

**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING ACT (INQUIRIES PROCEDURE) RULES 2000**

**APPEAL REF.
APP/T31915/A/05/1193511**

APPEAL BY ENGLISH HERITAGE

LAND TO THE EAST AND WEST OF COUNTESS ROAD, AMESBURY

**SUMMARY PROOF OF EVIDENCE
by GEORGE MCDONIC
on ENVIRONMENT AND PLANNING MATTERS**

**on behalf of
THE STONEHENGE ALLIANCE**

NOVEMBER 2006

1 PERSONAL DETAILS

1.1 My name is George Ferguson McDonic.

1.2 Amongst my professional qualifications is that of being a Chartered Town Planner. I am a Fellow and Past President of the Royal Town Planning Institute. I have been a member of this Organisation since 1945.

1.3 I was County Planning Officer and Director of Environmental Services for Wiltshire County Council from 1967 to 1987. Before that I was Deputy County Planning Officer for Leicestershire for three years and before that was Deputy County Planning Officer for Fife County Council for six years.

1.4 I am the senior partner in the Town Planning practice of George McDonic of Great Hinton, Trowbridge. The practice is a general planning practice working in the Midlands and the South of England.

1.5 I was a member of the Department of Environment Working Party on Stonehenge (the Sheaf Committee) which met in the late 1970's and also a member of the English Heritage Working Group on Stonehenge (the Golding Group) which reported in 1985.

1.6 I am the Chairman of the Stonehenge Alliance and chairman of the Wiltshire Branch of the Campaign to Protect Rural England (CPRE). The Wiltshire Branch of CPRE is a member of the Stonehenge Alliance and I am authorised by the Branch Committee to include its opposition to the appeal proposals in my representations on behalf of the Stonehenge Alliance.

1.7 The Stonehenge Alliance is a Group of organisations and individuals who are opposed to the planning application which is the subject of this appeal. It strongly supports the principles of the widely agreed Stonehenge Management Plan which recognises that the whole archaeological and spiritual landscape of the World Heritage Site is of outstanding universal value and international importance and as such should be conserved and enhanced.

2 THE OBJECTION TO THIS APPLICATION.

2.1 The objection to this application relates to the transit system. It also questions whether the District Council was able to deal with that part of the application relating to the A344. I will address the issue of the impact of the landtrain on the landscape of the World Heritage Site and the inadequacy of the details of the structures relating to the landtrain.

2.2 It is considered the matters which the Secretary of State asked to be informed about in the call-in letter of 24 August 2006 are relevant to this inquiry.

3 THE SITE IN RELATION TO DESIGNATIONS AND PLANNING POLICIES.

3.1 The part of the application to which the objection relates falls within the designations of a World Heritage Site, a Special Landscape Area and an Area of Special Archaeological Interest.

3.2 The Stonehenge and Avebury and Associated Sites was inscribed by the UNESCO Convention as a World Heritage Site and as such a duty was placed on the State to protect and conserve the area. Part I and Article I with Part II and Article 4 are relevant to this appeal.

3.3 PPS1 declares that it is Government policy to protect the environment and landscapes within national and international designations which should receive the highest level of protection.

3.4 PPS7 says that one of the key principles of the Government is the protection and enhancement of the environment. LPAs should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.

3.5 PPG15 deals with World Heritage Sites by stressing the importance of such a site being a key material consideration in dealing with planning applications within such areas. Great weight should be placed on the need to protect them.

3.6 PPG16 refers to nationally important archaeological remains. It is considered those remains within the WHS are of national importance. It says where these remains, whether scheduled or not, and their settings, are affected by proposed development, there should be a presumption in favour of their physical preservation.

3.7 PPG24 in dealing with noise says that special consideration should be given to development which would alter quiet enjoyment in special areas.

3.8 The Good Practice Guide on Planning and Tourism that replaced PPG21 deals with the key planning considerations for Tourism developments saying that they need to respect their environs and complement them rather than detract from them. They should be designed to have a positive impact on the landscape, the historical setting and upon ecology.

3.9 RPG10 stresses the need in relation to tourism developments of protecting and enhancing environmental assets.

3.10 The Wiltshire and Swindon Structure Plan 2016. The Plan has four significant Policies relative to this Inquiry; they are DPI, C9, HE1 and HE2. These Policies seek to minimise the loss of countryside and protecting and enhancing the Plan area's environmental assets. Also to protect landscape character and scenic quality. The Policies which deal with Stonehenge say that the WHS and its landscape setting should be protected from inappropriate development to reflect its outstanding international value. No development should take place which by reason of

its scale, siting and design would prejudice the WHS and its setting in the landscape. Features of archaeological or historic interest and their settings should be protected from inappropriate development.

3.11 Salisbury District Local Plan. The Policies which are relevant to the appeal are G1, G2, C1, C2, C6, CN20, CN21, CN22 and CN24. These Policies echo those of the Structure Plan.

3.12 The Stonehenge World Heritage Site Management Plan. This document says its vision for the future of the WHS is based on the fundamental need to conserve, enhance and interpret the cultural significance of the whole Stonehenge landscape and its outstanding universal value.

3.13 The Rural White Paper Our Countryside: A Fair Deal for Rural England. The Government's policy is stated that the countryside should be safeguarded for its own sake and will continue strict control over development in the open countryside.

4 THE MESSAGE FROM THESE POLICY DOCUMENTS.

4.1 The documents referred to in section 4 above define this site to be of international importance because of its archaeological and landscape features and its outstanding universal value. All the documents identify a need to conserve, protect and enhance the World Heritage Site.

4.2 This planning application raises issues which go to the heart of the policies referred to and it is against these policies the proposals should be judged.

5 DESCRIPTION OF THE SITE.

5.1 The objection to the appeal proposals relates to that part which is concerned with the proposed transit system and this lies in the north eastern part of the WHS. The area is that largely between A303 to the south, Countess Road to the east, the fringe of the housing development to the north and extending westwards in a spur to Byway 12 and the land to the east of King Barrows Ridge.

5.2 In this section of the WHS there are open long distance views particularly from King Barrows Ridge and along that section of Bridleway 37 from the Woodhenge drop-off to Bridleway 39 where there are views of the traffic moving along the A303. This is a very open landscape of large fields in active agricultural use. There are very few agricultural buildings or man made features in this area which contributes to its unspoilt openness which forms a tranquil cultural landscape of outstanding universal value. In the WHS Management Plan at Figure 2 the plan of the Landscape Character and Structure, the area is shown as Downland Ridge Lines around the King Barrows Ridge and River Valley Slopes for the land to the east.

5.3 The area between Bridleway 39 and Byway 12 has the Cursus lying within it. There is a different form of landscape in this area which contains more man made development. It is nevertheless a tranquil area and generally open countryside. This area plays an important part in providing a setting for the Cursus and other monuments in the WHS.

5.4 Those using the Bridleways 9A, 10, 30, 37 and 39 enjoy a tranquil area of open landscape free from development. This area is an important part of the setting for the Stonehenge monuments. It is important that this existing landscape remains undisturbed and protected from development intrusion.

5.5 The whole of the area through which the land train would run beyond Countess Road is open countryside.

6 THE LANDTRAIN PROPOSALS

6.1 The landtrain is shown to run to four drop-off points within the WHS and it would be incongruous, intrusive and conspicuous in the landscape. For the most part this landscape which forms an important setting to ancient monuments is open and tranquil.

6.2 The Council wish to restrict the landtrain movements to a maximum of 10 per hour. It is proposed the time of summer operations would be 12 hours per day giving a maximum of 120 movements per day. in the winter this would reduce to a maximum of 95 movements per day. This would mean a very significant number of movements in the WHS each day. These movements would be visibly and audibly intrusive in this part of the WHS.

6.3 Landtrains using the track from the Visitor Centre to Woodhenge drop-off point, the Cursus drop-off point and the King Barrow Ridge drop-off point would be conspicuous from Bridleways 9A, 10, 30 and 39. From the Cursus drop-off point to the Durrington Farm drop-off point the land train will run close to the Cursus ancient monument and for a considerable part of the journey it will be in a 'corridor' of trees as the proposal is to plant a belt of trees on the north side of the track. This form of planting is alien to the landscape of the WHS.

6.4 The application fails to show adequate drawings of the proposed shelters at the drop-off points. From the information provided the design of the shelters and accompanying hardstanding areas would be inappropriate and out of keeping with this landscape.

7 AN ANALYSIS OF THE PROPOSALS AGAINST THE MATTERS THE SECRETARY OF STATE AND THE INSPECTOR ASKED TO BE INFORMED ABOUT.

7.1 A full detailed analysis is set out in the proof of evidence. This analysis shows that the Policies and statutory designations within all the documents referred to seek to protect and enhance the landscape character of the area concerned. It is considered that the introduction of the landtrain would not protect and enhance the landscape character of this part of the WHS and as such would be in conflict with international, national and local planning policies.

7.2 The extent to which the proposed development is compatible with the Government's proposals for improving those sections of A303 and A344 cannot be judged at the present time in the absence of the Government decision following on its Review of the options for the A303 Improvement scheme. It is clear from the appeal application and the recommended condition 44 of the District Council to be attached to any permission granted, that the A303 scheme which was the subject to the recent public inquiry is to be approved by the Government before development can commence. If the scheme for the improvement of the A303 as set out in the Stonehenge Improvement Order 200 is not approved the application, even if found acceptable, will not be able to proceed.

7.3 Conditions to be attached to any permission granted. A further condition is recommended. it is this: The development hereby approved shall not commence until there has been submitted to and approved in writing by the local planning authority of full details of the proposed shelters to be built at the drop-off positions to a scale of 1:50 together with the details of all building materials and with full details of hardstanding and materials to be used at the drop-off points.

8 THAT PART OF THE APPLICATION WHICH IS DESCRIBED AS RESTORATION WORKS TO A344.

8.1 Part of the description of the proposed development is described as “Restoration Works to A344”. In the Officer's report to the Committee on the planning application this operation is described as “Decommissioning of the A344 between its junction with the A360 (Airman's Corner) and remodelling the roadbed”. This suggests that a length of A344 is to be closed and physical works will be carried out on the metalled part of the highway. The description does not indicate how much of A344 is to be decommissioned.

8.2 Salisbury District Council is not the highway authority for this road and it is considered that any works to be carried out within its limits can only be approved by the highway authority. It is believed that this would be the case after an order had been confirmed closing the road.

8.3 In these circumstances it seems inappropriate for this development to be included in the planning application.

9 CONCLUSIONS

9.1 That part of the appeal application for the landtrain operation is largely within the world Heritage Site, one of the most important cultural heritage sites in the United Kingdom. International, national, regional and local planning policies seek to conserve and protect these sites. The WHS is recognised for its outstanding universal value which is the highest recognition of areas of international importance. The proposed landtrains are shown to operate in one of the most important landscape settings in the WHS which is crossed by bridleways but it is open, tranquil and free from development.

9.2 The landtrains would be an intrusive incursion into this important open landscape; in many parts they would be conspicuous and would be incongruous wherever they were. Their presence would not preserve or conserve this precious landscape.

9.3 It is so important to preserve and conserve the Stonehenge landscape as provided for in all the international, national, regional and local policies that any benefits of providing access to the Stones by landtrain from the proposed Visitor Centre should be totally discounted.

9.4 I ask that the Inspector should recommend that the Secretary of State should refuse the application for the reasons given above.