

### 53. Appendix 3 - Neighbour/Third Party Objections and Officers Response

Neighbour Objection Raised		No. Officer Comment		Action	
Tourism					
Visitor centre too far from Stones		98	A through analysis of sites confirms both in policy and environmental terms that Countess is the best suited. A land train option will be provided to take visitors within 1.1 km of the Monument along a level walk with electric wheelchairs for the mobility impaired.  Policy and SPG states that new facilities should be built outside of the World Heritage Site	None	
Length of stay for visitors will be too long/Casual visitors will be lost		66	The business plan of the applicants is to make a much-improved visitor experience including multi-media interpretative information. Average visit will be in the region of 3/4 hours. The business plan is outside of the scope of planning considerations as are the vagaries of the behaviour of tourists	None	
Detriment of existing coach operators		10	Patterns of tourism will change. However a 'fast track' system is planned for coach operators lasting @2 hours. The existing facilities have been branded a national disgrace and safeguarding the interests of one group against the wider public interest is not legitimate	None	
Detrimental to other aspects of local tourism		3	It is considered that the improved quality of the experience and increased length of visit will encourage visitors to explore the neighbouring area and use facilities. This will be prompted by the new TIC within the Centre. There is expected to be an net benefit for other tourist attractions win the area	The Operational Management Plan will be required by condition and this will be expected to demonstrate how the tourist attractions in the surrounding area are to be promoted.	

Neighbour Objection Raised		No.	Officer Comment	Action
Visitor numbers will never be sufficient to finance the scheme		1	Market research indicates that visitors would welcome a more meaningful experience with greater information and a visit to the monument incorporating a walk. The applicants business plan is not a valid planning consideration	None
<b>Local Community</b>				
Visitor centre site will affect the lives of local people adversely		36	A rigorous assessment of the likely impacts of the scheme has been conducted and this confirms that provided the mitigation measures proposed are satisfactorily implemented and maintained then there will be no unacceptable adverse impact upon the amenity of neighbouring residents. Mitigation measures are numerous but include landscaping, noise monitoring, design and siting and operating hours	Conditions/SI06 to ensure mitigation measures proposed are satisfactorily implemented and maintained.
Needs of local people and impact on community ignored		13	The application will all told create some 76 fulltime construction jobs and 79 FTE jobs, which would provide local opportunities. The proximity of the Centre to Amesbury will encourage linked trips and contribute to the viability and vitality of the existing town centre. Local people will be afforded free access to the monument and local anglers will enjoy free access to the river.	None
Devaluation of property prices		12	Property prices are not planning issues. The impacts on residents amenity is covered above	None
Pressure on Salisbury employment situation		1	The application will all told create some 76 fulltime construction jobs and 79 FTE jobs, which would provide local opportunities.	None
VC is component of Amesbury so all it's components need to be exposed.		1	This objection is not sufficiently clear to be answered	None

Neighbour Objection Raised		No.	Officer Comment	Action
Location				
Site is completely wrong Fargo plantation/Airman's cross/A344 is a better site	61		A thorough analysis of sites confirms both in policy and environmental terms that Countess is the best suited. The Environmental Impact Assessment confirms that Fargo/Airman's would cause very serious archaeological damage	None
Too close to residential area	22		A rigorous assessment of the likely impacts of the scheme has been conducted and this confirms that provided the mitigation measures proposed are satisfactorily implemented and maintained then there will be no unacceptable adverse impact upon the amenity of neighbouring residents	Conditions/SI06 to ensure mitigation measures proposed are satisfactorily implemented and maintained.
Centre site positioned in area where most disruption will be caused.	14		A thorough analysis of sites confirms both in policy and environmental terms that Countess is the best suited. Although other alternative sites considered are more remote from existing settlement patterns invariably there are other environmental and policy reasons which mean that they are less suitable	None
Site is too near to sewage works and recycling centre	9		This has been evaluated and discussed with Wessex Water who operate this facility and they have no objections on these grounds	None
Entrance/Exit of visitor centre in wrong location	7		Both the County Engineer and Highways engineer raise no objections to the proposed access and egress. It is agreed that in order to comply with the Planning Brief for the VC site that the egress must physically prohibit right turn	Condition/I06 to ensure egress junction is left turn only
Area inside WHS should be used/was formerly acceptable	4		The World Heritage Site Management Plan has the objective of trying to remove 20 <sup>th</sup> /21 <sup>st</sup> Century development from the WHS. The Local Plan backs this up. What may have been considered acceptable years ago does not mean it will always be so.	None

Neighbour Objection Raised		No.	Officer Comment	Action
Visitor centre should be on the west side of the A345	3	A through analysis of sites confirms both in policy and environmental terms that Countess is the best suited. Alternative sites considered invariably subject to significant environmental and policy constraints which mean that they are less suitable	None	
Downland setting is not appropriate as it would have been forested in those days	2	No one is claiming that a downland setting would have been the original setting for Stonehenge, but the Management Plan does state that it would be a more respectful, peaceful and appropriate setting than the existing one.	None	
Locate visitor centre in Solstice Park	2	Alternative site analysis did take in Solstice Park, but the distance from the Monument and the incompatible land uses proposed meant it was considered inappropriate	None	
E H have not proved beyond all doubt that Countess East is best site	1	The Environmental Assessment and systematic analysis by officers makes a compelling case that Countess East is the best site.	None	
Cost to tax payers to screen site and build land train tunnel far more than any other site	1	The funding of the scheme is a matter for the applicants and outside of the remit of planning. Any planning consent will be controlled to ensure that what is approved is delivered	Conditions/106 ensuring the scheme is delivered as per the approved plans	
Site should be located behind Countess Farm	1	A through analysis of sites confirms both in policy and environmental terms that Countess is the best suited. A land train option will be provided to take visitors within 1.1 km of the Monument along a level walk with electric wheelchairs for the mobility impaired.  Policy and SPG states that new facilities should be built outside of the World Heritage Site	None	
VC should be in Amesbury to draw more tourists into the town	1	The site is in a good location to encourage linked trips with Amesbury, while still making the World Heritage Site accessible.	None	

Neighbour Objection Raised		No.	Officer Comment	Action
Free Access				
Loss of free visual access especially from A303		31	The A303 scheme is being pursued under the appropriate highways regulations and is not within the scope of this application	None
Stones were gift to nation, access should be free		19	This is something of a fallacy. The Stones were given to the Commissioner of Works as a gift to the nation. This has passed through the hands of relevant Government ministries as reorganisation has taken place. It is now owned and is now owned by DCMS and charging for visitor centre entry is legal.	None
The project is designed to deny the non-paying public views		6	Walking, cycling and riding throughout the VHS is encouraged and free of charge. If the A303 is placed in a tunnel obviously motorists will be denied the current view. The A303 scheme is being pursued under the appropriate highways regulations and is not within the scope of this application	None
Visitors should be allowed access to Stonehenge in the way they wish		3	The application encourages dispersed access in a manner with far more choice than existing arrangements. People will be encouraged to walk, cycle and ride throughout the VHS and the transit system will have 4 drop off points to encourage exploration of a much wider area. Choice for mobility impaired visitors will vastly improve	None
Stones will not stay free to local residents		2	This is incorrect. The application states that locals will benefit from a pass which allows free access to the VC, land train and VHS. (see Supplementary Submission Para 1.32, Page 15) This council should seek to ensure this commitment is followed through	Condition/106 to ensure free access scheme for locals
Option to be bussed to the stones should be available to all visitors		2	This would require a drop off and pick up point, a turning area and shelter near to the monument, which is contrary to policy.	None

Neighbour Objection Raised		No.	Officer Comment	Action
<b>Parking</b>				
Parking and traffic issues with visitors avoiding car park charges	8		This is a potentially serious issue. The applicants seek to control it by working in conjunction with the county council and adherence to their Travel Plan. The County are satisfied that these measures plus their own powers under Traffic Regulation Orders will be adequate to control the potential problem	106 to require the agreement of a Travel Plan which includes active measures to manage and prevent fly parking
Parking issues with non paying visitors parking on local roads	3		As Above	As above
Amesbury parking will be affected	3		The VC will have more than adequate parking spaces to cope with their busiest day. Visitors choosing to park in Amesbury Town Centre and then walk to the VC will be encouraged as this may bring new business to the existing service centre.	None
Solstice parking on Fargo road etc	1		Solstice arrangement will continue as they have and temporary parking on land to the west of the Stones may be permitted as a one off occasion.	The Travel Plan should include details of Solstice management to discourage fly parking on neighbouring residential roads.
<b>Transportation and Highways</b>				
Traffic impact and congestion on Countess Roundabout and road, access and egress will exacerbate this	91		The Traffic Assessment demonstrates satisfactorily that with the new flyover that the Roundabout will have more than adequate capacity to cater for the new Visitor Centre. However without the flyover then the junction will be inadequate	Condition/106 to ensure the flyover commences construction prior to the Visitor centre and is operational before the VC opens.
Traffic impact and congestion on local road network	46		Traffic Assessment has confirmed that the proposal will not cause unacceptable impacts upon the local road network	As above
Traffic increase in countess road	5		Assessments show that there is adequate capacity to cope with extra traffic on the road, providing the improvements to Countess Roundabout are secured	As above

Neighbour Objection Raised		No.	Officer Comment	Action
Increased traffic will cause more accidents	5		Highways specialist for the County have expressed they are satisfied within highway safety impacts	None
It will encourage rat-running through northern villages	3		This is a concern shared by SDC and is expressed in the Planning Brief for the site, which is explicit in requiring no right turn junction from the VC. The plans submitted show that right turn, north up Countess Road is possible and it is considered that this will encourage rat-running	Condition/106 to ensure egress junction is left turn only and physically prohibits right turn north onto Countess Road
Travel Plan targets not acceptable	5		The Travel Plan framework is generally considered acceptable, although it will become more detailed during the section 106 discussions	Section 106 agreement to specify detailed content of the Travel Plan
Land train crossing Countess Road will cause traffic delay	1		The Land Train will pass under Countess Road in a tunnel	None
Validity and clarity of traffic assessments	1		These have been scrutinised by the County Specialists and officers and are considered to be credible and convincing	None
No reference to Solstice Business park traffic	1		Traffic modelling has taken into account potential growth in use of the network in the future	None
Increase in traffic on A303 which will impact on other sensitive areas	1		No major net increase in the number of visitors are envisaged, it is projected to stay at @800,000 per year. This means that any increase of traffic on the A303 as a result of this scheme will be negligible	None
Roads of the Turnpike trust cannot be closed down or removed without a proper debate in parliament. The A344 was a toll road, the milestone is sited near the heel stone	1		The Highways Authority under the correct legal framework will pursue the closure of the A344. This application is confined to the reinstatement works	None
Bus park is too far away from centre	1		The coach park is some distance from the Visitor Centre, but they will only park there once they have dropped visitors off at the designated drop off points which are only some 200 metres from the main entrance.	None
Proposal to build a monorail linking Avebury, Stonehenge and Salisbury cathedral as solution.	1		This is not part of the application before us and we must confine deliberations to the application as submitted	None
<b>Traffic Pollution</b>				
Traffic pollution	3		Our environmental analysis indicates that there will be no adverse impacts as a result of the scheme	None

Neighbour Objection Raised		No.	Officer Comment	Action
Additional cars will cause exhaust pollution		2	Our environmental analysis indicates that there will be no adverse impacts as a result of the scheme	None
<b>Government spending</b>				
Excessive cost/Waste of money		55	The funding of this scheme is not a planning issue	None
Project purely financially driven to allow English Heritage to make money		12	This is a subjective comment and one outside the scope of planning consideration. Analysis of the plans does make it clear that English Heritage's scheme will make significant in-roads to delivering key objectives of the Management Plan	None
Money should be spent on new local facilities		6	The funding of the project is not a planning issue. It should be taken up with central Government	None
Community charge will rise in order to pay for the project		4	This is not a locally funded project, and it will be expected to pay business rates on opening. There is no reason it should add to the burden of local taxation	None
Money should be used on the roads		3	How the Government chooses to prioritise spending is not a planning issue	None
Wrong government priority		2	How the Government chooses to prioritise spending is not a planning issue	None
Money should be used to improve the road to Devon Cornwall		1	How the Government chooses to prioritise spending is not a planning issue	None
Money should be spent on a new hospital		1	How the Government chooses to prioritise spending is not a planning issue	None
Use the tunnel money to build Salisbury a bypass.		1	How the Government chooses to prioritise spending is not a planning issue	None
<b>Land train</b>				
Land train route will destroy the quality of life for local residents of Fargo road and Larkhill		36	Assessment has shown that the land train will not have an unacceptable impact on neighbours provided the mitigation measures are implemented and maintained. These include landscape screen planting and control of noise levels.	Conditions/S106 to ensure mitigation measures proposed are satisfactorily implemented and maintained.



Neighbour Objection Raised		No.	Officer Comment	Action
Land train impractical/hot environmentally friendly/suitable	31		There is no reason to assume the land train is impracticable. The non-penetrative and reversible nature of the track construction is a good environmental design solution. It will be designed to run on low emission LPG and also electricity when technology permits	None
Land train is a safety worry for local children	10		Due to the routing of the land train and its comparative slow speed (Max. 15kph), it is considered that such safety issues are negligible.	None
Land train runs too close to houses	11		The land train will run comparatively close to the rear boundaries of properties at 50-120 Fargo Road, (@30 meters at the nearest point) However with the mitigation measures proposed and substantial screen planting it is not considered that it will cause unacceptable detriment to residents.	Conditions/SI06 to ensure mitigation measures proposed are satisfactorily implemented and maintained.
Access route to the stones is in the wrong location	7		Careful analysis of alternatives has confirmed that the twin routes of central and northern are in environmental terms the most acceptable	None
Modern Land trains are not fitting for Stonehenge	2		From the Stonehenge amphitheatre the land trains will not be visible. Furthermore to the northeast portion of the WHS the routes are discreetly planning alongside existing routes and hedgerows, which minimises the impact. Also the impact should be weighed against the removal of the A344 and existing facilities from the setting of the Stones	None
No details of land train refuelling	2		Refuelling and servicing will be carried out to the rear of the Visitor Centre	
Land train tunnel will have a significant visual and noise impact on Countess Road residents	3		Analysis of noise and vibration demonstrates that the operation of the land train will not cause a nuisance to neighbours. As it meters and exits the tunnel it is in a cutting and therefore at it's closest point to residential properties will be hidden from view	Conditions setting maximum noise levels permitted and a monitoring and enforcement regime

Neighbour Objection Raised		No.	Officer Comment	Action
How will visitors who have booked an out of hours visit get there?	1		As with current arrangements there will be the opportunity to book a visit into the Stone circle itself, prior to general opening. These visitors, who are comparatively few in number will be taken to the monument by minibus, utilising the adapted bed of the A344	None
<b>Crime and Security</b>				
Security breach to local houses	23		Measures are proposed to minimise opportunities for crime. The VC site will be secured and guarded at night and the route of the land train and its tunnel will be gated. The applicant has offered to erect new fences for neighbours following discussions. Both the Police and MOD have been consulted and do not object to the application.	A condition requiring details of boundary treatments will be recommended
Security breach to army camps	6		The MOD have not raised objections to this proposal	None
Increased crime	1		See above	None
Increased likelihood of trespass on local properties	1		See above	A condition requiring details of boundary treatments will be recommended
Drugs will increase	1		This is speculation. If there is a breach of the drugs laws then this is a matter for the Police	None
How will fire and ambulances get to the stones themselves?	1		An access will be retained along the adapted bed of the A344	None
<b>A303</b>				
Project should not be determined until decision has been made on the tunnel	21		It is agreed that the flyover is a critical element, without which the visitor centre could not proceed. It is considered that conditions and legal agreements must be used to ensure that the visitor centre application cannot proceed until such time as the flyover is constructed.	Condition/106

Neighbour Objection Raised		No.	Officer Comment	Action
A303 should be dualled		9	The A303 scheme is being pursued under the appropriate highways regulations and is not within the scope of this application. For information the proposal is to dual the carriageway	None
A303 tunnel dangerous and a waste of money		2	The A303 scheme is being pursued under the appropriate highways regulations and is not within the scope of this application	None
A303 should be sunken		1	The A303 scheme is being pursued under the appropriate highways regulations and is not within the scope of this application	None
Application dependant on tunnel which is not certain		1	It is agreed that the flyover is a critical element, without which the visitor centre could not proceed. It is considered that conditions and legal agreements must be used to ensure that the visitor centre application cannot proceed until such time as the flyover is constructed.	None
<b>Access for the mobility impaired</b>				
Insurmountable obstacles for disabled, elderly or those with young children		23	It is considered that the scheme will in fact improve access for the disabled, by providing choice and a much wider opportunity to enjoy wider tracts of the World Heritage Site via 4 land train drop off points.	None
<b>Current site</b>				
Improve the existing site, buildings and roads		19	The existing site is extremely injurious to the setting of the stones and even with a facelift would still form an incongruous 21 <sup>st</sup> Century incursion on the monuments setting. Polices and the WHS Management Plan indicate the new centre should be built outside of the World Heritage Site	None
Build it underground at present site		9	There are a number of environmental constraints especially archaeological destruction through the extensive additional digging that would be required. Polices and the WHS Management Plan indicate the new centre should be built outside of the World Heritage Site	None

<b>Neighbour Objection Raised</b>		<b>No.</b>	<b>Officer Comment</b>	<b>Action</b>
The existing facilities are adequate		7	Disagree, the existing facilities are of a very poor quality, detract from the setting of Stonehenge and provide an underwhelming visitor experience.	None
<b>Noise pollution</b>				
Noise pollution		18	Analysis of noise and vibration demonstrates that the operation of the new proposals will not cause a nuisance to neighbours. The council will require and environmental monitoring scheme to be in place and will set maximum noise levels which the land train and visitor centre must not exceed. Opening hours will be controlled to prevent early morning and night-time operation	Conditions setting maximum noise levels permitted and a monitoring and enforcement regime
Problems with increased noise and property access on countess road		6	See above	
Noise of gunfire, planes from MoD use of plain		1	It is not envisage that this application has any relationship with the MOD's continued use of Salisbury Plain.	None
<b>Wildlife</b>				
Impact on wildlife		16	The council has carried out an Appropriate Assessment under the Habitat Reg's. This along with the Environmental Impact Assessment show that providing the mitigation measures proposed are implemented and maintained then this scheme will not cause significant harm to ecological interests	Conditions/106 will be used to ensure that the Construction Environmental Management Plan is implemented
<b>Contrary to planning policies</b>				
Loss of greenfield site		9	A through analysis of sites confirms both in policy and environmental terms that Countess is the best suited.	None
Not complimentary to the local area		4	To the contrary, in sustainability terms the proximity to Amesbury is considered to be a major benefit of this site. It will contribute to the vitality and viability of the Town Centre through encouraging linked trips. The application will all told create some 76 fulltime construction jobs and 79 FTE jobs, which would provide local opportunities.	None

Neighbour Objection Raised		No.	Officer Comment	Action
Main design not in keeping with local agreed designs		2	The design is considered to be excellent. It is innovative, modern, subtle and appropriate. The council is not aware of any plans being agreed locally prior to this application	None
Back land development		2	This is not the case	None
Proposed VC site does not form part of the Local Plan for development adopted in 2003		1	True the Countess Site is not allocated in the Local Plan. But if the development plan is read as a whole in conjunction with SPG of the WHS Management Plan and Countess Planning Brief and taking into account the site selection process, then it does emerge in policy terms as the best site available.	None
Supermarket was refused permission on this site. What's different about the VC?		1	An application for a food store was refused over ten years ago. The policies affecting the two land uses are very different and out of town retail use, which could draw trade, away from existing Town Centres is strongly resisted. The VC application is linked to very significant environmental benefits for the World Heritage Site	None
Does not form part of local plan adopted in 2003		1	Not true, the local plan has policy T3: 'It is proposed that a new visitor centre will be provided for the Stonehenge World Heritage Site'. True the Countess Site is not allocated in the Local Plan. But if the development plan is read as a whole in conjunction with SPG of the WHS Management Plan and Countess Planning Brief and taking into account the site selection process, then it does emerge in policy terms as the best site available.	None
Not consistent with the Management Plan		3	Disagree, assessment shows that the application is based on delivering key objectives of the Management Plan	None
Not consistent with planning policy		1	Disagree. In principle this development is supported by the Development Plan	None

Neighbour Objection Raised		No.	Officer Comment	Action
Environment				
Impact on River Avon	12	The council has carried out an Appropriate Assessment under the Habitat Reg's. This along with the Environmental Impact Assessment show that providing the mitigation measures proposed are implemented and maintained then this scheme will not cause significant harm to ecological interests		Conditions/106 will be used to ensure that the Construction Environmental Management Plan is implemented
Strategic environmental impact assessment inadequate/non-existent	7	Initial assessment of the ES did identify gaps in their information and hence further information was requested. This was supplied as a supplementary submission and further consultation and analysis undertaken. The Environmental Assessment is considered to be a thorough, credible and acceptable document		None
Appropriate Assessment for River Avon has not been done	4	The council has carried out an Appropriate Assessment under the Habitat Reg's. It is included at Appendix 5 of this report.		None
Environmental 'cost' is too high	7	Scrutiny of the Environmental Impacts indicates that providing mitigation measures proposed are implemented and maintained that the scheme will not have a significant adverse impact on the environment		Conditions/SI06 to ensure mitigation measures proposed are satisfactorily implemented and maintained
WHS is too sensitive to be doing anything to it.	2	The scheme is based on delivering key objectives of the WHS Management Plan. It is seeking to deliver a net benefit through removal of a substantial amount of inappropriate development from the setting of Stonehenge		None
Large number of visitors will cause litter	4	Agree, this may be a problem and could have a serious adverse impact on the WHS. A management regime to deal with this is required from the applicants		Condition/106 to ensure adequate measures to control litter

<b>Neighbour Objection Raised</b>		<b>No.</b>	<b>Officer Comment</b>	<b>Action</b>
Increased production of waste material	1		Infrastructure is in place to deal with the volumes of waste that will be produced. However there are opportunities for recycling that are yet to be fully exploited and in accordance with County Council SPG, should this application go ahead a full waste audit should be carried out to address these issues	Condition/106 to require a waste audit and measures for recycling.
Excessive environmental impact on northern land train route when bridleway 9a could be used	1		Assessment of alternative routes with the dispersed strategy adopted has confirmed that the northern route will not cause excessive environmental impact. The track lies over the ground needing no excavation and the scheme is fully reversible.	None
<b>Landscape character</b>				
Ruining the unique character of Stonehenge	6		Disagree. The scheme is based on delivering key objectives of the WHS Management Plan. It is seeking to deliver a net benefit through removal of a substantial amount of inappropriate development from the setting of Stonehenge thereby returning it to a more respectful landscape.	None
Destroying an historical landscape	2		Disagree. The scheme is based on delivering key objectives of the WHS Management Plan. It is seeking to deliver a net benefit through removal of a substantial amount of inappropriate development from the setting of Stonehenge thereby returning it to a more respectful landscape.	None
Currently Stonehenge is largely uncommercialised. VC would change that.	1		The numbers of visitors are expected to stay at current levels of about 800,000 per year, but the quality of the experience is to be improved. The manifestation of commercialisation right next to the Stones will be removed.	None
<b>Archaeology</b>				
Impact on archaeology	22		The whole of the application has been subject of a very high level of archaeological scrutiny and quite right to. The conclusions drawn are the application can proceed without significant harm.	None

Neighbour Objection Raised		No.	Officer Comment	Action
Site must be closer to the monument to comply with UNESCO's criterion for WHS's		1	Disagree - The WHS Management Plan has been written based on guidelines prepared by the International Committee on Monuments and Sites (ICOMOS), the expert body which advises UNESCO	None
	<b>Construction</b>			
Construction work will cause congestion and inconvenience		4	Construction will inevitably cause some disruption, however the Construction Environmental Management Plan will mitigate these impacts as far as possible.	Conditions/106 will be used to ensure that the Construction Environmental Management Plan is implemented
Will ruin a beautiful and popular walking route				
	<b>Pedestrian</b>			
		4	Disagree. The scheme is based on delivering key objectives of the WHS Management Plan. It is seeking to deliver a net benefit through removal of a substantial amount of inappropriate development from the setting of Stonehenge thereby returning it to a more respectful landscape. It will also seek to provide increased free access around the WHS.	None
Crossing the land train route will be dangerous for walkers		3	The junction will be carefully planned to ensure the safety of all	Condition/106 detailing how this junction is to work
Pedestrian access to stones via Byway 12 is dangerous		1	Byway 12 will be part surfaced and incorporate some segregation between users who will be predominantly pedestrians, cyclists, wheelchair users and horses. There is no reason to suppose that this will cause unacceptable conflicts	None
Proposal wants to change Bridleway routes and use.		1	The use of the Bridleways will still be open to current users. There will be some minor diversion, but this will not alter the overall connectivity or truncate it	None



Neighbour Objection Raised		No.	Officer Comment	Action
VC Design				
Turning it into amusement park		3	Disagree. The design of the visitor centre is considered to be excellent and a fitting, subtle and dignified building to herald the trip to Stonehenge	None
Size of car park is inadequate		4	Disagree. Parking analysis shows that the car park has more than enough capacity to cope with the busiest days. For freak events or unplanned growth an area of overflow car parking is shown.	Condition. The car park must be complete prior to opening of the VC building
Car and coach parks will be an eyesore		2	Disagree. The parking facilities are subject to land reprofiling and substantial landscape planting, which will render them inconspicuous when, viewed from outside of the site.	Conditions
Centre too large		1	In design and landscape terms the building is considered to be subtle and non intrusive within the landscape.	None
Architecture not sympathetic with the area/will be a hazard on sunny days		1	Disagree. The design of the visitor centre is considered to be excellent and a fitting, subtle and dignified building to herald the trip to Stonehenge	None
The centre and train will be an eyesore		1	Disagree. The design of the visitor centre is considered to be excellent and a fitting, subtle and dignified building to herald the trip to Stonehenge. From the Stonehenge amphitheatre the land trains will not be visible. Furthermore to the northeast portion of the WHS the routes are discreetly planning alongside existing routes and hedgerows, which minimises the impact. Also the impact should be weighed against the removal of the A344 and existing facilities from the setting of the Stones	None
The large VC is designed to make visitors feel they don't need to see the Stones themselves		1	The business case is not a planning consideration. Visitors will need to make up there own minds	None
VC looks like a bunker.		1	Partially agree and this is positive making it subtle and unobtrusive within the landscape.	None

Neighbour Objection Raised		No.	Officer Comment	Action
<b>Drop off points</b>				
Drop off point too far from stones	4		The shortest walk to the monument from the Durrington Farm Complex would be 1.1km each way along a level path. Electric wheelchairs would be provided. Severely disabled people would be bussed to the Stones. These are considered reasonable and acceptable arrangements	None
No design plans for the drop off structures	1		Detailed plans have been submitted and are further included in the Supplementary document at Appendix H	None
Drop off shelters are major structures and will interfere with the look of the landscape of the WHS	1		The shelters are lightweight largely transparent and discreetly located. It is not considered that they will be unduly detrimental to the character of the WHS	None
<b>Agriculture</b>				
Impact on agriculture	6		This is an important issue. Some of the best and most versatile agricultural land will be lost at the Countess Road East site. Structure Plan policy seeks to protect such land. However, the unique and exceptional circumstances related to the case, the environmental and economic benefits to be gained, together with the lack of feasible alternatives all lead to the unavoidable conclusion that this planning application is in accordance with those provisions of the development plan, which will permit the principal of development.	None
<b>Comments on EH</b>				
Project ill-conceived	3		The planning application has been well put together and is comprehensive. The plans for the new visitor centre have been well thought through and justified.	None
The project is a fait accompli	1		No. This application has been subject to an impartial planning process. It is determined upon its own planning merits taking into account planning policy and all other material considerations	None
English Heritage are incompetent and should be abolished	1		Subjective and erroneous comment.	None

Neighbour Objection Raised		No.	Officer Comment	Action
EH can't take no for an answer. Amesbury residents have objected to this many times.		1	The motivation for the application is clearly explained by the applicants. The planning issues are confined to scrutiny of its acceptability and not the character of the applicants.	None
<b>Comments on stones</b>				
Stones should be sold to the Americans		1	Subjective and erroneous point	None
Stones are dreary and uninteresting		1	Subjective and erroneous point	
Stonehenge should be ground up and used for a sub-base for local roads		1	Subjective and erroneous point	
Craziest idea anyone has ever dreamt up for this country. Will be a complete white elephant		4	Subjective and erroneous point	
<b>Bad weather</b>				
Nowhere for people to go during bad weather at the monument		1	Visiting Stonehenge has, by its very nature always been an outdoor pursuit. There will be shelters at the principle drop off points and limited shelter at the retained underground facilities at the monument. As the monument is in England visitors will have to live with the vagaries of the weather.	None
<b>Screening</b>				
Screening issues for affected residents		1	The applicants have agreed to offer residents new fences to be agreed. There is also substantial landscape planting proposed to screen the proposals.	Condition to ensure boundary strategy and screening is adequately implemented and maintained.
<b>Electricity</b>				
Re-siting of electricity pylon will create eyesore for residents facing west on countless road		1	This has been clarified as part of the supplementary submission. Two 33kv power lines that cross the site as are to be buried. With regard to the 132kv high voltage lines Scottish and Southern have drawn up plans to direct electric cable underground under there own permitted development rights.	None

Neighbour Objection Raised		No.	Officer Comment	Action
<b>Flooding</b>				
VC will increase flooding of the countess services site		I	The Environment Agency have been consulted and are satisfied that these proposals are acceptable	None
<b>Cyclists</b>				
Provisions for cyclists will worsen especially with loss of underpass		I	Disagree. There will connectivity to the surrounding area, byways will be improved to facilitate cycling, 40 cycle parking spaces will be provided at the VC, bicycle hire will be available, and the SUTRANS link will pass thorough the site.	None
<b>Plan detail</b>				
Plans not correct as farmland will remain farmed and with relevant buildings in it		I	English Heritage owns the Countess Road site and the application contains no plans for the continued farming of this land. The wider WHS is predominantly is arable and livestock use and there are no plans to later or interfere with this as part of these proposals	None
<b>Light pollution</b>				
Light pollution		I	Agreed, it is important that sky glow does not impact upon the WHS. The Royal Astronomical Society has been consulted. If the application proceeds then a condition will specify all lighting will be 'cut off' design and limited to certain hours to avoid this issue	Condition.



## 54. Appendix 4

### How to Appraise Design

It is often argued that appraisal of what constitutes good design is subjective and that "beauty is in the eye of the beholder. This is not a credible argument and will not be accepted by Salisbury District Council as an excuse for poorly exercised and ill-conceived schemes. The appraisal of good design has widely accepted and internationally established principles as much as any other of the recognised professions.

It has been one of the purposes of this guide to try and break down some of the mystique and misconceptions that surround the issue of design. To this end this appendices highlights the stages that The Local Planning Authority will go through when appraising your scheme. There are no secret formulas and it may provide you with some very valuable guidance that you can apply to your ideas at an early stage to see if they are likely to be acceptable to the Council

#### **Step 1: Think about the spaces around your site and consider how they connect.**

Think about the framework of routes and spaces that connect locally and more widely, and the way other developments, routes and spaces relate to one another. Consideration of how your particular proposals can plug into the existing framework and not harm it should be your starting point. These issues are often referred to as "**Layout: Urban Structure**"

#### **Step 2 Take a look at the predominant pattern of buildings in the area?**

You should look at the pattern of the arrangement of street blocks, plots and their buildings in a settlement. Is your area characterised by a regular pattern such as a 1930's style development, or is more irregular due to the use of many different types of buildings. You should try and ensure that your proposals are in keeping with the general pattern that prevails in your area. These issues are often referred to as, "**Layout: Urban Grain**"

#### **Step 3 Take time to look at the wider landscape**

Consider the character and appearance of the land, including its shape, form ecology, natural features, colours and elements, and the way these components combine. Then think how your proposal can be designed to blend into it. May be the use of native species for new hedges, or the creation of contours could help. Is there an established field pattern your development could sit within without causing harm?

#### **Step 4 How much can you realistically expect to get on this site?**

You should consider the amount of development on a given piece of land and the range of uses. Density influences the intensity of development, and in combination with the mix of uses can affect a place's vitality and viability. However all sites have their limits and you will need to carefully go through steps 1 to 3 to help you arrive at a reasonable amount of development. Overdevelopment, which is shoehorning too many buildings on one site, can have a damaging impact on the appearance of a settlement, similarly bland low-density units may be inappropriate in an area characterised by high-density development such as the centre of Salisbury. In each case the key to getting this step right is making sure steps 1 to 3 are carried out rigorously. These issues are often referred to as **Density and Mix**

#### **Step 5 Consider how big your development should be**

You must design your new building taking full care to ensure it is of an appropriate scale. Scale is the size of the building in relation to its surroundings or the size of parts of a building or its details, particularly in relation to the size of a person. Height determines the impact of development on views, vistas and skylines. You must also consider the combined effect of the arrangement, volume and shape of the building in relation to other buildings and spaces. Again it is essential that the scale of your development respects its context and is in keeping with the surrounding pattern of development. You must consider the impact the building would have when viewed by other people passing by.

#### **Step 6 What is your finished building actually going to look like?**

Once you have gone thoroughly through steps 1 to 4 you must then think about the design details of your proposal. Things to consider are the craftsmanship, building techniques, decoration, styles and lighting of a building or structure. This includes careful choice of materials where you should consider

so that the style of the building respects those of the wider context, although this doesn't necessarily mean you must copy what's already there. Often a different style can be just as effective. Look for example at the contrasting styles that sit together so well in many of our settlements.

### Step 7 How to realise your plans

Once you have been through the previous 6 steps, you will be in a position to draft up your plans. We strongly suggest that a qualified architect with a proven track record is chosen, as drawing up detailed plans is a skilful and difficult job. Once the plans have produced then please send them into this office for pre-application discussion so that we can inform you if they are on the right lines. When finally submitting your planning application you should keep your workings from stages 1 to 6 and submit them in the form of a "design statement" that explains and supports your chosen design.

### Checklist for Appraising a Scheme

CRITERIA	ASSESSMENT
<b>Layout: Urban Structure</b> The framework of routes and spaces that connect locally and more widely, and the way developments, routes and spaces relate to one another	
<b>Layout: Urban Grain</b> The pattern of the arrangement of street blocks, plots and their buildings in a settlement	
<b>Landscape</b> The character and appearance of the land, including its shape, form ecology, natural features, colours and elements, and the way these components combine	
<b>Density and Mix</b> The amount of development on a given piece of land and the range of uses. Density influences the intensity of development, and in combination with the mix of uses can affect a place's vitality and viability	
<b>Scale; Height</b> Scale is the size of the building in relation to its surroundings or the size of parts of a building or it's details, particularly in relation to the size of a person. Height determines the impact of development on views, vistas and skylines	
<b>Scale: Massing</b> The combined effect of the arrangement, volume and shape of the building in relation to other buildings and spaces	
<b>Appearance: Details</b> The craftsmanship, building techniques, decoration, styles and lighting of a building or structure	
<b>Appearance: Materials</b> The texture, colour, pattern and durability of materials and how they are used	

## 55. Appendix 5 - Stonehenge Planning Application

### Appropriate Assessment under The Conservation (Natural Habitats & c) Regulations 1994

**Proposal:** Full Planning Application for New Visitor Centre and Associated Works for Stonehenge

**Location:** Land East And West Of Countess Road Amesbury

**International Nature Conservation Site:** River Avon System Site of Special Scientific Interest and River Avon Candidate Special Area of Conservation

**Nature/Description of Application;** Construction Of New Stonehenge Visitor Centre, Transit System, Undergrounding Of 33 Kv Power Line, Removal Of Existing Visitor Facilities & Replacement With New Underground Operations Facility, Restoration Works To A344 And Environmental Statement

#### **Purpose of this Document**

To set an agreed framework with English Nature and other parties as to how the Appropriate Assessment both alone and in combination will be carried out for the Stonehenge application. In each category below the relevant guidance is quoted to set the framework and then the work or proposed course of action to relate it to this specific planning application is highlighted within the yellow box.

#### **Legislative Framework**

Required by Regulation 48 of the *Habitats Regulations 1994* implementing Article 6(3) of the *Habitats Directive (92/43/EEC)*.

#### **Why is an appropriate assessment required for the Stonehenge Application?**

Under Regulation 48(1), an appropriate assessment needs to be undertaken in respect of any plan or project which:

- ≠ either alone or in combination with other plans or projects would be likely to have a *significant effect* on a European Site, and
- ≠ is not directly connected with the management of the site for nature conservation.

#### **Salisbury District Council (Competent Authority) Action**

The visitor centre is adjacent to and bordered by the River Avon cSAC and represents a major infrastructure proposal that may have significant impacts both alone and in combination on the ecology of the watercourse.

#### **When does the appropriate assessment need to be Carried Out?**

An appropriate assessment needs to be undertaken in respect of a plan or project described above before any "*competent authority*" decides to give any consent, permission or other authorisation for the plan or project. (Regs. 48(1) *et al*);

#### **Salisbury District Council (Competent Authority) Action**

Therefore the Appropriate Assessment (which includes an in-combination assessment) needs to be complete prior to the application being placed before the decision-making Planning and Regulatory Committee.



### **Determining significant Impacts**

Likely significant impacts have already been determined and hence the need for this appropriate assessment.

#### **Salisbury District Council (Competent Authority) Action**

English Nature in letter dated 28<sup>th</sup> October 2004 confirmed that the Stonehenge Application may have significant effect on the River Avon cSAC and that an Appropriate Assessment is required, alone and in combination with other plans and projects.

### **Who is the Competent Authority that will undertake the appropriate assessment?**

#### **Salisbury District Council (Competent Authority) Action**

Salisbury District Council.

### **What is an Appropriate Assessment?**

It is a self contained step in a wider decision making process,

According to the nature conservation value of the site, an appropriate assessment will identify whether particular aspects such as hydrology, disturbance to habitats and any other affects with a negative impact on a SAC will occur. When adverse impacts are identified the assessment will then indicate whether these impacts could be successfully mitigated, whereupon conditions may be applied or whether the destruction to habitat is so severe that the development should be refused. While the assessment required under the Habitats Regulations does not correspond to an environmental assessment, for some projects such as this where an EA will be necessary, it will be appropriate to use the information assembled for the purposes of the EA also for the assessment required by the Habitats Regulations.

### **Scope and Content**

The scope and content of an appropriate assessment will depend on the location, size and significance of the proposed plan or project (PPG 9 box C10). English Nature will advise on a case-by-case basis. According to the nature conservation interests of the site, English Nature will identify particular aspects that the appropriate assessment should address

#### **Salisbury District Council (Competent Authority) Action**

English Nature in their letter dated 28<sup>th</sup> October 2004 have confirmed that The AA is required both alone and in combination with other projects. This could be based on previously completed AA's, but updated with new information obtained by the Council. Based on previous AA's and in combination work carried out related to the River Avon cSAC the key impacts to be assessed can be summarised as:

- ## Runoff, spillage or leakage directly or via groundwater polluting the river during construction.
- ## Increase or decrease in run off during operational use of the development
- ## Increased demand upon water resources arising from increased visitor and employee populations
- ## Increased sewerage disposal impact upon
  - a) Capacity of existing treatment works
  - b) Quality/quantity of discharge into the Avon
  - c) Need for additional works to treatment works
- ## Direct loss of habitat
- ## Indirect pressures on the river system if floodplain dynamics are altered.

## **Relationship with Environmental Statement**

An Environmental Statement has been prepared and submitted with the planning application.

The ES addresses all significant environmental effects. It is appropriate to use the information assembled for the ES when carrying out the appropriate assessment under the Habitats Regulations. In view of this the ES clearly identifies, under a specific subject heading, the likely significant effects on the internationally important habitats and/or species.

## **Methodology - How the Appropriate Assessment, Alone and in Combination will be carried out for the Stonehenge application**

The Appropriate assessment will comprise of the following key stages:

The competent authority:

1. *Must consult English Nature*
2. *May consult the general public*
3. *Should clearly identify and understand the site's conservation objectives having regard to the advice of English Nature*
4. *Should require the applicant to provide such information as may reasonably be required for the purposes of the assessment*
5. *Should identify the effects of the proposal on the habitats and species of international importance and how those effects are likely to affect the site's conservation objectives*
6. *Should decide whether the plan or project, as proposed, would adversely affect the integrity of the site in the light of the conservation objectives*
7. *Should consider the manner in which the plan or project is proposed to be carried out, whether it could be modified, or whether conditions or restrictions could be imposed, so as to avoid adverse effects on the integrity of the site*
8. *Should conclude whether the proposal, as modified by conditions or restrictions, would adversely affect the integrity of the site*
9. *Should record the Assessment and notify English Nature of the Conclusions*

## **The Key Stages Related to the Stonehenge Planning application**

### **1. Consulting English Nature**

Under Regulation 48(3) the competent authority must consult English Nature and must have regard to any representations made by English Nature.

#### **Salisbury District Council (Competent Authority) Action**

English Nature were consulted by letter dated 16.9.04 and have confirmed by letter dated 28.10.04 that an Appropriate Assessment both alone and in combination is required. Salisbury District Council as competent authority fully accepts these representations and will implement the requirements accordingly. English Nature provided detailed comments to Salisbury District Council and these form the basis for the request for further information in section 4 below

## 2. Consulting the General Public

Under Regulation 48(4) the competent authority may (if it considers it appropriate) take the opinion of the general public, on the implications of the proposal for the site's conservation objectives, using whatever steps they consider necessary. This may usefully include taking the opinion of others with relevant knowledge or expertise.

### **Salisbury District Council (Competent Authority) Action**

After discussion with Legal services and balancing the nature of the proposals, the character and proximity of the cSAC against the extensive public consultation of 11 weeks already undertaken as part of the planning process, it has been decided that additional consultation was not merited in this case.

## 3. The Site's Conservation Objectives

English Nature will be able to give a clear statement of the site's conservation objectives.

### **Salisbury District Council (Competent Authority) Action**

Related to the previous Appropriate Assessment work it is apparent that the sites conservation objectives are based on the River Avon and its major tributaries, The Bourne, Till, Wylye, Nadder and Dockens Water being recommended as eligible for cSAC status in 1998 because it contains a high diversity of habitat types and species which are of European importance given that they are either rare or threatened.

The species of European importance are:

- €# Atlantic Salmon (*salmo salar*)
- €# Bullhead (*Cottus gobio*) for which the River Avon catchment is considered to be one of the best areas in the United Kingdom
- €# Brook Lamprey (*Lampetra planeri*) a small, jawless, eel like freshwater fish, for which the River Avon catchment is considered to be one of the best areas in the United Kingdom
- €# Sea Lamprey (*Petromyzon marinus*) The largest lamprey found in the UK. Inhabits coastal waters and spawns in rivers, for which the River Avon catchment is considered to be one of the best areas in the United Kingdom (although not the upper reaches of the River Avon)
- €# Desmoulin's whorl snail (*vertigo moulinsiana*) a small snail usually found in long established environments bordering lowland rivers and lakes. It occurs in scattered sites between the Norfolk Broads and Dorset. Within Europe, only England and Ireland have reasonable populations. The River Avon catchment is considered to be one of the best areas in the United Kingdom
- €# Flowing water vegetation (*Ranunculus fluitantis* & *Callitriche-Batrachion*). Watercourses dominated by water-crowfoot species reflecting relatively unpolluted water. The River Avon catchment is considered to be one of the best areas in the United Kingdom

#### 4. Requiring Further Information

The competent authority, taking the advice of English Nature where necessary, should require the applicant to provide such information as the competent authority may reasonably require for the purposes of making the assessment (Reg.48(2)).

#### **Salisbury District Council (Competent Authority) Action**

In this case to allow the assessment to be made additional information has been requested from the applicants English Heritage and their agents, Chris Blandford Associates at a meeting held in the Planning Office, Salisbury on 18<sup>th</sup> November 2004. The information requested was as follows:

- ## Empirical evidence on potential future growth in visitor numbers. Calculations for likely foul water loads and demand for water resources have been based on current levels of visitors. No account has been taken of potential growth and this needs to be accounted for. This may also have implications for traffic loadings and resulting pollution risk.
- ## Further detail is required of the method used to assess demand for water, especially with regard to how increased demand on resources resulting from this proposal may have adverse impacts on the flow.
- ## Figures on water usage from this proposal have been provided to inform previous AA's. The applicants should work with Wessex Water to provide an updated estimate of demand from this proposal and to relate demand to impacts on flows alone and in combination with other projects and proposals.
- ## Foul water assessments are satisfactory; with the exception that further detail will be required for higher visitor projections.
- ## The detailed drainage scheme is not considered to be sufficient to conclude that there will be no significant effect on water quality during operation. Further detail of the system is required; to cover operation and maintenance requirements and to ensure high water quality can be maintained.
- ## In particular it is imperative that all possible eventualities for removing any risk of pollution to the river and swamp area are addressed. The location of the infiltration trench is not clearly specified and needs to be clarified to ensure there are no direct impacts on habitat
- ## The assessment of the risk of pollution is inadequate to justify the conclusion of a neutral effect on the river. The following further detail is required
  - a) The risk assessment should include an attempt to identify the magnitude and likelihood of occurrence as separate parameters. Together these generate the level of risk for each issue. At present there is no information on the expected relative significance of the various "risk" identified
  - b) De-icing for winter maintenance is not mentioned. This can be a major source of pollutants, introducing sodium and chlorine into run off. The detention/swale/wetland system should be designed with these impacts in mind
  - c) Storage requirements for on-site de-icing agents need to be carefully considered. Cyanide compounds can be present and represent an additional risk.
- ## The ES states, at para 10.4.26, that a "modification of the final outfall position ... may be necessary to coordinate with the A303 Stonehenge Improvement Scheme". English Nature understands that there may still be a requirement for a separate treatment system for this scheme, due to liability and management issues. In view of this, scheme designs for the Visitor Centre should be developed and described within the ES which account for both possibilities
- ## There is no specific assessment of potential impacts on groundwater and effects in relation to the SSSI/cSAC. This needs to be clearly outlined and conclusions justified.
- ## English Nature is concerned that there could be impacts on the SSSI/cSAC and associated species from disturbance and pollution if access should increase as a result of the development. However we are concerned that access should be managed to ensure disturbance and negative impacts are minimised and the detail of any access proposals would need to be clarified
- ## 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 English Nature to be satisfied that their implementation and maintenance has been duly considered. The detail will need to be agreed with the Environment Agency and English Nature.
- ## There is an intention to bury some electric cables to "re-emerge on the East bank of the River Avon". This has the potential to cause an adverse effect on the SSSI/cSAC and further detail is required of the methodology for this works.

### 5. Identifying Effects

Having regard to English Nature's advice and other consultation responses and, where relevant, taking account of the ES or any other information supplied by the developer/proposer, or otherwise available, the competent authority should identify what the effects of the proposal are likely to be. The effects considered should be those of the plan or project, either alone or in combination with other plans or projects, on the habitats and species of international importance and how those effects are likely to affect the site's conservation objectives. This will involve considering, for example, the nature, scale, geographic extent, timing, duration and magnitude of direct and indirect effects; considering the degree of certainty in the prediction of effects; considering all mitigating measures already contained in the proposal and the extent to which these measures are likely to avoid, reduce or ameliorate adverse effects on the international nature conservation interests. It is the residual effects, after mitigation, that are considered at this stage.

#### **Salisbury District Council (Competent Authority) Action**

The information supplied by the applicants to allow an Appropriate Assessment to be made is contained within the Environmental Statement, which accompanies the planning application. From this information, which has been the subject to scrutiny and assessment by the key consultees and the Technical Consultative Group, the following risks can be identified

There are the following acknowledged impacts and risks:

- ⌘ Changes to water quality from run-off during construction and operation affecting flora and fauna
- ⌘ Changes in hydrology caused by construction events, including drying out of the floodplain fen and subsequent changes in vegetation
- ⌘ Increased need for foul water treatment and potential upgrade of existing facilities.
- ⌘ Noise impacts from piling and machinery.
- ⌘ Risk of pollution and failure of mitigation measures during construction, which is assessed as a moderate adverse impact
- ⌘ There is a small adverse impact that may occur due to a rise in Biochemical Oxygen Demand (BOD) in the River through additional foul sewage treatment at Amesbury Sewage works.
- ⌘ Increase in visitor numbers, which is key to calculating likely foul water loads and demands for water resources
- ⌘ Groundwater pollution could occur during construction and operation
- ⌘ Increased and unmanaged public access to the river could cause damage to habitats
- ⌘ Burying of the 33 kV power lines has the potential to cause harm.

### **6. The In-combination Assessment**

As well as determining what impacts the planning application on its own may have on the integrity of the SAC, there is also a requirement to look at other planned developments and existing consents in the area to assess whether cumulatively they will have an adverse impact on the nature conservation of the river.

In 2002 a report was endorsed by the Planning and regulatory committee which considered an in combination assessment of major development proposals may have upon the health and integrity of the River Avon. The major developments identified at this time were as follows:

Project location	North of Salisbury Plain, Salisbury to Newbury, Salisbury and Larkhill
Training Estate, Salisbury Plain	EIA submitted to LPA's addressing post strategic defence review use of the Plain
Solstice Business Park	Business park development
Residential development	Up to 1000 houses, land south of Boscombe Road Amesbury
Stonehenge Visitors Centre	As per this application
A303 Improvements	Undergrounding and flyover
Wyllye Valley Relief Road	Route options
Brunel Link and Harnham Relief Road	Major road schemes in Salisbury
The Maltings Redevelopment	Major city centre redevelopment in Salisbury
Ringwood, New Forest	Retail redevelopment

The 2002 report has formed the baseline for the in-combination assessment of the Stonehenge application the status of major projects reviewed. This shows there are no new major projects planned which will have an impact, and that in fact a number of the projects included above are not likely to happen within the foreseeable future (e.g. the Maltings Redevelopments and Wyllye Valley Relief Road). There has been therefore a net reduction on the likely in-combination impacts and the conclusions drawn in 2002 are therefore still germane to this case. Further information where it can reasonably be expected to be attained, such as the A303 Stonehenge Improvement Scheme, Statement to Inform the Appropriate Assessment, then the most up to date information has been used to produce the most up to date assessment of the current pressures on the River Avon.

#### **Salisbury District Council (Competent Authority) Action**

The conclusions of the in-combination appropriate assessment: construction pollution issues controllable through management programme. Surface run off to be attenuated to greenfield rate. Requirement for additional abstraction and effluent treatment, which will need to be agreed with the appropriate authorities.

The overall impact of the Stonehenge planning application in combination with other projects is that there are minor tangible risks but they can be successfully mitigated through condition.

### **7. Integrity of the Site**

Having regard to English Nature's advice, other consultation responses and any other information available, the competent authority should decide whether the plan or project, as proposed, would adversely affect the integrity of the site, in the light of its conservation objectives. That is, whether the plan or project would adversely affect the "*coherence of the site's ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified*" (PPG 9 box C10). An adverse effect on integrity is likely to be one which prevents the site from making the same contribution to favourable conservation status for the relevant feature as it did at the time of its designation.

The form of words used in Regulation 48(5) implies that a precautionary approach should be taken in considering effects on integrity, in line with the Government's principles for sustainable development (see *Sustainable Development: the UK strategy* page 33). Regulation 48(5) says that (subject to Regulation 49) projects may only proceed if the competent authority has ascertained that it will not adversely affect the integrity of the European site

#### **Salisbury District Council (Competent Authority) Action**

Risks of the adverse impacts on the River Avon as identified above are considered to be minor. They are short-term, based principally around the construction phase of the Visitor Centre, but with some operational risks due to visitor number impacting on water quality. These risks are highlighted at section 5 above. However by securing proper and permanent safeguards (see section 8 below) then it is not considered that the development will have an adverse impact upon the integrity of the European site.

#### 8. Considering How To Avoid Adverse Effects

If the proposal would adversely affect the integrity of the site then, having regard to English Nature's advice, the competent authority should consider the manner in which it is proposed to be carried out and whether the plan or project could be modified, or whether conditions or restrictions could be imposed, so as to avoid the adverse effects. This may include, for example, changes to the siting, layout, timing or use of the proposal and the use of obligations or legal agreements. (Reg. 48(6)).

Compensatory measures that may be offered in the proposal at this stage, seeking to redress but not remove residual harm to the international interests (such as the provision of land for habitat creation purposes), should not be considered in the appropriate assessment, but may be considered later in the decision making process. (See Reg. 53).

#### **Salisbury District Council (Competent Authority) Action**

In order to avoid the potential impacts outlined above, the applicants are suggesting a number of mitigation measures. This is based around an Outline Construction Environmental Management Plan, which has been submitted with the application, Ecological Construction Management and Monitoring Plan (ECMMP) and a Water Strategy. A project ecologist would oversee the works including the following safeguarding measures:

1. Defined works areas would be clearly marked and no construction works, storage of materials or workers would be allowed outside these areas, particularly in areas of important grassland habitats or near areas of importance for terrestrial invertebrates.
  2. No entry would be allowed by employees/construction/site workers to the River Avon bank-side during the construction period to limit disturbance impacts on the river SAC and associated habitats and fauna.
  3. Works external to buildings would be restricted to daylight hours to avoid the use of external lighting, which would be required with night-time works to prevent unnecessary disturbance to nocturnal and crepuscular species such as certain invertebrates, bats and birds.
  4. No herbicide would be used within or adjacent to important grassland areas identified
  5. To reduce the risk of fire damaging habitats within the Site, smoking would not be allowed on Site during construction.
- ## Specific protected species mitigation guidance would be provided including:
- \*DEFRA Licence guidance with regard to bats; Seasonal constraints such as vegetation clearance only allowed outside the breeding bird season
  - Specific construction methodology near to badger setts to be agreed with Project Ecologist and English Nature (EN) and if necessary carried out under an EN licence;
  - \* Methodology of relocation of reptiles to be agreed with EN;
  - Any steep sided excavations to be provided with plank/ramps to allow animals, which could fall in such as deer and badger an opportunity to get out.
- ## Water Strategy includes a "sensitivity test" based on higher projected estimate of visitors
- ## Water Strategy outlines potential impacts and mitigations on water resources and water quality including foul run-off and groundwater.
- ## The management plan makes it clear that there will be no access to the water courses for general public hence preventing the risk of human activity causing habitat destruction or damage
- ## Information indicates that burying of electric cables will not occur in the vicinity of the River Avon

It is considered that the mitigation measures proposed will prove effective if they are properly implemented and this may be secured via an appropriate condition up an planning permission granted.

## **9. Conclusion on Effects In The Light of Conditions and**

The competent authority should reassess the conclusions in the light of any such modifications, conditions or restrictions that may be agreed or imposed.

It is not considered that the scheme either alone or in combination would have an adverse impact on the SAC. Some minor risks have been identified, but it is considered that the mitigation set out within the Construction Environmental Management Plan, the Ecological Construction Management and Monitoring Plan (ECMMP) and the Water Strategy would minimise the likelihood of occurrence and make the risk negligible. It is however, necessary to ensure that the measures promoted are adequately implemented and the management regimes maintained and this should be secured through condition should planning permission be granted. Requirement for additional abstraction and effluent treatment has been agreed between the applicant and appropriate authority.

## **10. Recording the Assessment**

It would be advisable for this conclusion, and the reasons for it, to be recorded. English Nature should be notified of the conclusion of the appropriate assessment and the authority's decision as to the effects on the integrity of the site, before the authority undertakes the plan or project or issues any permission, consent or other authorisation (PPG 9 para 30).

The subsequent courses of action open to a competent authority are set out in Regulations 48(5) - (7), 49 and 54(3). The Regulations prohibit a competent authority from undertaking or giving consent to any plan or project unless the appropriate assessment concluded that it would not have an adverse effect on the integrity of the site, or specific criteria are met and the Secretary of State has been informed.

### **Salisbury District Council (Competent Authority) Action**

To record the assessment the local authority will adopt the Good Practice Outline at paragraph 29 of the English Nature, Habitats Regulations Guidance Note (May 1997) and will append the assessment to the Committee report, place a public inspection copy on deposit in the public reception area, copied to English Nature and all parties who were consulted on the assessment and a copy placed on the planning application file.

## **Background Papers**

The Conservation (Natural Habitats &c) Regulations 1994  
Habitats Regulations Guidance Note 1 - English Nature 1997  
Planning Policy Guidance Note 9  
Committee Report to Planning & Regulatory Panel - John Hammond, Salisbury District Council 2002  
Counsel's Opinion & Guidance Note - James Maurici 2003

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