

BRAMFIELD, SLAB LANE, WEST WELLOW, ROMSEY, HANTS, SO51 6BY

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

30 November 2009
[Via e-mail to Judith.howles@wiltshire.gov.uk]

Dear Mr. Madge

S/2009/1527 - Stonehenge Visitors' Centre and associated works: OBJECTION

I am a member of two environmental and transport campaign groups that have already lodged objections to this planning application - Salisbury Campaign for Better Transport and the A36/A350 Corridor Alliance. Both belong to the Stonehenge Alliance which has today e-mailed a substantial objection to the plan to Judith Howles.

I wish to add my personal objection to the plan. Having been consulted over the drafting of the above objections, I endorse the reasons they have listed with such thoroughness for treating this as a departure application. There is little point in listing those reasons again. I believe they provide substantial grounds for rejecting the application outright and indeed that it would be perverse to conclude – as I believe you have already done – that this scheme can possibly comply with a development framework that must inevitably consider the duty to prevent damage to the world heritage site.

The fact that the proposal comes from English Heritage does not give it any privilege in the planning system. Your duties are the same as if the proposal came from an operator of regional heliports or open-air car auctions: the proposal would probably look much the same and I am sure you would instinctively reject it out of hand as an unwarranted intrusion into such a visually and culturally sensitive location.

The undue haste displayed by English Heritage and the government should not influence your deliberations. The reported reasons for that haste are spurious and without any material bearing on the decision: the desire of the developer to have this building and its vast area of parking ready for the 2012 Olympics should be no more relevant than if a purely commercial developer – say the car auctioneer or helipad operator envisaged earlier - wanted to cash in on the same event.

I get the impression that you will ignore such a commonsense approach and consider it your duty as part of a council that supports growth of almost any kind associated with road transport and the A303 corridor to proceed as fast as possible to approval of this

application.

Much of the information required to make that decision is still missing. I do not believe you have the information needed to complete the most rudimentary appropriate assessment under the Habitats Directive. I have seen no evidence that you are considering, or asking the applicant to provide data on, the potential impacts of the scheme on the integrity of the Salisbury Plain SAC/SPA (not just the Avon chalk stream system SAC). In the latter case it is acknowledged that data on abstraction from, and potential pollution of, the aquifer are not yet available. In the absence of this data it is not possible to conclude, as you must under the law, that the scheme will *not* damage the integrity of the European site. Similarly, in the absence of traffic data from this scheme and in-combination effects from other plans and projects in the area, you cannot reach a conclusion on absence of threat to Salisbury Plain.

The relevance of these in-combination effects to the Avon system and the Salisbury Plain may be judged from studying the Habitats Regulations Assessment (HRA) carried out of the SW Regional Spatial Strategy. Table 11.1 lists sites for which uncertainty remains about the adverse effects of air pollution on integrity. Salisbury Plain SAC/SPA and the River Avon SAC are both listed.

Due to recent ill-health I have not had time to submit this objection before now, let alone deal as fully as I would have liked with the questions of European biodiversity law that bear on this application. I have a great deal of information on recent planning decisions and judgments of the High Court and the European Court of Justice and if you were interested in a proper and timely consideration of this application I would be pleased to forward the HRA for the SW and some of the recent planning decisions bearing on matters such as the duty to consider alternatives to proposals that could damage European species and sites.

However, I expect you will wish to proceed to a favourable determination of this application without the delay involved in satisfying the requirements of the Habitats Directive and the 1994 Regulations. I will therefore copy this letter to DCLG and GOSW in the hope that a call-in will lead to an inquiry at which all the required information can be presented and a competent decision made on the UK's duties to conserve cultural and natural assets of national and international importance.

Yours sincerely

Patrick Kinnersly

Cc

DCLG

GOSW

Natural England