



Campaign to Protect
Rural England
WILTSHIRE

President: Mr J Bush OBE
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Lansdowne House
Long Street
Devizes
Wiltshire SN10 1NJ

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

30th 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

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