

SA/2/2/1

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

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

APPLICATION REF. S/2004/0001

APPEAL INQUIRY:

NEW STONEHENGE VISITOR CENTRE

ON

**LAND TO THE EAST AND WEST OF COUNTESS ROAD,
AMESBURY, SALISBURY**

SUMMARY OF PROOF OF EVIDENCE

by

KATE FIELDEN

on

- 1. HISTORY OF THE STONEHENGE VISITOR CENTRE PROJECT**
- 2. IMPACT OF THE LAND TRAIN ON ARCHAEOLOGY AND THE
WHS**
- 3. VISITOR FACILITIES AND THE NEED TO PROTECT THE WHS**
- 4. THE APPROPRIATE ASSESSMENT IN RESPECT OF THE
RIVER AVON SPECIAL AREA OF CONSERVATION**

on behalf of

THE STONEHENGE ALLIANCE

1. Personal details etc.

- 1.1. My name is Katherine (Kate) Fielden. My qualifications are in archaeology and I work as curator of a country house open to the public.
- 1.2. I have been involved in Stonehenge matters since 1991, as a member of CPRE and WANHS. I attended conferences on the A303 at Stonehenge in 1994 and 1995, and represented CPRE in discussions relating to the production of the Stonehenge Management Plan. I am a member of the Avebury Society and sit on the Avebury WHS Steering Committee. I am Hon Secretary to the Stonehenge Alliance and am authorised to speak on its behalf.
- 1.3. My evidence on the impacts of the proposals on archaeological and WHS issues has been prepared for the Alliance on behalf of RESCUE: The British Archaeological Trust, of which I am a Council member.

2. Introduction

- 2.1. The Stonehenge Alliance supports Salisbury District Council's refusal of the visitor centre planning application in 2005 and the reasons given for refusal.
- 2.2. I give evidence on the following matters.
 - (i) The history of the decision-making process on the visitor-centre scheme
 - (ii) The impact of the scheme on archaeology and the WHS; and the inadequacy of detail on the land train structures
 - (iii) Need for new visitor-facilities and the requirement to protect the WHS
 - (iv) The inadequacy of Salisbury District Council's appropriate assessment of the potential impact of the 'in combination' effects of development on the River Avon Special Area of Conservation (SAC).

3. History of decision-making on the visitor centre scheme

3.1. I describe the history of decision-making on the visitor centre over the past 15 years, including the link with proposals for widening and tunnelling of the A303 through part of the WHS. The decision-making process appears to have been both illogical and over-ambitious. The Stonehenge 'Master Plan', renamed the 'Stonehenge Project', disregarded the planning framework and the emerging Management Plan; it remains in conflict with planning policy and the published Management Plan (2000). The visitor centre scheme is linked, as a 'baseline condition', to road proposals that are unsuitable for the WHS and apparently too expensive. Neither scheme is satisfactory in terms of protection and rehabilitation of the whole WHS as required under the World Heritage Convention and the WHS Management Plan.

3.2. Salisbury District Council's reasons for not defending the Appeal are obscure and in our view unjustified. The Council refused the application in July 2005, quoting conflict with eight Local and four Structure Plan policies. In inviting re-submission of the application in 2006, the Council considered that no change to the land train scheme would be a 'worst case scenario' and yet the application was agreed by the Council entirely unchanged, despite declared conflict with planning policy in its earlier refusal.

4. Archaeological and WHS objections to the proposals

- 4.1. The Alliance's objections on these matters are principally confined to the impact of the proposed land train on the settings of monuments and the WHS cultural landscape; and possible damage to archaeological remains. Further concerns about archaeology and setting arise from the lack of detail provided on the land train scheme. I point to planning policy and Management Plan objectives that conflict with the scheme.
- 4.2. There are strong objections to the visual impact of the land train on settings of Scheduled and unscheduled monuments in the WHS: for example, the Cursus, the Avenue, the barrows on King Barrow Ridge, and even the henge itself. The northeastern part of the WHS cultural landscape and the enjoyment of it and its monuments by visitors and others would be compromised by the adverse visual, physical and noise impacts of the land train scheme. The proposals do not take into account Management Plan objectives for rehabilitation of the wider landscape of the WHS, the removal of trees and the enhancement of degraded monuments. The proposals conflict with advice in PPGs 15 and 16, and with specific planning policy and guidance for the WHS.
- 4.3. There is insufficient information about the land train structures to assess their full impact on archaeology and setting. We believe this substantial lack of detail alone ought to be grounds for refusing the application.
- 4.4. Despite Government guidance in PPG 16 and the Council's own policy, trial trenching which should have been undertaken, notably north of the Cursus, to assess the importance of archaeological remains before tree planting proposed to screen the land train could be considered, has not been done prior to

determination of the application by the LPA. The applicant, also a Statutory consultee, admits that this work should be and has not been undertaken.

- 4.5. The Council's reasons for refusal of the scheme in relation to the land train remain as pertinent today as they were in 2005.

5. Need for new visitor-facilities and the requirement to protect the WHS

The proposals fail to place protection and rehabilitation of the whole WHS before the provision of visitor-facilities. Instead, the scheme concentrates on rehabilitation of the setting of the henge at the expense of the wider landscape of the WHS. This is contrary to the World Heritage Convention (Article 4), ICOMOS' *Principles for the balanced development of cultural tourism*, and Management Plan principles for sustainable tourism.

6. Inadequacy of the appropriate assessment required in relation to the River Avon SAC

The Council's appropriate assessment, required under Regulation 48 of the Habitats Regulations, is inadequate in respect of the potential 'in combination' effects on the SAC of defined large development projects including the visitor centre application. The Council has failed to take into account recent findings on hydrogeology in relation to the A303 Improvement. The Council cannot be *certain*, nor could any national authority be *convinced* that there will be no adverse effects on the SAC arising from new findings announced by the Highways Agency.

7. In conclusion

We hope that the Appeal will be dismissed for the reasons outlined above.