# 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, SALISBURY

Application Ref. S/2004/0001

**PROOF OF EVIDENCE: SUMMARY** 

by

**Kate Freeman and Margaret Willmot** 

on

Traffic and Transport on behalf of

THE STONEHENGE ALLIANCE

November 2006

#### 1. Background

1.1 This proof of evidence has been compiled by Kate Freeman, on behalf of Wiltshire Friends of the Earth and Margaret Willmot, on behalf of Salisbury Transport 2000. Both groups are affiliated to national parent organisations and are members of the Stonehenge Alliance.

1.2 We believe that management of the World Heritage Site and visitor facilities at Stonehenge should stand as a beacon for the future and that this application does not deliver that vision. Our detailed proof of evidence makes the following arguments against the scheme.

#### 2. Links to A303 improvement scheme

- 2.1 The application is tied to a road scheme that does not conform with current and emerging policy on sustainable development and climate change. The A303 Stonehenge Improvement scheme has been justified as 'an exceptional environmental scheme' which would not be prioritised if assessed solely in terms of transport benefits [POE¹ 3.6, 4.1].
- 2.2 The evaluation process for the 'second strategic route' to the South West is flawed since the SWARMMS multi-modal study accepted the dualling of the A303 at Stonehenge as a given and then used this to justify capacity increases further westwards. The environmental consequences of expansion of the A303/A358 route, including cumulative and indirect effects, have not been properly evaluated [POE 3.8].
- 2.3 The current status of the A303 Stonehenge Improvement scheme is uncertain, as is the precise nature of the dependency between the proposed Visitor Centre and components of this scheme. The Highways Agency has suggested that the Countess East Visitor Centre is compatible with some of the other A303 options put forward for consideration in the January 2006 options review. However the acceptability of these alternative options to English Heritage and other key players is in doubt [POE 3.12, 3.17]. Also the viability of the proposed Visitor Centre might be compromised [3.18], and the likelihood of fly parking increased [POE 3.15 and 4.18], if the Stonehenge monument were still visible from the road network.
- 2.4 Because of the extreme sensitivities regarding developments impacting on the World Heritage Site it seems certain that any alternative road proposals would need to be examined at a Public Inquiry. The Visitor Centre would be dependent on the outcome of that process and to determine this planning application before that point is premature [POE 3.18].

#### 3. Associated traffic and compliance with objectives

- 3.1 The assumptions on numbers at the new Visitor Centre are not justified. The radical change in the nature of the Visitor Centre experience might be expected to draw on a different leisure market than that attracted currently [POE 4.2-4.14].
- 3.2 The increased parking capacity (581 car spaces) at the new Visitor Centre is very high, especially when the additional 0.91 ha overflow car park is taken into account. This level of parking is not in line with advice in PPG13, nor with Objective 25 of the Management Plan 'to reduce the reliance on the private car by visitors to the WHS'. The concerns of numerous consultees on parking issues are noted as are the unresolved issues concerning fly parking [POE 4.15 4.17].
- 3.3 The increased road and parking capacity associated with the Visitor Centre proposals is out of step with current government policy and the proposal does not describe measures to effectively manage traffic demand [POE 4.26-4.27].

<sup>&</sup>lt;sup>1</sup> 'POE' refers to Stonehenge Alliance Proof of Evidence SA/2/3/1

#### 4. Sustainable choices and adequacy of Travel Plan

- 4.1 Stonehenge deserves a more visionary travel plan worthy of this World Heritage Site and something which would be a world-class showcase for sustainable tourism in the 21<sup>st</sup> century [POE <u>5.25</u>].
- 4.2 The Travel Plan needs a much greater focus on reducing the numbers of car borne visitors. The challenges of meeting greenhouse gas reduction targets are becoming ever more urgent and the 'Stonehenge Project' should be contributing to meeting these goals rather than adding to the problem [POE <u>5.20 5.24</u>].
- 4.3 There is much evidence of good practice from elsewhere which should be incorporated into the Travel Plan. Consideration should be given to parking restraint, financial incentives, network improvements for non-car modes, promotion, marketing and partnerships [5.10, 5.13 5.14]
- 4.4 The Travel Plan needs to have teeth. Targets and network improvements for non-car modes should be mandatory and guaranteed [POE 5.17 5.20].
- 4.5 Improvements to local bus service and infrastructure would bring benefits for the local community as well as visitors to Stonehenge [POE 5.4 5.8].

#### 5. Alternative options

- 5.1 The overall impact of a new development on the Countess East site is too great. Instead, measures should be considered which can be done straight away and have low environmental impact [POE 3.22, and Section 6].
- 5.2 The Stonehenge Alliance supports early closure of the A344/A303 junction to motorised traffic. This would provide immediate safety and environmental benefits [POE 6.5].
- 5.3 There should be an examination of what could be done to modernise and improve the existing underground visitor facilities at Stonehenge. Other low impact alternatives should be explored, such as the dispersal of interpretation and parking for visitors round the periphery of the WHS rather than a single large scale visitor centre [POE 6.8-6.9].