

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:

1) 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 co-ordinated 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,  
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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  
Archruidess  
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: T Gray  
Tel No: (01722) 439300  
Email: [salisbury.firesafety@wiltsfire.gov.uk](mailto:salisbury.firesafety@wiltsfire.gov.uk)  
Our Reference: S0302984/SR  
Your Reference: -  
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



Awarded for excellence

## WILTSHIRE AND SWINDON FIRE AUTHORITY

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

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Campaign to Protect  
Rural England  
WILTSHIRE

Lansdowne House

Long Street

President: Mr J Bush OBE

Branch Chairman: Mr George McDonic MBE, BL, DIPLPT, FRTPI, DPA, FFB

Devizes

Wiltshire SN10 1NJ

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.

CPRE 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

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

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 Appropriate Assessment is required under European legislation in respect of the SAC associated with the River Till, and that this Assessment must be undertaken before

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

#### 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 in 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

- a controlled crossing of the A303(T) for walkers, cyclists and horseriders
- 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
- 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

□ 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 □ 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 **REFUSED** until this is rectified. The

lack of compliance forms further grounds for our **OBJECTION** to the planning application

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 (section 1.1.6), 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

**With reference to: 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 identifies 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](mailto:melanie.pomeroy-kellinger@wiltshire.gov.uk)





MINISTRY OF DEFENCE

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



**Defence Estates Safeguarding**  
Statutory & Offshore

EP

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Sutton Coldfield, West Midlands, B75 7RL

Telephone (MOD): +44 (0)121 311 2010  
Facsimile (MOD): +44 (0)121 311 2218  
E-mail: safeguarding@de.mod.uk

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**

**Proposal:** Decommissioning of existing visitor facilities and 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 SP3 4DX

**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**

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[www.atkinsglobal.com](http://www.atkinsglobal.com)

Planning Department
11 NOV 2009
Acknowledged
Copy to
Action

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

Dear Sir

**Decomissioning 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**  
**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](mailto:southernwaterplanning@atkinsglobal.com)

WAN



29 October 2009

THE WILTSHIRE ARCHAEOLOGICAL  
AND NATURAL HISTORY SOCIETY

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

Planning Department
04 NOV 2009
Authorising: _____
Copy to: _____
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 Trustees

FP



31 October 2009

WILTSHIRE HERITAGE

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

Plan	Department
Date	03 NOV 2009
Wiltshire Council	
Copy to	
ACTION	

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 1NS 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**

ACA ✓

*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

Planning Department

Rec	03 NOV 2009
Acknowledged	.....
Copy to	.....
Action	.....

**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

CA ✓

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

10<sup>th</sup> November 2009

Dear Judy,

**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 5<sup>th</sup> 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

DATE	11 NOV 2009
APPROVED	.....
COPY TO	.....
ACTION	.....

South Wiltshire Economic Partnership  
 3 Rolestone Street, Salisbury, SP1 1DX

E: [info@southwiltshire.com](mailto:info@southwiltshire.com)  
[www.southwiltshire.com](http://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

Planning Department	
04 NOV 2009	
Acknowledged	-----
Copy to	-----
Action	-----

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

[REDACTED]

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

[REDACTED]

KW

TRF



Patron: Lord Fairfax

# 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,

[Redacted signature]

Bill Riley

Planning Department
28 OCT 2009
Acknowledged _____
Copy to _____
Action _____

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



Fr SWR

Planning Department

12 NOV 2009

Copy to.....

Action.....



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](http://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**

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

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.

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

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South West RDA

Confirmed Activity:	<b>Encourage the development and marketing of regional 'icons' to maximise economic benefits to the localities and wider region, including Stonehenge.</b>
---------------------	--

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.

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

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

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

[www.southwestrda.org.uk](http://www.southwestrda.org.uk)



**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.

<b>Strategic Objective SO3:</b>	<b>An Effective and Confident Region</b>
<b>Regional Priority 3B:</b>	Promote and enhance what is best about the region.
<b>Delivery Activity 3B.2:</b>	Build on existing strengths to develop the South West as the leading region for sustainable development.
<b>Confirmed Activity:</b>	<b>Promotion of sustainable construction techniques for new developments in the region.</b>

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](http://www.southwestrda.org.uk)

<sup>f1</sup>  
Ashley, Katherine

✓ From: Roger UPFOLD  
Sent: 12 November 2009 22:32  
To: Development Control  
Cc:  
Subject: <sup>f1</sup> Planning application number S/2009/1527 STONEHENGE VISITOR CENTRE  
Attachments: 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

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For more information please visit <http://www.messagelabs.com/email>

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Planning Department

Rec.	13 NOV 2009
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working for cycling

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

Dear Sir/Madam

Planning Department

Rec.	13 NOV 2009
Acknowledged	
Copy to	
Action	

Hampshire Cycling CTC  
c/o 7 Ruffield Close  
WINCHESTER  
Hampshire  
SO22 5JL

12 November 2009

### **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 Sustrans 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 at-grade 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



working for cycling

Planning Department

Rec.	13 NOV 2009
Acknowledges	.....
Copy to	.....
Action	.....

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

HA2

Our ref: HA 004/001/004014  
Your ref: S/2009/1527/FULL

Mrs Jacqui Ashman  
Assistant Network Manager  
2/08K  
Temple Quay House  
2 The Square, Temple Quay  
Bristol BS1 6HA

**Planning Department**

1 2 NOV 2009

Acknowledge \_\_\_\_\_  
Copy to \_\_\_\_\_  
Action \_\_\_\_\_

Direct Line: \_\_\_\_\_  
Fax: \_\_\_\_\_

Wiltshire Council  
Development Services  
61 Wyndham Road  
Salisbury  
SP1 3AH

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.



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

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.*

*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:*

- 1. the appointment of a Travel Plan Co-ordinator;*
- 2. the collection and recording of baseline data on travel patterns;*

3. *targets to be achieved for modal share;*
4. *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.*

*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

[Redacted signature]

Mrs Jacqui Ashman  
Network Operations South West Planning

[Redacted contact information]

Enclosures: Preliminary Design for works to Longbarrow Roundabout ref: MP-A-G100-P-02 (rev i)

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 CouncilCouncil'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**

<b>Date:</b> 10 November 2009	<b>Signature:</b> 
<b>Name:</b> Mrs Jacqui Ashman	<b>Position:</b> Assistant Network Manager
<b>The Highways Agency:</b> Network Operations South West Planning Temple Quay House Zone 2/08-K 2 The Square Bristol BS1 6HA	

**Annex A**

**Condition(s) to be attached to any grant of planning permission:**

**Reason(s) for the direction given at b), c) or d) overleaf and the period of time for a direction at e) when directing that the application is not granted for a specified period:**



F1 715

**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.

<b>Planning Department</b>	
Rec.	17 NOV 2009
Acknowledged	-----
Copy to	-----
Action	ATC

14<sup>th</sup> November 2009

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 Ewart Holmes (Chairman)  
Rosemary Cottage,  
West Overton,  
Marlborough,  
SN8 4ER.

cc Mr. Michael Ancram MP.  
Mr Ian Wallis GOSW

5th November 2009

South Wilts Economic Development Team

3 Rollestone Street

Salisbury

Wiltshire

SP1 1DX

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

Planning Department

Rec. 06 NOV 2009

Our ref : SJW/ED24

Acknowledged	.....
Copy to	.....
Action	.....

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.

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

Planning Department

Rec.	29 OCT 2009
Acknowledged	.....
Copy to	.....
Action	.....

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

FA/

SCFBT

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 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). 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

cc Ian 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: WX/2009/113035/01-L01  
Your ref: S/2009/1527 EA FA ✓

Date: 19 November 2009

Rec. 23 NOV 2009

Acknowledged.....  
Copy to.....  
Action.....

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.

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](http://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 20m<sup>3</sup>/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 an 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 20m<sup>3</sup>/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 m<sup>3</sup>/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.

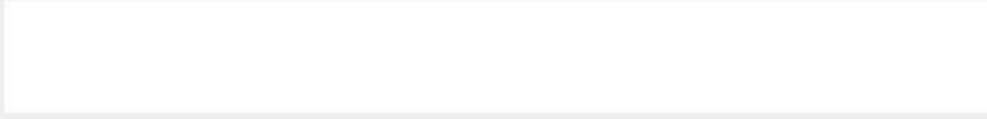
We understand from the information submitted that a groundwater investigation is to be carried out similar to that proposed for the abstraction borehole to establish aquifer characteristics and design parameters for the boreholes. We would welcome the opportunity to comment on the findings of this in 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.

Yours sincerely

**Mrs Tracey Brightman**  
**Planning Liaison Officer**



cc English Heritage: South West Regional Office, Chris Blandford Associates



# THE AMESBURY SOCIETY AS

The Amesbury Society  
14 Stonehenge Road  
Amesbury  
Wiltshire  
SP4 7BA

Planning Department

Rec.	24 NOV 2009
Acknowledged	.....
Copy to	.....
Action	.....

22 Nov 2009

Head of Development Services  
Wiltshire Council  
61 Wyndham Road  
Salisbury

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 commonly 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



NT

**THE NATIONAL TRUST**  
for Places of Historic Interest or Natural Beauty

Planning Department

Rec. 26 NOV 2009

Acknowledged .....

Copy to .....

Action .....

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WARMINSTER · WILTSHIRE BA12 9HW  
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Wiltshire Council  
Development Services  
Planning Office  
61 Wyndham Road  
Salisbury  
SP1 3AH

E-mail  
Direct Tel  
Your Ref S/2009/1527  
Our Ref SH EIP PA1  
Date 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  
Registered Office: Hedis · Kemble Drive · Swindon · Wiltshire · SN2 2NA Registered Charity Number: 205846

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  
SP1 3AH

THE WILTSHIRE ARCHAEOLOGICAL  
AND NATURAL HISTORY SOCIETY

Planning Department

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.

Yours sincerely

Doug Roseaman  
Deputy Chair

The Wiltshire Archaeological and Natural History Society  
41 Long Street, Devizes, Wiltshire SN10 1NS Telephone 01380 727369 Fax 01380 722150  
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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**

1.1. 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 11 and 12 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 than 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. 1, 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 11 km. 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 solstitial 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

Rec:	26 NOV 2009
Acknowledged:	
Copy to:	
Action:	

Wiltshire Council  
Development Control  
Planning Office  
61 Wyndham Road  
Salisbury, SP1 3AH

25<sup>th</sup> 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 be 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

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:-

1. 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**

3 Hadrians Close  
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**BY EMAIL ONLY**

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November 24<sup>th</sup> 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>1</sup> Full response available at <http://www.salisburybettertransport.org.uk/cbtfoevc.pdf>, summary available at <http://www.salisburybettertransport.org.uk/cfvsum.pdf>

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 guidance.

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>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 over-abundance 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 agricultural 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.
  - 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
- C&BT:  
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

CHIT

Chapel Cottage  
93 Shrewton Road  
Chitterne  
Warminster  
Wiltshire  
BA12 0LW

Planning Department

Rec.	25 NOV 2009
Acknowledged	.....
Copy to	.....
Action	.....

Mr Adam Madge  
Wiltshire Council  
61 Wyndham Road  
SALISBURY  
Wiltshire  
SP1 3AH

23 November 2009

*Dear Mr 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. Signing. 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

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

Dear Mr Madge, we sympathetically designed low key and single storey building(s) that blend 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.**



Telephone 0117 975 0700 Facsimile 0117 975 0701  
29 QUEENSWAY, BRISTOL, BS1 1LN

*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



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Campaign to Protect  
Rural England  
WILTSHIRE

Lansdowne House  
Long Street President: Mr J

Bush OBE Devizes Branch Chairman: Mr George McDonic MBE, BL, DIPLPT, FRTPI, DPA, FFB Wiltshire SN10  
1NJ

Tel: 01380 722157 Email:  
[wiltsepre@btconnect.com](mailto:wiltsepre@btconnect.com) Web site:  
[www.wiltshire-cpre.org.uk](http://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.

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  
Wiltshire Council South  
Planning Office  
61 Wyndham Road  
Salisbury  
Wiltshire  
SP1 3AH

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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;

- (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

Date: 24 November 2009  
Our ref: Your ref:  
S/09/1527



Adam Madge Development Services Wiltshire Council 61 Wyndham Road Room 118  
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 identified 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 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 *Callitriche* (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.
- 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.
  
- 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. *A 344 Approach to Stones*
8. *Function of the Visitor Centre*
9. *Local Communities*
10. *Conclusions*

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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 inter-linkages 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:

- 1 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
- 6 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

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.

**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**

**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 byway 12. 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 it 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

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

**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.**

**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**

## 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 WHS sites. 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 before determination of the application. 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:**

1. 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 :

□. 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.

□. 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

<b>Planning Department</b>
1 2 NOV 2009
Acknowledged _____
Copy to _____
Action _____ <i>AM</i>

30.10.09

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

*AM*                      *AM*

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

[Redacted Signature]

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  
(i) 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  
Wiltshire

Direct Dial: 0117 975 0663  
Direct Fax: 0117 975 0684

Our ref: P00080089

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 severely restrict their freedom of movement.

Town Clerk Mary Towle Dated 12.11.09

**DURRINGTON TOWN COUNCIL**

<b>APPLICATION NUMBER S/2009/1527</b>	<b>OUR REF 09/43</b>
<b>Proposal : Decommissioning of existing visitors facilities and section of A344 Erection of a New Visitors Centre, car park, coach park and ancillary service building and related highway and landscaping works.</b>	<b>Address : Stonehenge and Airmans Cross.</b>
	Planning Department
	Rec: 26 NOV 2009
	Copy to.....
	Action.....

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.

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 severely restrict their freedom of movement.

Town Clerk Mary Towle

Dated 12.11.09

## 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

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  
61 Wyndham Road  
Salisbury  
Wiltshire

Direct Dial: 0117 975 0663  
Direct Fax: 0117 975 0684

Our ref: P00080089

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