



Campaign to Protect
Rural England
WILTSHIRE

President: Mr J Bush OBE

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

**Lansdowne House
Long Street
Devizes
Wiltshire SN10 1NJ**

Tel: 01380 722157

Email: wiltscpre@btconnect.com

Web site: www.wiltshire-cpre.org.uk

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

25th 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:

- (i) more sympathetically designed low-key and single-storey building(s) that blend into the landscape and are not highly visible from a distance;
- (ii) better screened car parking arrangements;
- (iii) coach and overflow parking removed to another, less visible location, such as Greenland Farm; and
- (iv) no highway illumination and substantially reduced other lighting, including the omission of downlights from the outside roof of any building.

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