

THE STONEHENGE ALLIANCE

Chairman: George McDonic, MBE, BL, DIPLTP, FRTPI, DPA, FFB

From The Chairman, George McDonic,
c/o 1 The Old Smithy, Alton Priors, Marlborough SN8 4JX

Ms. Louise Porter
Development Management
Wiltshire Council
PO Box 2281
Salisbury
SP2 2HX

Sent by email on 27 May 2016

Dear Louise Porter,

Planning Application 16/03988/FUL: Permanent use of temporary coach park and modification of existing coach park to create 53 coach spaces and 26 motorhome spaces; construction of ancillary building for new coach visitor facilities; change of use from agricultural land and creation of new visitor transit system turnaround area for shuttle bus use; creation of extended visitor transit system turnaround area for shuttle bus use; decommissioning of existing visitor transit system turnaround area; all with associated ancillary and landscaping works at Stonehenge Visitors Centre Airman's Corner SP4 7DE

The Stonehenge Alliance objects to this application, for largely the same reasons as in our response to you on planning application **14/12106/FUL** for extension of the coach park, which we ask you to take into account.

Arising from our concerns relating to the current application (given in greater detail below), **we ask the Council to request from the applicant, in advance of determination of this application:**

- An explanation of why the current application has been made despite not having met planning consent Condition 5 re application no. 14/12106/FUL, and an account of what efforts are being made to meet that Condition by April 2017 (see our section 2.1, below)
- A fully explained and convincing visitor-transit system that builds in future increases in visitor numbers and safety measures for buses passing, and for pedestrians
- A full and up-to-date Green Travel Plan to include measures to ensure that visitor-arrivals are spread throughout the day rather than at peak times
- A comprehensive visitor management strategy

- A fully detailed sustainability appraisal, to include discussion with ICOMOS-UK on archaeological and landscape issues
- Detailed explanation of the location and assurance of an uninterrupted potable water supply, including current and predicted usage, and evidence of having secured any necessary permits
- Detailed explanation of sewage and waste water disposal, including current and predicted measures, and evidence of having secured any necessary permits

Our objections on specific issues are as follows.

1. Impact on the archaeological landscape of the World Heritage Site (WHS)

1.1. In applying for planning permission for the visitor centre under application number S/2009/1527/FULL, it was recognized by the applicant that the development would result in adverse effects on the OUV of the WHS and on the immediate setting of the Site. It is therefore wholly unconvincing for anyone now to suggest that there would be no adverse impact on the WHS and its attributes of OUV as a result of *extended* development of the visitor centre facilities. Comparison of September 2009 photomontages of the proposed visitor centre complex in the E.S., Vol. 3, Fig.10 (S/2009/1527/FULL) with the present-day view shows just how different and prominent the impact of the complex is from what was suggested.



Stonehenge visitor centre complex from the W end of the Cursus monument, August 2015
Note: this development extends over formerly undeveloped open countryside within the WHS

1.2. The seven attributes of OUV of the WHS are linked not only to the prehistoric monuments and sites themselves, but also to the archaeological landscape surrounding them, their disposition in that landscape, their siting in relation to one another, and the design of the monuments in relation to the skies and astronomy. The network of monuments and sites and interrelationships spreads out across the landscape and is not confined to any one part of it. Not all of the Neolithic

and Bronze Age sites and monuments are legally protected by scheduling but all are attributes of OUV, contrary to the understanding in the application Planning Statement, para. 3.4.6, which states:

‘The 2015 Management Plan identifies a number of attributes that convey that OUV, which, together with its integrity, authenticity and setting represent the heritage significance of the WHS. **The attributes of OUV relate to the survival, disposition and interrelationships of groups of Neolithic and Bronze Age funerary and ceremonial monuments and associated sites, which individually are protected as Scheduled Monuments.** Assessment of the effects of the Scheme on key groups of Scheduled Monuments that convey these attributes forms the basis for assessment of the effects on the OUV of the WHS.’ [our emphasis]

We believe that the Planning Statement indicates a misunderstanding, not only of what is to be considered to be of OUV but also of what is required concerning development in the WHS under planning policy, notably Wiltshire Core Strategy Policy 59.

1.3. The current proposals, constituting cumulative development within the WHS, would add considerably to the seriously adverse visual impact already imposed upon the landscape by what was intended six years ago to be a temporary new Stonehenge visitor centre and ancillary facilities, including its very extensive vehicle parks. The interrelationships of monuments experienced in views to and from the Great Cursus, the Winterbourne Stoke barrows and other sites on the western side of the WHS would be further adversely affected visually by the proposed works. Recent archaeological work has shown only too clearly that much more remains to be discovered and learned about the Stonehenge landscape and its archaeology. The proposals would also involve changes to transit bus turning spaces, including the resurfacing of a substantial area close to the henge, reversing the original intention of its permanent restoration to grass.

1.4. The proposed development should be judged in the first instance by the demands of **Core Strategy Policy 59**, to which it would be directly contrary. Core Policy 59 clearly states:

“Core Policy 59

The Stonehenge, Avebury and associated sites World Heritage Site
The Outstanding Universal Value (OUV) of the World Heritage Site will be sustained by:

- i. Giving precedence to the protection of the World Heritage Site and its setting*
- ii. Development not adversely affecting the World Heritage Site and its attributes of OUV. This includes the physical fabric, character, appearance, setting or views into or out of the World Heritage Site*
- iii. Seeking opportunities to support and maintain the positive management of the World Heritage Site through development that delivers improved conservation, presentation and interpretation and reduces the negative impacts of roads, traffic and visitor pressure*
- iv. Requiring developments to demonstrate that full account has been taken of their impact upon the World Heritage Site and its setting. Proposals will need to demonstrate that the development will have no individual, cumulative or*

consequential adverse effect upon the Site and its OUV. Consideration of opportunities for enhancing the World Heritage Site and sustaining its OUV should also be demonstrated. This will include proposals for climate change mitigation and renewable energy schemes.”

1.4. Further degradation of the landscape of the WHS by unsightly development is not only contrary to Core Policy 59 but also to para. 132 of the **NPPF**; and to the **World Heritage Convention** (Articles 1, 3, 4 and 5) which demands protection and rehabilitation of the designated property, not of OUV. OUV, as explained in Core Policy 59, would be sustained by protection of the property.

1.5. The Vision of the **WHS Management Plan** (MP) states:

“We will work together to care for and safeguard this special area and provide a tranquil, rural and ecologically diverse setting for it and its archaeology” (MP, p.10)

The ‘primary purpose’ of the Management Plan is

“ . . . to guide all interested parties on the care and management of the WHS to sustain its OUV. This will ensure the effective protection, conservation and presentation of the WHS for present and future generations. It will also ensure that all decisions affecting the WHS move towards the achievement of the Vision.” (MP, p.11)

Notwithstanding its aims for visitor facilities and experience, the WHS Management Plan also demands, for any development affecting the WHS :

“Ensure any development is consistent with the protection and, where appropriate, enhancement of the monuments and their settings and the wider WHS landscape and its setting.” (MP, p.11, Priorities for 2015–2021, no. 5; our underlining).

It is therefore accepted that the presentation of the WHS and its enjoyment by visitors must not override the primary commitment to protect the site and its setting, even where development to facilitate visitors’ activities runs contrary to that obligation.

1.6. This last concern was underlined in the joint **Report of the WHC/ICOMOS Advisory Mission** to Stonehenge which warned against the dangers of over commercialization of the site:

“ . . . it can be expected that Stonehenge and the Stonehenge visitor centre, managed by EHT, will come against considerable pressures to be as economically performing as possible (revenues and expenditures), not only for its own sake, but for the sake of English Heritage Trust and its many other, less visited "properties". Such pressure may result in lowering expenditure, such as specialized or expert personnel, maintenance, standards of archaeological curation, etc., and also in increasing revenues: by channelling in more visitors for shorter times, by increasing fees, and by slashing free or reduced cost access. . . .” (Report, pp.15–16)

2. Sustainability and visitor-management

2.1. Condition 5 of planning consent re application no. 14/12106/FUL, for interim improvements to the coach park reads as follows:

“The coach park expansion hereby permitted shall be removed in its entirety and the land restored to its former condition on or before 09/04/2017 in accordance with a scheme of work submitted to and approved in writing by the Local Planning Authority. REASON: In order for a permanent and sustainable solution to be found to coach parking for the Stonehenge Visitor Centre.”

We see no evidence in the current application of a permanent and sustainable solution to the coach parking for the visitor centre, nor of any such solution being sought. The proposals before us serve not only to compound the problem of the visual impact of the visitor centre complex and ancillary works on the landscape and key monuments of the WHS but also to raise serious questions about the implications for visitor management at Stonehenge and the underlying assertion, widely understood, that the visitor centre and its vehicle parks are in themselves to be considered only a temporary solution. The current application is for permanent planning permission. How temporary is permanent planning permission? and, if temporary, when will English Heritage begin the search for a truly sustainable and far less visually damaging facility?

2.2. Are we to continue to see a succession of planning applications in reaction to failed attempts to deal with inadequate-for-purpose management arrangements? We note that Condition 10 under planning permission **S/2009/1527**, for the visitor centre and associated works, required that:

“No development shall commence of the visitor centre hereby approved until a visitor management strategy as detailed in section seven of the environmental statement shall be submitted to and approved by the LPA. The development shall operate in accordance with the approved scheme unless otherwise agreed in writing by the LPA.”

Did this agreement take place – and, if so, what has gone wrong? Will the LPA *ensure* that the situation is fully and coherently rectified?

2.3. Though it is stated that the proposals before us are not intended to encourage greater visitor numbers to Stonehenge, it is indisputable that they would do so. There are a number of indications in the application documentation that visitor numbers are expected to increase: e.g., the Design and Access Statement, at para.4.3, states that

“There is considerable variation in the demand for the VTS (Visitor Transit System) across the day due to the weather and other factors, however it is known that the peak visitor numbers for a given day are around 8920 for a busy day in July and that this number is projected to increase over the next three years”

We have the following questions:

- How many more visitors are expected and what is the optimum number of transit buses that can be operated to accommodate them?

- Will passing places for buses be required in future on the A344?
- Will the greater numbers of visitors lead to more bus journeys on the A344 and significant implications for health and safety of pedestrians and bus users?
- Are we going to see surfaced footpaths alongside the A344? (There are already mown paths in the landscape, such that, alongside the proliferation of gates, artificially-surfaced woodland pathways and information boards, parts of the landscape to the north of the A303 are becoming like a country park.)
- Why has the agreement between the Council and English Heritage under Conditions 6 and 7 of planning permission S/2009/1527, relating to the transit system and turning spaces so obviously failed?
- Are there potential pollution and noise disturbance problems with the possible introduction of even more petrol- or diesel-driven buses to take visitors to and from the henge?
- Will there be a future application for fuel tanks for refuelling the buses?
- Will buses be parked at the visitor centre overnight?

3. Potable Water, sewage and the natural environment

3.1. We understand from the media that there are currently serious problems concerning sewage disposal from the visitor centre. We raised questions, at the time of the application for the new visitor centre in 2008–9, about the fresh water supply to the visitor centre and the impact abstraction from the aquifer might have on the nearby SAC, to which we received unsatisfactory answers.

The D&A Statement, Appendix D, makes the following statements:

“The domestic water strategy for the new CVF Ancillary Building is in line with the existing facility. Potable water would be provided from the existing bore hole. Waste water would be evacuated into the Membrane BioReactor (MBR) plant where the foul water will be treated and then either recycled and discharged under Environment Agency licence, or removed from site via a tanker facility.”

“Whilst the quality of water discharge from the MBR over the initial operational months was variable, over time the nature of use for the site has allowed this to be controlled and recent monitoring has shown this is to be under control. Discussions with respect to the quality of water are ongoing with the Environment Agency, and a report outlining the results of recent monitoring is soon to be issued to the Environment Agency for approval of excess treated water to be discharged. **It should be noted that no treated water has been discharged from the MBR plant to date, with all waste and excess treated water having been removed from site via tanker.** Permission to discharge being subject to approval from the Environmental Agency with respect to water quality.” [Our emphasis]

“Potable water for the site is taken from an existing bore hole. There is currently an abstraction licence in place with the Environment Agency, licence number SW/043/0021/003: for the period 17th May 2013 to 17 May 2025, which confirms the

agreed maximum abstraction rates as being: 3m³ per hour, 35m³ per day, 2,837m³/year with a maximum continuous extraction rate of 2l/s. Following a period of monitoring of the operational site, a revised application for a small increase in peak requirements is currently awaiting approval, the application being submitted November 2015.”

We ask and believe that the Council should wish to know:

- How often is the current peak abstraction rate of potable water exceeded?
- Where does potable water used by the facility come from when peak abstraction level is reached?
- Are we to assume that measures for dealing with sewage on-site are inadequate or have failed? If so, what are the costs and environmental implications of tankering sewage away from the site on a regular basis?
- What would be the impact on the aquifer and SAC if new facilities are permitted that involve an unspecified increase in visitor-numbers, along with increased use of potable water and disposal of waste water and sewage on site?

4. In conclusion

We understand that English Heritage is faced with a serious management problem at Stonehenge, partly owing to insufficient scrutiny of previous proposals and partly to ad hoc measures to deal with problems as they arise. A temporary solution is needed but not one that generates further mistakes. We therefore suggest, in the first instance, that the following should be required before determination of the present application (also set out at the beginning of this letter):

- An explanation of why the current application has been made despite not meeting planning consent Condition 5 re application no. 14/12106/FUL, and an account of what efforts are being made to meet that Condition by April 2017
- A fully explained and convincing visitor-transit system that builds in future increases in visitor numbers and safety measures for buses passing, and for pedestrians
- A full and up-to-date Green Travel Plan to include measures to ensure that visitor-arrivals are spread throughout the day rather than at peak times
- A comprehensive visitor management strategy
- Detailed explanation of the location and assurance of an uninterrupted potable water supply, including current and predicted usage, and evidence of having secured any necessary permits
- Detailed explanation of sewage and waste water disposal, including current and predicted measures, and evidence of having secured any necessary permits
- A fully detailed sustainability appraisal, to include discussion with ICOMOS-UK on archaeological and landscape issues

In view of the uncertainties evident re the potable water source and waste water and sewage disposal matters, we believe that the Council should not only await the outcome of the Environment Agency's permit decisions but also undertake an Appropriate Assessment of the potential impacts of increased visitor-numbers and run-off from the parking areas on the Avon SAC before before determination of the application. An Appropriate Assessment is a legal requirement under the Habitats Regulations and, in our view, ought to be a part of this application documentation.

We hope that the Council will refuse this application, for the reasons we have set out above, and that no further planning consents will be given before previous relevant planning conditions have been satisfactorily resolved.

Should the Council wish to grant planning permission, despite the concerns we have raised, we strongly recommend that, in view of the succession of planning applications for extension of the visitor facilities at Stonehenge and the number of unsatisfactory outcomes of proposals and changes implemented since opening in 2013, any permission given is made temporary, for a maximum period of five years.

Within that time limit and in line with the aim of the Management Plan, we sincerely hope that stakeholders would work together, bearing in mind possible changes to the A303 and proposed re-siting of the Artillery Museum, to reach a truly sustainable and perhaps partly shared solution to the location and operation of visitor facilities. We hope that such a solution would involve park and ride, restoration of the WHS landscape on its western boundary, and greater emphasis on dispersed access and walking to the henge.

Yours sincerely,



George McDonic
Chairman, the Stonehenge Alliance

THE STONEHENGE ALLIANCE IS SUPPORTED BY:
Ancient Sacred Landscape Network; Campaign for Better Transport; Friends of the Earth;
Campaign to Protect Rural England; and RESCUE: The British Archaeological Trust