

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

October 28th 2009

Planned Department

Rec.	29 OCT 2009
Acknowledged
Copy to
Action

Dear Mr Madge

Planning application: S/2009/1527 Stonehenge Visitor Centre

I am writing further to my phone conversation with you on 26th 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

FO/

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