of cyclists to use the entire length of the A344 route should be maintained in perpetuity. Our preference is for a definitive bridleway or restricted byway. If a stopping up order is used, it must explicitly exclude cyclists and grant them the right to use the route in perpetuity. Also the proposed gate(s) must be suitably designed not to impede the access needs of all cyclists, sufficiently visible during the hours of darkness, and not locked or subject to any restrictive control.

Furthermore the surface of this route must be suitable for all types of cycles 24/7: i.e. not unduly slippery or rough, especially on the steeper sloped sections which may be prone to wear, such that even narrow tyre heavily laden touring bicycles (with or without trailers), tricycles and disabled adapted cycles can safely use the route in all weathers throughout the year. The reinforced (how is not specified) grass surface proposed is not likely to meet all cyclists needs—grass will almost certainly be too slippery and unsafe in the wet, and depending on how it is reinforced, may result in unacceptable ride characteristics for heavy and narrow tyre cycles.

We note that English Heritage proposes retaining the existing path into the stones and see no reason as to why a narrower strip of the A344 from Byway 12 to the A303 isn't likewise retained within a formal right-of-way, perhaps with a more visually sympathetic surface treatment, to enable safe access on this historic road alignment which is suitable for all non-motorised users, including the disabled.

The lack of any suitable safe alternative right-of-way to the A344 past the stones is a primary reason for our objection to the planning application as it stands.

#### SEVERANCE OF THE RIGHTS-OF-WAY

One of the aims of the WHS Management Plan was the opening up of the entire WHS. Had the tunnel earlier proposed been constructed most of the problems associated with the A303 severing existing rights-of-way and the WHS itself would have been overcome. It is still desirable that these severance issues are tackled, not least because this application represents the only foreseeable opportunity in the coming years to improve the environment of the WHS.

It is understood that the work proposed here is designed to be completed by the 2012 Olympics, when this pre-eminent monument will be on show to all the world. Important opportunities to improve safe access for all are being ignored by this planning application. In fact, as acknowledged in the documentation, the changes being proposed will almost certainly increase severance which goes against the stated aims of the Highways Agency, an integral partner in the proposed works, and contrary to planning guidelines for sustainable access that bind the planning and local highway authority: Wiltshire Council.

#### THE CROSSING AT STONEHENGE BOTTOM

Almost all visitors cycling up the Woodford Valley, a very attractive route forming part of the Sustains signed National Cycle Network from Salisbury, wishing to visit Stonehenge will use the shortest desire line that Stonehenge Road, Stonehenge Bottom and the A344 currently provide. Stonehenge is also on the shortest route from Shrewton to Amesbury, a reasonable commuting distance, and the best route for residents in Amesbury who may work at the Visitor Centre. The existing crossing point at Stonehenge Bottom is therefore of vital Importance.

Access to/from further west over Salisbury plain is also facilitated by the A344 past the stones. The route formed by Stonehenge Road, the A303 through Stonehenge Bottom and the A344 is currently an on-road route (with a surfaced path alongside), of sufficient quality that permits easy riding by cyclists on any type of cycle 24/7 regardless of weather conditions. Even though the severance currently caused by the A303 in Stonehenge Bottom is a major problem, most cyclists arriving at this point will eventually cross here as the alternative routes are very much longer (even if they were signed and of comparable, or better quality). In the absence of a suitable grade separated crossing it is essential that this at-grade crossing point is retained and improved.

However, the proposals to re-align the A303, in particular removing the central hatching which separates the opposing lines of traffic, coupled with the smoothing of traffic flows from the closure of the junction without any mitigating works will make atgrade crossing between the existing footpaths even more difficult than now.

The best solution for the safety and convenience of all would be the provision of an underpass constructed within the built-up embankment at Stonehenge Bottom. It appears to be of sufficient depth that an underpass could be constructed underneath the live road using the pipe jacking technique linking the footpaths within the existing wide A303 footprint, without disturbing subsurface archaeology in the area. Such a new facility could be almost invisible from most view points and significantly enhance sustainable access to and across the area for all non-motorised users. It is disappointing that such a facility has not been proposed by the applicant in conjunction with the Highways Agency to enhance sustainable access to the stones and the new visitor centre. And in conjunction with access measures on the south side of the A303 (below) would significantly open up the southern side of the WHS.

Alternatively safe at-grade crossing at Stonehenge Bottom could be facilitated for all non-motorised users by a pair of on-demand Toucan controlled crossings with extended lane separation. It is unlikely that the frequency of use would be such as to significantly interrupt the traffic flow, and visually there would be little additional impact from near the stones (the view this way is already significantly impaired by the A303 and traffic on it).

There is an existing A303 underpass some mile further east of Stonehenge Bottom. Whilst there appears to be sufficient space within the highway footprint on the north side of the A303 for a shared cycle/foot path from Stonehenge Bottom to this underpass, at least 1 km would be adjacent to the busy noisy dual carriageway section of the A303, and no right of way appears to exist on the southern side of this underpass to Stonehenge Road, so it is not currently a suitable crossing point.

Notwithstanding the above preferred solutions, all of which do not appear to have been considered, we are very concerned that the Highways Agency as a partner to the applicant appears to be obstructing the most obvious simple and low cost improvement in road crossing safety at this location: the provision of a crossing refuge facility allowing the crossing of each stream of traffic separately (this must be significantly safer for all than trying to cross uncontrolled opposing streams of traffic in one go).

Furthermore, we can see no fundamental reason why the speed limit of this particular section of the A303 running through the WHS is not reduced to the maximum which large goods vehicles are permitted by law (40 mph), and overtaking prohibited by solid white lines on safety grounds. In any case the ramp down into and out of Stonehenge Bottom frequently results in the existing traffic moving significantly slower than the national speed limit. Speed limit reduction would be a benefit for all non-motorised users, and more safely enable a suitable refuge to be provided within the existing road footprint. This would have no additional visual impact over that created by the existing junction and markings.

Additionally, improvements (width and surface maintenance) to the existing footway alongside the A303 from Stonehenge Road to Stonehenge Bottom should be made, upgrading it to a formal shared foot/cyclepath.

Because of its fundamental importance in linking communities and facilitating the most direct access possible to the Stones and new Visitor Centre, the lack of a safe crossing of the A303 at or near Stonehenge Bottom is a primary reason for our objection to this planning application.

#### **BYWAY 12 & THE A303**

Whilst the linked TRO should, with repairs to the surface and ongoing maintenance of Byway 12, improve the experience of all non-motorised users of the byway, nothing is proposed in this application to reduce the severance cause by the A303 at this point. The WHS Management Plan of opening up access to other archaeological features such as those at Normanton Down is not facilitated by this application.

A tunnel underneath the A303 could be provided here within the footprint of the existing Byway and it could be all but invisible from any distance. Such a facility would provide safe crossing without any wait or traffic interruption. It is acknowledged that this would be relatively expensive and potentially disturbing to subsurface archaeology.

An over-bridge could equally be constructed within the footprint of the existing Byway, potentially with much less disruption to subsurface archaeology, and could be a non permanent feature. However it is acknowledge that it would have a significant visual impact from some considerable distance, and again would be expensive, although less so than a tunnel.

An on-demand light controlled crossing for all non-motorised users could be installed to facilitate safe at-grade crossing. It would need to be allied to a 40 mph limit, but it is suggested that this should be imposed anyway on this part of the A303. Such a crossing could certainly be justified by the level of traffic flowing along the A303 and

the current difficulty (or in the case of horse riders the virtual impossibility) of crossing here. Whilst it would disrupt traffic to some degree, with appropriate programming it is suggested that at the current, or even likely level of demand it would not make a significant impact on traffic flows (at times of heavy traffic flow the effects of dual to single carriageway coupled with the ramps down into and out of Stonehenge Bottom, and Longbarrow roundabout would be much more significant; at times of light traffic flow the effect of stopping the traffic would be minimal). It is suggested that careful positioning of the lights and supplementary signage (there are existing signs nearby advising of an emergency telephone which are hardly visible away from the A303) would reduce the visual impact at or near the Stones to a very low level (suitable screening of the lights as used elsewhere should make them only visible to road users). These three options also potentially facilitate improved safe access to other WHS features and routes south of the A303 (see below).

At the very least a 40 mph order for the A303 throughout the WHS should be implemented so that it is safer to cross here, even if no other measures are taken.

#### BYWAY 12, BYWAY 11 & STONEHENGE BOTTOM

These are all currently linked by the "very hostile" A303. Nothing is proposed in this application to reduce the severance cause by the A303 between Byways 11 and 12, and the path at Stonehenge Bottom, and improve access to other parts of the WHS.

Along this length the single track A303 has a 2.5-3m wide grass verge on its south side within the existing HA footprint. We believe it would be realistic to upgrade this verge to a shared cycle/foot path with a suitably sealed surface of reasonable width for the likely level of usage, but still separated from the carriageway by a narrow grass strip (as currently exists at Stonehenge Bottom). Such a path would hardly add to the existing visual scar that the A303 and its traffic create even close-up, and would be virtually invisible from anywhere near the Stones. Coupled with a 40 mph limit the HA could in this way safely reduce severance on the south side of the A303.

At the very least a 40 mph order for the A303 throughout the WHS should be implemented so that it is safer to use the existing road and footpath.

#### OTHER RIGHTS OF WAY

Improvements to the surfaces of the existing rights of way should be made as a condition of restricting vehicular rights on them so that they become more viable options for all non-motorised users in accessing the WHS and passing through it. In particular Byway 10 and 12 to the north where damage currently limits their use.

#### CYCLE PARKING

In addition to the cycle parking facilities proposed at the visitor centre (space for at least 20 cycles is suggested as a starting minimum -but kept under review), suitable facilities should also be provided close to the Stones drop off point to allow those who wish to cycle direct to the Stones to secure their cycles there. All cycle parking facilities should be of the Sheffield or similarly secure robust design, with a number of lockers at the visitor centre for staff and visitors with luggage (free of charge).

#### CONCLUSION

In our view the planning application and associated TRO do not adequately address the obligations placed on developers and authorities for permanent safe routes for sustainable means of transport. We cannot support a planning application which removes existing cyclists rights of access to and past one of the country's most important historic monuments, and makes crossing of one of the busier rural trunk roads in the country even more difficult than now.

Therefore, we formally request -as per our letter of 6 November 2009 in response to the TRO consultation- a meeting with the relevant parties (particularly both highway authorities), with invitations extended to other cycling organisations and representatives, in particular Sustrans and COGS.

I look forward to an early and constructive response from all parties.

Please acknowledge receipt by return.

Yours sincerely

Roger Upfold Hampshire Cycling, CTC

CC

English Heritage National Trust Highways Agency Wiltshire Council: Transport Sustains Halcrow COGS



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Hampshire Cycling CTC c/o 7 Ruffield Close WINCHESTER Hampshire SO22 5JL

6 November 2009

Peter Ridal Halcrow Group Burderop Park SWINDON SN4 0QD George Batten, Corporate Director Department of Transport Environment & Leisure Wiltshire Council BA14 8JD

Dear Mr Ridal and Mr Batten

# Proposals for a permanent TRO on routes within the Stonehenge World Heritage Site (Ref: THSTON 11)

I am writing to you on behalf of Hampshire Cycling CTC representing the interests of Hampshire cyclists in this matter, and with reference to the related Visitor Centre Planning Application S/2009/1527.

We presume that this is a pre-consultation and that the TRO will be advertised on site and in the normal journals in due course, at which stage members of the public can raise formal objections. Please confirm that this is the case (if not please take this as a formal objection to the TRO on the grounds given).

Whilst in principle we fully support the aims of the TRO proposed by Wiltshire Council for the existing rights-of-way within the World Heritage Site and that part of the A344 from Airman's Corner to Byway 12, our support is conditional on a satisfactory resolution of the issues relating to that section of the A344 from Byway 12 to the A303 in Stonehenge Bottom which we understand is currently to be covered by an order under the Town and Country Planning Act within the above planning application. If this issue is not adequately addressed by the TRO, or through binding commitments as part of the planning application, it will be our intention to formally object to the TRO as proposed.

Currently a highway right of access for all non-motorised users exists along this length of the A344 (Byway 12 to the A303). Nothing in the proposed TRO or planning application maintains this right following the proposed stopping up and removal of this part of the A344. Our position is that the rights of cyclists to use this part of the A344 route should be maintained in perpetuity. Our preference is for a definitive bridleway or restricted byway. If a stopping up order is used, it must explicitly exclude cyclists and grant them the right to use the route in perpetuity.

Furthermore the surface of this route must be suitable for all types of cycles 24/7: i.e. not unduly slippery or rough, especially on the steeper sloped sections which may be prone to wear, such that even narrow tyre heavily laden touring bicycles (with or without trailers), tricycles and disabled adapted cycles can safely use the route in all weathers throughout the year. This is essential as the only current alternative route to this existing east-west route past the stones not requiring a substantial and unacceptable diversion involves use of Byway 12 with a less than ideal surface and about 1 km of the busy and intimidating (derestricted speed) A303.

We have other concerns which relate to routes within the WHS, some of which are covered by the proposed TRO, and which are directly affected by the related planning application. We will be responding to the related planning application on these issues, but submit that it is essential that the above concerns are properly addressed alongside the planning application by both Highways Authorities, as well as part of determining this TRO, because of the intimately linked nature of these issues.

Therefore we formally request a meeting with both the Highways Agency and Wiltshire Council (Planning, Highways and Rights-of-Way), to which other interested parties should attend, including English Heritage with invitations to other cycling organisations, in particular Sustrans and COGS.

I look forward to an early and constructive response from all parties.

Please acknowledge receipt by return.

Yours sincerely

Roger Upfold Hampshire Cycling, CTC

cc Wiltshire Council
Highways Agency
English Heritage
National Trust
Sustrans
COGS



HAZ

Mrs Jacqui Ashman Our ref: HA 004/001/004014 Assistant Network Manager Your ref: S/2009/1527/HULL 2/08K Planning Department Temple Quay House 2 The Square, Temple Quay Wiltshire Council 1 2 NOV 2009 Bristol BS1 6HA **Development Services** 61 Wyndham Road Acknowledged Direct Line: Salisbury Copy to SP13AH ax: 10 November 2009

For the attention of Mr A Madge

Dear Mr Madge

DECOMMISSIONING OF EXISTING VISITOR FACILITIES AND A SECTION OF THE A344 AND THE ERECTION OF A NEW VISITOR CENTRE, CAR PARK, COACH PARK AND ANCILLARY SERVICES BUILDING; AND RELATED HIGHWAYS AND LANDSCAPING WORKS AT STONEHENGE, WILTSHIRE

Application Reference: S/2009/1527/FULL

Thank you for consulting the Agency on the above proposals. We have now had opportunity to review the application identified above and the content of this letter sets out the Agency's position.

The Agency has been party to detailed pre-application discussions with the applicant on these important proposals within a World Heritage Site and acknowledges many of our inputs have been incorporated into the supporting documentation to accompany this application. This position is welcomed by the Agency.

#### Content of Application

The scheme proposal is for the construction of a new visitor facility on land adjacent to the A360/A344/B3086, with a visitor transit system to provide access to the Stonehenge Monument along the route of the A344 in a controlled manner. The proposal seeks to provide 500 car parking spaces (an uplift of 315 from the existing provision), 20 motorcycle spaces, 22 disabled bays and 30 coach bays (an uplift of 14 spaces from the existing provision). It is intended the new facility will engage 65 full time employees (uplift of 23 FT positions). It will operate seven days a week between 9am-7pm.

#### **Planning Policy**

The proposed scheme is compliant with Policy T3 of the adopted Salisbury District Local Plan and Core Policy 13 of the emerging South Wiltshire Core Strategy which was the subject of a formal consultation exercise in August 2009.

Page 1 of 6







The proposal has also been the subject of a Ministerial Project Board and has been developed under the umbrella of a revised, updated Management Plan for this World Heritage Site, overseen by English Heritage. The Agency has played an active role as a member of the Board and has directly informed the development of Policies 5a-5d of the Management Plan which relate specifically to highway matters. For completeness these policies are set out below:

- Policy 5a Measures should be identified and implemented to reduce the impacts of roads and traffic on the WHS and improve road safety.
- Policy 5b Proposals should be developed, assessed and implemented, if practical, for the closure of the A303/A344 junction and of the A344 between the junction and the current visitor centre site, and for restricted access on some or all of the remainder of the A344 up to Airman's Corner, depending on the location of the new visitors centre.
- Policy 5c Vehicular access to Byways within the WHS should be restricted apart from access for emergency, operational and farm vehicles.
- Policy 5d Measures should be taken through an exemplary Green Travel Plan to encourage access to the site other than by car

Any proposal must be compliant with these Management Plan policies. The Agency, having reviewed the supporting documentation, is satisfied the proposals are compliant with the policies set out above.

#### **Transport Assessment:**

The application is accompanied by a Transport Assessment (TA) carried out by Halcow on behalf of the applicant. As indicated above, the Agency was consulted on the scope and content of the TA as part of the pre-application discussions and the key matters raised have been incorporated into the submitted document.

Having reviewed the TA in detail, the main observation is that the TA does not refer to a specific Rights of Way Strategy which the Agency considers would be an important and useful tool in managing non-motorised movements within the World Heritage Site (WHS) and would specifically enable the management of safety issues associated with crossings of the A303 to be considered in a structured manner. This strategy should incorporate key routes for cyclists and pedestrians, crossing of the A303, signage, nature of controlled accesses (ie: gates or stiles where required) and a monitoring and review mechanism.

The Outline Travel Plan does refer to Wiltshire Council's Rights of Way Improvement Plan (RoWIP). However this document does not make any direct reference to pedestrians and cyclists crossing the A303. The Agency would wish this matter to be dealt with comprehensively through a Rights of Way Strategy for the proposal and suggests this could be secured by way of a planning condition.

The Agency also has concerns regarding the form and nature of pedestrian and cycle movements along the former A344 and the impact this may have on the safe operation of the A303. The Agency believes this issue will require further consideration as part of

Page 2 of 6

the detailed design stage and therefore would suggest a planning condition to this effect.

The Agency would undertake itself the proposed works at Longbarrow roundabout that are required as a consequence of the proposed closure of the A344/A303 junction. These works are to be undertaken and completed prior to the closure of the A344. The nature of these works are broadly illustrated in preliminary design drawing MP-A-G100-P-02 (rev i) which is attached to this correspondence for convenience. In order to ensure there are no unacceptable impacts, in capacity and highway safety on the A303, the Agency would suggest a planning condition to control the sequence of works.

The Agency also understands Wiltshire Council is applying for a Traffic Regulation Order to limit the use of the A344 by motorised vehicles and, if planning consent is secured, the Council will then apply for a stopping up order under Section 247 of the Town & County Planning Act as part of the proposals. The Agency would expect to be consulted upon these matters in due course as part of our ongoing support of the project.

In response to above TA points, if the local planning authority is minded to approve the application, the Agency would recommend the following planning conditions are included:

#### Proposed Conditions

i) No development shall take place until a Rights of Way Strategy has been submitted to and approved in writing by the local planning authority (in consultation with the Secretary of State for Transport). This Rights of Way Strategy will include: key routes for cyclists and pedestrians; details of surface level crossing of the A303; signage proposals; nature of controlled access; and monitoring/review mechanism.

Reason: In the interest of highway safety on the strategic road network

ii) Development hereby permitted shall not commence until details of the pedestrian and cycle route along the former A344 route and crossing arrangements of the A303 have been submitted to and approved in writing (in consultation with Secretary of State for Transport) and the development shall not be occupied until these works have been constructed in accordance with the approved details.

Reason: In the interest of highway safety on the strategic road network

iii) The development hereby permitted, shall not be occupied nor will the closure of the agreed section of the A344 (which will be the subject of a stopping up order under Section 247 of the TCPA 2000) take place unless and until the scheme for modification of Longbarrow Roundabout, broadly shown on preliminary design drawing MP-A-G100-P-02 (rev i), shall be implemented and completed to the satisfaction of the Highways Agency.

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Reason: to ensure that the scheme for Longbarrow Roundabout is designed and constructed to appropriate standards enabling the A303 to operate effectively, following the closure of the A344/A303 junction, in accordance with Circular 02/07 'Planning & the Strategic Road Network'.

#### Outline Travel Plan

The application is accompanied by an outline travel plan, which the applicant recognises requires further work and direct involvement with the Highway Agency, National Trust and Wiltshire Council.

The final travel plan (to be approved) will not only need to consider measures for English Heritage employees at the new Visitor Centre but also for visitors arriving at the site once operational. The Agency has extensive experience of developing visitor orientated travel plan and would be happy to share this knowledge with the applicant as part of the preparation of a final travel plan.

Whilst the Agency's preferred route, consistent with PPG13, is to agree travel plans at the determination of planning application. The policy advice does allow for Travel Plans to be secured by way of planning condition. The Agency will, if the local planning authority is minded to approve the proposals, look for the full travel plan to be submitted and approved prior to the commencement of development.

The Travel Plan will need to be compliant with the advice set out in PPG13 and Good Practice Guidelines: Delivering Travel Plans through the Planning Process (2009). The purpose of the Travel Plan is to support and encourage sustainable travel to the site, both for employees and visitors and it is an important mechanism to reduce the use of the private car. The Travel Plan should therefore provide robust, enforceable and forward thinking measures to achieve modal shift away from the private car. Targets for the modal shift should be set within this document.

In response to this point, if the local planning authority is minded to approve the application, the Agency would recommend the following planning condition is included:

#### Proposed Condition

No development shall take place until a Travel Plan (building on the submitted Outline Travel Plan) for the development hereby approved has been submitted to and approved in writing by the Local Planning Authority (in consultation with the Secretary of State). The approved Travel Plan shall be implemented within one month of the first occupation of the development and shall thereafter be maintained in perpetuity. The Travel Plan will accord with the advice set out in Good Practice Guidelines: Delivering Travel Plans through the Planning Process (2009) and shall provide as a minimum the following:

- the appointment of a Travel Plan Co-ordinator;
- 2. the collection and recording of baseline data on travel patterns;

Page 4 of 6

- targets to be achieved for modal share;
- details of the specific measures to be implemented to promote the use of sustainable modes of transport and details of the ways in which these will be implemented in order to meet the identified targets;
- 5. details of the mechanism for monitoring the identified targets;
- 6 details of the means by which the Travel Plan shall be reviewed and the corrective measures to be employed in the event that identified targets are not met.

Monitoring shall be carried out in accordance with the approved details and the results of the monitoring shall be submitted to the Local Planning Authority within one month of the end of each monitoring period. Where targets are not achieved, the Travel Plan Co-ordinator will be notified in writing by the Local Planning Authority and the Travel Plan shall then be reviewed and updated and submitted to the Local Planning Authority for approval within one month of receipt of the Local Planning Authority's notification. The updated Travel Plan shall be implemented within one month of the date of the Local Planning Authority's approval.

Reason: In order to reduce the use of the private car and promote the use of sustainable modes of transport in accordance with the guidance set out in Planning Policy Guidance Note 13 'Transport'.

The Agency would, due to the scale of the proposed development and its proximity to the strategic road network, seek that all construction traffic and activities associated with the construction of the proposed development are managed through a Construction Management Plan which will be submitted to and agreed in consultation with the Agency in advance of development commencing.

In response to this point, if the local planning authority is minded to approve the application, the Agency would recommend the following planning condition is included:

#### Proposed Condition

The occupation and use of the development hereby permitted shall not commence until a Construction Management Plan has been submitted and approved in writing by the Local Planning Authority (in consultation with the Secretary of State for Transport). The Plan shall include details of the number and frequency of construction vehicle movements, construction operation hours, construction vehicle routes to and from the site with distance details, construction delivery hours, car parking for contractors, specific measures to be adopted to mitigate construction impacts (including infrastructure improvements if appropriate) a construction workers' travel plan, and a detailed traffic management plan to control to control traffic during the construction phases.

Page 5 of 6

Reason: To mitigate the impact of construction traffic during the construction period and in the interests of highway safety on the local and strategic road network.

#### Summary:

In light of the comments above, and subject to the proposed conditions being accepted by the local planning authority, the Agency is in a position to support the application as proposed.

If you require any further information or clarification in relation to the above please do not hesitate to contact me.

Yours sincerely

Mrs Jacqui Ashman Network Operations South West Planning

Enclosures: Preliminary Design for works to Longbarrow Roundabout ref: MP-A-G100-P-02 (rev i)

Page 6 of 6



TR110 (May 2007)

An Executive Agency of The Department for Transport

#### Developments Affecting Trunk Roads and Special Roads Highways Agency Response to an Application for Planning Permission

From: Divisional Director, Network Operations, South West, Highways Agency.

To: Wiltshire Council

Council's Reference: S/2009/1527/FULL

Referring to the notification of a planning application dated 19 October 2009, your reference S/2009/1527/FULL, in connection with the A303, Stonehenge, notice is hereby given under the Town and Country Planning (General Development Procedure) Order 1995 that the Secretary of State for Transport:-

- a) offers no objection;
- b) recommends that planning permission should either be refused, or granted only subject to conditions
- c) directs conditions to be attached to any planning permission which may be granted;
- d) directs that planning permission is not granted for an indefinite period of time;
- e) directs that planning permission not be granted for a specified period (see Annex A).

(delete as appropriate)

Signed by authority of the Secretary of State for Transport

Date: 10 November 2009 Signature:

Name: Mrs Jacqui Ashman Position: Assistant Network Manager

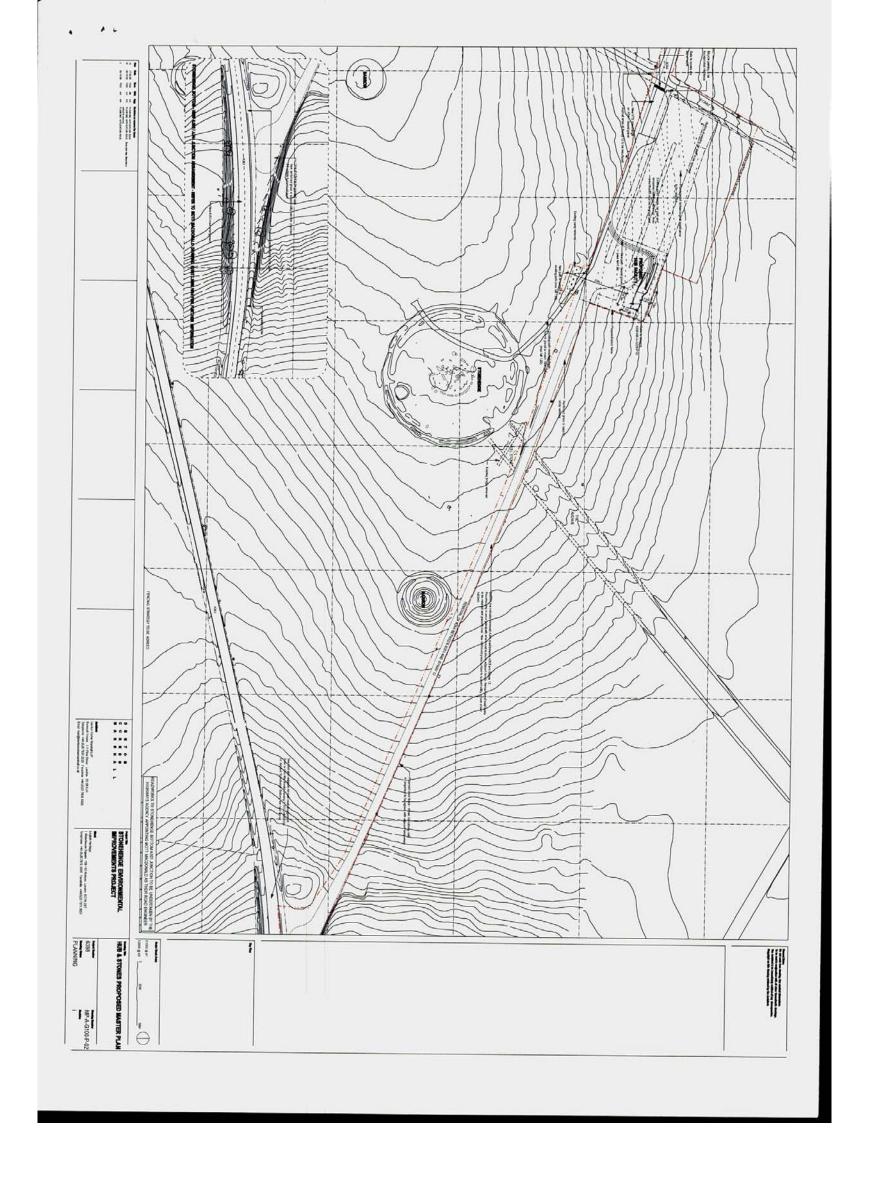
The Highways Agency: Network Operations South West Planning

Temple Quay House Zone 2/08-K 2 The Square Bristol BS1 6HA

Annex A

Page 1

Condition(s) to be attached to a	any grant of planning permission:
Reason(s) for the direction give direction at e) when directing the	en at b), c) or d) overleaf and the period of time for a nat the application is not granted for a specified period:
	Page 2



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#### THE AVEBURY SOCIETY

(Registered with the Civic Trust)

Chairman, Ewart Holmes: Harpers Cottage High Street, Avebury Wiltshire SN8 1RF

Mrs Judy Howles, Area Development Manager Wiltshire Council, 61 Wyndham Road, Salisbury SP1 3AH. Flanking Department
Fig. 17 NOV 2009

Action 14th November 2009

Action 14th Company 10

Dear Mrs Howles,

# Planning Application S/2009/1527/FULL: for a new visitor centre for Stonehenge

We have only recently been alerted to this application and find that the consultation period lasts only three weeks. We are surprised at this, in view of the size and importance of the proposals and the impact they would have on the World Heritage Site. In view of an apparent brushing aside of local plan policies and the latest guidance on world heritage sites, we are also surprised that the scheme has not yet been advertised as a clear departure from planning policies for the WHS.

The current scheme, is for a large Visitor Centre building and parking for 500 cars (neither with any screening), and a separate coach park for up to 30 coaches (with little screening), all spread across a dry valley in the wide open countryside of the WHS and beside its boundary at Airman's Corner; together with a new roundabout nearby, and an enlarged roundabout on the A303 at Longbarrow Crossroads alongside one of the most important barrow groups in the WHS, both to be lit by numerous high lamp pillars.

We cannot understand how such an application could have been entertained for Stonehenge by English Heritage who have expressed concern over its adverse impact in the Environmental Statement.

Planning policy that ought to protect the archaeological landscape of sites and monuments appears to us to have been ignored. The Local Plan Policy CN24 states that

'Development that would adversely affect the archaeological landscape of the Stonehenge WHS, or the fabric or setting of its monuments, will not be permitted.'

This has been ignored.

There are other planning policies and statements for the protection of this special landscape, in addition to the World Heritage Convention, Article 4 of which requires: 'Each State party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future

generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to the State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain.'

The newly agreed and published Guidance on the protection of World Heritage Sites (CLG 07/2009), in which the Society was involved, underlines that the outstanding universal value of a WHS makes it a key material consideration in determining planning applications. The Guidance also highlights the need to protect WHSs and their settings, important for Stonehenge not least because of the spate of new discoveries within the WHS.

Whilst there are elements of the proposals before us with which we can agree: the long term aim of closure of the A344 and A303 junction and use of the A344 as a visitor-access route only; and the removal of the present unsightly facilities at the henge, we see no value in a trade-off that moves an eyesore from one part of a WHS to another. We know that the protective planning framework must not permit this to happen.

We trust that the Council will reject this scheme and ask for substantial amendments to the proposals: in particular the reduction of height and impact on the landscape of the visitor centre building. Many of the facilities could be located elsewhere where they would have less impact.

The Stonehenge WHS is prominent in the eyes of the world. We hope that the Council will not wish to see a national disgrace at its heart replaced by a national disgrace at its entrance.

This is a time when any government spending should be both wise and prudent. We remain wholly unconvinced by the scheme and must therefore OBJECT to it in both principle and detail.

Yours sincerely,

Sue Rogers (Hon Secretary) PP Ewa Rosemary Cottage, West Overton, Marlborough, SN8 4ER.

PP Ewart Holmes (Chairman)

ur lan Wallis Gosw

# Wiltshire Council

Where everybody matters

SP1 1DX

STI

5th November 2009

Judy Howles Area Development Manager 61 Wyndham Road Salisbury SP1 3AH South Wilts Economic Development Team 3 Rollestone Street Salisbury Wiltshire

Planning Department

Rec.	06	NOV	2009
Acknow	wledged	j	
Action	·		

Our ref : SJW/ED24

Dear Judy

#### Re: Stonehenge Visitor Centre (Applications S/2009/1527/FULL & S/2209/1528/LBC)

Thank you for providing us with the details regarding the above applications.

Stonehenge is a unique visitor attraction with World Heritage Site status. As such, it draws visitors to the south Wiltshire area from the regional, national and international communities. However, visitor facilities at the site are limited and consequently the current 'visitor experience' is not as fulfilling as it might otherwise be.

Strategic Objective 3 of the South Wiltshire Core Strategy document is to deliver a thriving economy (para. 4.4). The tourism sector, in providing local jobs and attracting visitors to and expenditure within the area, has a key role to play in this regard.

The South Wiltshire Core Strategy document recognises that some tourist visitor facilities are sub-standard and in need of improvement and specific reference is made to Stonehenge (para. 3.5).

Strategic Objective 6 includes establishing tourism as a major sector of the economy. One of the desired outcomes in response to this objective is the delivery of a new world class visitor centre for Stonehenge.

The South Wiltshire Economic Partnership (SWEP), which represents the local business community, has developed a strategy and delivery plan outlining objectives which businesses have identified in order to set the agenda for economic development. We have passed the application information to SWEP who we understand will be providing comments on the proposals directly. However, by virtue of the SWEP delivery plan including activities to support the creation of a world class visitor centre at Stonehenge, we believe that local businesses recognise the strategic importance of the Stonehenge attraction to the local economy.

During 2006 Salisbury District Council, in conjunction with Salisbury & Stonehenge Tourism Partnership (the fore-runner to Visit Wiltshire within the south Wiltshire area) developed a tourism strategy for south Wiltshire. That document incorporated an action plan which includes for a new visitor centre and improved visitor facilities at Stonehenge.

Telephone: 0300 456 0100 • Textphone: 01225 712500 • Web: www.wiltshire.gov.uk

Having reviewed the application information, the key aspects from an economic development standpoint are that the proposal will:-

- Attract and provide for increase visitor numbers to the area;
- Enhance the visitor experience thereby encouraging repeat / multiple visits;
- Create potential local employment opportunities during the construction / implementation stage;
- Create the potential for local businesses and services to be engaged and have input during the construction / implementation stage; and
- Increase the workforce requirements at Stonehenge thereby creating new local permanent employment opportunities.

Considering the above, the Local Economic Development Team in south Wiltshire is supportive of the proposals.

Yours sincerely,

#### Steve Wilson

Local Economic Development Team Leader (South)



### Salisbury Campaign for Better Transport

3 Hadrians Close Salisbury

SP2 9NN

BY EMAIL ONLY

Mr A Madge Case Officer Development Control Wiltshire Council 61 Wyndham Road Salisbury SP1 3AH

Rec. 2 9 OCT 2009

Acknowledged \_\_\_\_\_\_\_
Copy to \_\_\_\_\_\_

October 28th 2009

Dear Mr Madge

Planning application: S/2009/1527 Stonehenge Visitor Centre

I am writing further to my phone conversation with you on 26<sup>th</sup> October.

Firstly, there are a few points regarding the planning application documentation:

- I note that the 'Planning Supporting Statement' and the 'Statement of Community Involvement' have now been added to the website. Thank you for rectifying this omission.
- I note that there is reference in the Environmental Statement to the need for an Appropriate Assessment for this application to be undertaken by Wiltshire Council, with the advice of Natural England. It is stated that this would need to be completed prior to the determination of the planning application (ES para 7.5.3). I would be grateful if you could confirm what matters are being considered in preparing this Appropriate Assessment, also when this work is expected to be completed and when it might be added to the website.
- There is also reference in the Planning Supporting Statement to the proposed heads of terms of the legal agreement, combining a s106 Planning Agreement and s278 Highways Works Agreement which it is stated 'are submitted with the application for information purposes' (PSS para 4.8.3). This does not appear to be on the web-site and I wonder whether you could clarify whether this has in fact been submitted.

Secondly, I note that the application has **not** been advertised as a departure from the local plan and in my view it clearly needs to be treated as such.

There are planning policies at national, regional and local level to protect the Stonehenge World Heritage Site (WHS) from development. For instance, local policy CN24 states that "Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted."

It is clear that this development, which places a new 500-space car park within the WHS in addition to the proposed Visitor Centre building itself, would have an adverse impact on the Outstanding Universal Value (OUV) of the WHS – this is admitted within

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#CFBT

the Environmental Statement itself where para 5.7.27 tells us that "The proposed Scheme would have adverse effects on the OUV of the WHS due to impacts on the settings of a small part of the Stonehenge Cursus; the Lesser Cursus and associated Bronze Age barrows; the Winterbourne Stoke barrow group; and barrows to the north of the Winterbourne Stoke group; and on the visual inter-relationships between these key monument groups, as a result of construction and operation of the proposed New Visitor Facilities and related traffic increases on the A360. The setting of 1 long barrow outside the WHS boundary would also be adversely affected."

The Planning Supporting Statement seems to reach the conclusion that "the Scheme complies with all relevant policies provided by the current planning policy framework" (PSS, para 5.1.1) by ignoring those policies which do not support the scheme. In terms of Local Plan Policies the PSS quotes only policy T3 ("It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site"). This ignores both the fact that this refers to a visitor centre for, not necessarily in the WHS and also disregards the supporting text for this policy in the Local Plan - "However, this policies of this plan will need to be taken into account during the consideration of any development proposals" (Adopted Local Plan, para 12.6). The policies which this scheme would contravene are ignored – such as CN24 (quoted above), also CN20 (Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features, or their settings will not be permitted).and C6 regarding development in Special Landscape Areas.

The documentation supplied with the planning application seems to provide a very one-sided view of the scheme's compliance with planning policy. While this is doubtless the norm from an applicant I do not feel that Wiltshire Council's officers should accept this view unquestioningly, as they seem to have done. The applicant concludes that the "adverse effects would be substantially outweighed by the permanent benefits to the WHS arising from the removal of the Existing Visitor Car Park and Facilities and the closure and removal of the A344." (ES para 5.7.28). However the decision to damage the OUV of a World Heritage Site, as this application would do, surely cannot be taken as being in accord with Development Plan policies even if compensating benefits may be deemed to arise.

I hope that this application will be re-advertised as a departure from the Local Plan and processed as a departure application.

Please note that Salisbury Campaign for Better Transport will be submitting further representations on this planning application prior to the closing date after we have had more opportunity to review the documents which have been supplied.

Yours sincerely

Margaret Willmot Secretary, Salisbury Campaign for Better Transport

lan Wallis, Planning Manager, Planning and Housing Delivery Team, GOSW

Mr Adam Madge Wiltshire Council

**Development Control South** 

61 Wyndham Road Salisbury

Wiltshire SP1 3AH Our ref: Your ref: WX/2009/113035/01-L01

S/2009/1527

EA

Planning Date:

19 November 2009

Dear Mr Madge

DECOMMISSIONING OF EXISTING VISITOR FACILITIES AND A SECTION OF THE A344; THE ERECTION OF A NEW VISITORS CENTRE, CAR PARK, COACH PARK AND ANCILLARY SERVICES BUILDING; AND RELATED HIGHWAYS AND LANDSCAPING WORKS.

AIRMANS CORNER, LAND SOUTH EAST OF THE JUNCTION OF THE A360 & A344, SALISBURY, SP3 4DX

Thank you for consulting the Environment Agency on the proposals for the new Visitors Centre at Airman's Corner and associated works.

2 3 NOV 2009

We have been involved in the Technical Consultative Group for this proposal for some time and have provided comments on the scope of the Environmental Impact Assessment.

We have no objection to the proposals subject to conditions being included on the specific issues given below. I would expect that the long term monitoring and maintenance of certain aspects of the scheme, such as surface water drainage and metering water use will be secured through a S.106 Agreement or Unilateral Undertaking.

We understand that the proposal hopes to achieve Very Good or Excellent BREEAM standards. Ensuring the measures proposed within the Environmental Statement (ES) and supporting documents are carried forward into the actual build in areas such as water efficiency, pollution control and energy efficiency should help to achieve this.

The main issues for us where we require conditions to be applied to any permission granted are:

- Water Supply
- Foul Drainage
- Surface Water Drainage
- Pollution prevention and control

The other area where I would like to provide comments but where we do not need a condition to be applied relates to the proposed open loop ground source heat pumps.

**Environment Agency** 

Rivers House, Sunrise Business Park, Higher Shaftesbury Road, Blandford, Dorset, DT11 8ST.

Customer services line: 08708 506 506

Website: www.environment-agency.gov.uk

Water supply

The supporting information provided within the Environmental Statement (ES) states that a new borehole will be constructed at Airman's Corner with an abstraction below the consented limit of 20m3/d (ref: 10.4.33) this will therefore will not require a Licence from the Environment Agency. A consent to investigate a groundwater abstraction has been issued for this site and we await the results of any investigation undertaken.

We can appreciate the overall environmental impact of providing a local private supply is likely to be less than requiring a connection to the water company's distribution network at this location.

We would expect a condition to be attached to the permission if granted to ensure that the water efficiency measures proposed within Chapter 10 of the Environmental Statement and Waste and Water Strategy are implemented on site.

I would also wish to see a commitment to metering and monitoring water use. This will help promote the English Heritage commitment (as stated in Appendix G of the Design and Access Statement) to creating and exemplar facility in terms of environmental sensitivity, inclusive access and sustainable tourism. It will also help ensure that if water use is getting close to, or exceeding the 20m3/d limit, action can be taken.

A suggested condition would be:

#### CONDITION

The development hereby permitted shall not be commenced until such time as a scheme to provide details of water supply, water efficiency measures (in line with the principles within the Water and Waste Strategy Appendix A10.1 of the Environmental Statement) and mechanisms for monitoring water use has been submitted to, and approved in writing by, the local planning authority. Any such scheme shall be supported by detailed information relating to water efficiency measures which will be included, revised calculations on predicted water use and how water use will be monitored. The scheme shall be fully implemented prior to the opening of the Visitor Centre, in accordance with the scheme, or any changes as may subsequently be agreed, in writing, by the local planning authority.

#### REASON

The site is located on a Major Aquifer within the catchment of the River Avon SCA/SSSI. The South Wiltshire Core Strategy Proposed Submission Document July 2009; Policy 19 includes the requirement for non-residential development to include water efficiency measures.

Foul Drainage

The new package treatment plant proposed to deal with foul drainage will require a Consent to Discharge from the Environment Agency. This process may take up to four months to complete.

It is not clear from the application details whether the package plant will discharge to a soakaway (as stated in Document 10.0 Water Quality, Drainage and hydrology section 10.4.29) or to a local watercourse (as stated in the Water and Waste Water Strategy sections 5.2 and 6.2). This must be made clear when applying for a Consent to Discharge and ideally confirmed for the planning process.

I would ask that the following (or similarly worded condition is applied):

#### CONDITION

No development shall commence a detailed scheme for the disposal of foul drainage has been submitted and approved by the Local Planning Authority. Details should include whether discharge is to ground or surface water, location of discharge, details of emergency storage proposals and emergency arrangements for tankering off-site. The scheme shall be completed in accordance with the approved plans before development of the site begins.

#### REASON

The site is located on a Major Aquifer within the catchment of the River Avon SCA/SSSI. Appropriate drainage arrangements will ensure groundwater is protected.

#### Surface Water Drainage

We note the proposed development falls entirely within Flood Zone 1 (low probability) as defined within Table D.1 of Planning Policy Statement 25 (PPS25) Development & Flood Risk. The total scheme is said to cover an area of 16.3 hectares. The proposed development is supported by site specific Flood Risk Assessment/s (FRA) as compiled by Sinclair Knight Merz, on behalf of English Heritage. On the basis of the FRAs provided and other supporting documents outlining the Surface Water Strategy for this proposal, it has been adequately demonstrated that the proposed scheme will remain safe from flood risk and will not exacerbate such risk to others.

Although a detailed design of the necessary surface water management scheme has yet to be finalised, we are satisfied that appropriate constraints and design criteria have been applied to the current proposal. The proposed surface water strategy makes suitable allowance for climate change and is in compliance with the requirements of PPS25. Provided that the planning condition below is applied to any subsequent planning permission and that we are reconsulted on this matter, we have no objection to the development.

#### CONDITION

Development shall not begin until the detailed design of the surface water drainage scheme for the site, based on sustainable drainage and pollution control principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority.

The scheme shall subsequently be implemented in accordance with the approved details before the development is completed, and shall also include details of how the scheme shall be maintained and managed after completion

#### REASON

To prevent the increased risk of flooding, to improve and protect water quality, improve habitat and amenity, and ensure future maintenance of the surface water drainage system.

#### NOTE TO LPA - Maintenance of Drainage Scheme

PPS25 paragraph F12 recommends that the management and maintenance of surface water drainage systems, for the lifetime of the development, may be more appropriate addressed within a Section 106 Agreement. We recommend you refer to PPS25 Practice Guide (Section 5.25 - 5.29) and CIRIA publication ICoP SUDs MA1, which can be found http://www.ciria.org.uk/suds/icop.htm, for further guidance

on how to ensure adequate adoption and maintenance of surface water drainage schemes. The failure to maintain surface water drainage schemes could result in increased flood risk to the development and elsewhere.

We assume that control of drainage on adopted roads will continue to fall with Wiltshire Council/Highways Agency it will be important that all parties involved in maintaining the drainage arrangements within the application area are aware of their responsibilities in perpetuity.

#### Informative

The applicant should be aware that any works offering an obstruction to flow within an Ordinary Watercourse will require prior Flood Defence Consent from the Environment Agency, in accordance with s.23 of the Land Drainage Act 1991. Further guidance is available from Environment Agency Development and Flood Risk Officer - Daniel Griffin (01258 483351).

Please note that we do not accept liability for any calculations contained within the FRAs or associated Surface Water Strategy documents provided. This letter does not constitute approval of such calculations nor does it constitute the Environment Agency's consent or approval that may be required under any other statutory provision, byelaw, order or regulation.

#### Pollution prevention and control

Mitigation measures for pollution control during construction are highlighted in section 10.4.1 of the ES and Appendix A2.2. Adoption of these measures during the construction phase will ensure appropriate protection of controlled waters.

We would expect the applicant's to produce a detailed Construction Environmental Management Plan following the measures already detailed in the outline document. This can be secured by way of a condition.

#### CONDITION

No development approved by this permission shall be commenced until a Detailed Construction Environmental Management Plan, incorporating the pollution prevention measures identified within the Outline Construction Environmental Management Plan, has been submitted to and approved by the Local Planning Authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

#### REASON

The site is located on a Major Aquifer within the catchment of the River Avon SCA/SSSI. Appropriate pollution prevention arrangements during construction will ensure groundwater and surface waters are protected.

#### Open loop ground source heating

We recommend that designers and developers of the Ground Source Heat Pump scheme should adopt the risk assessment approach outlined in 'Guidelines for Environmental Risk Assessment and Management' (DETR/EA/IEH 2000). Further guidance on ground source heat pumps is provided in Part 4 (Chapter 10) of the Environment Agency document 'Groundwater Protection: Policy and practice (GP3)' from which the following guidance is taken.

The key issues with ground source heat pumps are:

 Risk of the pipes or borehole(s) creating undesirable connections between rock or soil layers. This may cause pollution and/or changes in groundwater flow and/or quality.

- Undesirable/unsustainable temperature changes in the aquifer or dependant surface waters.
- Pollution of water from leaks of polluting chemicals contained in closed loop systems.
- Pollution of water from heat pump discharge from an open loop system that contains additive chemicals.
- Impacts of re-injection of water from an open loop system into the same aquifer, both hydraulic and thermal, as well as any water quality changes induced.
- The potential impact of groundwater abstraction for ground source heat systems on other users of groundwater or surface water.

Open loop systems operate by direct groundwater abstraction. Water is pumped to the surface and through a heat exchanger. It is then either discharged back to the ground or to a sewer or river. Normally one aquifer will act as both 'source' and 'sink' for these systems.

If water is disposed via an injection well, the designer/operator must take care to ensure removal of particulate matter prior to injection. This, along with good abstraction borehole design, possibly including surface particulate removal using strainers, is recommended to prevent clogging of the injection well. Another risk to open loop systems is breakthrough of the injected water back into the abstraction well, reducing system efficiency. System operators need to allow a sufficient distance between the abstraction and recharge boreholes, in the same aquifer, to minimise the breakthrough of injected water, driven by the induced hydraulic gradient. Operation of the system in a seasonally balanced mode, that is cooling in summer and heating in winter, will also reduce breakthrough effects.

As mentioned in the water supply subheading, we will normally require you to have an abstraction licence unless the abstraction rate is below the threshold for licence control (currently 20 m3/d).

For most discharges to ground you will need a discharge consent. We may not require authorisation for a discharge to ground if you can show it will not cause any deterioration in groundwater quality and no significant change in ground or groundwater temperature, and that the discharge is not classified as trade effluent. All trade effluent discharges will need consent.

We understand from the information submitted that a groundwater investigation is to be carried out similar to that proposed for the abstraction borehole to establish aquifer characteristics and design parameters for the boreholes. We would welcome the opportunity to comment on the findings of this in due course and would be happy to be involved further as the scheme progresses.

Please contact me if you have any queries. If you (or other consultees) to this application are asking for similar conditions to those I have suggested please feel free to contact me to discuss how these can be appropriately reworded to address everyone's needs.

Once a decision is made please can I have a copy of the planning decision notice and any S.106 Agreement for our records.

Mrs Tracey Brightman
Planning Liaison Officer

cc English Heritage: South West Regional Office, Chris Blandford Associates



### THE AMESBURY SOCIETY AS

Head of Development Services Wiltshire Council 61 Wyndham Road Salisbury

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The Amesbury Society 14 Stonehenge Road Amesbury Wiltshire SP4 7BA

22 Nov 2009

Reference

Planning applications S/2009/1527/FULL and S/2009/1528/LBC

Dear Sir /Madam

Further to the reference planning applications, may I on behalf of the Amesbury Society make the following observations.

Firstly, due to the magnitude of the application for the construction of the latest proposed Visitors Centre and the ridiculously short time allowed for any meaningful study of the proposal it has not been possible for our Society to comment . This has been in part compounded by ongoing medical problems by myself which has not helped. So any comment made will be confined to the bat and breeding bird survey supplement despite much that could be said on the main proposal.

. The very proposal to build a large Visitors' Centre on a green field site on chalk, agricultural downland completely isolated from any other buildings must have a devastating effect on the flora and fauna of the area extending a long way from the boundaries of that site. This must have an equally devastating effect on the habitat of the birds listed, all too many of which are "red listed" and in serious decline. Also and not mentioned are species such as the English native Grey Partridge (Perdix Perdix). This is now I understand on the critically threatened list and as a downland bird would doubtless nest in areas such as this if their population were high enough.

The construction of this Centre will also have an adverse effect on the Lapwing (Vanellus Vanellus). This is or was a typically downland ground nesting species, but the native population has all but died out and the only ones now commomly seen are winter visitors. The winter feeding grounds for Fieldfare, Redwings and overwintering Starlings will be locally impaired and all in all it will have a seriously detrimental effect on a wide range of birds, this in turn must have a knock on effect on predator species in year round nesting and feeding patterns.

Not much is known by me of bats and their needs but it would be safe to assume that their hunting areas would be seriously impaired and it would lead to, at least, a decrease of the local population of these animals.

It could also be assumed that with the loss of predator bird species this would be accompanied by an increase in the population of vermin, rats and foxes etc. in and around the Visitors' Centre and the predations they would make on ground breeding and feeding birds and their young would further reduce any local populations of these all too scarce species.

So while the proposal is at least an improvement on the original Countess offering it is still a long way from ideal being sited so far from the henge and from the ecological point of view at least should be refused. But doubtless in the haste to appease English Heritage (hence the too short consultation period?) and their need to have a means of commercially exploiting the expected rush of visitors in 2012 what do a few birds and bats matter, after all they cannot complain.

Yours faithfully	
Roland Ware	
Secretary	

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Acknowledged

for Places of Historic Interest or Natural Beauty Action

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Wiltshire Council Development Services Planning Office 61 Wyndham Road Salisbury SP1 3AH E-mail Direct Tel Your Ref

Our Ref

Date

S/2009/1527 SH EIP PA1 25<sup>th</sup> November 2009

Dear Sir/Madam

Application number S/2009/1527 Decommissioning of existing visitor facilities and a section of the A344; the erection of a new visitors centre, car park, coach park and ancillary services building at Airman's Corner; and related highways and landscaping works.

The National Trust has carefully considered the application and supporting material in relation to the above application.

As the main landowner within the World Heritage Site, the Trust is acutely aware of the important opportunity currently available dramatically to improve the environment around the Stones and provide enhanced visitor facilities to this internationally significant site. We are however required, by our statutory purpose, to assess the potential impacts of development on the Trust's interests, in the same way as we would for any other planning application.

Our analysis of the most significant planning policy statements suggests the critical issues requiring careful judgement revolve around the World Heritage Site and Special Landscape Area designations and interpretation of policies relating to them.

We consider the key question is whether the proposed building and parking is "in keeping" with the WHS as required by WHSMP policy 4j. [Policies 5a and 5b are met]. Arguably, as the new facilities are not visible from most of the WHS, including the Stones, and are located right on the edge of the WHS, the impact on it is minimal; though there are inevitably some impacts such as visibility from the Cursus.

The WHS Circular 07/09 requires the Outstanding Universal Value (OUV) of a WHS to be protected through appropriate policies but also refers to "enhancing the WHS where appropriate" and "striking a balance between conservation, biodiversity, access, the interests of the local community and the sustainable economic use …" of the WHS.

The Trust takes the view that, while any building in this area with associated parking etc, will have some visual impact, the OUV of the WHS is not significantly

PRESIDENT: HRH THE PRINCE OF WALES

REGIONAL CHAIRMAN: RICHARD WILKIN LVO MBE REGIONAL DIRECTOR: BRENDAN MCCARTHY

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compromised as a result of the proposals and the chosen site is better than any of the other available options. In our view, overall the net benefit for the OUV is strongly positive, taking into account the improvements at the Stones themselves and improved visitor experience which more than offset the landscape losses that come with the new visitor facilities.

We also note that Structure Plan policy C9 and Local Plan policy C6 both allow new development within the Special Landscape Area but require that siting, design and scale should be sympathetic to the character of the Special Landscape Area. The applicants' themselves recognise that there is some impact on landscape character arising from the new facilities. This largely arises from the scale of the new building in otherwise open and undeveloped wider landscape. However, the Landscape Impact Assessment indicates the quality of the landscape is judged to be 'moderate' there and the site is somewhat enclosed at the head of a valley.

There remain areas of uncertainty in the current application with regard to how elements of the scheme will operate. We consider these to be matters of important detail which the Trust is confident may be resolved in discussion with English Heritage as plans develop.

In summary, the Trust has concluded that the net benefits arising from the removal of the existing, grossly unsatisfactory, visitor facilities and the closure of the A344 are sufficient to warrant living with some landscape impacts at Airman's Corner associated with a new building and extensive car and coach parking.

The Trust therefore is not raising an objection to Planning Application number S/2009/1527 which it strongly supports.

Yours faithfully

B M McCarthy Director for Wessex



Ms Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road Salisbury Wiltshire SPI 3AH

Planning Department

THE WILTSHIRE ARCHAEOLOGICAL

AND NATURAL HISTORY SOCIETY

26	NOV	2009	

25 November 2009

Dear Mrs Howles

#### Stonehenge Visitor Centre Planning Application: S/2009/1527/FULL

We write to comment on the Application. This covering letter provides an overview of our response (attached) with reference to that document.

The Society has supported the preservation and presentation of Stonehenge for over a century (Section 2).

The Society agreed a formal position on the Stonehenge Visitor centre at its AGM in October 2009 and support for that position and concerns about the proposed site are specified in Sections 4, 5 and 6. In summary the Society welcomed the positive step forward taken by English Heritage in preparing proposals for a new Visitor Centre, but would prefer the Visitor Centre to be located outside the World Heritage Site and on brownfield land.

There are a number of aspects that we welcome and warmly support including:

- the closure and grassing-over of the A344
- the removal of visitor facilities and car parking from the vicinity of Stonehenge
- the proposal for a new visitor transit route that will not require the construction of new roads within the World Heritage Site
- the closure to certain motorised vehicles of Byways 11 and 12

We have a number of concerns and make suggestions which we feel will improve the scheme and address some of the issues that we raise in our response:

- · Additional screening of the proposed visitor facilities
- Reduction in the height of the visitor centre building
- · Minimising the long term impact of the visitor centre by retaining existing slopes
- Minimising light pollution

We suggest that the application is accepted in part, but that a decision is deferred to allow Council Officers to negotiate amendments along the lines we suggest above, so that the scheme may proceed without substantial delay.

Doug Roseaman
Deputy Chair

Yours sincerely

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#### WANHS

#### **ANNEXE**

Planning policy and considerations designed for the protection of the WHS from development that would adversely affect the OUV of the Site due to impacts on the Site, its monuments and their settings.

## UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (2008)

- Guideline 98: Legislative and regulatory measures at national and local levels should assure the survival of the property and its protection against development and change that might negatively impact the outstanding universal value, or the integrity and/or authenticity of the property. States Parties should also assure the full and effective implementation of such measures.
- Guideline 108: Each nominated property should have an appropriate management plan or other documented management system which should specify how the outstanding universal value of a property should be preserved, preferably through participatory means.
- Guideline 109: The purpose of a management system is to ensure the effective protection of the nominated property for present and future generations.
- Guideline 112: Effective management involves a cycle of long-term and day-to-day actions to protect, conserve and present the nominated property.

[NB. Guidelines 108, 109 and 112 are quoted verbatim, together with other relevant Guidelines, on p.53 of the *Stonehenge WHS Management Plan.*]

#### CLG Circular 07/2009 on The Protection of World Heritage Sites (DCLG July 2009)

Paragraph 8: The outstanding universal value of a World Heritage Site indicates its importance as a key material consideration to be taken into account by the relevant authorities in determining planning and related applications, and by the Secretary of State in determining cases on appeal or following call-in. It is therefore essential that policy frameworks at all levels recognize the need to protect the outstanding universal value of World Heritage Sites. The main objective should be the protection of each World Heritage Site through conservation and preservation of its outstanding universal value.

Principles and policies for the protection of WHS: Paragraph 12: Policies should reflect that all these sites have been designated for their outstanding universal value, and those policies should place due weight on the need to protect World Heritage Sites for the benefit of future generations as well as our own. . . .

Wiltshire and Swindon Structure Plan 2016

Policy HE1: The World Heritage Site of Stonehenge and Avebury, together with its landscape

setting, should be afforded protection from inappropriate development, to reflect its Outstanding International Value. No development should take place which by reason of its scale, siting and design would prejudice the World Heritage Site and its setting in the landscape.

Policy HE5: World Heritage Sites, Scheduled Ancient Monuments, Registered Battlefields, Registered Parks and Gardens and other historic sites should be enhanced, as far as practicable, through appropriate management, interpretation and public access arrangements, having regard to the impact of any new development on the character of the area.

#### Salisbury District Local Plan (adopted June 2003)

Policy CN24: Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted.

[NB. This policy is described as 'The key development control policy for the WHS in the Local Plan' in the WHS Management Plan, Appendix O, paragraph 3.2.]

Policy CN 20: Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features, or their settings will not be permitted.

#### The WHS Management Plan (2009; adopted as SPG by Wiltshire Council)

The purpose of the Plan, paragraph 1.3.1: The primary purpose of the Management Plan is to sustain the Outstanding Universal Value of the WHS to ensure the effective protection, conservation, presentation and transmission of the WHS to present and future generations . . . it is the OUV of the Site which makes it important in global terms for all humanity, and which is therefore the main focus of and reason for the Plan. . . . 'Conservation' in the context of this Plan includes not only ensuring the physical survival of the archaeological sites and monuments and/or the improvement of their condition, but also enhancing the visual character of their landscape setting, increasing biodiversity and improving the interpretation and understanding of the WHS as a landscape without parallel. . . .

The need for improved visitor facilities: paragraph 9.7.1: For many years it has been acknowledged that there is a need to remove the existing visitor facilities which have an adverse impact on the OUV of the Site, and to develop improved visitor facilities where they will not have an adverse impact on the WHS and its OUV. . . .

Statutory and Policy Framework: paragraph 14.2.5: Ensuring that any new development within the WHS is compatible with its status as a WHS is a clear priority for the Plan. Development control policies should seek to prevent or avoid, as appropriate, the adverse impacts of development within the WHS upon the Site and its OUV.

Similarly, development outside the WHS which might adversely affect it and its setting should also be controlled through appropriate policies.

- Intrusive features in the landscape: paragraph 14.4.19: Modern development and changes in land use have significantly influenced the character of the WHS, and continue to impact on important visual and historic relationships between the archaeological sites and their settings. Light pollution, much of it originating from sources outside the WHS, has led to increased concealment of the night sky: this is inappropriate in a landscape with monuments celebrated for their astronomical alignments.

  Considerable steps have been taken since 2000 to create an appropriate landscape setting for the Stones and other key monuments, but much remains to be done to remove or screen intrusive features.
- Paragraph 14.5.1: . . . While the development of tourism will remain an important factor, it is essential that this does not conflict with conservation of the WHS and maintenance of its OUV, on which such tourism depends. Any proposals should follow government guidance *Good Practice on Planning for Tourism* (CLG 2006) published to guide planning authorities and others.
- Visitor facilities for the World Heritage Site: paragraph 14.5.26: A full Environmental Impact Assessment will be prepared for any proposed visitor facilities scheme. The location and design of any proposed visitor facilities (including parking areas) should ensure that they:
  - · avoid adverse impact on the WHS, its setting and the attributes of its OUV . . .

### Application for planning permission S/2009/1527/FULL: new visitor centre for Stonehenge and related works

#### 1. Introduction and summary of our response

I.I. The Society is pleased to have the opportunity to comment on this application and welcomes English Heritage's initiative in bringing forward proposals for improving the present facilities for visitors to Stonehenge. This response is based on information from the Society's specialist Stonehenge Committee and endorsed by its Board of Directors, although the time limits set have made it difficult for us to comment as comprehensively as we would have liked.

#### 2. The Society's role at Stonehenge

2.1. Our Society has been involved in the preservation and presentation of the Stonehenge landscape for more than a century. We set a practical example in 1927 when we initiated the acquisition of land around the famous stone circle in order to protect its setting and the monuments within it: this land was subsequently vested in the National Trust and became the core of its Stonehenge Down estate. The Society is represented on the Stonehenge Advisory Forum. We participated in the formulation of the previous and current Management Plans for the World Heritage Site (WHS) and in the production of a more detailed Land Use Plan for the National Trust's Stonehenge Down estate. Additionally, the Society curates and displays in its museum, the Wiltshire Heritage Museum in Devizes, material of international significance from the WHS: indeed, our museum is recognised as one of the two "intellectual gateways" to the WHS in the WHS Management Plan. We have therefore signed a Memorandum of Understanding with English Heritage and the Salisbury & South Wiltshire Museum to interpret and present the story of the Site and its wider context.

Our comments on the present application are based on this experience and involvement.

#### 3. Our support for parts of the scheme

- 3.1. There are a number of elements to commend in the scheme now before us. In particular, we warmly welcome the proposals for:
  - closure of the junction between the A303 and A344 and the grassing-over of the A344 from that junction to Stonehenge;
  - · the removal of visitor facilities from the vicinity of the henge;
  - the grassing-over of a large part of the present car parks, along with the abandonment
    of the pedestrian tunnel and the reduction of the service area;
  - that there will be no new road construction within the WHS for the proposed new visitor-transit route; and
  - the placement of permanent Traffic Regulation Orders on Byways II and I2 within the WHS. We recognize that the success of the applicant's scheme would depend on this being undertaken as soon as possible so that any problems it gave rise to might be resolved sooner rather than later.
- 3.2. Together, these proposed changes would greatly improve the setting of the great prehistoric monuments in the heart of the WHS and would in themselves enhance the visitor experience. These changes have been at the centre of the Society's agenda for Stonehenge for more than forty years and we are delighted to see positive moves for their achievement.
- 3.3. We would point out, however, that these undoubted benefits flow from the removal of the existing visitor arrangements from the vicinity of Stonehenge and from the closure of part of the A344. They are not dependent on the development of replacement visitor facilities at the particular location selected by the applicant.

#### 4. The Society's position on the location of new visitor facilities

4.1. The statement below was agreed at our 2009 AGM last month

"This Annual General Meeting welcomes the positive step forward in the process taken by the publication by English Heritage of initial proposals for the development of the Stonehenge Visitor Centre in July 2009.

The Meeting considers that, in planning the new visitor facilities, the most important issue is the preservation of the Outstanding Universal Value of the World Heritage Site. In line with the Resolution agreed at the 2008 Annual General Meeting, the Society would prefer the Visitor Centre to be located outside the boundary of the World Heritage Site and on brownfield land, but it recognises the constraints upon English Heritage in deciding the location for the Visitor Centre. In particular, the Society is pleased that the Visitor Centre is not to be located at Fargo Plantation.

The Annual General Meeting supports the Board of Trustees in working in partnership with English Heritage and South Wiltshire Museum to achieve an outcome worthy of the World Heritage Site."

#### 5. Conflict with planning constraints for the WHS

5.1. We wrote to you on 31 October to express our view that the proposal is in conflict with Local Plan policies. We attach as an Annex a list of planning considerations and WHS Management Plan statements which indicate that the scheme also conflicts with other planning safeguards.

#### 6. The Society's objections to certain parts of the scheme

6.1. Although we understand the constraints on the applicant in choosing a site for replacement visitor facilities, we have concerns about the proposal to site them at Airman's Cross. We have serious concerns about the design and layout of these facilities and about the associated new highway lighting at Longbarrow and Airman's Cross roundabouts. These concerns relate to the interlinked issues of landscape preservation, heritage protection and planning policy, all of which come together in a particularly sensitive way in the WHS and which stem from the most important issue of all, as agreed by our members at our AGM last month – the protection of the Outstanding Universal Value (OUV) of the WHS.

#### 6.2. The OUV and its protection over the entire WHS

- 6.2.1. Despite the benefits the scheme would bring to parts of the WHS, we are not convinced that it is acceptable to claim that those benefits can offset the impacts (admitted by the applicant) to the OUV of the WHS in other parts of the Site. Our view appears to be well supported by planning policy and guidance, and by the 2009 WHS Management Plan, which was formally adopted as Supplementary Guidance by Wiltshire Council in July of this year.
- 6.2.2. The attributes of the WHS which together express its OUV are set out in the 2009 Management Plan. They encompass many monuments and groups of monuments other than the Stonehenge monument itself. During the preparation of the 2009 Management Plan, we argued strongly against the concept of a defined "core area" of the WHS since it gave the misleading idea that the immediate visual setting of Stonehenge was more important that the wider landscape of the Site and the settings of other major prehistoric monuments in that landscape. This argument was supported by research at Durrington Walls the largest known Neolithic settlement in the WHS, ritually linked to Stonehenge by the River Avon and the Stonehenge Avenue even although situated at the extreme edge of the WHS.
- 6.2.3. The concept of a higher-value "core area" has now been abandoned and is no longer included in the 2009 Management Plan. Every development of potential impact on the OUV of the WHS must now be assessed on its own merits and not as a function of its distance or visibility from the Stonehenge monument.

#### 6.3. Adverse impacts of the proposed scheme on the OUV of the WHS

- 6.3.1. Looking now at the western parts of the WHS, we note from the Environmental Statement (Vol. I, section 5.27–28) that the applicant has recognized the adverse effects their proposed development at Airman's Cross would have on the OUV of the WHS, most particularly in relation to the settings and visual interrelationships of key monument groups.
- 6.3.2. The monuments in question are the Stonehenge Cursus, the Lesser Cursus and its associated Bronze Age burial mounds, the burial mounds lying to the south of the proposed new car park, the Winterbourne Stoke Bronze Age burial mounds, and Long Barrow 1664 which lies outside the WHS. The applicant's assessment of the visual effects of their development on these monuments varies from "slight adverse" to "moderate adverse". The operational effects vary from "moderate adverse" to "large adverse".
- 6.3.3. However, the visibility impact statement is based on existing vegetational cover. The Planning Committee should take into account the probable future removal by the landowner of trees and scrub to the south of the Stonehenge Cursus: this is in order to reinstate the visibility from all directions, including from Stonehenge, of the prehistoric monuments in this area and especially the singular "Monarch of the Plain" burial mound, which is deliberately located at the junction of two important ridgelines.
- 6.3.4. The applicant's assessment underplays the significance of these key monuments. The 2009 Management Plan specifically mentions the Stonehenge Cursus, the Lesser Cursus and "the densest concentration of Bronze Age burial mounds in Britain" when defining the attributes of the WHS which express its OUV. The significance of these key monuments is, if anything, likely to increase, given the current research by Professor Parker-Pearson and his associates, which shows how much still remains to be discovered in this landscape, both in terms of its buried remains and in the visual associations between individual monuments and groups of monuments. For example, the discovery of the site of a former Preseli Bluestone circle at the east end of the Stonehenge Avenue has served to emphasise the potential significance of a scatter of Bluestone fragments at the west end of the Stonehenge Cursus.
- 6.3.5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape is an Attribute of the WHS contributing to its OUV (2009 Management Plan, Attribute 3, p.28). As regards the Stonehenge Cursus, Attribute 3 also draws attention to its function of linking outward views over the Till and Avon valleys. The Cursus is the largest prehistoric monument in the WHS: using the applicant's own assessment system, as a monument specified in one or more attributes of OUV it makes a Very High contribution to the OUV of the WHS.
- 6.3.6. The significance of the Stonehenge Cursus is not confined to the area within its earthworks, but includes the designed outward views from its eastern and western terminals over the Avon and Till valleys. The alignment of the Cursus extends eastwards over Woodhenge to a probable equinoctial marker on the Beacon Hill Ridge and westwards to Long Barrow 1664 overall, a distance of 11km. This is by far the longest piece of axial planning in the WHS.
- 6.3.7. Whatever the purpose of demarcating this line, the outward view from the west end of the Stonehenge Cursus over the Till valley specified in Attribute 3 is centred on it and it is *precisely upon this line* that the proposed visitor centre would be sited. This is equivalent to placing the development astride the solsticial axis from Stonehenge. The result is (again using the applicant's own assessment system) a "direct Large or Very Large Adverse effect". That this western area of the WHS was an area of ritual and ceremonial significance for more than a thousand years is shown by the building of the Lesser Cursus and the four major groups of Bronze Age burial mounds nearby. All of these monuments would be adversely affected by the proposed development, which the applicant admits would also have a "major adverse impact" on the landscape (Env. Statement 1, p.213).
- 6.3.8. In the applicant's view, these adverse effects are offset by benefits stemming from the closure of part of the A344 and the removal of the existing visitor facilities from the vicinity of Stonehenge. This

approach relies on the concept that the landscape and monuments immediately around Stonehenge are in some way more important than the landscape and monuments elsewhere in the WHS, and that one area of the Site can be traded off against another. The 2009 Management Plan has abandoned this concept and does not support the approach suggested by the applicant. Instead, the Plan emphasises the overall goal of sustaining and enhancing the OUV of the whole Site, rather than diminishing that Value in any one part of it.

## 7. Specific suggestions for improvements

7.1 Our comments on specific aspects of the scheme are as follows:

#### 7.1.1. The visitor centre building

We consider that the height of the roof canopy should be reduced so as to lessen the building's visible impact. Moreover, given the suggested position of the building astride an alignment of major significance in the WHS, some form of vegetational screening should be introduced to hide it in views from the western end of the Stonehenge Cursus area.

#### 7.1.2. The car park

The visual impact of the proposed new car park should be reduced by vegetational screening.

# 7.1.3. Down-cutting of the topography

We note that while this part of the scheme is declared to have minimum impact and is planned to be reversible with no down-cutting into the existing topography, this is not the case, as 1500 sq m of down-cutting is proposed at the south-east corner of the visitor centre, to create a level platform for the reconstruction of Durrington Walls Neolithic houses which were themselves constructed on a slope comparable to the one in this area. This part of the scheme must be reversible.

#### 7.1.4. Treatment of the redundant A344 road surface

We applaud the proposal not to attempt to erase all trace of the closed section of the A344 from its junction with the A303 up to Stonehenge, but to leave it as a visible earthwork. Puncturing the tarmac may not be sufficient to avoid serious parching of the new grass surface. Accordingly, we recommend the removal of the tarmac here as proposed for the area where the A344 crosses the Avenue.

#### 7.1.5. Highway lighting

We are concerned about light pollution within the WHS. Accordingly we would suggest that in balancing light intensity and road safety there could be a role for speed limits and traffic calming measures in order to minimise impact on Attribute 4 of OUV.

## 8. Our suggested way forward

The Council will see from our response that we are supportive of parts of the application but have serious concerns about those parts of it which impact adversely on the OUV of the WHS. In the circumstances, we would like to suggest that the application is acceptable in part, but that a decision should be deferred in order that Wiltshire Council's Officers may be able to negotiate alternative solutions to those aspects of the scheme which are, in our opinion, inappropriate to the obligations concerning the Outstanding Universal Value of the World Heritage Site and should be reconsidered or substantially modified. Bearing in mind that we would prefer the facilities to be located elsewhere, these are:

- the siting and/or lack of screening of the visitor-facilities at Airman's Cross;
- the height of the visitor centre building;
- the alteration of the topography at the visitor centre building; and
- minimising light pollution.



# Planning Department

Acknowledge U

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Wiltshire Council Development Control Planning Office 61 Wyndham Road Salisbury, SP1 3AH

25th November, 2009

Dear Sir/Madam

## Re: Planning Application S/2009/1527 STONEHENGE VISITOR CENTRE

I am writing to formally object to the above application. Sustrans supports and develops sustainable transport across the United Kingdom. In this capacity has been working actively in the area around Stonehenge to support new cycle routes for tourists and local people. Sustrans also has a network of supporters in the South Wiltshire area and it is also on their behalf that we raise the issues in this letter.

While Sustrans supports the need for a new visitor centre we cannot disregard national and local policy with regards to new development. Moreover, while under Local Plan Policy T3, Wiltshire Council indicates its support for the development of a new visitor centre within the World Heritage Site, it also makes clear that "other policies of this plan will need to be taken into account during the consideration of any proposals".

Regrettably Sustrans must object to the proposed development. Our grounds for objection are as follows:-

#### Loss of access along part of the A344

The proposed stopping up of the A344, to be replaced by permissive access, does not comply with the saved Salisbury Local Plan Policy R17. This states that "proposals for closure will not permitted unless it can be demonstrated that an alternative route is permitted which is no less attractive than the original route, and which will be dedicated as a public right of way and waymarked by the time the original route is closed". The removal of access for motor vehicles along the A344 between the A303 and byway 12 should not also mean the loss of a right of way to pedestrians, cyclists and other non-motorised forms of transport. The alternative access via byway 12 is not "as attractive" by virtue of the considerably longer distance to reach Amesbury and points beyond. As a minimum this section of the A344 should be maintained as a byway to ensure the right of way of cyclists is not subservient to other users. We therefore object to the application on the grounds non-compliance with Salisbury Local Plan Policy R17.

The applicant has not provided details regarding the proposed reinforced-grass surface in this location. Such surfaces can vary in quality substantially depending on the choice

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of materials used, gradients, camber and drainage. We therefore object to the application in the absence of details of the proposed replacement surface being provided by the applicant.

The applicant has not provided details regarding the proposed gates to be located at either end of the path along the stopped-up section of the A344. Besides ensuring compliant access under the Disability Discrimination Act we are concerned to ensure access by cyclists with tandems and trailers is not restricted. We believe that access such not be restricted in any way at these locations. In any event the applicant should be required to submit designs of the proposed access arrangements prior to any planning approval being granted. We object to the application in the absence of details of access controls being provided by the applicant.

### Impact on safety on A303 as a result of closure of junction with A344

The closure of this junction is regarded as being beneficial to road safety at this location by removing the risk of collisions involving vehicles turning into or out of the A344. However, while any right of access for other road users (permissive or public) remains along the former line of the A344 there will equally be a reduction in road safety as a result of the proposed changes to the road layout in this location. Currently cyclists travelling west along the A303 and turning right into the A344 have the benefit of a filter lane. The proposals will force cyclists to cross both carriageways in one movement. The closure of the junction and removal of hatched markings will enable traffic on the A303 to travel at faster speeds in this location, thereby reducing the available time for crossing by pedestrians, cyclists and other non-motorised road users. Options are available to mitigate this loss; the addition of a light controlled crossing, the provision of a refuge and/or a reduction in the speed limit. We therefore object to the application in the absence of any proposed measures to mitigate the reduction in road safety in this location for non-motorised road-users.

#### **Absence of Detailed Travel Plan**

The submission of an outline travel plan for a detailed planning application is in itself grounds for objection. The applicant states the intention to develop sustainable travel initiatives subsequent to the opening of the facility. This is unacceptable for a scheme of this significance where it is reasonable to expect initiatives to be implemented at the opening of the facility. The World Heritage Site Management Plan states its timescale for the delivery of improvements to walking and cycling links as 5 years from 2009. This would require detailed planning and budgeting well in advance of the visitor centre opening. In reality, to ensure any likelihood of delivery, this should be in place prior to a grant of planning permission.

We wish to draw your attention to the following omissions from the travel plan:-

- · Clear targets for trips by sustainable modes means of transport.
- A statement of financial commitment from the applicant.
- Specified rather than aspirational infrastructure either within or outside the application site such as cycle routes, footpath and footways or road crossings.
- A monitoring, review and reporting strategy to evaluate progress against targets.

We would argue that this does not comply with current planning policy and is unacceptable in the context of a scheme of such importance, with the potential to generate visitor trips both nationally and internationally.

We therefore object to the application in the absence of a detailed travel plan which demonstrates the applicant's intention and ability to reduce the need for travel to the new visitor centre by car.

#### Inadequate provision for alternative modes of transport

Current national regional and local planning policy, specifically PPG13, PPS1, PPS7 and RPG10 are explicit in the need for applicants to enable trips by a range of modes including cycling and walking. The current proposals offer no safe or adequately surfaced route to Stonehenge for pedestrians, cyclists, mobility-scooter users and wheelchair-users from any nearby settlements. Options are available to build or improve paths from all the nearest settlements (Larkhill, Amesbury and Durrington). These are within the powers of the Highways Authority and the Highways Agency to deliver with contributions from the applicant. Alternatively the applicant could secure the assistance of partners within the World Heritage Site, particularly the Ministry of Defence and National Trust, to identify walking and cycle routes. However nothing is proposed within this application.

The applicant proposes to continue bus services to the visitor centre. Stonehenge is an attraction which draws visitors at all hours of the day and on all days of the year. Moreover on certain days it attracts unusually high numbers of visitors. The provision of a bus service does not mitigate the absence of any provision for walking and cycling.

While PPG13 does give some flexibility in its application to rural locations we would argue strongly that it does not apply in this case for the following reasons:-

- Significance: As already stated the application is for a scheme of national and international significance. Stonehenge already attracts in excess of one million visitors each year. Moreover on certain occasions, typically events such as summer solstice, over 30,000 people have been known to visit the site in one day.
- 2. Proximity to population centres: The application site is sufficiently close to three population centres for which adequate access for non-motorised traffic can reasonably be expected. For the avoidance of doubt the distances from Stonehenge itself to the centre of the nearest settlements are as follows: Larkhill 2.2 km, Amesbury 3.3 km, Durrington 3.8 km. These are short distances for a rural area. The settlements have a combined population in excess of 15,000 with two secondary schools.

Furthermore we must draw your attention to the following saved Salisbury Local Plan policies:-

- G1 Seeking the reduction in the need to travel by private car.
- G2 Stating that highways issues, including the suitability of proposed access, are material considerations in the suitability of proposed access.

- G9 Stating that planning permission may be refused if the applicant fails to propose an adequate S106 contribution to mitigate the impact of development.
- TR1 Stating the requirement for the promotion of alternative forms of transport including walking and cycling. It also requires the sustainable patterns of development.
- TR12 Stating that developments must incorporate appropriate provision for additional traffic generation, and measures to mitigate its adverse effects, particularly by improving provision for cycling and walking.
- TR13 Stating that even at low levels of usage there is justification for measures that encourage trips by pedestrians and cyclists.

The applicant has failed to comply with the above local policies, as well as national and regional policy, through the design of the scheme and the contents of the outline travel plan. We therefore object to the application in the absence of detailed proposals and a detailed travel plan which enables visitors to travel safely to Stonehenge on foot, by bicycle, by mobility scooter or by wheelchair.

# Inadequate provision for cycle parking

The application includes the provision of space for 10 bicycles at the visitor centre. The extent of provision in the vicinity of Stonehenge is unclear. This level of parking is wholly inadequate if the intention is to encourage a great number of sustainable trips to the site. Moreover at a location where long-distance cyclist will be arriving there is also a need for secure lockers to ensure baggage can be stored safely during visits. Saved Salisbury Local Plan policy TR14 requires new developments to provide cycle racks at suitable locations. We therefore object to the application in the absence of adequate provision for cycle parking.

Yours faithfully

Alistair Millington Area Manager - Wiltshire



# Salisbury Campaign for Better Transport

BY EMAIL ONLY

Mr A Madge Case Officer Development Control Wiltshire Council 61 Wyndham Road Salisbury SP1 3AH 3 Hadrians Close Salisbury SP2 9NN

Email: sec@salisburybettertransport.org.uk

November 24th 2009

Dear Mr Madge

## Planning application: S/2009/1527 Stonehenge Visitor Centre

I write further to my letter of October 28<sup>th</sup> re the above planning application. Having considered the details of this application we wish to **object** to these proposals for the reasons given below:

# 1) The proposed location is not in accord with planning policy, both because of the adverse impact on the World Heritage site and because of the relative inaccessibility of the site

Airman's Corner is a poor choice of location since it means that the bulk of this development (including the main visitor centre building and the 500-space car park) would be located within the open landscape of the World Heritage Site. This is contrary to a number of policies designed to protect the WHS, such as local plan policy CN24 which states that "Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted."

Since the new Visitor Centre would be further from Amesbury than the current facility it would also be more inaccessible and this conflicts with numerous clauses in PPS1 including the following:

- to "Focus developments that attract a large number of people .... in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development."
- to "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should ....focus development in existing centres and near to major public transport interchanges."
- to "Enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character."

The consultation which ended in October 2008 regarding the visitor centre location featured alternatives which were all to the north and/or the west of the monument. The Campaign for Better Transport, jointly with Friends of the Earth, proposed as an alternative that a world class visitor centre for Stonehenge should be sited away from the World Heritage Site, suggesting that a facility at Solstice Park would make good use of the amenities which are already there<sup>1</sup>. It is regrettable that this option, or alternatives such as a visitor centre in Amesbury itself, were not considered by the applicant.

<sup>&</sup>lt;sup>1</sup> Full response available at <a href="http://www.salisburybettertransport.org.uk/cbtfoevc.pdf">http://www.salisburybettertransport.org.uk/cbtfoevc.pdf</a>, summary available at <a href="http://www.salisburybettertransport.org.uk/cfvcsum.pdf">http://www.salisburybettertransport.org.uk/cfvcsum.pdf</a>

Not only has there been a failure to fully consider alternatives located outside the World Heritage Site and in closer proximity to existing development and public transport/walking/cycling links, there has also been a failure to consider whether a single large visitor centre is the best way forward for a dispersed site such as Stonehenge. Issue 23 in the 2009 Management Plan makes it clear that there should be increased public access to, and awareness of, the whole WHS. This could be better achieved by more local interpretation of the landscape and what has been found there – rather than reconstruct Neolithic houses found at Durrington Walls outside a Visitor Centre at Airman's Cross, why are these reconstructions not at Durrington, showing what might have existed in that landscape? More local interpretation centres could be considered, served by an 'explorebus' service (suggested in the 2009 Management Plan 9.2.5) and by excellent walking and cycling links.

This distributed approach would address another issue raised in the 2009 Management Plan (9.1.10), which noted that although visitors may spend money in the visitor centre, they do not tend to bring much benefit to the area as a whole.

# 2) There is a failure to put Green Travel planning at the heart of the application, instead this is seen as an 'add-on' to be developed once the site is operational

The Outline Travel Plan supplied with the application states that "issues of access and transport are of primary importance" but then goes on to explain that "a full travel plan will be developed once the new facilities are operational." This is contrary to the latest Government guidance<sup>2</sup> which states (para 2.11) that "Wherever a travel plan is required, a full travel plan should normally be prepared and submitted with the planning application. [emphasis in original] Robust plans will include clear outcomes, all relevant targets and measures to ensure that these can be achieved, as well as monitoring and management arrangements..... Full travel plans are appropriate for full planning applications where the proposed use and accessibility needs are known. They may also be appropriate with outline applications where the scale of uses is known. Wherever possible, a full travel plan should be developed rather than an interim plan." By postponing production of a full Travel Plan, and saying that "aims, objectives and targets for reduction in car use" will be developed only post-completion of the Visitor Centre (Outline Travel Plan 6.1.1) the applicant has clearly failed to comply with current quidance.

Our representation in October 2008 requested that the transport implications of any visitor centre be given central importance from the outset, integrated with the design and that there is an aspiration to achieve a step-change in the expectations of how visitors arrive at the site. We pointed out that the aim for the 2012 Olympics was that 100% of ticketed spectators should travel to the Games by public transport or by walking and cycling, with no private car parking for spectators at any venue except for some Blue Badge parking.

The current proposals fall woefully short of this Olympian ideal, as will be apparent from a comparison of the coach and car parking spaces in the current and proposed Visitor Centres:

Current site c185 cars ) see
16 coaches ) Transport Assessment (TA) 2.1.3
Proposed site: 360 cars + 140 overflow spaces = 500 cars ) see
30 coaches ) TA 4.1.4

So in broad brush terms while coach parking is nearly doubled car parking spaces are nearly trebled - it certainly doesn't look as if the applicant has any belief that their 'future toolkit of measures' to encourage non-car modes (Chapter 5 of the Outline Travel Plan) will be successful.

The Stonehenge World Heritage Site Management Plan, adopted by Wiltshire Council as supplementary guidance and a material consideration in determining planning applications that affect the Stonehenge WHS, states at Policy 5d that "Measures should be taken through an exemplary Green Travel Plan to encourage access to the Site other than by car". The

<sup>&</sup>lt;sup>2</sup> Good Practice Guidelines: Delivering Travel Plans through the Planning Process, DfT April 2009 http://www.dft.gov.uk/pgr/sustainable/travelplans/tpp/goodpracticeguidelines-main.pdf

Outline Travel Plan provided clearly falls well short of this 'exemplary' status, and the overabundance of parking spaces makes it seem unlikely that such an exemplary plan will be forthcoming.

As well as catering for an excessive number of cars, the location and access to the new Visitor Centre falls well short of the ideal in terms of accessibility on foot or by bicycle. This is covered in more detail below.

# 3) There has been a failure to consider the needs of walkers and cyclists, indeed access is made worse for these groups when it should be prioritised.

The Outline Travel Plan (5.9.1) suggests that "The proposed visitor centre, as with the existing site, is beyond the threshold walking distances of most surrounding settlements". By moving the Visitor Centre approximately 2 kilometres away from the Stones themselves, and further from the nearest population centre and public transport hub at Amesbury, the applicants have chosen a site which is less convenient for walkers and cyclists and which fails to comply with PPG13 whose objective is to promote accessibility to developments, including leisure facilities, by public transport, walking and cycling. This issue has already been raised under (1) above.

For those who wish to access Stonehenge on foot or by bicycle the barrier presented by the A303 will be made worse by the current proposals. Currently there is a hatched area in the A303 at Stonehenge Bottom which gives some small measure of safety to walkers/cyclists from the Amesbury direction who cross to the footpath by the A344 roadway at this point. It seems that the plan is for this hatching to be removed. The Transport Assessment (4.4.1) states that "Upgrading this crossing point by the installation of a refuge, or providing a 'signed' right turn facility for cyclists in this location by utilising part of the wide hatched area, is not proposed or supported by the Highways Agency. The latter has expressed concerns about safety issues associated with crossings of the A303(T) at this point, especially after the junction is closed, and does not want to encourage crossings of the trunk road in potentially hazardous circumstances." To actually make access on foot or by bicycle less safe – which is clearly what these proposals do – cannot be considered to accord with PPG13 or other policies to promote sustainable transport modes.

It appears that the Highways Agency would reject a refuge or safer crossing point on the A303 because of the traffic speed. It is not clear why they have not followed the advice which they themselves have quoted in para 4.4.2 of the TA where it is stated "the Highways Agency make reference to TA91/95 'Provision for Non-Motorised Users' (NMU's) in the Design Manual for Roads and Bridges (DMRB) Volume 5, Section 2. Key clauses/tables are as follows: .....Paragraph 6.18: "Refuge islands may be provided within the carriageway to improve crossing facilities for pedestrians and cyclists. However, it should be noted that physical islands on high speed roads may constitute a hazard, and consideration should be given to speed reduction measures in these situations. Any island on a road with a speed limit greater than 40mph; that is not part of a single lane dualling design, requires 'Departure from Standards' approval." [our highlighting].

A sensible way forward would be for a 40 mph limit to be introduced on the A303 through the World Heritage Site – this would have benefits in terms of the reduction of noise and pollution and would enable safety measures to be taken for walkers and cyclists which would comply with the Highways Agency rules. This would also be in line with the WHS Management Plan (para 14.6.4) which suggests "Review speed limits and consider appropriate measures that could be taken to improve safety within the boundaries of the WHS" and "Review existing signing within the WHS, and consider appropriate gateway signs at all main entry points to the WHS, as at Avebury, to raise driver awareness of the special nature of the Site".

For cyclists there are further concerns regarding the surfacing and access rights along the line of the former A344 from Stonehenge Bottom. The application states (TA 4.5.1) that "A reinforced grass surface will be provided over the bed of the former A344 over this length [from Byway AMES12 to Stonehenge Bottom]. Agreement will be secured (with partners) to access by cyclists and pedestrians (24/7) over this land/reinforced grass area". While there are obviously sensitivities about the surfacing which might be used in this proximity to the

Stonehenge monument it should be noted that reinforced grass might not be a safe surface in all weather conditions for cyclists. Alternatives which are unobtrusive but safer should be considered. Access 'by agreement with partners' also does not sound as definite as it should be – these access rights need to be secured as a formal part of the planning application and in perpetuity.

Cycling parking at the Visitor Centre (10 covered cycle spaces to cover both Staff & Visitor use) seems woefully inadequate and clearly shows no intention of increasing the modal share of those arriving by bicycle. We suggest that this should be increased by a significant amount and furthermore cycle lockers should be provided for the convenience and security of those arriving on laden touring bicycles. There should also be cycle parking, and lockers, provided at the Hub (on the site of the existing Visitor's Centre).

To encourage and facilitate access by walkers and cyclists from Amesbury, and those from Salisbury arriving up the Woodford Valley, a safe crossing of the A303 is essential. One option would be to link the existing argricultural underpass near Vespasian's Camp to the walking/cycling network. This is not currently a right of way, but consideration should be given to its use since that would provide the safest possible crossing of the A303. An alternative would be for the current footpath on the south side of the A303 from Stonehenge Bottom to Stonehenge Road to be upgraded to shared use, in conjunction with a safer crossing point at Stonehenge Bottom itself.

# 4) The site location and poor travel planning will add to traffic through the World Heritage Site, rather than reducing it.

The Transport Assessment purports to show that the traffic implications of the Visitor Centre will be acceptable by demonstrating that the road works associated with this planning application – namely the Highways Agency proposals for Longbarrow Roundabout and the roundabout to be added at Airman's Corner – will mean that congestion is little worse (or in some cases better) than in the 'do minimum' situation.

However the conclusions drawn are essentially unsound, since if there will be capacity problems on the A303 even without the Visitor Centre relocation then improvements might well have been required in any case. The modelling only shows the 'No junction improvement/No Airmans Cross Visitor Centre' and 'Junction Improvement/Airmans Cross Visitor Centre' scenarios. There is no modelling of the 'Junction improvement/No Airman's Corner Visitor Centre' or the 'No Junction improvement/Airman's Corner Visitor Centre' scenario so it is impossible to evaluate what the contribution of the Visitor Centre relocation to the congestion levels will be.

We fully support the closure of the A303/A344 junction both on safety grounds and in order to enhance the setting of Stonehenge in accordance with the commitment made when Stonehenge became a World Heritage Site in 1986. However there are further commitments in the Stonehenge WHS Management Plan 2009 where Policy 5a states that "Measures should be identified and implemented to reduce the impacts of roads and traffic on the WHS and to improve road safety". The implementation of this policy needs to consider reducing traffic volumes on the A303 through the WHS. The choice of Airman's Corner as a location and the failure to link a new Visitor Centre with an exemplary Green Travel Plan are **not** in accordance with Policy 5a of the Management Plan.

# 5) This application has not been advertised as a departure application when it clearly conflicts with numerous planning policies.

The documentation submitted with the planning application contains comprehensive details about the planning policies which apply to the site but is rather less forthcoming on quite how the proposals in fact comply with these policies. The Planning Policy Statement quotes local plan policy T3 ("It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site") but it ignores both the fact that this refers to a visitor centre for, not necessarily in the WHS and also disregards the supporting text for this policy in the Local Plan - "However, this policy does not imply the automatic acceptability of any particular scheme; the

other policies of this plan will need to be taken into account during the consideration of any development proposals" (Adopted Local Plan, para 12.6). This scheme is contrary to numerous policies at national, regional and local level, some of which are listed below:

- PPS1 states that developments that attract a large number of people should be in existing
  centres to help reduce the need to travel, and should also enhance and protect the historic
  environment and landscape (see also (1) above).
- PPG13 states that a key planning objective is to ensure that leisure facilities and services are accessible by public transport, walking, and cycling, with para 37 stating that "Developments involving leisure, tourism and recreation which generate large amounts of travel should accord with the advice contained in this guidance. In determining the acceptability of such developments where they are proposed near to existing buildings, monuments, physical features or landscapes and which will not be well served by public transport, the local planning authority should ...consider the extent to which the proposal needs to be in the proposed location".
- Local plan policy TR12 states that "permission will not be granted for major new development unless provision is made in the layout for:
  - (i) facilities giving priority to, and allowing access by, buses;
  - (ii) cycleways and footpaths;
  - (iii) direct and sustainable links to adjoining developments and urban centre, particularly those links giving priority to public transport, walking and cycling; and
  - (iv) measures to achieve safe traffic speeds and secure a pleasant and safe environment."

Although this policy is quoted in both the Environmental Statement (4.6.30) and the Outline Travel Plan (3.3.4) the choice of location and the lack of safe cycle/pedestrian access to it are clearly contrary to the policy which would suggest that permission should not therefore be granted.

- Local plan policy CN24 states that "Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted." Note the Environmental Statement (5.7.27) tells us that "The proposed Scheme would have adverse effects on the OUV of the WHS due to impacts on the settings of a small part of the Stonehenge Cursus; the Lesser Cursus and associated Bronze Age barrows; the Winterbourne Stoke barrow group; and barrows to the north of the Winterbourne Stoke group; and on the visual inter-relationships between these key monument groups, as a result of construction and operation of the proposed New Visitor Facilities and related traffic increases on the A360. The setting of 1 long barrow outside the WHS boundary would also be adversely affected."
- Local plan policy CN20 states that Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features, or their settings will not be permitted.
- The Stonehenge World Heritage Site Management Plan 2009 has been endorsed by Wiltshire Council as supplementary guidance and a material consideration in determining planning applications that affect the Stonehenge WHS. The proposals are contrary to many of the policies in this Management Plan including:
  - Policy 1e that "Development which would impact adversely on the WHS, its OUV or its setting should not be permitted". Note that this policy covers any adverse impact and is not qualified in any way.
  - Policy 5a which states that "Measures should be identified and implemented to reduce the impacts of roads and traffic on the WHS and to improve road safety" – we appreciate decommissioning of the A344 achieves part of this goal, but adding to the traffic on the A303 is contrary to it and the A303 crossing point at Stonehenge Bottom will be made less safe when the current hatching is removed.
  - o Aim 5 also includes (14.6.4) the following goal "Restrict light pollution from road lighting into and within the WHS wherever possible". Lighting proposals at Longbarrow roundabout and the new roundabout proposed for Airman's Corner are contrary to this aim.

### 6) No Appropriate Assessment has been supplied.

There is reference in the Environmental Statement to the need for an Appropriate Assessment for this application to be undertaken by Wiltshire Council, with the advice of Natural England. It is stated that this would need to be completed prior to the determination of the planning application (ES para 7.5.3). Both construction and operation phases of the proposed Visitor Centre require an assessment of the impact on the River Avon SAC and Salisbury Plain SPA to take account of the in combination effects with other developments, noting that traffic and run-off from the A303/A360 will be one of the aspects to be considered.

#### Our conclusions and suggested way forward

We believe it is a mistake, in this protected prehistoric landscape, to set an artificial target such as the 2012 Olympics, and to suggest that a new Visitor Centre must be provided in this timeframe. The important thing for Stonehenge is to get the solution right and fit for the 21<sup>st</sup> century and future generations.

We would suggest that the best solution in the short-term for Stonehenge is as follows:

- Develop as a priority an exemplary Green Travel plan for the existing visitor centre
  site which would see a step change in the way visitors arrive at Stonehenge. This
  would include much more promotion and marketing of the existing train/bus link from
  Salisbury and the development of further coach and bus links from other tourist
  destinations such as Bath and also the development of safer walking and cycling links
  from Amesbury and other locations around the WHS.
- Close the A344 from Stonehenge Bottom to the western end of the current car park and allow this stretch to be used only by non-motorised users (walkers, cyclists and equestrians). Access to the current Visitor Centre for motorised vehicles would be via Airman's Corner from the west.
- There should be a speed limit of 40 mph through the WHS on the A303 and a safer crossing point for cyclists and pedestrians
- Upgrade the current visitor centre to provide the best facilities possible within the existing footprint.

The current proposals do not, we feel, represent the best way forward for a Stonehenge Visitor Centre, or for the A303. The desire to get improvements in place by 2012 should **not** be allowed to override policies which are rightly in place to protect the World Heritage Site and ensure that developments are appropriately sited such that the need to travel is reduced and sustainable transport alternatives are encouraged. In view of the controversial nature of this application and the national and indeed international importance of getting the right visitor facilities for the Stonehenge World Heritage Site we hope that the matter will be the subject of a Public Inquiry so that the proposals can be fully and independently evaluated.

Yours sincerely

Margaret Willmot Secretary, Salisbury Campaign for Better Transport



ACA was formed in 1993 to bring together groups opposed to the creation of a strategic highway from the M4 to the South Coast. It now includes the following groups:

□Friends of the Earth South West:

Bath, Bristol, Somer Valley, West Wilts, North Wilts, Salisbury

□Friends of the Earth South East:

New Forest, Test Valley, Southampton, Hampshire Network

□Council for the Protection of Rural England:

Wiltshire Branch and West Wilts and South Wilts local groups; Dorset Branch

□CoBT:

Wiltshire, Salisbury, SW Network

☐Westbury Bypass Alliance

Please reply to: 16, Upper High Street, Winchester, Hants SO23 8UT

Mr A Madge Wiltshire Council Development Control Planning Office 61 Wyndham Road Salisbury SP1 3AH

23<sup>rd</sup> November 2009

Dear Mr. Madge

#### S/2009/1527 - Stonehenge Visitors' Centre

The A36/A350 Corridor Alliance exists to resist damaging road building in corridors from the south coast to the towns of north Wiltshire and Bath and Bristol and to promote sustainable transport solutions instead. Though the A303 crosses these corridors it is a significant factor in their traffic patterns. We are naturally concerned at any developments that encourage further traffic growth and we believe that this planning application falls into that category.

It is in fact a great disappointment that after all the high-flown language about making our great national monument fit for an environmentally enlightened twenty-first century, the promoters of this Visitors Centre are clearly stuck in the dismal thinking of the twentieth century. Here was an opportunity to have a modern, pleasant, healthy, sustainable and efficient access policy and instead we get a large car park in the World Heritage Site itself and generating yet more traffic on the A303 past the monument.

To propose some vague Travel Plan process to follow construction of this centre is in our view so highly implausible that we can only regard it as cynical. One does not add massively to the car parking of an attraction and then take measures to attempt to persuade motorists not to use it.

To move the Visitor Centre further west is to move it further away for those visitors who do choose to come by sustainable transport modes (walkers, cyclists via Salisbury or Grately), thus further encouraging transfer to the least sustainable mode. We find it extraordinary that one of the reasons proposed for hurrying this thing through is to enable it to be ready for the Olympics, considering that the 2012 Games are supposed to be encouraging green travel.

Yours sincerely

Christopher Gillham



Chapel Cottage 93 Shrewton Road Chitterne Warminster Wiltshire BA12 0LW

Mr Adam Madge Wiltshire Council 61 Wyndham Road SALISBURY Wiltshire SP1 3AH

23 November 2009

Dear he Madge

# STONEHENGE VISITORS CENTRE PLANNING APPLICATION COMMENTS FROM CHITTERNE PARISH COUNCIL

Thank you for sending Chitterne Parish Council a copy of the Stonehenge Visitors Centre Planning Application. We have now perused the documents and our comments are on the attached sheet. We hope that these comments will be taken into account during the scrutiny process.

Your assistance in this matter is much appreciated.

Yours Sincerely

MA LUCAS

# STONEHENGE VISITORS CENTRE PLANNING APPLICATION COMMENTS FROM CHITTERNE PARISH COUNCIL

- 1. Thank you for providing the Planning Application for the Stonehenge Visitors Centre (SVC) so that Chitterne Parish Council can comment on it. These comments are detailed below.
- 2. We note that the Transport Assessment states at paragraph 3.2.30 (my emphasis in bold):

"Tackling congestion, improving air quality, improving road safety for all and improving other quality of life issues are all national themes which must be covered in Local Transport Plans. Wiltshire aims to reduce the number of people killed or seriously injured on its roads and reduce the impact of traffic on people's quality of life and Wiltshire's built and natural environment, and manage the transport network in a sensitive and appropriate manner."

Regrettably this does not occur even now as traffic, including a considerable number of tourist coaches, use the B390 as a rat run. By locating the Visitors Centre at Airman's Cross, this situation will only be exacerbated. It is therefore imperative that the following actions are taken to deflect traffic from this route:

- a. At Airman's Cross. The westbound exit must be closed so that traffic from the SVC is directed down to the Longbarrow Roundabout and the A303. Traffic from the south can go straight over the new Airman's Cross roundabout or they can take a proposed beginning new slip road, starting well before the roundabout, which will take them to the A360 and on to Devizes. Traffic coming from the SVC wishing to go to Devizes will need to go down to the Longbarrow Roundabout and return north and use the filter lane.
- b. At Longbarrow Roundabout. The closure of the A344 will increase the traffic activity at this roundabout. The latter already becomes clogged at peaked times and this additional load will not be properly solved by adding extra lanes on the A303 approaches. The traffic flowing to and from the SVC must be able to get on to the A303 easily and the traffic on the A360 transiting through the roundabout must also be able to flow without undue impediment. The solution may propose traffic lights or a flyover.

- c. <u>Signing</u>. It is imperative that the signing, not only to the SVC but also away to other tourist locations, such as Bath, is clear and unambiguous. This is to ensure that traffic is directed away from rat runs such as the A360/B390 to get to Bath.
- 3. We trust that these comments will be taken into account during the scrutiny of this planning application so that Wiltshire's aim to reduce the impact of traffic on people's quality of life can be met.

, , ,

### **SOUTH WEST REGION**

Direct Dial: 0117 975 0663

Mr Adam Madge Wiltshire Council South Planning Office 61 Wyndham Road Salisbury

Wiltshire

SP13AH

Direct Fax: 0117 975 0684

Our ref: P00080089

26 November 2009

Dear Mr Madge are summathatically decimed law leavend single storay building(s) that bland into the

AIRMEN'S CROSS AT JUNCTION OF A344 AND A360, SALISBURY, WINTERBOURNE STOKE, WINTERBOURNE STOKE, WILTSHIRE, SP3 4DX

Notification under Environment/DCMS Circular 01/2001 Town and Country Planning (General Development Procedure) Order 1995 Application for Planning Permission by English Heritage.

Airmen's Corner land South East of the junction of the A360 and A344 Salisbury SP3 4DX Application No S.09.1527.FULL

Decommissioning of existing visitor facilities and a section of the A344; the erection of a new visitor centre, car park, coach park and ancillary services building and related highways and landscaping works.

Notification under Environment/DCMS Circular 01/2001 **Application for Listed Building Consent by English Heritage** 

Airmen's Cross at Junction of A344 and A360. **Application No S/2009/528** 

Relocation of the Airmen's Cross memorial.

The List of Documents received, upon which this advice is based is as set out the full planning application.



English Heritage is subject to the Freedom of Information Act. All information held by the organisation will be accessible in response to a Freedom of Information request, unless one of the exemptions in the Act applies.

#### **SOUTH WEST REGION**

Thank you for your letters of 19 October notifying English Heritage of an application for planning permission by English Heritage relating to land at Airmen's Corner south east of the junction of the A360 and A344 Salisbury SP3 4DX and an application for listed building consent by English Heritage to move the Airmen's Cross at the junction of the A344 and A360.

We do not intend to comment in detail on these proposals but we offer the following observations to assist with determining the applications.

## **English Heritage advice**

We confirm that these applications by English Heritage

- were the subject of pre application discussion within English Heritage
- were considered against the standards we apply in advising on planning applications
- are submitted with the corporate support of English Heritage.

With reference to the impact of these proposals on the historic environment, you are particularly referred to sections 5.8.11 and 5.8.12 of the Environmental Statement which fully represent the view of English Heritage. Our overall view of the impact of the application on the historic environment is set out in section 5.8.13 which is worth quoting in full:

"On balance, taking into account the benefits of the proposed development in sustaining the Outstanding Universal Value of the Stonehenge WHS, the overall cumulative effect of the Scheme would have a **Large Beneficial** impact".

With reference to the listed building consent application to relocate the Grade II listed Airmen's Cross, you are referred to section 5.6.58 of the Environmental Statement. This memorial dating to 1912 has been relocated at least once already during a previous reconfiguration of the road junction. The proposed new location will allow visitors to access it more safely than at present, and is nearer to the original crash site, the event which it commemorates.

# **Next steps**

We advise that this case should be determined in accordance with government guidance, development plan policies and with the benefit of any further necessary



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# SOUTH WEST REGION

conservation advice locally. It is not therefore necessary for us to be consulted again on this application.

Yours sincerely

# **Amanda Chadburn**

Inspector of Ancient Monuments E-mail: amanda.chadburn@english-heritage.org.uk



English Heritage is subject to the Freedom of Information Act. All information held by the organisation will be accessible in response to a Freedom of Information request, unless one of the exemptions in the Act applies.



SHIRE Lansdowne House
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Tel: 01380 722157 Email: wiltscpre@btconnect.com Web site: www.wiltshire-cpre.org.uk

Mrs Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road Salisbury Wiltshire SP1 3AH. 25<sup>th</sup> November 2009

Dear Mrs Howles,

Planning Application S/2009/1527/FULL: Decommissioning of existing visitor-facilities and a section of the A344; erection of a new visitor-centre and other associated works at Airman's Corner and Stonehenge

At a meeting of our Executive Committee this week, it was agreed that I should formally register **CPRE's objections to the proposals** put forward in the above application. It was very much regretted that it had been difficult if not impossible for most of the Committee members to acquaint themselves adequately with the application documentation in the time available.

I wrote to you on 30 October about the application and received an answer from Mr Madge, dated 2 November. I respond to his comments within our response below.

As mentioned in our earlier letter to you, CPRE has been involved in proposals for Stonehenge for over a decade and is currently represented on the Stonehenge Advisory Forum which helped to produce the Stonehenge Management Plan. We are therefore conversant with planning policy and the Management Plan for the World Heritage Site (WHS) and are **not** in agreement with the Council that the proposals do not constitute a departure from planning policies for the WHS and Special Landscape Area. The list of planning considerations given in our earlier letter on the proposals could be expanded considerably to support our view that the proposals now before us are a serious departure from the safeguards we have been advised by Government should be in place to protect the WHS and its Outstanding Universal Value (OUV).

The applicant has admitted that the scheme would impact adversely on the WHS and its attributes of OUV (Environmental Statement, para.5.7.27); so there can be little doubt that our views are shared by English Heritage in this respect.

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It remains our view that the size, unnecessarily prominent 'flagship' design and lighting of the proposed visitor-centre, together with the impact of the associated works, including the highly visible car and coach parks, and the improved roundabouts, would be such as to severely damage the OUV of the WHS, including the settings of the Site and its monuments. The scheme would clearly not enhance the high quality landscape of the Special Landscape Area. The proposals for lighting the roundabouts at Airman's Corner and Longbarrow Crossroads are particularly insensitive, especially as the Management Plan aims for a reduction in light pollution at the WHS (Policy 31 (p.102) and para. 14.4.19), in order to protect that attribute of its OUV which is related to the skies and astronomy (Attribute 4; see Management Plan, p.28).

We are disappointed that detailed proposals for the scheme were not brought first to the Stonehenge Advisory Forum where our input might have encouraged a more acceptable scheme to have been brought forward.

Although the site chosen at Airman's Corner is not well suited to the purpose, being in the open countryside of the WHS and Special Landscape Area, we would be prepared to accept it on a temporary basis, so long as the scheme were amended to meet the strict requirements of development in a visually sensitive location such as this.

#### We suggest the following amendments:

Mr Adam Madge
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Our ref: P00080089

26 November 2009

more sympathetically designed low-key and single-storey building(s) that blend into the

(i) landscape and are not highly visible from a distance;

# Concerning information missing from the application

There is still missing or inadequate information which we believe is required to make a fully informed judgment on a number of important issues.

## More information is still needed for comment on such matters as:

- (i) the siting of *external lighting* associated with the scheme;
- (ii) the practical *operation of the visitor-transit vehicles* (turning circles and sufficient room at road junctions appear to be lacking);
- (iii) the *possible pipe line required for mains water* at the new visitor-centre and the archaeological implications of this proposal;
- (iv) the *pedestrian route to the henge along the A344* that it is proposed would be shared with the visitor-transit vehicles, rendering the experience both unattractive and potentially dangerous for walkers;

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- (v) detail concerning the entrance doorways for the timber-faced 'pod' for the visitor centre;
- (vi) how much might be seen of the 'hub' building in views from the wider landscape, especially if it is to be lit (this 'underground' area is currently screened by a structure that apparently will no longer be required);
- (vii) A *Green Travel Plan* setting out proper provision for cyclists and walkers and a range of choices for travelling to the Site and entering it at various locations. The siting of the visitor facilities so far away from any bus and train station renders them unsustainable from a walker's or cyclist's point of view. More cycle racks should be provided and an A303 pedestrian/cycle underpass should be included, possibly at Stonehenge Bottom. Management Plan Policies 4c and 4d, and paras. 14.5.3 and 14.5.4 demand wide dispersal of visitors around the Site.

#### **Appropriate Assessment**

We are puzzled by Mr Madge's comments concerning this aspect of the scheme since such an Assessment is required under European legislation in respect of the River Avon SAC. The Environmental Statement (Table 7.1) indicates that an Appropriate Assessment is considered necessary by English Nature in respect of 'the impacts on the aquifer in relation to surface water, potable water supply and foul drainage'. The Appropriate Assessment must be undertaken before determination of the application but at the present time the necessary information regarding water abstraction/supply and waste and surface water removal is still lacking (ES, 10.1.7–8; 10.3.22; 10.4.9, 10.4.33; etc.) and may not be available for some months. In the interest of natural justice, we continue to believe that the public should be informed that an Appropriate Assessment has been undertaken, and all its requirements have been fulfilled, before the application is determined; and that the document itself should be available at the same time so that we may comment on it, if necessary.

#### In conclusion

We have asked the Government Office for the South West if they would consider recommending a call-in for this application. We believe that the obvious conflict between what is proposed and the planning safeguards for the WHS; the lack of information on a number of crucial issues; and the inadequacy of provision for cyclists, and routes for walkers in the wider landscape of the WHS, are all matters that need to be considered more fully. The democratically agreed intention to protect and rehabilitate the WHS and its Outstanding Universal Value through the planning process may otherwise be in question.

We suspect that the shortage of time in which to complete the proposed works by 2012 has engendered undue urgency in relation to the application; and the only possibility now of fair consideration of the scheme would be through deferral of a decision by the Council until such time as our concerns are met by amendments to the scheme and provision of the missing information – or a full hearing at a Public Inquiry which would draw out all the information needed to make a fully informed decision.

Yours sincerely,

John Blake Secretary, CPRE Wiltshire Branch

cc. Mr Ian Wallis, GOSW

Wiltshire Branch CPRE, Registered Charity No 211318, is working for a beautiful and living countryside It is active locally and membership is open to all

Date: 24 November 2009

Our ref: Your ref: S/09/1527

Adam Madge Development Services Wiltshire Council 61 Wyndham Road Road 18 Salisbury Block 3 Burghill Wiltshire Road SP1 3AH Westbury on Trym

Bristol BS10 6NJ

0300 0601679

Dear Mr Madge

# ENVIRONMENTAL STATEMENT AND PLANNING APPLICATION FOR PROPOSED VISITOR CENTRE AND ASSOCIATED ENVIRONMENTAL IMPROVEMENTS AT STONEHENGE

Thank you for consulting Natural England on the Environmental Statement and Planning application for the proposed new visitor centre and environmental improvements at Stonehenge.

Natural England supports the overall aims and objectives of the Stonehenge Environmental Improvements alongside the commitment to integrated management and the protection and enhancement of the natural and historic environment and landscapes within the WHS. Natural England supports the principal elements of the proposal to a) improve the visitor facilities and interpretation of the World Heritage Site (WHS) and b) the closure of the A344 and associated enhancements adjacent to the Stones.

We would like to make the following comments on the Environment Statement and planning application details supplied. There are several key areas where the design solutions/ detailed designs have still to be worked up and it has therefore been difficult to comment in full. Our response below has highlighted the need for further information details required so we can fully assess the scheme or whether proposed mitigation will be sufficient.

In recognition of the aims of the European Landscape Convention to which the UK has signed up to and the World Heritage status of Stonehenge, Natural England would like to see an exceptional solution of high environmental and sustainable design standard that reflects the uniqueness of the site. We believe that the final option should also look to maximise environmental gain not just mitigate for potential impact.

## **Landscape Character and Visual Amenity**

Natural England expects high standards of site restoration around the stones and site planning and design of new infrastructure associated with the visitor facilities. In many respects, particularly around the stones, the consultation process and the current proposals, have achieved this.

#### **The Stones**

The landscape context for the stones will be significantly improved by the removal of the existing visitor facilities that are currently so close to the stones, and by the landscape restoration work. Natural England welcome the fact that the proposals keep the service and access infrastructure at this site to a minimum, because the historic landscape character is expressed through wide views, natural landform punctuated by the archaeological features and open grassland.

It will be imperative that the works are implemented appropriately so that the restoration of the existing road to grassland, and the associated verges, is as sympathetic to the existing/adjoining grassland sward as possible; an appropriate seed mix and grazing management should be specified to achieve this within a certain period of time; the annual management regime will affect the appearance of the grassland.

We feel that thought should be given to alternative materials for the pedestrian access surfacing into the immediate area of the Stones. Artificial green finishes to most materials used in the countryside can be very difficult to blend effectively with natural vegetation and is likely to look incongruous until the finish has bleached/weathered over years. Other options such as a dark coloured aggregate or preferably consideration of a grass seeded, robust geo-textile matting suitable for pedestrian use may be more appropriate. It would be helpful if alternative options could be provided for consideration by the parties involved, rather than one proposed solution.

# The new infrastructure for the visitor centre -design and connection with the landscape

We welcome the systematic, logical approach taken to the selection and site planning of the new facilities. Natural England has been closely involved with the decision-making process throughout. The coach park, a potentially conspicuous component has been well planned into the landscape, being situated on previously disturbed ground, utilising the existing belt of mature beech trees and with new planting to mask the site (see below). This is a site that might otherwise have been available

for the car park/visitor centre, but will now accommodate the coach park.

The visitor centre design has not been quite so easy to track during the design process, and whilst the footprint for the building had been evident in the conceptual design stage, the architectural design -and the relationship with the landscape context -has not been evolved through the same degree of wider discussion. The result is that while the car park and access road fit more organically into the land form,

the building and associated paving appear to be "at odds" both with the grain of the land form (i.e. the building straddles the head of the shallow valley) and the overall aim to reduce the visual impact of the building (i.e. the use of a canopy that increases the perceived height and mass of the building – particularly from the middle distance). A model of the building to scale, in the context of the landscape would assist in these judgements and facilitate better stakeholder input.

Also, whilst the building has some interesting features in the twist to the canopy roof and the irregular pattern of the supports, it does not relate very strongly to the surrounding landscape, as might be expected of a visitor centre within the Stonehenge World Heritage Site. (this may have been the intention re the design philosophy-re light and reversible, deferential to the Stones) The building does have some similarity in scale to the modern barns found in the area, although the barns are positioned and designed with shelter from wind and rain in mind. The proposed design appears to relate to a more benign climate than can be expected in the vicinity of Salisbury Plain where the exposure to the elements is a significant constraint on landscape and building design. In this respect it may be appropriate to consider lowering the height of the roof and shaping the roof to sweep down to deflect the wind and protect visitors; this would also offer some scope

to make some reference to the local vernacular and visually "anchor" the building into the landscape.

The paved areas associated with and external to, the building are very rectilinear in contrast to the more organic pedestrian approach paths. We would advise that further consideration is given to the variety (e.g. use of a simpler palette) in paving materials. Paved areas around the building should be sympathetic to the surrounding landscape and the proposed regular "apron" of paving creates an abrupt boundary against the adjoining landscape; therefore there may also be scope to soften the lines of paving within and around the building (relating to the curves in the roof).

A more organic, natural character could be reinforced by the use of some selective scrub vegetation planting in the vicinity of the building and the car park. The shallow valleys in the surrounding landscape often contain some scrub vegetation, and planting or natural regeneration of scrub has been discussed at the conceptual stages of the project, where this did not conflict with the archaeological value.

Scrub vegetation would also help to blend the car park into the landscape, break up views of the cars and help to improve the landscape context of the reconstructed Neolithic dwellings that may otherwise be perceived as incongruous with the visitor centre. Was consideration given to using such scrub when combining the options 2 and 5 of the preliminary designs? It would be useful to model this option or provide detailed reason for why it was discounted.

With regard to the building / Visitor centre design were other design options, use of sustainable green building materials, green roof considered ?: this is not outlined in the Design and Access Statement.

### Large coach park adjacent to existing line of beech trees.

We would advise that the planting should be designed to give an external shape that is sympathetic to the surrounding landscape, using locally characteristic plant species rather than a standard alkaline-tolerant planting mix such as Prunus spinosa (blackthorn) and Crataegus monogyna (hawthorn), Cornus sanguinea (dogwood), Corylus avellana (hazel) and Viburnum opulus (guelder rose) and Viburnum lantana (wayfaring tree).

# **Landscape Management Plan**

We support the intention to produce a detailed Landscape Management Plan. This should set out the full details of the planting and landscape design details and longer term management proposed to achieve the desired screening, landscape and biodiversity objectives. The landscape design plan should be an holistic integrated document covering historic environment, wildlife, access and landscape considerations. Natural England would welcome the opportunity to comment on this document. The Management Plan should be a legally enforceable requirement of planning approval. To enable full evaluation /assessment of the impacts and proposed mitigation the Landscape Management plan should be agreed by the relevant parties and consultees before a final planning decision is made.

# Decommissioning of the A344, existing Visitor Centre and car park

The proposals for the site of the existing visitor centre and car park have been well designed and will make a tremendous benefit to the landscape around and the setting of the Stones at Stonehenge. The proposed use of suitable chalk grassland species rich grassland mix will also have a biodiversity benefits. We would however raise the following points regarding the detail:

We note in the current proposals that it is not intended to remove the existing road surface in total along the length from Byway 12 and on the site of the old car park. I could not find an explanation the documents for why this is the case. We would recommend that it would be more sustainable and enable better establishment of the desired

sward to remove the surfacing along the entire length not required for transit vehicles and car park rather than just puncturing the existing road surface and over topping with topsoil. Was thought given to this but discounted for practical reasons? Has there been experience of good longer term establishment using this technique?

More detail regarding the proposed methods and species is required. We would welcome the opportunity to comment on the methods set out in the Construction and Environmental Management Plan (CEMP), Ecological Construction Management and Monitoring Management Plan (EEMP) and Landscape Management Plan.

With regard to the selected use of a sports rye grass seed mix on areas susceptible to high visitor pressure/ footfall-have alternative amenity/ sports turf mixes been investigated that would blend with adjacent existing recreated grassland and which would require less watering to sustain them.

### Lighting

Sections 6.6.7 and 6.6.9 of the Landscape Section of the Environmental Statement summarise the landscape and visuals impact of the lighting associated with the operation of the new visitor Centre and associated car parking and other infrastructure. The sites are not only located at the margins of the World Heritage Site largely characterised by its historic landscape with tranquillity, open views and dark skies, but also the wider landscape is open and relatively sparsely populated with few points of more intensive lighting. The impact of lighting especially with regard to the new roundabout at Airman's Corner (and Longbarrow roundabout) is a concern to Natural England, as potentially one of the largest new impact in terms of visible infrastructure by day( 19 columns) and light pollution at dusk/ night time/dawn. Horizontal cut off to prevent spill of upward lighting may not be enough to avoid flare from the site. We are pleased to see that this issue is being addressed and the intention is identify the optimal number, design and height of lighting columns. Initial proposals for lighting design have been given within the ES and Design Statement. The final scheme has yet to be finalised. We would welcome the opportunity to comment on the final details. The final lighting design needs to minimise the impacts of road lighting on the night sky and surrounding landscape, through the use of baffled/ directional lighting, automatic dimming of lights during periods of low traffic and other appropriate lighting technologies to keep visual impacts to a minimum.

The final lighting design should be agreed prior to planning approval and final strategy included as a legally enforceable planning condition.

#### **NATURE CONSERVATION**

# **Protected Species**

The ES has indentified the key species and habitats which could be adversely impacted by the proposed development. The proposed mitigation and amelioration proposed as set out in sections 7.4.2 to 7.4.4, 7.4.18 and the draft Construction and Environmental Management Plan (CEMP) should prevent impact on the protected species recorded. The final CEMP should be agreed in advance and implementation secured by appropriate legally enforceable means or planning conditions.

# **Mitigation Measures**

We would endorse the avoidance / minimisation measures set out in section 7.4.2. With regard to the statement regarding the Dew pond will its proposed use as a soak away adversely impact on the potential of this pond as a habitat?

## **Amelioration/ reduction Measures**

Natural England support the production of a Construction Method Statement (CMS) and Construction and Environmental Management Plan (CEMP). These documents should be agreed in advance of any planning decision. If planning approval is given the implementation of the agreed plans should be required as legally enforceable planning conditions. (See comments regarding the River Avon and River Till SSSI / SAC below).

The draft CMS has identified the main key issues and suggested suitable mitigation/ method statements. However further information is required e.g.full final details of SUDS, ECMMP etc before the impacts on the River Avon and River Till SSSI / SAC can be fully assessed. This additional information will be needed before a planning decision is made and as part of the Appropriate Assessment.

**7.4.5 Hydrological mitigation**-see below – more data is required to inform the Appropriate Assessment.

We endorse the proposals to use local seed/ hay for habitat creation/ landscape work and local native trees and shrubs as part of the planting proposals. Specific details will need to be agreed.

# 7.4.6 Ecological Monitoring and Management Plan (EMMP)

Again we support the production of this document and integration of land management with visitor access and circulation. As will other proposed plans and proposed mitigation, If planning approval is given there should be subject to implementation of these plans as a legally enforceable planning condition. The key details should be agreed prior to a planning decision being made.

# Operational Impacts 7.4.7- Visitor Access- Public access and impact on birds other wildlife.

Natural England agrees with the key bullets in this section, particularly the need to carefully manage the access to protect nature conservation features. The intention to interpret the wildlife and wider landscape is particularly welcome.

The proposed visitor Management strategy should look in more detail at the potential access/ disturbance impacts on the key bird and other species. We would support its production and implementation, which should be assured through suitable legally enforceable conditions.

## 7.4.10/ 7.4.11-Waste water/ surface water drainage

We would welcome the SUDS and other measures outlined to minimise water consumption and potential pollution. The final waste water and surface water drainage strategy documents will need to be agreed in consultation with EA/NE prior to planning decision to ensure they will achieve the mitigation required. A suitable legally enforceable condition should be used to ensure the implementation should planning approval be granted.

**7.4.17 Lighting** – Natural England agree with that measures should be taken with regard to lighting design and timing of operation to minimise impact on stone curlew, foraging and commuting bats and other birds. This element should be included in final lighting design and strategy to be agreed in advance and implemented as a legally enforceable condition.

We welcome the proposed calcareous habitat creation and use of native trees and shrubs as set out in section 7.4.19, 7.6.15 and Design Access Statement. The ES does not however state how much grassland is to be created versus the area lost and area of improved grassland to "enhanced". There is currently no detailed specification of what enhanced will entail. The details should be included in the CEMP, EEMP and Landscape Management Strategy.

# Salisbury Plain SSSI/ SAC/ SPA

Based on the evidence presented in the ES, it is not envisaged that the development itself would have any direct effects on the designated features. Changes in visitor usage could however impact on potential future stone curlew nest sites. Provided the suggested mitigation as set out in section 7.4.7, 7.6.10 we would agree with the conclusion that there should be no likely significant effect on the SAC/ SPA. Precise details of the required mitigation should be agreed as part of an integrated Access Visitor Management Strategy. This should be produced prior to a planning decision being and made in order to confirm the assessment. Planning permission should be subject to the production and implementation of the strategy.

# River Till and River Avon SSSI/SAC

The nature conservation importance of the River Till and River Avon System Site of Special Scientific Interest and Special Area of Conservation (SAC), arises from the range and diversity of riparian habitats and associated species. The SAC qualifying features include one habitat (the watercourse characterised by floating *Ranunculus* (water crowfoot) and *Callitricho* (starwort) vegetation) and five species

(brook and sea lamprey, bullhead, salmon and Desmoulin's whorl snail). All are dependent upon the maintenance of high water quality and surface and ground water flows. The habitat quality is sensitive to nutrient enrichment.

Given the proximity of the above European Protected Sites and potential impacts, the proposed development will need to be subject to

the Appropriate Assessment process in accordance with the Habitats Directive and Regulations (*The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)*).

The ES has identified the potential indirect impacts on the River Till. The information in the ES is however currently insufficient to fully assess the likely significance e.g.

- Page 6 of the Water and Waste Water Strategy states that the aquifer needs further investigation to determine whether it can support the abstraction rate from the aquifer.
- I Further detail is required on the predicted water usage and impact of the demand for water, potential pollution expressed in terms of impact on the flow and water quality conservation objectives site specific standards.
- The planning application does not clearly set out the difference between the current water consumption and that expected in the new visitor centre and hub. We would also query the amount of water needed for irrigation at the Hub. Is this amount of water needed How was it calculated? Could other methods/ solutions be designed to reduce this level of use without impact on the archaeological conservation of the site (e.g. use of alternative seed mixes?)
- Further detail on the design and operational arrangements for mitigation measures proposed for the construction and operational stages and for management post construction are required in order for Natural England to be satisfied. The detail will need to be agreed with the Environment Agency and Natural England.
- I Ground water heat pump-are there any potential impacts re temperature changes of water circulated back into the aquifer?

# **ACCESS AND GREEN TRAVEL PLAN**

Natural England supports the objectives within the planning application to encourage the use of more sustainable uses of transport to reach the Visitor Centre and explore the wider landscape. This is an aspiration of the WHS management Plan. With this in mind would it not be possible to include more facilities for cyclists rather than provide the minimum required? The development and implementation of an integrated Green travel Plan is welcomed.

I hope the above comments are helpful. Please contact me if you have any queries.

Yours sincerely

Stephanie Payne Conservation and Land Management Adviser



Mr Adam Madge Development Control Planning Office Wiltshire Council 61 Wyndham Road Salisbury SP1 3AH

25th November 2009

Dear Adam Madge,

# STONEHENGE VISITOR CENTRE & CAR PARK: ICOMOS-UK Response to Application S/2009/1527

ICOMOS-UK welcomes the chance to comment on this application which it sees as substantial progress towards providing much needed improved visitor reception arrangements at Stonehenge. The following views are those of the organisation and reflect the revised Stonehenge Management Plan, the World Heritage Planning Guidance Circular, and the UNESCO World Heritage Operational Guidelines, 2005.

In 1986 when Stonehenge was inscribed on the World Heritage List (as part of Stonehenge, Avebury and Associated sites), the State Party gave assurances that 'the closure of the road which crosses the avenue at Stonehenge was receiving serious consideration as part of the overall plans for the future management of the site'. We are delighted that the A344 is to be closed where it passes the Stones, some 23 years after the assurances were given.

We put forward our detailed comments on the proposed scheme under the following headings:

- 1. Aim of the new Visitor Centre and proposed access route
- 2. Consultation
- 3. Visitor Access/Tourism and Landscape Strategies
- 4. Permanence of proposed building
- 5. Siting of the proposed building and car park
- 6. Impact of the proposed Visitor Centre and Car Park on the WHS

- 7. 8. A 344 Approach to Stones Function of the Visitor Centre
- Local Communities
- 10. Conclusions

International Council on Monuments & Sites UK 70 Cowcross Street London EC1M6EJ

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ICOMOS-UK is a Registered Charity no: 1057254



- 1. Aim of the new Visitor Centre and proposed access route: As well as ensuring that Outstanding Universal Value (OUV), authenticity and integrity are sustained, we consider that the overall aim of the new visitor centre project must be to:
  - Optimise benefits by allowing greater understanding of, and access to, the whole World Heritage site (WHS)
  - Allow visitors to appreciate the Stones in an inspirational way
  - Contribute to improved landscaping of the WHS related to the visual interlinkages of monuments in the landscape
  - Contribute to better management of visitors in line with the carrying capacities of key parts of the WHS

The scheme must therefore provide substantial cultural as well as environmental benefits. As presented the scheme is said to have cultural dis-benefits, as it impacts adversely on OUV, but that these are said to be outweighed by benefits for visitors. We do not consider that such dis-benefits are acceptable and moreover do not consider that are necessary if the scheme is modified.

The visitor centre needs to be truly sustainable in cultural, economic, environmental and social terms in the way its design concept meets the needs of visitors and the needs of the WHS, through delivering benefits to both.

ICOMOS-UK considers that a major intervention within the WHS, largely funded by public funds, should contribute major cultural (and environmental) benefits. We consider that the proposed Visitor Centre should deliver cultural benefits related to major landscape improvements in relation to the monumental and visual attributes of the WHS, to major access benefits for visitors to the wider landscape, and to better visitor management that will help improve the conservation of the WHS. We also consider that it is essential that it does not cause dis-benefits in terms of adverse impact on the attributes of OUV.

We consider that the first of these benefits could only be achieved with considerable modifications to the overall design of the proposed building, car park and screening; in essence a 'down-grading' of the scheme so that it is lower key, recessive, sits well in the landscape and does not impact adversely on the attributes of OUV. The second and third benefits need to be achieved

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through the way the centre operates in terms of it being more than a visitor service provider. The dis-benefits can be removed by changes to the design and landscaping.

2. Consultation We are disappointed that the process for designing the visitor centre has not involved more engagement with stakeholders, in the spirit of consultation envisaged in the Management Plan, and in line with English Heritage guidance on pre-application discussions for major applications. Early discussions, at the time the brief was being drawn up for the Architect, could, in our view, have allowed for an understanding as to how a new building and car park could be put on the Airman's Corner site without adverse effects on OUV, through articulating clearly the attributes of OUV. These adverse effects and possible mitigation are discussed in more detail below.

ICOMOS-UK considers that with early consultations, the adverse impacts on OUV of the proposed Visitor Centre could have been avoided.

3. Visitor Access/Tourism and Landscape Strategies: We consider that a visitor centre would have benefitted from being developed within the frameworks of Visitor Access/Tourism and Landscape Strategies for the overall WHS.

An Access Strategy could have set out aims for how visitors might gain access and understanding of the attributes across the whole of the WHS, and thus how a Visitor Centre could contribute to providing enhanced understanding and access – as envisaged in Policy 4d of the Management Plan – across the whole WHS, and through encouraging green transport – walking, cycling and the use of buses.

ICOMOS-UK considers that an overall Access Strategy that relates the proposed Visitor Centre to enhance access and understanding of the whole WHS should now be developed.

A Landscape Strategy could have evaluated the current landscape of the WHS, both for use, such as grazing, arable and tree planting, and for visual aspects such as views and panoramas. On the basis of these evaluations, a Landscape Strategy it could have set out a medium term vision for the overall landscape that encompassed enhanced views between key attributes and enhanced key views out of the WHS – as envisaged in Policies 3d, 3h and 3i- and improved tree planting in the overall landscape. Such a vision would have allowed understanding as to

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how a Visitor Centre and car park might be screened so as to contribute towards agreed overall landscape improvements.

Without either of these strategies in place, there is, in our view, a danger that the Visitor Centre will only provides narrow access to the Stones, will not be linked to wider landscape access, and that the screening of the Visitor Centre and car park will incorporate elements that do not contribute positively to visual inter-linkages between key attributes of OUV, to key views out of the property, or to improvements in the overall visual character of the property.

ICOMOS-UK considers it essential that the landscape proposals for all three elements of the site – visitor centre, car and coach parks – should be interrelated and related to a Landscape Strategy, which should now be developed.

- 4. **Permanence of proposed building** Although the initial proposals for the Visitor Centre were for a short-term, interim building, with a life span of up to 25 years, we consider that what is now being proposed, in terms of scale of intervention, size, complexity, and particularly cost, cannot justify so many resources being spent for such short-term benefits: this would be inherently unsustainable in terms of the amount of energy expended. We therefore consider that the building must be considered, to all intents and purposes, as a permanent structure.
- 5. Siting of the proposed building and car park Although we support in principle the site at Airman's corner, given the open nature of the proposed site, we consider that caveats set out in our response to the Options appraisal for the Visitor centre (in October 2008) are highly relevant:
  - A large car park for 800 cars would only be acceptable on the edge of the WHS if not visible in the wider landscape
  - 2 All buildings will need to be carefully sited, have sensitive low key designs and minimal light spillage
  - 3 Car parks will need to have maximum area of grass surface
  - 4 The Visitor Centre, restaurants, shops, and car parks will need to be as small as possible
  - 5 The Visitor Centre should promote access into the wider WHS landscape, particularly the arable reversion areas, through a detailed access and knowledge strategy
  - Further detailed work will need to be undertaken to assess the impact of any proposals on the attributes that carry OUV.

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We consider that all of these elements should have been included in the overall brief for the current project and are concerned that the current proposals cannot be said to:

- Be low key
- Have minimal light spillage
- Include maximum grass coverage and adequate screening in the car and coach parks
- Be as small as possible, yet adequate in scope
- Promote wider access to the landscape
- Be based on a clear articulation of the attributes of OUV that will be affected

ICOMOS-UK supports the concept of a Visitor Centre being sited at Airman's Corner, subject to modifications to its design and landscape arrangements – as set out below.

6. Impact of the proposed Visitor Centre and Car Park on the WHS We consider that it is essential that the proposed Visitor Centre and Car Park is assessed for any negative impact on the attributes of OUV, and for positive impacts on visitor access and enjoyment.

Not all aspects of the WHS are related to OUV: those that are, known as attributes have been set out clearly in the revised Stonehenge Management Plan.

In our view, the starting point for evaluating impact must be an assessment of the attributes of OUV that might be affected by the proposals, including the strong visual inter-relationships of monuments, which appear to reflect their careful and deliberate placing in the landscape. It is important to acknowledge that although the proposed site is on the edge of the WHS this does not mean that it is not an extremely important part of the site: the more that has been discovered about the area, the more interesting and significant it has become.

The key attributes affected by the proposals are the:

- Lesser Cursus and associated barrows
- Cursus and associated barrows, particularly views out from the western end of the Cursus to the west (as shown in Figure 9)
- Northern Winterbourne Stoke Barrows
- Visual links between each of these and particularly views from the major visual axis between the northern Winterborne Barrows linear group and the henge site just south of the Cursus

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If these attributes are to be conserved, then it is essential that the proposed building does not impact adversely on them.

We consider that it is essential that any interventions on the site should sustain the OUV, authenticity and integrity of the WHS through protecting the attributes of OUV.

In ICOMOS-UK's view, the current designs for the proposed building, car park and roundabout will impact adversely on the attributes of OUV (which include visual links between monuments). We further consider that these adverse impacts could be avoided by changes to the design of the proposed centre, car and coach parks, and roundabout. Such changes should limit the height of the building, the light spill from it, the screening of the visitor centre, car and coach parks, and the lighting on the new roundabout.

6 a) Height of the building and light spill: The roof of the building rises to 8 metres and with its light grey steel membrane cover is designed to be a striking addition to the landscape rather than a structure that is low key and recessive. It will have a major negative impact on views on the attributes listed above and the views between them, in respect of its height and the light spill from it.

We consider that the current style of the building with its tall, widespread, curved roof is fundamentally unsuited for the open landscape site and creates a disturbing interception of the gentle valley landform. We consider that the two proposed low buildings within the over-sailing roof structure should be roofed separately and reflect the idiom of farm buildings sitting low in the landscape.

In ICOMOS-UK's view, the height of the building should be reduced to a level that ensures that it does not impinge on downward views west from the Cursus (as shown in Figure 9), on views from the major visual axis between the northern Winterborne Barrows linear group and the henge site just south of the Cursus, and on views between the northern Winterborne barrows and the Lesser Cursus and barrows. Further, when the roof is re-arranged lower in the landscape, the colour should be amended to ensure it is not light or reflective.

The proposed building has two main sides: one that faces the car park and one that faces towards the Stones. The latter should not intrude into the landscape.

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ICOMOS-UK considers that the side to the car park could be permeable and with limited light spill but that the side facing towards the Stones should be as blank as possible with no light spill, as should the two other sides. The building(s) should be surrounded by a substantial native thicket of chalkland shrubs and small trees, two to three times the surface area of the building, to provide effective cover and light suppression from the Cursus and from other attributes, (with archaeological evaluation prior to determining the precise shape of the planting). If seeing the position of the building from a distance is considered desirable, a flagpole would suffice.

6 b) Proposed Road Access and Car Parking Proposals There are two aspects of these proposals that are cause for concern: light pollution and tree screening.

### Light pollution:

The proposed lighting scheme for the Airman's Corner roundabout and the improvements to the Winterbourne Stoke roundabout (up to 18 lights for each) would be exceptionally damaging in terms of light spill on dull days and early evenings. We understand that the number of lights is advisory only. We consider that there should be no roundabout lighting and only ground level lighting in the car and coach parks. Traffic lights would be preferable to street lighting.

Currently the WHS is remarkably unspoilt by light pollution. We consider that it would be highly regrettable if the proposed visitor centre, parking areas and ancillary roundabouts, were to adversely effect this situation.

### Tree Screening:

Had a Landscape Strategy been developed, it would almost certainly have concluded that the overgrown beech hedge alongside the A344 at Airman's Corner was an undesirable addition to the landscape, as seen from the Cursus and in terms of views south from the Lesser Cursus.

We are therefore concerned that this landscape feature has become a key part of the landscape screening proposals for the proposed coach park. First the overgrown hedge is not sustainable in the long term and secondly it looks unattractive in the landscape views from the Cursus and blocks views south from the Lesser Cursus.

ICOMOS-UK considers it essential that the landscape proposals should not rely on the existing overgrown beech hedge and that it should be removed and

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replaced by low-growing trees such as thorn or blackthorn that do not block views across the shallow valley west of the Visitor Centre.

Further we consider that the proposed screening to the north of the coach park is unattractive in following tightly the boundary and should be extended to form an extensive native copse to screen the coaches without intercepting views from the Lower Cursus to the Winterbourne Barrows.

For the new car park which is on the north facing slope, we consider that native shrub and small tree planting should envelope and spread beyond the parking areas to provide complete screening from key attributes.

Overall we consider that the screening for all three areas – visitor centre, car park and coach park – should be merged to create an overall low-growing dispersed thicket, typical of chalk downland.

*7*. A 344 Approach to Stones The current proposals are to take the land 'trains' along the current tarmac of the A344 until just past byway12. The remainder of the A344 will be grassed over but with a reinforced surface that can take vehicles. The existing car park will have grass put over the tarmac.

We consider that the land 'train' should stop to the west of byway 12, rather than crossing it, in order that the by-way can form a divide between the pedestrian only areas and the downgraded road.

We are concerned that the width of the current tarmac A344 does not make for an attractive feature in the landscape nor an attractive and inspirational approach to the Stones.

We consider that the remaining A344 road should be narrowed, by allowing grass to grow over the edges, that all white lines and signage should be removed, and that the surface should be covered with gravel coated resin to give it a more modest feel.

8. **Hub Building** The hub building is necessary to provide certain resources near the Stones. We do however consider that the current designs for a sunken building within a 'hole in the ground', fenced around its edge, need amending to ensure that the overall site

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and particularly the fence, do not impact adversely on views from the Avenue as it nears the Stones.

We consider that the ground around the hub (which has already been disturbed) should be landscaped to create an inward sloping profile around the rim, to allow the perimeter fence to be sited at the lower edge of the inner slope, with its top no higher than the level of the main landscape, so as to ensure that the fence is not seen from the Avenue.

- 9. Function of the Visitor Centre Although we appreciate that the way the visitor centre functions is not entirely a planning matter, we do nevertheless consider most strongly that the Visitor Centre should be a discreet gateway providing access to the wider WHS physically, intellectually and emotionally but that is should also be part of key part of the management processes for sustaining the attributes of OUV, by managing carrying capacity and tourism congestion at peak times and enhancing the overall visitor experience. It is not evident from the current documentation how this wider remit will be achieved, nor specifically what alternative strategies will be adopted at times of heavy throughput that does not materially impact upon the landscape.
- 10. Local Communities In line with the Stonehenge Management Plan, and the general precepts for WHSs, we consider that the major public investment that is envisaged for the visitor site (from the Government and possibly the HLF) should bring with it improved links with local communities and local stakeholders and, wherever possible, benefits to both.

We consider that the Visitor Centre should articulate links with local communities, in terms of how visitors might also visit other local attractions and facilities in the region, We believe that the visitor centre should be seen as more of a local resources than one linked only to English Heritage. We consider that there should be links with the National Trust, as the major landowner of the WHS, and with local museums. And we also consider that links should be made with local transport providers as well as with public transport operators. All of these considerations should be part of an Access Strategy which should now be developed.

11. Conclusions

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11.1 Site: ICOMOS-UK supports the concept of the Visitor Centre being sited at Airman's Corner, subject to modifications to its design and landscape arrangements – as set out below.

11.2 Sustaining OUV and protecting the attributes of OUV a) We consider that it is essential that any interventions on the site should sustain the OUV, authenticity and integrity of the WHS through protecting the attributes of OUV.

- b) In ICOMOS-UK's view, the current designs for the proposed building, car park and roundabout will impact adversely on the attributes of OUV (which include visual links between monuments). We further consider that these adverse impacts could be avoided by changes to the design of the proposed centre, car and coach parks, and roundabout. Such changes should limit the height of the building, the light spill from it, the screening of the visitor centre, car and coach parks, and the lighting on the new roundabout.
- c) ICOMOS-UK considers that with early consultations, the adverse impacts on OUV of the proposed Visitor Centre could have been avoided.
- d) ICOMOS-UK considers that an overall Access Strategy that relates the proposed Visitor Centre to enhanced access and understanding of the whole WHS should now be developed.
- e) ICOMOS-UK considers it essential that the landscape proposals for all three elements of the site visitor centre, car and coach parks should be inter-related and related to an overall Landscape Strategy, which should now be developed.

### 11.3 Cultural benefits

a) ICOMOS-UK considers that a major intervention within the WHS, largely funded by public funds, should contribute major cultural (and environmental) benefits. We consider that the proposed Visitor Centre should deliver cultural benefits related to major landscape improvements in relation to the monumental and visual attributes of the WHS, to major access benefits for visitors to the wider landscape, and to better visitor management that will help improve

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the conservation of the WHS. We also consider that it is essential that it does not cause dis-benefits in terms of adverse impact on the attributes of OUV.

b) We consider that the first of these benefits could only be achieved with considerable modifications to the overall design of the proposed building, car park and screening; in essence a 'down-grading' of the scheme so that it is lower key, recessive, sits well in the landscape and does not impact adversely on the attributes of OUV. The second and third benefits need to be achieved through the way the centre operates in terms of it being more than a visitor service provider. The dis-benefits can be removed by changes to the design and landscaping.

11.4 Suggested Amendments to the proposed scheme a) We consider that the current style of the building with its tall, widespread, curved roof is fundamentally unsuited for the open landscape site and creates a disturbing interception of the gentle valley landform. We consider that the two proposed low buildings within the over-sailing roof structure should be roofed separately and reflect the idiom of farm buildings sitting low in the landscape.

- b) In ICOMOS-UK's view, the height of the building should be reduced to a level that ensures that it does not impinge on downward views west from the Cursus (as shown in Figure 9), on views from the major visual axis between the northern Winterborne Barrows linear group and the henge site just south of the Cursus, and on views between the northern Winterborne barrows and the Lesser Cursus and barrows. Further, when the roof is re-arranged lower in the landscape, the colour should be amended to ensure it is not light or reflective.
- c) ICOMOS-UK considers that the side to the car park could be permeable and with limited light spill but that the side facing towards the Stones should be as blank as possible with no light spill, as should the two other sides. The building(s) should be surrounded by a substantial, native thicket of chalkland shrubs and small trees, two to three times the surface area of the building, to provide effective cover and light suppression from the Cursus and from other attributes, (with archaeological evaluation prior to determining the precise shape of the planting). If seeing the position

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of the building from a distance is considered desirable, a flagpole would suffice.

- d) Currently the WHS is remarkably unspoilt by light pollution. We consider that it would be highly regrettable if the proposed visitor centre, parking areas and ancillary roundabouts, were to adversely effect this situation.
- e) We do not consider that screening for the coach park should rely on the existing overgrown beech hedge and that it should be removed and replaced by low-growing trees such as thorn or blackthorn that do not block views across the shallow valley west of the Visitor Centre.
- f) Further we consider that the proposed screening to the north of the coach park is unattractive in following tightly the boundary and should be extended to form an extensive native copse to screen the coaches without intercepting views from the Lower Cursus to the Winterbourne Barrows.
- g) For the new car park which is on the north facing slope, we consider that native shrub and small tree planting should envelope and spread beyond the parking areas to provide complete screening from key attributes.
- h) Overall we consider that the screening for all three areas visitor centre, car park and coach park should be merged to create an overall low-growing dispersed thicket, typical of chalk downland.
- i) We consider that the remaining A344 road should be narrowed by allowing grass to grow over the edges, that all white lines and signage should be removed, and that the surface should be covered with gravel coated resin to give it a more modest feel.
- j) We consider that the ground around the hub (which has already been disturbed) should be landscaped to create an inward sloping profile around the rim, to allow the perimeter fence to be sited at the lower edge of the inner slope, with its top no higher than the level of the main landscape, so as to ensure that the fence is not seen from the Avenue.

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k) We consider that the Visitor Centre should articulate links with local communities, in terms of how visitors might also visit other local attractions and facilities in the region, We believe that the visitor centre should be seen as more of a local resources than one linked only to English Heritage. We consider that there should be links with the National Trust, as the major landowner of the WHS, and with local museums. And we also consider that links should be made with local transport providers as well as with public transport operators. All of these considerations should be part of an Access Strategy which should now be developed.

### 12. Planning Committee

To achieve the suggested improvements outlined above, in order to ensure that the proposed scheme does not impact adversely on OUV, and also delivers substantial cultural benefits, ICOMOS-UK urges the Planning Committee NOT to approve the current application, and to request the applicants to make modifications to the scheme in order to mitigate its adverse impacts and deliver an exemplary approach.

Yours sincerely

Susan Denyer Secretary, ICOMOS-UK

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### THE STONEHENGE ALLIANCE

From The Hon Secretary, Kate Fielden 1 The Old Smithy, Alton Priors Marlborough SN8 4JX

30 November 2009

Mrs Judy Howles Area Development Manager Wiltshire Council 61 Wyndham Road Salisbury Wiltshire SP1 3AH.

Dear Mrs Howles,

# Planning Application S/2009/1527/FULL: New visitor centre for Stonehenge and associated works

Thank you for asking Mr Madge to reply to my letter to you of 3 November. We are glad of the few extra days in which to comment on the application although we have not, in the event, been able to call an Alliance meeting in time to discuss the scheme together. Some of our member-organisations have, however, been able to hold their own meetings at which the scheme was considered and they have forwarded their views for this response.

Although we broadly welcome proposals to improve the surroundings beside the Stonehenge monument, including closure of the A344/A303 junction, we consider that Airman's Corner is not an appropriate site for the proposed visitor facilities. It is accepted that Ministers have decided that Airman's Corner is the chosen site for the visitor centre, but both the scale and the impact of the proposed development are such that even the applicant has recognized that it would result in adverse effects on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) and on the immediate setting of the Site (ES, paras.5.7.27–28).

### 1. We object to the proposals

It is the collective view of the Stonehenge Alliance that we object to the proposals for the reasons set out below, most of which have already been mentioned in our letter of 3 November. We trust that earlier letter will be taken into account by the Council and that it will now be published on your website.

### 2. Consultation

We are both surprised and disappointed that so little time has been given for consideration of this very extensive application and also to learn that it is not considered by the Council to be a departure from planning policy for the WHS in respect of the protection of its OUV which we understand should be a *key material consideration*. Stonehenge is internationally a highly important WHS and the application comprises a major scheme with national if not international implications, for which considerable sums of public finance are involved. A number of our representatives attended the pre-application exhibition earlier this year and wrote to the applicants with our views in July. So little detailed information was available to

consultees at that time that it was impossible to envisage what was being proposed in terms of the size and design of the building works, or the screening of the facilities, including car parking, and so on. We made a number of comments about the lack of adequate information as well as suggestions for amelioration of the scheme, almost none of which appear to have been taken into account in the proposals now before us. Important information is still lacking and the scheme, in its adverse impacts on the WHS, does not meet the requirements of planning policy and the World Heritage Convention.

### 3. Departure of the Scheme from planning policy and guidance

The Stonehenge Alliance took part in Public Inquiries into the A303 Improvement Scheme and the Countess East Visitor Centre. At those Inquiries we argued, on planning policy grounds, against proposals that would create permanent and unacceptable damage to the WHS. We are aware that the planning framework ought to provide secure protection for this unique archaeological landscape. We continue to hold the view that the scheme as proposed is in substantial conflict, not only with Local Plan policy but also with regional and government policy and guidance, and the WHS Management Plan (which has SPG status), all designed specifically to safeguard the WHS. Rather than reproduce the relevant planning policies and advice in full, the relevant policies and guidance which argue for protection of the WHS and its OUV and therefore against the scheme as proposed, are listed below. After all, the British Government will be judged by its approach to its international responsibilities.

The World Heritage Convention (UNESCO 1972): Article 4

UNESCO Guidelines for the Implementation of the World Heritage Convention (2008): Guidelines 8, 49, 96, 97, 98, 99, 108, 109, 112 and 119

CLG Circular 07/2009 on The Protection of World Heritage Sites (DCLG July 2009):

Introduction: paragraph 1;

Objectives: paragraphs 6, 8 and 9;

Principles and policies for the protection of WHS: paragraphs 10, 11 and 12;

Protecting the setting of World Heritage Sites: paragraph 15; and

Minor incremental changes: paragraph 20

Planning Policy Statement 1: Delivering Sustainable Development (ODPM, 2005): Protection and enhancement of the environment: Paragraph 17

PPG 16: Archaeology and Planning:

Paragraph 8: protection of settings of nationally important archaeological remains Paragraph 14: role of planning authorities in implementing planning safeguards

Regional Planning Guidance 10:

Policy EN 3: The Historic Environment

Wiltshire and Swindon Structure Plan 2016:

Policies HE 1, HE 5 (heritage protection);

RLT 1 (recreation, sport and leisure); and RLT 8 (tourism)

DP1.6 (minimizing loss of countryside, protecting and enhancing the area's environmental assets)

C9 (protection of Special Landscape Area)

Salisbury District Local Plan (adopted June 2003) Policy CN24 (cited as 'The key development control policy for the WHS in the Local Plan': WHS Management Plan, Appendix O: 3.2) Policy CN20

Good Practice Guide on Planning for Tourism (DCLG 2006) Key Planning Considerations for Tourism Developments: Introduction: 5.1 Contributing to the Environment: 5.11 and first two bullet points

Delivering a Sustainable Transport System (DfT November 2008) Contributing to goals in Chapter 1 is supported by Local Transport Plan 3 Guidance (DfT July 2009)

*The WHS Management Plan* (2009; adopted as SPG by Wiltshire Council): Vision, p.10; Priorities for 2009-2015, p.10, introductory paragraph Function of the World Heritage Site Management Plan: paragraph 1.1.5 The purpose of the Plan, paragraph 1.3.1 (overriding commitment to conserve the

Site) Part 2: Key Management Issues, Introduction to key issues: paragraph 6.1 Issue 1: UNESCO guidance and requirements: paragraph 7.1.9 Section 8.2: The settings of the WHS and its attributes of OUV: Issue 13 Issue 29: The need for improved visitor facilities: paragraph 9.7.1 Section 14.2: Statutory and Policy Framework: Aim 1, Policies 1c and 1e;

paragraphs 14.2.5; 14.2.6; and 14.2.7 Section 14.4: Conservation of the WHS: Aim 3, Policies 3a, 3b, 3d, 3i and 3l; and paragraphs 14.4.1 (primary aim of Plan is to preserve and sustain OUV)

and 14.4.2 Intrusive features in the landscape: paragraph 14.4.19 (light pollution) Sustainable tourism and visitor management: Policies 4a and 4j and paragraph 14.5.1;

paragraphs 14.5.3 and 14.5.4 (wider access to the WHS) Visitor facilities for the World Heritage Site: paragraph 14.5.23 and 14.5.26, introductory paragraph and first bullet point Section 14.6: Sustainable traffic management and transportation: paragraphs 14.6.4, bullet point 3 (light pollution) and 14.6.5 (Green Travel Plan) Management, liaison and monitoring: paragraph 14.9.1 (key purpose of Plan)

We have not quoted from the *European Convention on the Protection of the Archaeological Heritage* (1992), now ratified by the UK, but it contains a number of Articles that are relevant to protection of the archaeological heritage at Stonehenge. The Management Plan, paragraph 14.2.26, refers to the implications of the ratification of this Convention.

We reiterate that it is clear from the planning framework for the whole WHS, including the entire philosophy of the Management Plan, that improvements to one part of the WHS cannot be offset by concomitant damage to another part: the obligation under the World Heritage Convention is to protect, conserve and rehabilitate the *whole* WHS, not to create further or new damage to any part of it. New facilities for visitors are therefore required, via planning policy and Management Plan commitments, to be located and designed in such a way as not to compromise the special qualities for which the Site was designated (Management Plan,

paras. 14.5.23, 14.5.26 (and bullet point one), Policies 4a and 4j, and, in particular, para. 9.7.1, which begins:

'For many years it has been acknowledged that there is a need to remove the existing visitor facilities which have an adverse impact on the OUV of the Site, and to develop improved visitor facilities where they will not have an adverse impact on the WHS and its OUV.'

Since the OUV of a WHS is a *key material consideration*, there appears to be an overwhelming case for putting the protection of the OUV of the Site first, before all other considerations. By damaging the OUV of the Site in areas where it is hitherto not compromised, the proposed scheme for visitor facilities respects neither the planning framework nor Management Plan aims for the protection of the WHS and its OUV.

In case the Council is not aware, there are now a number of inappropriate planning applications for World Heritage Sites that have come under legal examination. One of the most pertinent of these, in the case of Stonehenge where the proposals are for an 'interim' development, lasting for possibly 25 years, is that of *Coal Contractors Ltd v. Secretary of State for the Environment and Northumberland County Council* (QBD, 9 December 1993). In that case, planning proposals were for removal of unsightly colliery works and temporary permission for open cast mining and associated works over a period of about *two years*, whose spoil heap and overburden mound (only) would be seen in views from part of Hadrian's Wall WHS. This was at a time when no specific government advice was available on the protection of WHSites. The applicants had challenged the Secretary of State's decision to refuse their application on the grounds of the impact it would have on the setting of the WHS: a decision that was upheld by the Court. The Judge noted that the Secretary of State had agreed that the application was not in conflict with a number of planning policies but that he had considered the effect on the WHS to be a 'main consideration'.

### 2. Archaeology

The Stonehenge and Avebury and Associated Monuments WHS Designation Document describes the Avebury and Stonehenge henges as

"... the largest, most evolved and best preserved prehistoric temples of a type unique to Britain. Together with the associated sites and monuments they provide a landscape without parallel in Britain or elsewhere and provide an unrivalled demonstration of human achievement in prehistoric times." (Department of the Environment, 1986)

In view of the depredations of roads and traffic and existing inappropriate development both within and impacting on the setting of the Stonehenge WHS, it may seem difficult to comprehend the extreme sensitivity of the whole of the designated area. Nevertheless, now that we have a new Statement of Significance for the WHS (Management Plan, pp.26–27), those attributes of the WHS that contribute to its OUV have been clearly identified (Management Plan, p.28). It can be seen that the seven attributes of OUV are linked not only to the prehistoric monuments and sites themselves but also to the archaeological landscape surrounding them, their disposition in that landscape and siting in relation to one another, and the design of the monuments in relation to the skies and astronomy. The network of monuments and sites and interrelationships spreads out across the landscape and is not confined to any one part of it. Thus the interrelationships of monuments experienced in views to and from the Great Cursus and other monuments on the western side of the WHS which would be adversely affected by the scheme, are of equal OUV to those seen in views to and

from the Stones. Recent archaeological work has shown only too clearly that much more remains to be discovered and learned about the Stonehenge landscape including that part of it which would be disfigured by the visitor centre scheme as proposed.

### 4. Sustainability

The applicants admit the adverse impacts of the scheme on the settings of key monuments and the WHS and on its OUV; thus the scheme itself cannot be considered 'sustainable' in these major respects.

The ES, para. 5.5.8, for example, says:

'Construction of the main New Visitor Centre building would involve some excavation and ground disturbance. Land to the east and west would be filled and recontoured, to provide suitable gradients for visitor movements; to achieve this, topsoil would be deposited above existing levels on a geotextile base. Construction and excavation of drainage swales, attenuation ponds, oil interceptors and associated linking drains and pipes may involve significant ground disturbance.' (Our emphasis)

The ground works for the building and associated works would leave a permanent archaeological footprint on the WHS where there appears to be almost none at present: thus the new structure would be neither sustainable nor truly 'reversible'.

It appears that 'sustainable' use of a borehole for potable water may not be found to be feasible.

The siting of the facilities so far away from any built environment makes the scheme unsustainable from the point of view of travel to and from the new facilities which would, for most people, have to be by private car or coach tour.

### 5. Missing information

We mentioned to you in our letter of 3 November that a number of elements of the planning application were missing from the documentation. Mr Madge informed us that he had passed our letter to the applicant's agents to see if they could provide any of the information we highlighted. We have only just heard back about this from Mr Madge and it is our view that the applicant's agents' comments either do not or cannot answer our queries, nor address the lack of sufficient detail for us to understand fully what is proposed. We remain hopeful that the Council will wish to obtain for itself and pass on, to us and to other interested bodies and persons, more detailed information on the following matters:

- (i) Positions of proposed lighting columns at Longbarrow and Airman's Corner (new) roundabouts which are not marked on the plans. No drawing is supplied of the type of lighting column to be used.
- (ii) Positions of exterior lighting at the visitor-centre building, the walkways, the car and coach park, and at the 'hub' at Stonehenge which are not marked on the plans.
- (iii) The Design and Access Statement, para. 4.5, indicates that 'Further consultation with various stakeholders will be undertaken as the design progresses': we would like to know, please, what elements are still considered by the applicants to be missing from the scheme as submitted; and who are the 'various stakeholders'.

- (iv) The photomontages of distant views of the visitor centre complex give a misleading impression of the impact of parked vehicles, which would be much more conspicuous in reality, with their brightly-coloured and shiny surfaces. We hope that more realistic impressions will be obtained and presented for public consultation.
- (v) The ES (para. 10.1.7) indicates that the use of a borehole for fresh water is not guaranteed; indeed, it is intended to monitor ground water levels 'over the coming months' (para.10.3.22) to see whether this method of obtaining water is a viable option. If not, we are told that the water main will be extended from the present visitor facilities along the A344 (ES, para 10.4.9) but no indication of the precise location of this pipe line is given on the plans, nor of any concomitant archaeological work that might be required in association with it. We also wonder whether a pumping station would be required at Fargo.
- (vi) We note that aspects relating to waste water and surface drainage are still subject to Environment Agency approval (e.g., ES, para. 2.4.24) and 'subject to detailed design' (e.g., ES, para. 2.4.25). When will this 'approval' and 'detailed design' be available?
- (vii) There is no Appropriate Assessment with the application documents. The ES indicates that the Appropriate Assessment, notably in respect of the River Avon Special Area of Conservation, is required by English Nature (Table 7.1):
  - 'Requirement for the ES to provide sufficient evidence to enable an Appropriate Assessment (AA) to be undertaken in relation to potential effects on the integrity of:
  - River Avon SAC (including the River Till SSSI) including exposure of underlying chalk geology and impacts on the aquifer in relation to surface water, potable water supply and foul drainage.'

The Appropriate Assessment is to be undertaken by Wiltshire Council <u>before</u> <u>determination of the application</u>. We do not understand how such an assessment can be carried out without the benefit of the information still missing in respect of water supply and treatment of waste water and surface runoff. The Appropriate Assessment is a legal requirement under the Habitats Regulations (1994) 48 and, in our view, ought to be submitted as a part of the application documentation. When will all this information be available?

- (viii) We note that there will be a pedestrian route to the henge along the A344, which will also be used by transit vehicles comprising up to four carriages possibly driven by a 4 x 4 vehicle. We would like to know precisely what provision will be made to ensure that pedestrians, some perhaps with pushchairs and/or small children, are safely protected from passing vehicles which, because of their length and articulation, may need more road space than unarticulated vehicles, especially when passing one another.
- (ix) We wonder whether sufficient space has been allowed for the visitor-transit vehicles with four carriages to negotiate the junctions as shown on plan. Nor is it clear how the vehicles would turn at the visitor centre or at the hub. We would like to see sweep diagrams indicating the turning arrangements for

junctions and terminals. The Wiltshire Fire & Rescue Service has indicated (representations on Council website) that a 'hammer head' or turning circle would be needed at the 'hub': we would like to know where this might be and how it would fit in with the (currently unclear) turning arrangements for the visitor transit system and what its surface would need to be.

(x) The application is deficient in not providing a Green Travel Plan which, among other things, would have addressed the serious lack of adequate provision for cyclists and walkers, including safe A303 crossing points.

We are conscious that we have only touched the surface of the documentation in the time available to us. There are obviously a number of matters that may appear to be of little significance, such as the proposed heating vents in the roof of the visitor-centre building that could, perhaps, produce visible emissions looking oddly out of place and would be better sited at the base of the structure; and the proposed down lighters around the outside edge of the building would look extremely odd when lit at dusk and at night.

### 5. Conclusions and suggestions

We are disappointed that the Council seems not itself to have recognized the deficiencies of the application in relation to the overriding requirements for protection of the WHS and its OUV, and for sustainability; nor asked for more detailed information on the matters we have raised.

The highly conspicuous nature of the visitor-centre building and the inadequacy of screening for parked vehicles are of course matters of particular concern in terms of visual damage and for which solutions may well be available.

We trust that Wiltshire Council will consider this application strictly on planning grounds and not be pressurized into ensuring a scheme is in place for the 2012 Olympics. We therefore ask the Council to reject the application as it stands, and ask for and then consult upon significant amendments to the scheme before coming to any decision on the application. The information missing from the application ought not to allow the application to be approved subject to conditions.

In case this does not happen, however, and in view of the quantity of missing information critical for full and proper consideration of the proposals, we will continue to hope that a Public Inquiry will be held so that the scheme may be judged independently by government and with all the relevant facts and policies before the public. For these reasons we are copying this letter to Ministers.

Yours sincerely,

Kate Fielden Hon Secretary, The Stonehenge Alliance

THE STONEHENGE ALLIANCE IS SUPPORTED BY: Ancient Sacred Landscape Network; Campaign for Better Transport; Friends of the Earth; Campaign to Protect Rural England; and RESCUE: The British Archaeological Trust

For: Mr Adam Madge

Reference: S/2009/1527/FULL & S/2009/1528/LBC dated 19 Oct 09

# OBJECTION COMMENTS:

 Mr Madge has confirmed that, even though this application may not lie within a Parish boundary, responses from Parishes in the general area of the application are welcome; for this reason Bulford Parish Council is replying formally in the normal way to this application and, for the same reason, this reply has been copied to other Parishes in the general area where there may be an interest.

- 2. Bulford Parish Council does not support this proposal to site the new Stonehenge Visitors' Centre at Airman's Cross at the junction of the A360 and A344.
- 3. The single carriageway stretch of the A303 that lies between its junction with the A344 and the Long Barrow Roundabout (junction A360/A303) is already severely congested and the proposed closure of the also busy A344 taken together with the additional tourist traffic (that will have to be carried on the A303 as far as the Long Barrow Roundabout) will exacerbate this congestion to a perfectly intolerable degree. In addition, the stretch of the A360 between the Long Barrow Roundabout and its junction with the A344 at Airman's Cross is also already busy and this stretch will have to carry a significantly heavier traffic load.
- 4. This will have secondary adverse consequences :
- H. The A360 provides a valuable alternative route into and out of Salisbury and the proposed obstruction at Airman's Cross will cause motorists to abandon this and revert to the A345; this will increase traffic through Amesbury and add to the present confusion and delay at the point where the A345 crosses the A303 at the Countess Roundabout. Drivers amongst this traffic, who are seeking to rejoin the A360, will then travel through Larkhill along The Packway and drop down to the A360 in Shrewton along the B3086: the final length of the B3086, through Shrewton itself, is an extremely narrow and hazardous stretch of road that is wholly unsuitable to carry any increase in traffic.
- H. Any increase in congestion on the A303 west of the Countess Roundabout (where the road narrows to single carriageway) will cause even more traffic to divert from the A303 at Folly Bottom (Solstice Park) and travel through Bulford Village, Durrington, and Larkhill. The initial length of road into Bulford from Folly Bottom is a C Class road and this diversion is already developing into a "rat run" of significant proportions for which the road is wholly unsuitable; anything that would add to this diversion of traffic, as this proposal will certainly do, would be a completely regressive development.
- 5. For these reasons, Bulford Parish Council considers that the proposal is ill-conceived and ill-planned and should be refused, at the very least until the A303 is developed into a dual carriageway throughout its length between the Countess and Long Barrow Roundabouts. Moreover, Council sees no advantage in closing the A344 which is a very useful short stretch of road that relieves pressure on the A303.



(JBB Clee) Planning Officer, Bulford Parish Council. FAO Adam Madge Stonehenge Visitor Centre – S/2009/1527 and 1528 Please note that Shrewton Parish Council objects to the planning applications above on the basis of the

### following:

### Traffic flows:- para 2.9.1

With around 24600 vehicles using the A303 at present, the congestion at peak periods is already unacceptable and presents a very real delay for emergency vehicles coming to incidents along the A360, let alone issues for local traffic trying to cross the A303 at Longbarrow. This is projected to increase progressively to around 41200 by 2027. The projected increase of vehicles on the A360 rises from 5900 at present to 15600 along this route, all of which is compounded by the closure of the A344 and inadequate provision of road management.

### Longbarrow Roundabout: - 2.10.1

The proposals are for 3 lanes on the roundabout and on some of the access roads whilst leaving only 2 on others and will do nothing to ease the flow. Traffic coming from Amesbury will have to filter onto the roundabout and those heading for the new proposed SVC will be joined by local traffic aiming to cross the A303 causing more congestion than there is at present.

### Airman's Cross:

As the plans are written, all local traffic will have to queue with SVC visitors until they can turn left off the proposed roundabout at Airman's Cross. There should be a left hand filter lane built into the proposals so that local traffic can flow away from the tourist traffic well before the roundabout.

### **Rollestone Crossroads:**

This does not feature anywhere in the proposals but it is certain that this misaligned junction will become much more busy and hazardous as traffic seeks access west or east along the Packway. Ideally a roundabout is required as well as clear signage to stop traffic entering Shrewton down London Road and along the narrow High St.

### Byways 11 and 12: para 2.8

Whilst the desire to keep the Stonehenge site as clear as possible is recognized, Council objects to the proposal to close byways 11 and 12 to vehicles. Regards Michelle Seaman Shrewton Parish Clerk

### The Rookery Orcheston Salisbury SP3 4RP

8<sup>th</sup> November 2009

Development Services Wiltshire Council 61 Wyndam Road Salisbury SP1 3AH

By email: FAO Adam Madge

Dear Sirs

### S/2009/1527 & S/2009/1528 – Stonehenge Visitor Facility Relocation

Thank you for your letter of 19<sup>th</sup> October addressed to Orcheston Parish Council seeking observations regarding the above planning applications. I am writing to you as Chairman of Orcheston Parish Council on behalf of the Council.

We wish to make the following observations with respect to the proposals:

1. Around 24,600 vehicles per day currently use the A303 at Stonehenge. This causes congestion at Stonehenge and at Longbarrow roundabout at peak periods. This congestion will increase as road usage is expected to rise to 41,200 vehicles by 2027. In the same period projected usage of the A360 at Longbarrow will rise from 5,900 vehicles to 15,600. The congestion is already unacceptable for local traffic crossing the A303 at Longbarrow in peak periods. It also causes real delay for emergency vehicles on the A303 and A360. This congestion for local traffic will increase considerably when mixed with tourist traffic visiting the new visitor centre.

- 3. **Airman's Cross** all local traffic is proposed to merge with visitor traffic upto the new roundabout at Airman's Cross. There should be a filter lane well before the roundabout to separate local A360 traffic from visitor traffic.
- 4. **The Packway & Rollestone Crossroad** there will inevitably be increased traffic along the Packway, both when the highway works are in progress and then afterwards when the new road system is in operation. When the A344 has been closed many road users will think, at peak periods, that it will be quicker to use this minor road system to avoid congestion at Stonehenge and Longbarrow. The junction at Rollestone Crossroads will become busier. There should ideally be a roundabout at this junction. There should also be clear signage directing traffic back down to the A360, as opposed to rat running down London Road into High Street, Shrewton or into Elston Lane, Orcheston.
- **5. Elston Lane, Orcheston** The increased traffic that will occur (despite any measures requested in 4 above) will cause danger to users of Elston Lane. Some form of traffic calming needs to be introduced in the lower part of Elston Lane and again at the Elston Lane Whatcombe Brow junction in Orcheston.
- **6. A344 Stopping Up** Closing a Right of Way that has been in existence for 5,000 years sets a poor precedent for all other Rights of Way proposals.

I shall be grateful if you will give due consideration to our comments when considering the Planning application.

Yours faithfully

S D W Shepherd Chairman Orcheston Parish Council Dear Mr Madge,

S/2009/1527 FULL & S/2009/1528

The proposed new Stonehenge Visitors' Centre is within our Parish Boundary. Winterbourne Stoke Parish Council has the following comments/observations:

Firstly, we are in agreement that a new visitors' centre for Stonehenge is needed and long overdue; however, the proposed new visitors' centre and access roads are situated in an undeveloped area of open countryside within the World Heritage Site. The creation of the visitors' centre and a new road across and through the WHS leading to the new car park is unacceptable and we are astonished that English Heritage could bring forward such a plan especially considering a main objection to the A303 being dualled on-line is that it would result in development within the World Heritage Site. The plans have failed to make proper use of the planned closure of the A344 which leads to areas of previously developed land at option X (on the consultation document) which is nearer the stones. We have been told that this is a temporary solution to cover approximately 20 years; however, we believe it will be permanent because of the inability of past and present governments to find a solution for the A303 in this area. It also raises the question of how long has the present "temporary" solution been in place?

Winterbourne Stoke Parish Council OPPOSE and OBJECT to these plans for the above reasons; however, if you are minded to approve the plans we make the following points:

Where the proposed new car park road runs close to the A360 between (Airman's Corner and Longbarrow roundabout) it should be linked directly to the A360 so that traffic exiting the car park can more easily return to the A303.

The introduction of a roundabout at Airman's Corner is necessary and welcomed but the improvements at Longbarrow will make little, if any, improvement.

Regards

J H Carr

Clerk to Winterbourne Stoke Parish Council

Your Ref: S/2009/1527/FULL and S/2009/1528/LBC

Date: 19.10.2009

For the Attention of Mr A Madge

Dear Mr Madge

Re: TOWN AND COUNTRY PLANNING - STONEHENGE VISITORS' CENTRE.

At our parish council meeting last evening I was asked to inform you of their concerns of the probable extra traffic at Longbarrow and Airman's Cross. Traffic already comes to a standstill (with the A344 still in use) on the A303 regularly.

The proposed plans show that at Airman's Cross local traffic will have to wait along with SVC vehicles until they can turn off the proposed roundabout. Could there not be a filter road built into the plans so that local traffic can move more quickly and not get tied up with SVC vehicles?

Yours sincerely Trudie James (Mrs) Clerk to Tilshead Parish Council

Allington Parish Council Mrs Jane Tier 40, Firs Road Firsdown Salisbury SP5 1SL Pianning Department
1 2 NOV 2009

Acknowledged \_\_\_\_\_\_
Copy to \_\_\_\_\_\_Action\_\_\_\_\_

30.10.09

Mrs Howles,

Development Services,

Wiltshire Council, 61 Wyndham Road

Salisbury, Wiltshire, SP1 3AH

Rm Rm

Reference S/2009/1527/FULL, S/2009/1528/LBC

Dear Mrs Howles,

Re the above Planning Notices, can confirm that Allington Parish Council have no objections to Application S/2009/1527/FULL or S/2009/1528/LBC,

Best Regards

Jane Tier On behalf of Allington Parish Council



### **DURRINGTON TOWN COUNCIL**

Mr Adam Madge
Wiltshire Council South
Planning Office
61 Wyndham Road
Salisbury
Wiltshire
SP1 3AH

Direct Dial: 0117 975 0663 Direct Fax: 0117 975 0684

Our ref: P00080089

26 November 2009

more sympathetically designed low-key and single-storey building(s) that blend into the landscape and are not highly visible from a distance:

At a Public Meeting held on 11/11/23009 Residents of Durrington, Larkhill and Bulford who attended the meeting plus the Town Council Planning Committee considered the above application/amended plans and has the following response to make.

Mr Adam Madge
Wiltshire Council South
Planning Office
61 Wyndham Road
Salisbury

Direct Fax: 0117 975 0684

Direct Dial: 0117 975 0663

Our ref: P00080089

Witiggested special conditions/reasons for refusal based on local knowledge 1). A number of members of the public requested the existing tunnel is kept open as the view of Stonehenge from the tunnel exit is unique and should be retained. 2). Members of a local motor cycling association requested the byways in the WHS should allow motor cycle use. They have lobbied to successfully keep areas of Salisbury Plain open for motor cycle use and the closing of the WHS byways would severely restrict their freedom of movement.

Town Clerk Mary Towle Dated 12.11.09

Telephone: 0300 456 0100 • Textphone: 01225 712500 • Web: www.wiltshire.gov.uk



### **DURRINGTON TOWN COUNCIL**

APPLICATION NUMBER S/2009/1527	OUR REF 09/43	
Proposal : Decommissioning of existing visitors facilities and section	Address : Stonehenge and Airmans Cross.	
of A344 Erection of a New Visitors Centre, car park, coach park and	Planning Department	
ancillary service building and related highway and landscaping works.	Rec 2 6 NOV 2009	
	Copy to	

At a Public Meeting held on 11/11/23009 Residents of Durrington, Larkhill and Bulford who attended the meeting plus the Town Council Planning Committee considered the above application/amended plans and has the following response t make.

No comment	
Support	
Support subject to conditions	X
Object	

Suggested special conditions/reasons for refusal based on local knowledge

1). A number of members of the public requested the existing tunnel is kept open as
the view of Stonehenge from the tunnel exit is unique and should be retained.

2). Members of a local motor cycling association requested the byways in the WHS
should allow motor cycle use. They have lobbied to successfully keep areas of
Salisbury Plain open for motor cycle use and the closing of the WHS byways would

Town Clerk Mary Towle

severely restrict their freedom of movement.

Dated 12.11.09

Telephone: 0300 456 0100 • Textphone: 01225 712500 • Web: www.wiltshire.gov.uk



### **AMESBURY TOWN COUNCIL**

Mr Adam Madge Wiltshire Council South Planning Office 61 Wyndham Road Salisbury Wiltshire SP1 3AH Direct Dial: 0117 975 0663 Direct Fax: 0117 975 0684

Our ref: P00080089

Direct Dial: 0117 975 0663

Direct Fax: 0117 975 0684

At a meeting held on 01/12/09 the Parish Council considered the above application/amended plans and has the following response to make.

Mr Adam Madge Wiltshire Council South Planning Office

Planning Office 61 Wyndham Road

Salisbury Our ref: P00080089

Wiltshire Suggested special conditions/reasons for refusal based on local knowledge

Observation that the building design is not in keeping with the landscape

Parish Clerk Dated 03/12/09

Telephone: 0300 456 0100 • Textphone: 01225 712500 • Web: www.wiltshire.gov.uk

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## Agenda Item 9

**Application Number** 

Proposed Development S/2009/1528

Officer Report

Reason for the application being considered by Committee

The application is integral to the main Stonehenge Visitor Centre application and it is therefore considered appropriate to consider the two applications together.

### 1. Purpose of Report

To consider the above application and to recommend that

Listed Building Consent be GRANTED subject to conditions and the signing of a legal agreement following referral to the Secretary of State because the application involves demolition of a listed structure.

### 2. Main Issues

the main issues to consider are:

- 1) Planning policies
- 2) The setting of the listed monument (its current and new settings)
- 3) Impact on the World Heritage site

### 3. Site Description

The site is that of the Airman's Cross at what is known as Airman's Corner. Airman's Corner is at the junction of three roads, the B3086 the A360 and the A344. The crossroads formed by these three roads is in the form of a staggered junction after realignment some years ago of the three roads. It is within a northbound slip on the A360 which forms a triangle in the South West Quadrant of the crossroads in the triangular piece of land the cross is located.

The memorial was erected in 1913 and commemorates an air accident which occurred in the previous year when Captain Eustace Loraine and Staff Sargeant Richard Wilson were killed near that spot. The memorial is carved from granite The memorial commemorates the first members of the Royal Flying Corps to lose their lives while flying on duty and also the first fatal flying accident on Salisbury Plain.

#### 4. Planning History

There is no specific planning history relating to this site.

### 5. The Proposal

It is proposed to move the cross to a new position to the south east of its current site into the field in which the visitor centre is proposed. It is proposed that the memorial will be located close to the path from the car park into the new visitor centre. Part of the proposal is that the memorial will be cleaned and refurbished when it is moved from one site to another.

The memorial is being removed because as part of the visitor centre planning application it is proposed to redevelop the area where the monument is currently sited in order that a new road junction including a roundabout can be incorporated at this point.

### 6. Planning Policy

the following policies are considered relevant to this proposal Including PPGs

PPG15 Planning and the historic environment

PPG16 Archaeology and planning
CN1 Demolition of a listed building
CN2 Dismantling of a listed building
CN24 Development in a conservation area

#### 7. Consultations

Town/ Parish council The site is located within the parish of Winterbourne Stoke who object to the application. Their letter of objection does not make further comment on the Airmans Cross application.

Durrington Parish council – Support subject to conditions. At the parish council meeting regarding this application it was felt that if the memorial was located where proposed it would not be seen by many local people and only visitors to Stonehenge. It was also considered that option 1 was nearer the original crash site.

Allington Parish Council - No objection

Various other parish council responses (Orcheston, Tilshead, Bulford, Shrewton, have been received making a variety of comments on the main visitor centre application although none relate specifically to the relocation of the Airman's cross.

Wiltshire Highways

This proposal relates to the relocation of the Airman's Cross to a new site within the curtilage of the proposed Stonehenge Visitor Centre.

The proposal is fully supported by the highway authority. No objection is raised, if the arrangements are subject to a planning obligation to provide, inter alia, for i) the temporary storage of the cross ii) the proper cleaning and restoration prior to its relocation to the proposed site, and iii) an undertaking from English Heritage to maintain the Cross in good order whilst in their care. (Ownership of the Cross is uncertain, but there is a view that the Council, as highway authority has a claim to the Cross. It is recommended that the Cross be transferred into the care of English Heritage in perpetuity)

### recommendation

No objection subject to the consent being withheld until an appropriate planning agreement has been completed.

Wiltshire Council archaeology

No objection to the movement of the cross specifically but if minded to approve the following condition is suggested.

No development shall commence within the application area until:

- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details. Page 242

Wiltshire Council Economic Development – Support the application. Most of their comments relate to the main application.

Defence Estates – Confirm that they have no safeguarding objections.

Conservation officer Wiltshire Council No objection to the proposal, However would wish to see the structure relisted if it was dismantled, also would wish to see a method statement for dismantling and rebuilding it and a further condition should be imposed seeking the local; authorities approval for a specification of any repairs.

English Heritage: No objection Our views are set out in sections 5.8.11 and 5.8.12 of the Environmental Statement.

The overall view of the impact of the application on the historic environment is set out in section 5.8.13 which states "On balance, taking into account the benefits of the proposed development in sustaining the Outstanding Universal Value of the Stonehenge WHS, the overall cumulative effect of the scheme would have a Large Beneficial impact."

We advise that the case should be determined in accordance with government guidance

### 8. Publicity

The application was advertised by site notice and press notice Expiry date 12/11/2009

Letter from the Museum of Army Flying indicating their support for the scheme and at the position proposed.

Letter received from Air Vice Marshall Newton outlining the history of the site and his support for the chosen site of the war memorial. The letter also corrects two factual inaccuracies in the applications submission and includes photographs of the Cross as it was prior to its movement to its present position and also shortly after its rededication in 1996.

Letter from the Amesbury Society stating they object to the proposal. No specific comment on the Airmans Cross proposal.

6 further letters of objection have been received from members of the public

These letters relate to the main visitor scheme and although they refer to the listed building application number in their title make no further reference to the airman's cross application in the content of their letter.

### 9. Planning policies

9.1 Policy CN1 states that demolition of a listed building will not normally be permitted unless under very specific and exceptional circumstances. Whilst this proposal does involve the demolition of a listed building it is considered that it is more appropriate to consider this particular application against policy CN2 of the saved policies of the adopted local plan as this relates to the dismantling of listed buildings and their re erection elsewhere which is essentially what this is. Policy CN2 states that –

Applications for the dismantling of listed buildings and their re-erection elsewhere will not be permitted. Exceptionally, local re-erection of threatened structures at an appropriate site may be allowed but only as an alternative to demolition or where the life of the structure and the public appreciation of it would be substantially enhanced.

It is considered that the airman's cross falls to be considered under the latter half of this policy in that the life of the structure and the public appreciation of it would be substantially enhanced by its movement to a new location.

Page 243

### Policy CN24 states -

Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of it's monuments, will not be permitted.

It is considered that the re erection of the airman's cross would not adversely affect the archaeological landscape of the world heritage site (see Wiltshire archaeologists advice) as it is a relatively small structure within the overall context of the main visitor centre and providing that the condition suggested by the councils archaeologist is imposed it is considered this will address this policy. The disturbance of the archaeological landscape for such a small structure will be minimal and it is therefore considered that this would comply with this policy.

### 9.11 The setting of the listed structure (as existing and proposed)

Existing- The existing setting for the memorial stone is poor. This is not due to it being located in the wrong place initially but rather a consequence of developments that have happened over a period of time. The roads in the area have become much busier with traffic. Various traffic signs have been added to the junction and the monument has been lost in the middle of what is essentially a traffic island meaning as the conservation officer has stated that the cross has become more of a local landmark rather than a memorial. It is considered by officers that the current setting could be improved.

The proposal is to move the cross to a new position within the grounds of the new visitor centre away from the traffic that currently creates a poor setting for the stone. With the stone set within the grounds of the visitor centre as it will be. It will then have a far more peaceful, quiet and uncluttered setting where more people will be able to stop and look at the memorial and it will be within the curatorial ownership of English Heritage where it can be looked after.

It is therefore considered that the setting for the memorial will be far better than that which it presently enjoys and will enhance the setting of the memorial in line with policy CN2 of the saved policies of the local plan. It is considered that the life of the structure and the public appreciation of it would be considerably enhanced by its movement to the new visitor centre and that there would be no significant adverse affects to this move.

### 9.12 Impact on the World Heritage site

It is considered that the impact on the world heritage site would be minimal. The memorial would be placed within the WHS but is a very small structure in comparison to the larger visitor centre within which grounds it is intended to be situated. In visual terms therefore it is not considered that the proposed movement of the memorial would have an adverse effect on the features of outstanding universal value that make up the world heritage site. In archaeological terms similarly the footprint of the structure will be small and providing the condition is imposed as requested by the councils archaeologist that a programme of archaeological work is carried out, it is considered that the proposal will have limited impact on the WHS in the overall enhancement scheme. Because of this and because this view is being taken in the context of the overall visitor scheme. It is not considered appropriate that the airman's cross is moved independently of the overall visitor scheme as the cross would then be effectively placed in the middle of a private field which would be inappropriate in terms of access. A condition should therefore be imposed to prevent this from occurring.

The highways department within whose ownership it is presently considered to lie, have suggested, and English Heritage has agreed to, the transfer of the memorial to the English Heritage site following the restoration and cleaning of the cross. This is something that can be controlled by legal agreement.

Access to the memorial when it is moved will be restricted to hours when the visitor centre is open to the public. There are considered to be both pros and cons to this approach. Doing this will mean that any potential damage or vandalism of the memorial will be negated as the memorial will be within English Heritages site where it will benefit from on site security. However it does mean that those wishing to see the memorial out of the core times for the visitor centre would not be able to do so. On balance given that greater care would be available for the memorial in the new proposed site and that it would be available for the public to see during most principle in the considered that the proposed memorial

location is acceptable.

#### 10. Conclusion

In conclusion it is considered that the movement of this memorial would not conflict with any local plan policies and would provide a positive enhancement of the memorial by moving it into the care of English Heritage and a position close to the visitor centre where it can be viewed in more detail by people on foot and given a more appropriate setting than it's current one which is diminished because of the traffic in the area and the clutter of signage which surrounds it.

### Recommendation

Following referral to the secretary of state and completion of a legal agreement to :Grant listed building consent subject to the following conditions –

1) The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2) No development shall commence within the area indicated outlined in red on the approved plans until:
  - a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
  - b) The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

3) Prior to the commencement of this development a timetable shall be submitted and approved in writing by the local authority, setting out the timing for the removal and replacement of the airman's cross memorial. The development shall be carried out in accordance with the agreed timetable.

REASON: To allow the local planning authority to ensure that the airman's cross is not erected independently of the main visitor centre to which it will relate

4) Prior to the removal of the Airmans Cross for repairs a method statement shall be submitted for the dismantling and rebuilding of the memorial along with a specification for any repairs to be carried out. This information shall be approved by the local planning authority prior to the commencement of development on the Airmans Cross.

REASON: To ensure that the detail of the repair and dismantling of the structure is undertaken in a manner which will not damage the listed structure.

#### **INFORMATIVE**

In relation to condition three the local planning authority will wish to see any timetable for the removal and replacement of the airman's cross memorial to show how this memorial will be removed and replaced during the construction works for the main visitor centre.

		I.N.				
Appe	ndices:	None				
Docui in the	ground ments Used Preparation s Report:	<ol> <li>Supporting statement: Listed building consent application for the relocation of the Airman's Cross Memorial</li> <li>Plan no AC -G200- PA-01 rev B</li> <li>Plan no AC-G200-XA-01 rev B</li> </ol>				
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Autho	Authorising Officer: Date:					
Section	on 106 Letter of	f intent sent?	Yes No			
			Date:			
Can t	he Decision No	tice be issued?				
	asing officers sig		Date:			
Decis	ion Date:	Appeal date Received:	Decision and D	ate:		
HUM	AN RIGHTS					
1.	<ol> <li>State the right(s)</li> <li>Article 6 – The Right to a Fair Hearing</li> <li>Article 8 – The Right to Respect for private and family Life</li> <li>Article 1, Protocol 1 – Protection of Property</li> </ol>					
2.	Give details of the victims and how their rights are affected – consider third parties as well as the person affected directly by the decision.  Applicants The right to extend their property  Neighbouring Residents the right not to be detrimentally affected  General Public The right not to be detrimentally affected					
3.	Give details of how the right is qualified and the interference is legitimate Article 8 and Article 1, Protocol 1 is qualified. Article 6 is absolute. Interference is legitimate in that is necessary in the public interest for the protection of the rights and freedoms of others and/or for protection of the environment					
4.	Give details of the laws with which the decision is in accordance.					

Town & Country Planning Act 1990

Details of the legitimate aim being pursued
 Aim – To control development in accordance with the Development Plan and National
 Policies contained in the accompanying report.

6. Give details of how the decision is proportionate and the relevant and sufficient reasons for

it.

- The balance of the considerations is such that the applicants' property rights outweigh any interference which there may be with the rights of neighbours and the general public for the reasons set out in the report.
- 7. Give the reasons why there is no discrimination.

  If there is discrimination give details. It has been dealt with no differently from any other planning application and the decision is in accordance with the Development Plan and National Policy Guidance.

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