

STONEHENGE, AVEBURY and ASSOCIATED SITES
WORLD HERITAGE SITE (WHS)

- 1 Stonehenge forms the southern, more visited part of the UNESCO, designated:- 'Stonehenge, Avebury and associated sites World Heritage Site.' The status of Stonehenge as a major part of the above entitled World Heritage Site (WHS) requires the UK Government to conserve and communicate its Outstanding Universal Value, to present and future generations.
- 2 Two busy roads (both the A303 and the A344) sever, compromise and cut off Stonehenge from protected surrounding monuments and landscape and; most importantly, from the Avenue – its ancient processional approach.
- 3 The combined effect of the Visitor facilities, roads, parking and the overarching lack of an integrated park and ride facility; so close to the Stones represent a significant visual intrusion apparent from the centre of the WHS.
- 4 The Government published "A New Deal for Transport – the Government's White Paper on the Future of Transport (Cm 3950)" – also known as the "Integrated Transport White Paper" (ITWP) on 20th July 1998. The ITWP at paragraph 1.35 page 16 requires absolute reductions in traffic in those places - the STONEHENGE WORLD HERITAGE SITE designated area – where its environmental damage is worst.
- 5 Government Policy is given in the ITWP, on pages 25 and 26, at paragraphs 2.21 to 2.25. This is under the headings of Sustainable Transport – a better environment in the ITWP Chapter 2. Paragraph 2.4 highlights 'It (the ITWP) is a long-term strategy to deliver sustainable transport.'
- 6 Paragraph 2.21 highlights cumulatively that: 'Road construction and car parking (generally like these Stonehenge proposals) have made heavy demands on land, a finite resource. In England alone, in the second half of the 1980's (when Stonehenge, Avebury was designated as a World Heritage site); an area equivalent to the size of Bristol, (where the headquarters of the Planning Inspectorate controlling at least two previous inquiries into Stonehenge, is located), was taken for road building and parking'.
- 7 Paragraph 2.22 after Kyoto in 1997 and with COPENHAGEN showing this remains valid, sets out, Climate Change is one of the greatest environmental threats facing the world today.'
- 8 Paragraph 2.23 points out, 'Yet buses and trains (as integrated herewith) can have distinct environmental advantages as highlighted by the Royal Commission on Environmental Pollution,' (in the RCEP 18th report on Transport and the Environment of October 1994, that led to the precursor to the ITWP [see later, and at Annex D] Transport: The Way Forward).

- 9 Paragraph 2.23 also points out 'emissions of carbon dioxide and most other pollutants are generally lower per passenger-kilometre for rail than for road. This report includes most importantly for one of its main contributions; the Copenhagen congruent utility of hydro-powered non-polluting, non carbon dioxide generating, renewable: rail facilities to Stonehenge. Thus there will be no carbon dioxide emissions, in future visiting to the eye of the storm surrounding the Stonehenge, Avebury World Heritage Site. The resultant future carbon dioxide emissions will thus be reduced from substantial, in the present proposals, to minimal in the enclosed aegis of an updated Jackson Plan for Stonehenge, Avebury WHS.
- 10 Going to paragraph 2.24 highlights 'We all know about noise pollution and road congestion around airports' (such as Heathrow, Gatwick, Lyneham, Boscombe Down, Bristol and Southampton) 'But air traffic also has a global impact.' Events such as the 9/11 in 2001, in terms of (above) extended noise pollution impacts through reconstruction, at New York and the Pentagon in Washington, indicate that some unwelcome so-called visitors to Stonehenge may be surreptitiously 'casing the joint' for future targeting of these National Icons. Stonehenge must be closed to these people by efficient security, as it was closed to travellers for several years, especially at the Summer Solstice. The fact of Stonehenge having adjoining Ministry of Defence lands and bases, renders this chilling consideration more plausible. Furthermore, it is clear that the military air traffic also has a global impact, next highlighting the exact wording of the rider of 2.24. In this way the Stonehenge Visitor Centre will be intrinsically affected by the escalation of wars.
- 11 Going to the middle of paragraph 2.24 shows 'CO₂ (carbon dioxide) emissions per passenger-kilometre are higher from air travel than from most other ways of travelling.' Returning to the end of 2.23 gives 'emissions of CO₂ (carbon dioxide) and most other pollutants are generally lower per passenger-kilometre for rail than for road.' This report contributes rail facilities to Stonehenge with no carbon dioxide emissions.
- 12 Thus with the COPENHAGEN CONTEXT, no reasonable reader will ignore these transport considerations, that will render significantly less, the carbon footprint of the nearly one million visitors to Stonehenge, Avebury WHS. It is particularly requested and required that the powers that be CALL IN this planning application for a deficient and inappropriate Stonehenge visitor centre; as essentially set out in DCLG/DCMS circular 07/2009 paragraph 19. The grounds are adverse impact on the Stonehenge/Avebury WHS and its setting. These include impact on the outstanding universal value, integrity in the Copenhagen context, and significance with regard to the ITWP Government Policy Framework extracted herewith.

13 ITWP 2.25

The conclusion of the ITWP Chapter 2 overarching part, headed 'A better environment' is set out at paragraph 2.25 in seven indents, on pages 25 and 26. It begins by stating, 'The New Deal for transport (herewith titled the ITWP) therefore (given the integrated transport points extracted herewith) sets the framework to:

14 2.25 first indent – 'Reduce road traffic growth.' This must be read cumulatively with similar statements at; John Prescott's personal Foreword on p.3, in the first paragraph 'The previous (Conservative 1979-1997) Government's Green Paper (Summarised in Annex D) paved the way that we needed to improve (rail) public transport and (thus) reduce dependence on the car.' ... This (ITWP) White Paper builds on that (improve rail and reduce car dependence) foundation.

15 Similarly, at the start of the Foreword, in the second paragraph where 'traffic growth has resulted in more congestion and worsening pollution.'

16 Therefore, immediately following this equation of growth = congestion and pollution; in the third Foreword paragraph; 'This (ITWP) White Paper fulfils our manifesto commitment to create a better, more integrated transport system to tackle the (equation above) problems of congestion and pollution we (the Government)

have inherited.' In 2.2 and 2.14 'There is much that needs to be done to recover from the legacy (for example the Sir John Jackson military railway of 1914, for the Government, to Stonehenge etc., abandoned since the inter-war period) we (the Government) inherited.'

17 Going to 2.14 'Yet in recent years (especially post-Beeching) investment in (rail) transport has failed to maintain the (outstanding first world war) quality of the rail system, allowing valuable assets (such as the list following) to deteriorate.

1 Sir John Jackson engineered military railway of 1914; between Amesbury, Countess, Larkhill, Airman's Corner, to Stonehenge Airfield, immediately south of the Stones.'

18 There is a backlog of neglect of railway stations; (in these terms the neglect of potential stations at Devizes Parkway at Lydeway, Wilton, Ludgershall, Tidworth, Amesbury and Bulford), track and bridges.

19 Devizes Parkway was included in the Stonehenge Management Plan – Consultation draft 2000 on pages 62 and 63. Please see ATTACHMENT .

20 The existing facilities at Stonehenge are basic and cramped, and there is no space for education or exhibitions. Both so-called park and ride to and from Salisbury station and parking are seriously inadequate.

21 The need to care for Stonehenge properly has been recognised for many years. A total scheme of up to £600 million was the recognition of Stonehenge's outstanding universal value. Unfortunately, both elements – a £540 million tunnelled A303 bypass proposal, and a £60 million visitor centre at Countess, just north of the historic Amesbury Abbey precinct; were stopped due to the recession in 2007.

The Prime Minister, responded to a question from Robert Key, MP (Salisbury) on 13th May 2009.

22 This Prime Minister's question from Robert Key MP (Salisbury) is recorded in Hansard as:

23 'Please will the Prime Minister tell us whether the Government are in a position (after the recession) to support the long awaited improvements to the (World) Heritage site (WHS) at Stonehenge* and to the roads, as well as the Visitor centre that has been anticipated for so long?'

24 From Hansard The Prime Minister (The Rt Hon Gordon Brown MP, responded:

'I am pleased to announce that, in partnership with the Stonehenge programme board, we have been able to identify a suitable and affordable solution for a visitor centre.

*Stonehenge is one of the world's key heritage sites (WHS), the Hon Gentleman is privileged to have it in his constituency. Today's (13th May 2009) announcement marks the **first stage towards making the long-held aspirations that he and others have had for Stonehenge a reality.

25 The site will be further enhanced by the closure of the A344, which at present takes traffic very close to the stones. Funding of up to £25 million (now £27.5 m) will be provided through a range of public and private sources. ***We are determined to help the development of one of the great sites in the world.'

26 However, the overarching climate change priorities are now being recognised, with Prime Minister, Gordon Brown, at the time of writing, attending the final part of the Climate Change Summit, in Copenhagen 7-18 December 2009. The cumulative World Heritage Site Management Plan(s), form the agreed framework of priorities; for Stonehenge, Avebury and associated sites comprehensive future management.

- 27 Essential improvements to the Stonehenge landscape setting, are for example the removal of Larkhill sewage works and power lines. The Stratford Olympics site offers a good example of the comparison enhancement of the latter site, through undergrounding at a cost of almost £200 millions. Such improvements and presentation to visitors are identified as priorities.
- 28 Over the years, there have been several attempts to do something about solely Stonehenge, in the totality of the Official UNESCO Designation of Stonehenge, Avebury and associated sites, World Heritage Site (WHS).
- 29 With reference to Copenhagen, The UK Climate Change Act 2008 provides for 80% reductions in carbon dioxide emissions by 2050. It is specifically stated that the above-mentioned Act applies both to Government Departments, and sponsored organisations such as English Heritage. Key stakeholders are warned that they are rendering themselves likely to prosecution. In Parliament, the expenses scandal has been over thousands. At Stonehenge £30 million has been spent on paper studies and nothing has been done.
- 30 The bulk of this was involved in the £192 millions - £540 millions A303 bypass.
- 31 The writer was involved both in the Ellison Inquiry, into the bypass, and an alternative proposal; and the Inquiry into the £60 million previous Visitor Centre, given planning permission in 200.. at Countess, north of Amesbury.
- 32 The Prime Minister Gordon Brown M.P's 13th May 2009 answer in Hansard, is said to give English Heritage's latest proposals (Application S/2009/1527) the go-ahead in principle by the Government.
- 33 Strangely, Airman's Corner was announced as the selected location for a new visitor centre, together with the more understandable decision in favour of the closure of the A344.
- 34 It is set out that the strange location has been agreed by a group of key stakeholders, who should know better, established by the Government in December 2007, and led by English Heritage.
- 35 This note sets out several basic conflicts with Government Policy. This context has been strongly set out on several occasions and must now be heeded. Government Policy must be complied with, inter alia, if Britain's future Climate Change Act 2008 targets are to be achieved. There are three main points:

- 36 A The Prime Minister did not announce Airman's Corner. This appears in error in, 'the proposed scheme and selected location left of a diagram showing some seeming children's doodle here. (See ATTACHMENT).
- 37 B The fully accessible transit system is a toylike play, that makes no contribution whatever to carbon dioxide emissions reductions. Indeed, the site at Airman's Corner is not only in the designated WHS, but also it is significantly further from London, and the linking justification to do something for the 2012 Olympics there. There is already planning permission at Countess Amesbury for a better integrated (though not perfect) Visitor Centre. Rail-based Electric vehicles are essential, to reduce carbon dioxide emissions; both by using hydro-electric non-polluting resources and having integrated parking, electric park and ride, and Visitor Centre both outside the World Heritage Site, (WHS) and near to London.
- 38 C As immediately above in the World Heritage Site (WHS). This fully applies the rigour of (WHS) planning considerations integrated with the Government Policy context set out herewith. It is, of course, as above, Stonehenge, Avebury, and associated sites (WHS).
- 39 It is stated that the Application S/2009/1527 scheme is to identify improvements under the Government's aegis, to the totality of the Stonehenge, Avebury and associated sites World Heritage Sites, that could be made by 2012. This is the London 2012 Olympics date, and please note carefully that the actual spending of the original Stonehenge sum of £600 million has gone in part (£200m approx) see ATTACHMENT) to undergrounding visually intrusive power lines at Stratford in time for the Olympics.
- 40 The major part of the above £600 million ... viz £300+ million has gone to the DEVIL'S (Punchbowl on the A3 near Haslemere and Hindhead, that is).
- 41 A planning application (No S/2009/1527) has now been submitted to Wiltshire Council for the necessary consultations. As part of this formal planning process, under the highlighted above Government Policy, these objections are made invoking the Climate Change Act 2008 and general statutory requirements.
- 42 The visitor centre will be on the wrong side resulting in far more emissions than if it was to be built according to the exact Planning Permissions granted on appeal at Countess, near Amesbury Abbey, the A345 and A303. The SWRDA News Release of 14th October 2009 claims the Application No S/2009/1527 is environmentally sustainable including a quasi – Eden Project, new low-emission visitor transit system. It is also claimed the proposals are sensitively designed for the landscape although they are inside the World Heritage Site (WHS). The main advantage of Countess as a future visitor centre is that it was outside the World Heritage Site (WHS).

- 43 John Prescott, Deputy Prime Minister 1997-2007, published and undersigned the Government's White Paper on the Future of Transport – Integrated Transport, (hence the abbreviation I.T.W.P. used herewith is derived) – A New Deal for Transport CM 3950 on 20th July 1998.
- 44 In his personal Foreword to the ITWP, he states in the second sentence, "The previous (Conservative 1979-1997) Government's Green Paper paved the way with recognition that we needed (at Stonehenge amongst the overarching status of general WHS and cumulative protected areas) to improve public transport and reduce dependence on the car."
- 45 This was highlighted after John Prescott had played a major role in establishing under UN auspices the Kyoto Treaty and Protocols on Climate Change in December 1997.
- 46 Readers are directed to the cumulative effects, post-Kyoto of the integration of ITWP page 16, paragraphs 1.33 to 1.36, both page 31 paragraph 2.52 (Box), and also page 32 paragraph 2.53, page 33 paragraph 2.59 and page 92 paragraphs 4.1 to 4.3 inclusive.
- 47 The second is English Heritage, at the National Monuments regenerated buildings on the Swindon Railworks site. English Heritage are similarly involved in both parts of the WHS.
- 48 The ITWP in Chapter 2, entitled Sustainable Development, in the part on 'A better environment' has the most important paragraph 2.25. The requirement here is to 'limit the visual intrusion caused by transport.'
- 49 The important paragraph 2.25 requirement is 'respond to the challenge of climate change'.
- 50 Thus the response herewith is to ask for the CALL-IN of Stonehenge Visitor Centre Application S/2009/1527; as it severely worsens carbon dioxide emissions. It would only make climate change worse. The alternative proposal herewith of rail facilities to Stonehenge, powered by hydro-electric green renewable resources; will be shown to be GOVERNMENT POLICY from ITWP page 134 PARAGRAPHS 4.200, 4.201, and 4.202. They are thus to be preferred options and must duly replace the S/2009/1527 proposals; which are thus to be REJECTED.
- 51 Continuing in ITWP paragraph 2.25 there is an overarching further requirement to, 'minimise transport's demand for land (especially inside the WHS), protect habitats and maintain the variety of wildlife.' This demand for land is minimised by the Jackson Plan, through joint tunnel infrastructure accommodating both 'green' railways and sewerage pipelines. This is most importantly near the Stones, where it is most vital, on WHS, ITWP and general grounds.

- 52 ITWP paragraph 2.25 penultimately requires the S/2009/1527 proposals via this Jackson Plan, 'ensure that the cumulative environmental impacts (listed herewith) are taken fully into account in investment (and planning) decisions.'
- 53 Finally in ITWP paragraph 2/25 The Government via the ITWP highlight the requirement to 'enhance public (Wiltshire Council – Planning Inspectorate – Government Department) awareness of (the listed herewith) transport and environment issues.' Thus the cumulative effect of ITWP 2.21 to 2.25, with inter alia 4.195 to 4.203; is to require the CALL-IN and REJECTION of the S/2009/1527 proposals and their replacement by the Jackson Plan proposals herewith.
- 54 This commentary returns to the context of the ITWP paragraphs 2.24 with 2.2 and 2.4. Readers are directed to paragraph 2.20 at the third indent. This requires the S/2009/1527 proposals 'support regeneration and the vitality of urban and rural areas.'
- 55 This is interpreted as supporting regeneration, in Swindon, Salisbury and in the totality of the Stonehenge, Avebury and associated sites WHS.
- 56 The as yet unlisted indent of ITWP paragraph 2.25 requires – reduce use of non-renewable materials/energy sources.' This is interpreted as – increase use of renewable energy sources such as hydro/tidal resources. Both the RCEP paragraph 8.85 of 1994; and the Energy of 200 similarly require more renewable regeneration.
- 57 Now the Swindon Railworks site, once employing 15,000, has been regenerated since its closure in 1986 by 3 main elements.
- 58 Then First is the National Trust new Headquarters' at Heelis. The National Trust is involved in both parts of the Stonehenge, Avebury and associated sites WHS.

2.45 Please go to the ITWP Chapter 2 – Sustainable transport at page 22, paragraph 2.2, where it is highlighted – "There is much that needs to be done," (self-evidently around Stonehenge, noting the words in brackets are inserted herewith in updating, and do not appear in the ITWP), to recover from the legacy we (The Government in 1997) inherited."

"ITWP paragraph 2.2 continues:- "The lack of a strategic and integrated approach; (since Stonehenge, Avebury WHS was designated in 1986, a decade before the ITWP of 20th July 1998), in recent years has made many of the overarching Stonehenge problems worse." "But our (Government ITWP) New Deal for transport sets out a framework (now listed and highlighted herewith) for change."

Going to ITWP paragraph 22.24, establishes, "It (the ITWP cumulatively) is a long-term strategy (at Stonehenge, Avebury WHS) to deliver sustainable transport. It (the ITWP cumulatively) is also a strategy for modernisation; (of course, as much as possible outside World Heritage Sites and other protected areas – see ITWP paragraphs 4.195 to 4.211 on pages 122, 134 and 135 to avoid compounding the highlighted paragraph 2.2 problems set out immediately above).

It is a strategy that harnesses the latest developments in technology." Five of these Copenhagen congruent measure are now listed in relation to putative Stonehenge visitor centres.

- (A) High Speed Frail to Heathrow, London etc
- (B) Park and Ride including road dual mode vehicles
- (C) New Stations
- (D) Ground source heat pumps
- (E) Renewable hydro-electric power

A. High Speed Rail

The Queen inaugurated High Speed One, at St Pancras International Station, London in November 2007.

High Speed One is the new name of the Channel Tunnel Rail Link (CTRL). In the ITWP the CTRL context is explored on page 81, at paragraphs 3.213 to 3.215 inclusive; in relation to Trans-European Networks.

The Second is English Heritage, at the National Monuments Record mainly regenerated buildings, on the Swindon ex-railworks site. English Heritage, as with the National Trust, are involved in both parts of the Stonehenge, Avebury World Heritage site (WHS).

The Third is the Designer Outlet Shopping Village of about 100 shops, again in the regenerated buildings of the old Railworks.

However, more regeneration is still required. This follows on from the cumulative citing of the ITWP herewith. This is a bus service linking the three east-west Wiltshire main railway lines, with new stations as interchanges, again citing the cumulative requirements of the ITWP

The paragraphs involved here are:

- 1.33 Box) page 16 especially – more buses and trains, improved networks.

Readers are asked to note that John Prescott allocated almost £1 million to bus network enhancement in Wiltshire, immediately after the ITWP was published by him on 20th July 1998.

The then non-unitary Wiltshire County Council accordingly provide for a Swindon-Avebury (part WHS) – Devizes – Trowbridge bus service. Trowbridge is, of course, the county Town of Wiltshire, with the headquarters buildings located there. Wiltshire is now a unitary authority and subsumes both Stonehenge and Avebury of the unitary World Heritage site.

Now Wilton is the historic county town of Wiltshire. It gives its name to the county but was supplanted firstly by Salisbury as it is a cathedral city, and then in the inter-war period by Trowbridge, with only half the population of Salisbury.

Historically there have been good bus services and even direct trains between Swindon and Salisbury.

Thus a hourly frequency Swindon to Salisbury bus service in accordance with the ITWP paragraphs 1.33 (Box), and 1.34 to 1.36 is proposed linking the 3 railway lines at Swindon, Devizes Parkway at Lydeaway, this must be a necessary condition to be directly attached to any visitor centre proposal at Stonehenge.

This would serve:

Swindon ex-railworks National Trust/English Heritage
Swindon railway station and bus station,
Avebury (part) World Heritage Site,
Devizes, for main Museum for Stonehenge/Avebury
Devizes Parkway at Lydeaway, new station and interchange on South West main railway line. (see ITWP)
Countess Visitor Centre at Amesbury for Stonehenge (part) World Heritage Site, described herewith park and ride.
Wilton, new station and interchange, serving the historic name county town for Wiltshire, Wilton House, and MOD and Forces Headquarters
Salisbury Railway Station
Salisbury Bus Station, Endless Street

The vital statement (at paragraph 1.34) covers Stonehenge, and appears as "We (The Government including the DEFRA sponsored English Heritage) will be more effective in our stewardship of natural resources, and are determined to build from the historic turning point of the special United Nations' Conference at Kyoto, where the developed countries agreed to legally up binding targets to reduce greenhouse gas emissions."

It is highlighted for readers, that the United Nations Copenhagen Climate Change Summit takes place in Denmark from 7th to the 18th December 2009. This will update to after 2010, direct continuation of the context and approach of the Kyoto Treaty and Protocols. The European Union, under the present Swedish Presidency, has tartgeted a 20% reduction by 2020 in carbon dioxide emissions. The longer term target is 80-% reductions by 2050.

Readers are asked to return to John Prescott's ITWP Foreword, at the end of the first paragraph there. It is set out that "This (ITWP) White Paper builds on that (cited above previous Government's Green Paper – Transport: The Way Forward – of which extracts appear at ITWP ANNEX D pages 158 to 160 inclusive) Foundation."

John Prescott sets out "This (ITWP) White Paper fulfils our (Labour 1997) manifesto commitment to create a better, more integrated transport system, to tackle the problems of congestion and pollution we have inherited."

"It (the ITWP) is timely. In its Green Paper (of which extracts appear at ITWP ANNEX D pages 158 to 160 inclusive) the previous (Conservative 1979-1997) Government recognised that we could not go on as before, building more and more new roads (for example at Stonehenge and Salisbury) to accommodate the growth in car traffic."

"With our (Government) new (in 1998), but now being comprehensively updated at Copenhagen [7th – 18th December 2009]) obligations to meet targets (above) on climate change, the need for a new approach (at Stonehenge, Avebury WHS etc) is urgent" (and remains urgent).

"The main aim of this (ITWP) White Paper is to increase personal choice, by improving the alternatives (at Stonehenge/Avebury WHS – my emphasis), and to secure mobility that is sustainable in the long term." Following the inauguration of High Speed One (HS1 to the Channel Tunnel) by the Queen at St Pancras International in November 1997; there are now proposals for new high speed railways –

HS2 to Heathrow, then north

HS3 to Heathrow, then west to Bristol and South Wales

Similarly there is a Conservative manifesto pledge to promote high speed rail routes via Heathrow, and not to proceed with a third runway and sixth terminal there. The reason relates to the present Copenhagen Climate Change UN Summit likely future targets and quotas. Britain is much criticised towards 2050, as a third runway at Heathrow will be tantamount to aviation producing all the carbon dioxide remaining allocation quotas likely for 2050. A Times article of 7th December 2009 is enclosed in this regard. Perhaps the Visitor Centre has crashed in at Airman's Corner, on this supposed loophole of the Heathrow Third Runway proviso.

John Prescott continues, in his ITWP Foreword at the fifth paragraph. "The priority will be maintaining existing roads rather than building new ones."

Going to John Prescott's Foreword, in its penultimate paragraph, "the economy, technology (high speed rail) and attitudes to transport and the environment (for example currently at Copenhagen's Climate Change UN Summit) are changing so rapidly."

John Prescott concludes his Foreword thus, and duly undersigns. He states, "This (ITWP) White Paper reflects the Government's commitment to giving transport (around the Stonehenge, Avebury and associated sites WHS) the highest possible priority." This is despite the Prime Minister,

Gordon Brown's Stonehenge announcement of 13th May giving £27.5 million priority; when Stonehenge enjoyed until 2007 the highest priority of £600 million, one tenth for the visitor centre, and the remainder for a tunnelled A303 bypass. No wonder the local MP, who asked the Prime Minister the question on 13th May 2009, has announced he is stepping down as an MP in Election Year 2010.

John Prescott's last sentence is – "We now look to others - companies, individuals – (such as Mr. J. Jackson, B.Sc [Hons] Wales, Dip.TP), employees and local authorities (- such as Wiltshire, acting as a unitary integrated council since 1st April 2009, on the valuable approach herewith) – to join us in shaping (at Stonehenge, Avebury and associated sites WHS) a new future (including both high speed rail and links to existing railways) for sustainable (such railways powered by non-polluting, non-carbon dioxide emitting, renewable hydro/tidal electricity, sourced for example from Severn and other barrages) transport in the UK.

Going to the Scope of the (ITWP) White Paper on page 8, it is made abundantly clear that the ITWP "embodies new, modern thinking on integrating transport with other aspects (such as heritage protection and specific lists arising from ITWP paragraphs 1.22 and 1.33 to 1.36 inclusive), of Government Policy.

The SCOPE continues in its penultimate paragraph on ITWP page 8 as follows – "This (ITWP) White Paper sets the framework which our (Government) detailed policies (such as for Stonehenge, Avebury and associated sites WHS integrated transport and visitor facilities), will be taken forward. Some of the proposals will require legislation which will be brought forward as soon as Parliamentary time allows.

As regards legislation the most Important Acts will be listed. These include the:

Climate Change Act	2008:
Transport Act	2000:
Energy Act	2008:
Planning Act	2008:

STONEHENGE – A RESPONSE TO THE MID 2008 / 2009
CONSULTATION PRESENTED BY
BARONESS ANDREWS

- 1.1 This response attempts an overarching view in its scope, to the July 2008 consultation proposals of English Heritage. The latter were presented by Lord Bruce Lockhart, then Chairman of English Heritage. I understand the proposals to be a cheap and nasty amalgam of three elements.
- 1.2 Firstly to have NO Stonehenge A303 tunneled bypass. This had escalated in cost from £192 million given at the Ellison Inquiry in 2004, to £540 million at the end of 2007, when the scheme was stopped, in view of the Government's redirection of resources to the Northern Rock £25 billion nationalisation and rescue.
- 1.3 Northern Rock was a precursor of the wider present financial crisis. Now Bradford & Bingley, 60% of Royal Bank of Scotland, and 40% of HBOS, to be merged with Lloyds TSB, are being similarly nationalised. 'Southern Rock' or 'my' historic Stonehenge stones and trilithons, were thus to have support equivalent to 4 years of the total budget of English Heritage access declined.
- 1.4 At about a ball-park figure of around 2% of Northern Rock, the Stonehenge ex-proposals were £540 million for the A303 tunnelled bypass and £67 million for a visitor centre at Countess, Amesbury, with a land train to near the stones of Stonehenge.
- 1.5 Secondly, to close and grass over the A344 road to Devizes. This would be from the Stonehenge fork on the A303, past the Heel Stone, of Solstice fame, to just beyond the present visitor centre.
- 1.6 Thirdly, to refurbish and extend the existing visitor centre by the stones. As long ago as 1993, fifteen years ago, the Parliamentary Public Accounts Select Committee had castigated the existing visitor centre as "a national disgrace." Little has been done since, apart for drawing up the £67 million visitor centre proposals at Countess, Amesbury with a land train (most of the way) to the stones.
- 1.7. Please note £20 million to £30 million has been spent by the Government on paper studies at Stonehenge, and very little has actually been achieved on the ground. The Jackson Report herewith aims to redress the endless costly studies that go nowhere, by giving a middle range solution that saves millions in studies and outgoings, by careful integration of two sets of existing infrastructure.
- 1.8 These are:
 - The 2 mile-long Boscombe Down Airfield Runway
 - The Sir John Jackson military railway of 1914, to be converted and extended in tunnel; as the basis of a land train, electrified from renewable resources, visitor shuttle from Countess at Amesbury to the Stones.

- 1.9 My involvement in these Stonehenge matters stems from an interest in transport, particularly railways and GWR matters. In the 1980's the book 'Plain Soldiering' by N D G James regarding military history on Salisbury Plain was published. I was on a GWR course at the time, and I was absolutely astounded to see photographs of wagons emblazoned Sir John Jackson at Stonehenge.
- 1.10 Sir John Jackson was a civil engineer, in the image of Brunel, who built a First World War military railway to Stonehenge in 1914. This is well shown in the 'Plain Soldiering' extracts attached.
- 1.11 He built this military railway primarily to serve the Stonehenge Airfield. It was wished that this should expand to accommodate bombers. However, as this would have meant the demolition of the Stones at Stonehenge; it fortunately did not come to pass. The National Trust acquired the Stonehenge Airfield following a national appeal. Sir Haydn Phillips, the Permanent Secretary in 1993 to the Department of National Heritage (now DCMS) has described this more fully. Sir John Jackson's military railway then had no function; and it closed in the 1920's, after a short life. Few even know it ever existed.
- 1.12 This report is forwarded in the context of: the Convention on European Human Rights and associated Directives, and especially the rights in effective consultation, for a fair consideration of matters concerning the Stonehenge A303 bypass, and associated proposals for a visitor centre at Countess, Amesbury.
- 1.13 The basic principle of a World Heritage Site (WHS) is to PROTECT STONEHENGE, through ensuring both visitor centres and A303 bypasses are relocated OUTSIDE the World Heritage Site designated area.
- 1.14 This statement of matters is addressed both to English Heritage and the Secretaries of State. It is most important that this report is treated officially by the Powers that be.
- 1.15 This statement of matters has been carefully set in train through extensive research of GOVERNMENT POLICY. The context is that Mr J Jackson B.Sc (Hons) Wales, DipTP was accredited by Lord Carter of Devizes, as a Roll B Parliamentary Agent, and generally. Lord Carter of Devizes was Chief Whip in the House of Lords, and a Member of the Cabinet.
- 1.16 The Government published "A New Deal for Transport – the Government's White Paper on the Future of Transport (Cm 3950)" – also known as the "Integrated Transport White Paper" (ITWP) on 20th July 1998. The ITWP at paragraph 1.35 page 16 requires absolute reductions in traffic in those places - the STONEHENGE WORLD HERITAGE SITE designated area – where its environmental damage is worst.

- 1.17 It was presented to Parliament by John Prescott, Deputy Prime Minister (1997-2007) and (then) Secretary of State for the Environment, Transport and the Regions.
- 1.18 In mid-1997 (please see ITWP para 4.3 page 92) "the merger of the former Departments of the Environment and Transport has already secured better integration of transport and environmental thinking and land use planning policy. This (ITWP) White Paper sets out the national framework for an integrated transport policy within which others (especially English Heritage and Mr J Jackson) can act."
- 1.19 However, a matter of concern is that English Heritage seem likely to report to 4 separate Secretaries of State, half of these following the break up of the integrated DETR in 2001. Indeed the Secretary of State for Transport, Ruth Kelly, MP announced her resignation at the Labour Party Conference at Manchester on 23rd September 2008
- 1.20 She had gained an inkling of the end September 2008 revisited 1929 Great Crash on Wall Street (New York, USA). Under her aegis the £540 million A303 Stonehenge tunnelled bypass had been stopped, by the efflux of funding to the £25 billion Northern Rock rescue (2% of it).
- 1.21 At the time of writing it is envisaged that the £20 billion Bradford & Bingley rescue and part nationalisation, will put paid similarly to the nearby £35 million Westbury A350 bypass.
- 1.22 There is no evident overarching environmental or integration context at Stonehenge apparent from English Heritage despite 3 major Bills in Parliament currently, and 2 similar statutes.
- 1.23 These Bills are:
- 1 Climate Change Bill
 - 2 Planning Bill
 - 3 Planning and Energy Bill
 - 4 Local Transport Bill
 - 5 There is a cumulative effect of the Channel Tunnel Rail Link (Supplementary Provisions) Act 2008, the Crossrail Act 2008 and the Queen's official opening of the Channel Tunnel Rail Link, to St Pancras International, in November 2007. This is setting in train Network Rail's consultation for High Speed New Railway Routes inter alia westwards from London, and via or near Westbury railway hub. (See ATTACHMENT 3).
 - 6 Heritage Protection Bill (for Stonehenge, Avebury and associated sites World Heritage Site) forthcoming in the next Parliamentary session.
- 1.24 Please report this unabridged to Ministers as it is Government Policy. Government Policy is to be overarching – and must be followed.

- 2.1 This report will proceed to diligently summarise the above mentioned "Integrated Transport White Paper" (ITWP) in detail.

Please see paragraph 4.7 highlighting Funding Transport under Chapter 4 MAKING IT HAPPEN where "IT" means INTEGRATED TRANSPORT. Transport makes a significant call on the public purse (The Stonehenge A303 tunnelled bypass escalated to £540 million, before the stop of December 2007): this year (1998), for example planned expenditure includes some £1.6 billion on railways in Great Britain (update), around £3 billion on local transport in Great Britain, and £1.3 billion (less than on railways), for the English trunk and motorway network

- 2.2 We (the Government) will ensure that public expenditure on transport is firmly (in and around the Stonehenge, Avebury and associated sites World Heritage Site generally) directed towards delivering the New Deal for Transport (otherwise termed the Integrated Transport White Paper – ITWP, as analysed diligently herewith).

- 2.3 Please see ITWP paragraph 4.8.

Responses to our consultation last year (1997) sought significant improvement in all modes of transport (including Stonehenge integrated road and rail), in rail (in and around Stonehenge and Salisbury) and bus services, in conditions for pedestrians and cyclists (in the Stonehenge, Avebury and associated sites World Heritage Site including initially a long distance cycleway between Bath World Heritage City and Stonehenge - southern part of World Heritage site, via the Bradford-on-Avon to Holt Junction old railway alignment to Devizes Parkway new station at Lydeaway section of the Devizes secondary railway line closed 1966 under the Beeching axe, by virtue of ITWP paragraph 4.165 at page 127 protection), and on our roads (A303). Please see the attachment regarding the Stonehenge Management Plan Consultation 1998. On pages 62 and 63 enclosed it states " A new station, Devizes Parkway at Lydeaway (following the ITWP of 1999) could serve Stonehenge.)

- 2.4 As Government, we have a duty to balance calls (from English Heritage for new roads, parking land trains and a visitor centre) for increased public spending, against the need to maintain stable and prudent finances over the economic cycle. For example a call for a £540 million (see ATTACHMENT 5) Stonehenge A303 tunnelled bypass immediately south of Westbury was firmly stopped by the debacle of the £25 billion rescue and nationalisation of Northern Rock in Parliament, marking the end of the associated economic cycle of boom in property prices. The resources involved in the £540 million Stonehenge bypass were abstracted off elsewhere over the downturn in the economic cycle recently.

2.5 Please see ITWP paragraph 4.10.

We (the Government) have matched spending to our priorities. For transport (overarching the A303, A345 and rail in and around the Stonehenge, Avebury and associated sites, World Heritage Site [rail notably at Salisbury and Swindon]) these are to ensure that we properly maintain and manage our existing (road and rail) infrastructure, and that we (the Government) support the delivery of integrated transport locally (in and around Stonehenge by virtue of no new road in the World Heritage Site there, and forwarding an alternative along the Boscombe Down Airfield runway [or taxiways] and south of and completely outside the Stonehenge WHS).

2.6 Please see ITWP paragraph 4.11.

Our (Government) transport policy sets the context in which (A303) roads and (Stonehenge) railways will be planned (inter alia in the English Heritage consultations) and operated. To improve efficiency and to reduce the impact of (the current proposals) on the environment (particularly the Stonehenge, Avebury and associated sites World Heritage Site), our (Government) focus (overarching the English Heritage consultations) must be on the need for better management, maintenance and use of what we have (already, in and around Stonehenge and Salisbury, including forming a network from the Sir John Jackson military railway to Stonehenge of 1914 – see ITWP paragraph 4.165; the Bulford Camp including the Sling extension continued; the similar First World War Boscombe Down Airfield Branch; the 1902 Amesbury Branch Railway; and the Midland and South Western Junction Railway MSWJR surviving railway from Red Post near Andover, to Ludgershall, and its lifted continuation to Tidworth and beyond).

2.7 Managing any infrastructure (such as road and rail in and around Stonehenge and Salisbury) needs a long-term perspective (including setting out possibilities for High Speed Railways) and a degree of certainty about approach and (which there is not) funding, otherwise it is difficult to plan ahead and make the best use of the (potential alternative route and Sir John Jackson military railway) resources available.

2.8 The box below ITWP paragraph 4.11 highlights new ways of funding. New sources of finance are for example, the Channel Tunnel Rail Link with some £6 billion of investment. The second stage of the Channel Tunnel Rail Link to St Pancras International was opened by the Queen in November 2007.

- 2.9 The Channel Tunnel Rail Link is now renamed High Speed One. It is setting in train five further High Speed Railways. Network Rail in Mid 2008 published a prospectus for consultation on these five further high speed railway routes. One potential route is via Westbury, on the London to Plymouth railway direct line. The Berks & Hants alignment, which follows the Kennet and Avon Canal, is sinuous, and speed restricted. So a proposal is included herewith, following ITWP paragraph 3.214 for a high speed route paralleling the A303 southern alternative highlighted in this report (Please see MAP – ATTACHMENT 7).
- 3.1 The above themes are integrated in Deputy Prime Minister (1997-2007) John Prescott's Foreword on page 3 of the Integrated Transport White Paper (ITWP).
- 3.2 He states "There is now (1998) a consensus for radical change in transport policy. The previous (Conservative 1979-1997) Government's Green paper paved the way, with recognition that we needed to improve public transport and reduce dependence on the car. This (ITWP) White Paper builds on that foundation." This is to be cross-referenced to the ITWP Annex D pages 158-160).
- 3.3 This (ITWP) White Paper fulfils our (Labour) manifesto commitment to create a better, more integrated transport system to tackle the problems of congestion and pollution we have inherited. It is timely.
- 3.4 In its Green Paper the previous (Conservative 1979-1997) Government recognised that we could not go on as before, building more and more (A303) new roads to accommodate the growth in car traffic.
- 3.5 With our new obligations (integrated in the Climate Change Bill currently in Parliament, as mentioned overarchingly previously) to meet targets (80% reductions by 2050), the need for a new approach is urgent.
- 3.6 The Key Foreword Statement then follows.
- 3.7 "The main aim of this (ITWP) White Paper is to increase personal choice by improving the alternatives (my emboldening), and to secure mobility that is sustainable in the long term." (With oil prices having peaked at 147 dollars per barrel in mid 2008, this is several times that of 1998 and threatens a major inflationary spiral. Oil prices are 107 dollars per barrel at the time of writing).
- 3.8 "The priority will be maintaining existing (A303) roads rather than building new ones (such as the £540 million tunnelled Stonehenge A303 bypass, which are thus to be rejected as contravening Government Policy, as regards Climate Change, Alternatives, and No new roads as highlighted herein); and better management of the Stonehenge and Salisbury road network (as is set out herewith) to improve reliability.

- 3.9 The economy, technology and attitudes to transport and the environment are changing so rapidly. (As the Chinese saying - may you live in interesting times).
- 3.10 This (ITWP) White Paper reflects the Government's commitment to giving transport the highest possible priority.
- 3.11 Finally in the Foreword, there is the key exhortation, followed by the Deputy Prime Minister, John Prescott's personal undersigning (see attached at 6 & 1 generally). We (the Government) now look to others – companies, individuals (including English Heritage leaders and Mr J Jackson BSc(Hons) Wales, Dip TP), employees and local authorities – to join us in shaping a new future for sustainable (in the totality of the Stonehenge, Avebury and associated sites World Heritage Site, including Salisbury and district) transport in the UK.
- 4.1 Please see the ITWP key requirements on 'Better Appraisal,' at pages 132 to 134 inclusive. Particular emphasis is placed on 'Environmental Appraisal' at paragraphs 4.199 to 4.203, mainly on page 134 – please see this report at 4.19, and 4.33 to 4.37.
- 4.2 The 'New Approach to Appraisal – for transport projects,' otherwise known as NATA, at paragraph 4.195 sets out requirements in bold.
- These are "We (the Government) are developing a new approach to the appraisal of different solutions to transport problems.
- 4.3 "This is designed to draw together the large amount of information (in the Stonehenge, Avebury and associated sites World Heritage Site in co-ordination with other World Heritage Sites) collected as part of the appraisal of a (Stonehenge) transport problem and alternative solutions."
- 4.4 The alternative solutions are now highlighted. The first is to utilise the Boscombe Down Airfield main runway (or taxiways) as two miles of free existing infrastructure for a future Stonehenge A303 bypass – completely outside the World Heritage Site designated area. There are compelling advantages to the Jackson Plan, over and above the two miles of FREE INFRASTRUCTURE GAINED BY ADAPTING the Boscombe Down Airfield main runway (or taxiways). No other alternative has this advantage, so readers must understand no other alternative approaches the Jackson Plan advantages. Please see the ITWP at paragraph 2.25 pages 25 and 26, etc.

- 4.5 The second is to utilise the broad framework of the Sir John Jackson military railway of 1914 to Stonehenge; as an extended Land Train. The Depot for this railway was at Countess, the exact site of the English Heritage Visitor Centre that has the benefit of planning permission. The extension would be co-ordinated in a dual function tunnel with re-sewering Larkhill, to Ratfyn sewerage works at Amesbury. Figuratively, the previous 2.1 km tunnel east to west; is made smaller in diameter, shortened to one third of the length, and rotated to be north to south, from Larkhill old sewerage works (to be closed) to the Stones at Stonehenge. This works is a blot on the landscape of the Stonehenge World Heritage Site.
- 4.6 The third is to power the extended "Land Train" from hydro electric resources by re-utilising the River Avon. This hydro electric generation is by virtue of co-ordinating ITWP paragraph 2.25 on page 26, RCEP paragraph 8.85 and Energy Review 2007 paragraph 5.3.69 – see ATTACHMENT 8.
- 4.7 The Southern alternative of the Jackson Plan, via Boscombe Down Airfield main runway (or taxiway) was costed at £151 millions in the Ellison Enquiry by Balfour Beatty/Costain professionally. This included a short tunnel where the alternative dipped down into the Avon Valley, via a short tunnel on the east side of the valley, emerging into an old quarry.
- 4.8 At this stage the comparison costing for the A303 tunnelled bypass was £192 millions. Thus the Jackson Plan was already £41 millions cheaper in 2004. In that the latter included only a short length of tunnelling and has the compelling advantage of two miles of FREE infrastructure, gained by adapting the Boscombe Down Airfield main runway (or taxiways); it would not escalate so much in cost as the project in point from £192 millions to £540 millions. Thus it would most likely now be in the £200 millions to £300 millions cost band, about HALF.
- 4.9 Please note the nearby Frome bypass, runs immediately to the south of the Frome Avoiding line, another railway high speed line/bypass of 1933. The Frome road bypass, of the 1990's is thus conjoint with railway high speed infrastructure; as this report intends, for the Boscombe Down Airfield main runway.
- 4.10 Returning to the text of ITWP paragraph 4.195 (middle) it continues to look at the contribution of different (for example rail – in and around the Stonehenge, Avebury and associated sites World Heritage Site, Salisbury, Swindon) forms of transport as alternatives. With the HS.3 Rail alternative routes to the West of England, now being finalised by Network Rail and the Government, this requirement is becoming steadily more important.

Appraisal in the English Heritage consultations into Stonehenge in the words of paragraph 4.195 – looks at the contribution of different (rail public transport including dual rail/road wheels exchange [see later]) forms of transport in developing alternative solutions and the potential effect of the new integrated transport approach, including the scope for and effect of demand management measures. Please see this report at 4.16 later.

- 4.11 It is our (Government) intention (overarching the Stonehenge, Avebury and associated sites World Heritage Site); that the new HS3 alternatives approach will be applied to the appraisal of all transport projects (particularly for an integrated replacement to the £540 million Stonehenge A303 bypass proposals, in continuing to reject this, and adopting such alternatives as imaginatively put forward herein).
- 4.12 A brief economic appraisal of previous proposals for a £540 million Stonehenge A303 bypass, is now drawn from three sentences in ITWP paragraph 4.198. The writer adds one indent from ITWP paragraph 2.25 page 26 that requires – “reduce use of non-renewable materials/energy sources.” To reduce A303 aggregate oil use, it is required to increase the use of hydro electricity renewable energy sources in true – (not make-believe) regeneration by adapting and electrifying the Land Train to nearer Stonehenge itself. Please see paragraph 4.6 above. Readers are requested to cross-reference with ATTACHMENT 9 which provides more information on the generation of hydro - (electric) power in and around Amesbury. True regeneration is of course, again utilising local hydro-electric power as is set out herein.
- 4.13 Claims that the Stonehenge A303 bypass will regenerate the Stonehenge, Avebury World Heritage Site and Mid Wiltshire are much over stated. In ITWP 4.198 “We (the Government – overarching the Stonehenge, Avebury and associated sites World Heritage Site and Mid Wiltshire) accept there is no simple, unambiguous link between transport provision and local regeneration. Each case must be assessed on its merits. We (the Government) agree improvements are needed so the contribution of transport investment to regeneration can be better assessed. With the Climate Change Act 2008 of Parliament, improvements are now statutory and most important.
- 4.14 Thus there must be better assessment and integrated appraisal in the English Heritage Studies, examining the cumulative alternatives as proposed herein.
- 4.15 This is integrated with the cumulative requirement in the ITWP Foreword of John Prescott, Deputy Prime Minister – 1997–2007, towards ‘improving the alternatives’ – to the Stonehenge A303 bypass and including the two at ITWP paragraphs 3.146 and 4.90. There is also the ITWP Foreword No new roads exhortation, to be co-ordinated with the principle of

3.123,
3.125 (start and third indent)
3.126
3.128 and
3.131

cumulatively with 3.147 (and see 3.146) regarding the NO NEW ROADS Government commitment.

4.16 Exchange platforms with the MOD would be set in train at key locations. There would be a 'pit' in the platform track, where wheel changing, adding or removing rubber tyred road wheels to and from adaptive rail wheels would take place. The Severn Tunnel now has a form of rail/road vehicles for emergency use as a result of the 7 December 1991 accident. Readers will recall that Frome has the distinction of both a road bypass of the 1990's, and a high speed railway line bypass of 1933 running together, in parallel. Frome also has the distinction of Jenson Button, the Formula One Racing Driver, hailing from there. With these connections I am sure readers will appreciate wheels being changed in five seconds by a dedicated team of mechanics, in competition in Grand Prix races, round the world.

4.17 This special feature is drawn to the careful consideration of English Heritage, Transport Secretary Rt Hon Geoff Hoon, MP, now Lord Adonis, and the Communities and Local Government Secretary and others, including DCMS.

4.18 The ITWP paragraphs that support these technological advances and alternatives, are to be found at the part on Technology – research and development, at paragraphs 4.224 to 4.228 pages 137 and 138. Time presses – so only five main sentences are extracted herewith.

1 (from 4.224) Technological development (such as the rail/road dual wheels highlighted) offers many new and better opportunities for integrating transport (in the purview of English Heritage overarching the Stonehenge, Avebury and associated sites World Heritage Site wider context.

Our (Government) policy is to use the most appropriate (dual rail/road wheels as advocated herein) and cost-effective technology for each (integration as above under 1.22 first indent and general), task and to encourage pilot trials of (the advocated) newer technologies or systems that show special promise (under Energy Review 5.3.69 – which see at ATTACHMENT 8).

4.19 These notes now proceed to analyse the important Chapter 4 on 'Making it (Integrated transport for Stonehenge/Avebury/Salisbury) happen,' in the part on A303 Stonehenge tunnelled ex-bypass 'ENVIRONMENTAL APPRAISAL' (or the lack of it, so far). This appears in the ITWP between paragraphs 4.199 to 4.203, also 4.195 and 4.198 inclusive on pages 133 and 134.

- 4.20 This part points out that 'Environmental appraisal (for the broad context of Stonehenge tunnelled ex-bypasses) considers a range of effects including (a slight re-ordering of the eight given in 4.199 is now set in train) – land, the countryside, the built environment and cultural heritage, air quality, emissions, noise, wildlife as well as the effects on people and their health.'
- 4.21 The first Environmental Appraisal effect of the set of eight to be analysed herein is land. The ITWP at paragraphs 2.25 on page 26 with 2.21 (end) on page 25) states the New Deal for transport (herein described as the ITWP) therefore sets the framework to: minimise transport's (in this case Stonehenge A303 tunnelled ex-bypass as under the Environmental Assessment of English Heritage) demand for land. Amazingly under 'A better (sic) environment' ITWP paragraph 2.21 confirms 'Road construction and car parking have made heavy demands on land, a finite resource. In England alone, in the second half of the 1980's an area equivalent to the size of Bristol was taken for road building and parking.
- 4.22 Minimising the demand for land is best achieved by utilising the alternative highlighted, including both tunnels and long underpasses and a combination of them. Both are underground and thus use the minimum of land. However, tunnels are essential near the Stones of Stonehenge, but north to south, not east to west.
- 4.23 Indeed, invoking the Royal Commission on Environmental Pollution (RCEP) leads to the discovery of four key sentences worthy of careful integration for reporting to the Secretaries of State following the English Heritage consultation on Stonehenge/Avebury/Salisbury and district in Wiltshire
- 4.24 The first emerges from the RCEP Eighteenth Report on Transport and the Environment of October 1994. Please see ITWP paragraph 2.52 on page 31. This context states "The Royal Commission on Environmental Pollution (RCEP) has produced two (18th and 20th) comprehensive reports on reducing transport's (in this context – the – Stonehenge A303 tunnelled ex-bypasses in the English Heritage Consultation on Stonehenge/Avebury/Salisbury and district in Wiltshire) impact on our environment."
- 4.25 The second (see ATTACHMENT 10) is found in the RCEP Eighteenth Report on Transport and the Environment page 59 paragraphs (RCEP) 4.60 to 4.62. "The policy objective (for Stonehenge/Avebury/Salisbury and district in Wiltshire tunnelled ex-bypasses for the English Heritage overarching consultation) must be:

To halt any loss of land to transport infrastructure in areas of conservation, cultural, scenic or amenity value (such as the Stonehenge/Avebury/Salisbury environs in these Special Landscape Areas) unless the use of the land for that purpose has been shown to be the best practicable environmental option."

4.26 The RCEP Eighteenth Report on Transport and the Environment continues on page 59 at paragraph 4.61. 'the aim is to give a higher overall priority (thus rejecting Stonehenge A303 ex-bypasses inside the protected World Heritage Site area) to environmental protection.'

4.27 The gist of the continuation of RCEP paragraph 4.61 is as follows. 'We (the RCEP) recommend that the following (five) general principles should apply:

(fifthly) where a proposed road (the Stonehenge A303 ex-bypasses under the aegis of Inspector Ellison) or railway (the Sir John Jackson military railway extension to the Stones from the [moved to Ratfyn, Amesbury] Larkhill sewerage works) would cause serious environmental damage; (to the World Heritage site cultural, scenic or amenity value land environs); careful consideration (in the Stonehenge A303 bypass future considerations under the aegis of English Heritage – off-line as in the two alternatives given herewith) should be given to placing it in a tunnel.' Readers are urged to understand well the wording herewith – 'careful consideration').

4.28 Fourthly and finally for 'land' it is then highlighted that for the alternatives given, in regard of the Stonehenge A303 bypass – 'tunnelling is an approach which may have considerable environmental advantages for a new road (the Stonehenge A303 bypass – off line), both in sensitive rural areas (such as outstanding World Heritage Sites), and in urban areas (such as Salisbury by undergrounding the Eastern sector of the A36 inner bypass. This is in view of the visual intrusion – ITWP 1.25 second and seventh indents and 2.25 fourth indent and 2.31 second indent; pollution – ITWP 1.25 first indent and 2.12 first and second indents and 2.25 second and sixth indents; other effects (including noise) – ITWP 1.36, 2.12 fourth indent and 2.25 devastating the Cathedral and medieval city framework).

4.29 The Second Environmental Appraisal effect analysed is the countryside. This is required by ITWP paragraphs 3.32 to 3.35 pages 44 and 45. Although, as time presses, the contributions of others on Stonehenge World Heritage Site, and the associated chalk Special Landscape area, is relied on. This report hopes to highlight that any chalk excavated from tunnels, should be taken by rail to Westbury cement works.

4.30 Proceeding to ITWP paragraph 3.119 on page 62 – ‘We (the Government) will therefore encourage the continued development of new and imaginative ways, (by overarching the Stonehenge A303 context of consultations of English Heritage; to insist on the continued development of the imaginative two alternatives set in train herewith being ‘carefully considered’).

Firstly,

Sir John Jackson’s military railway extension in tunnel to the Stones;

Secondly

To use the Boscombe Down runway (or taxiways) as two miles of free infrastructure in a Stonehenge A303 bypass completely outside the World Heritage site (i.e: well to the south of it)

This is required by RCEP paragraph 4.61 on page 59. This entirety is incorporated in the ITWP by virtue of its paragraph 2.52 on page 31 where the cumulative RCEP reports ‘have been key influences’ on the ITWP); of designing local traffic schemes to make them more sensitive to their surroundings (by rejecting the schemes especially the Airman’s Corner Visitor Centre Planning Application No 2009/1527 in the World Heritage Site in a Special Landscape Area; and forwarding the required careful consideration and continued development of the imaginative two alternatives set in train herewith).

(Gist)

- 1 Please see letter at ATTACHMENT 11 for MICHAEL ANCRAM, MP (Devizes), highlighting a comprehensive joint Stonehenge/Avebury Management Plan as required by PPG 15 paragraph 6.37. Please see ATTACHMENT 12.
- 2 An alternative based on the Jackson Plan of £300 million should have been adopted following the Ellison Enquiry. Please note the £300 million involved has been extirpated by the Devil’s Punchbowl scheme on the A3 to Portsmouth. See ATTACHMENT 13. The claimed logic was that the A3 to Portsmouth is much busier than the A303 to Exeter and Plymouth. So things have gone to the Devil (Punchbowl).
- 3 The recent announcement on Stonehenge compared it with the London – Stratford – 2012 Olympics. This site has the benefit of Electricity cable tunnels at Stratford, to remove for the 2012 Olympics visually intrusive (under ITWP 1.25 and 2.25), electricity pylons and overhead lines. These are costing about £180 millions where Stonehenge is given a 2012 Olympic spin as an “Icon of Britain,” without foundation. Please see ATTACHMENT 14.

- 4 Regeneration – extracts are included from P Stanier’s book – Wiltshire in the Age of Steam - ATTACHMENT 15, on turbines for waterpower at Amesbury, regarding this aspect of Heritage.
- 5 Fonthill Abbey – there was a BBC television programme presented by Dr Simon Thurley (Chief Executive of English Heritage). This highlighted William Beckford’s late Georgian achievements both at the Beckford Tower in Bath and at Fonthill Abbey. Indeed, the latter could be seen from the former. This sort of lateral thinking leads to a proposal for a English Heritage Visitor Centre at Countess, emulating Amesbury Abbey.
- 6 Admiral Nelson, the victor of Trafalgar, 1806 visited Fonthill Abbey, as related by Dr Simon Thurley (above). Nelsonian Nile Clumps (of trees) were planted at Stonehenge, in the formation of the 1799 Battle of the Nile. This was in remembrance of Nelson.

4.31 The third Environmental Appraisal effect analysed is the built environment and cultural heritage. However, due to time constraints, the contributions of others are again mainly relied on.

4.32 Readers are directed to the part of the ITWP entitled ‘Better protection for the environment’ in Chapter 1. Paragraphs 1.34, 1.35, and 1.36 (third indent) on page 16 and 1.22 (second indent) apply to overarch the Stonehenge A303 bypass and Visitor Centre consultations under the aegis of English Heritage.

4.33 Please see ITWP paragraph 4.200

All projects, such as the Stonehenge Visitor Centre present application 2009/1527, likely to have a significant effect on the environment are subject to a formal environmental impact assessment in accordance with EU Legislation. Proposals for transport infrastructure affecting (Stonehenge) sites of international importance are assessed in accordance with the provisions of the relevant international legislation. In practice, we expect there to be few cases, and definitely not this one, where it is judged that imperative reasons of overriding public interest will allow development to proceed which will have an adverse impact on the integrity of internationally designated sites (- thus the arising Jackson Plan to take the A303 Stonehenge bypass entirely outside the World Heritage Site designated zone; and the nil-emissions park and ride proposals herewith, to modify the existing planning permission () for a visitor centre at Countess, outside the WHS).

4.34 Please see ITWP paragraph 4.201

For all environmentally sensitive, (such as the Stonehenge WHS at Airman's corner) areas or sites there will be a strong presumption against new or (the case in point) expanded transport infrastructure which would significantly affect such sites, or important species, habitats or landscapes. Where such (Stonehenge) proposals arise, they will be assessed in relation to the status and purpose of the (World Heritage) site including whether it is of international (it clearly is) and national importance and where relevant, the protected status of the species or habitat, ... against massive and overwhelming degree of impact of the scheme and the minimal scope for mitigation.

4.35 Please see ITWP paragraph 4.202

A transport scheme which would significantly affect a sensitive site or important species, habitat or landscape should not go ahead... (so, the Airman's Corner visitor centre Application [No. 2009/1527] should be CALLED-IN and rejected), unless there is no other better option. There is a much better option at Countess, with planning permission, as modified herewith, and all reasonable steps have been taken to mitigate the impact. Each case will be determined on its merits, by CALL-IN, as required herewith, taking account the following questions:

4.36

- How important is the area/site including its international importance?
How serious is the likely impact?
MASSIVE AND OVERWHELMING
- Are there alternatives (2 alternatives are given [above]) which avoid the impact (including not going ahead with the scheme)? (CLEARLY THERE ARE SUCH ALTERNATIVES – including that herewith of Countess Visitor Centre with planning permission, as modified herewith with a nil carbon dioxide emissions park and ride scheme.
- Would the 2 alternatives serve the purpose and at reasonable cost?

4.37 Please see ITWP paragraph 4.203

The feasibility, desirability and cost of providing compensatory measures will be a factor: some areas, sites, habitats or species may be (Stonehenge is irreplaceable) irreplaceable and that will have a particular weight in the assessment. These principles of overwhelming weight in the balance against Airman's Corner as a visitor centre necessitate its CALL-IN and REJECTION. Readers are

referred DCLG/DCMS Circular 07/2009 paragraph 19 on Stonehenge, Avebury among World Heritage Sites (WHS) generally. This states, beyond peradventure; that Stonehenge, Avebury is such a sensitive site. These principles will be applied to all forms of transport development which affect sensitive areas or significant aspects of our cultural heritage, (such as Stonehenge).

Stonehenge is self-evidently an irreplaceable World Heritage site, and this will have an overwhelming weight in the balance against the Airman's Corner visitor centre proposals; which are to be CALLED-IN and REJECTED.