

THE STONEHENGE ALLIANCE

From the Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB

Chris Taylor,
Director - Complex Infrastructure Programme
Highways England
Woodlands
Manton Lane
Bedford MK41 7LW

Sent by email on 29 October 2017

Dear Mr Taylor,

A303 Stonehenge Preferred Route

I am writing on behalf of Stonehenge Alliance members invited to attend a meeting on 17 October 2017 with you and Derek Parody, Project Director for the A303 scheme. We found the meeting helpful and are grateful to have been able to discuss a number of relevant matters with you. I had expected some notes from you and that is the reason for the delay in my response. We have now agreed our own notes of the meeting and I would like to highlight some matters raised which we found to be of particular concern.

1. World Heritage Site status

Highways England does not wish the road scheme to result in loss of the World Heritage Site (WHS) designation. At the same time, Highways England considers the advice, on outstanding universal value (OUV) and seeking alternative route options, of the WH Committee and the second UNESCO WH Centre/ICOMOS Advisory Mission is misplaced.

2. Protection of OUV

Highways England is confident that the A303 scheme preferred route will protect OUV, despite the advice of the second Advisory Mission to Stonehenge in January–February 2017 that

“The design of the scheme within the WH property and road network development must however reconcile [the aims of the scheme] with avoiding adverse impact on the OUV of the World Heritage property in all its components” (Mission Report, 2017, p. 5); and

“In particular it should be noted that benefits arising from changes in some parts of the property cannot outweigh negative impacts on OUV arising from impacts elsewhere” (Mission Report, 2017, p.29).

We pointed to advice given in the World Heritage Centre’s advisory bodies’ Report to the World Heritage Committee, adopted along with the Committee’s Decision on 6 July 2017, that:

“It is not considered satisfactory to suggest that the benefits from a 2.9km tunnel to the centre of the property can offset significant damage from lengths of four lane approach roads in cuttings elsewhere in the property.”

The unanimous Decision of the WH Committee urged the UK Government

“to explore further options with a view to avoiding impacts on the OUV of the property, including: the F10 non-tunnel bypass option to the south of the property, [and] longer tunnel options to remove dual carriageway cuttings from the property . . .”

We expressed concern that Highways England appeared not to have fully understood the meaning of OUV as set out in the WH Convention (which demands protection of the whole WHS) and how that understanding should be applied in relation to a WHS. Mr Parody, convinced that the preferred route would protect the OUV of the WHS, questioned the meaning of ‘protect’ in this context. Highways England considers the Advisory Mission and WH Committee are mistaken in their advice, suggesting they had misunderstood their own guidance. Furthermore, Highways England asserts that the Advisory Mission and WH Committee had also misunderstood ICOMOS’ *Guidance on Heritage Impact Assessments for WH properties* (2011) which had been used to assess the impact of the proposed scheme on the OUV of the WHS. We disagreed with Highways England’s opinion on the impact of the scheme on the OUV of the WHS, for the reasons given by the Advisory Mission and WH Committee; and pointed out that standard *Design Manual for Roads and Bridges* heritage impact assessment methodology is not the same as that recommended by ICOMOS for WH properties.

You admitted that you had not taken independent or legal advice on OUV, on UNESCO/ICOMOS’ advice and guidance, or on planning policy for WHSs, but are relying on the Heritage Management Advisory Group (HMAG) for such advice. We understand that this group comprises local representatives of English Heritage, Historic England, Wiltshire Council and the National Trust who have been advising Highways England on *archaeological evaluation* for the project. You said that the HMAG would ask the next Advisory Mission (expected within the next few months) to explain the perceived ‘misunderstandings’ on the part of UNESCO and ICOMOS. You also indicated that you were expecting the DCMS to provide advice on these matters and that the DCMS would also be discussing the above mentioned ‘misunderstandings’ with UNESCO’s WH Centre.

3. Choice of preferred route

Mr Parody said that the choice of the preferred route was governed by lack of archaeology along it, confirmed by evaluation undertaken for an earlier road scheme. He assured us that archaeological evaluation work currently under way will show there is no archaeology in the way of the scheme so there will be no damage. We replied that there *are* archaeological concerns about the preferred route and that there *would* be impacts on archaeology, monument settings, and the WHS landscape.

4. The WHS boundary

Highways England considers the WHS boundary is arbitrary, since important archaeology continues beyond it. We advised that the boundary is clearly defined but is at the same time required to include all those attributes that contribute to the OUV of the WHS, as explained in UNESCO’s *Operational Guidelines for the Implementation of the World Heritage Convention* (updated 2017). There is no buffer zone for the WHS, although one is now required on designation for all WHSs, but the setting of the WHS must be protected as set out in the *Operational Guidelines* and in UK planning policy. We advised that the Convention is binding under International Law even if the WHS itself has no UK statutory protection.

5. Traffic flow and alternative routes

We pointed out that inadequate information was provided at the 2017 non-statutory consultation to support discarding alternative options. We also questioned the need for A303 widening in the context of far greater traffic congestion elsewhere in the UK, including the M25 and in cities where daily congestion is the norm.

We were told that predicted traffic flow figures are normally for 15 years ahead but we questioned accurate use of this short time span, taking into account the rapid and considerable changes in technology that can be expected within a few years. We noted that there was insufficient data to support the traffic flow figures provided in the Technical Assessment Report; or to support the predicted increase in traffic flows and the assumption that traffic flow would be eased with the Expressway in place, even if the A303 improvements were to be phased. You agreed to take forward our request to be provided with the raw modelling data over the whole route to the South West and we hope to receive it shortly.

We pointed to the CPRE report, *The End of the Road?* (2017) which, with data supplied by the Highways Agency, shows that road widening in almost every case studied led to induced traffic and more congestion within a few years, and did little to improve economic and house building activity other than in areas close to the improved road corridor.

We were advised by you that irrespective of the concerns we raised, the Government had decided that the scheme should go ahead and that is what you are aiming to ensure.

Our suggestion that local communities might be helped by implementing measures to prevent rat-running with funding from Highways England was dismissed as not Highways England's job. In raising the issue of value for money, we questioned the grounds on which the 'heritage value' of the scheme had been assessed, especially in view of UNESCO's advice. We also reminded you that the estimated cost of the scheme was now close to the highest estimate for the scheme before work has even started.

6. Consultation

We were shocked that even though 77% of respondents to the non-statutory consultation earlier this year were not in favour of a 2.9km tunnel scheme at all in the interest of the WHS, their views had been discounted by Highways England in favour of responses from statutory bodies and the National Trust who spoke for large numbers of people.

7. Scientific Committee

We are concerned that the Scientific Committee, recommended by the Advisory Missions to provide advice to the HMAG, had been set up without the involvement of the Avebury & Stonehenge Archaeological and Historical Research Group as recommended. You agreed that we would be provided with minutes of Highways England's meetings with HMAG and we look forward to receiving these soon.

8. Request for geological data

You advised us that the geological core data requested by us would also be provided shortly but this has not yet arrived.

9. The Special Area of Conservation (SAC)

You assured us that there would be no impact as a result of the scheme on the rivers Avon and Till SAC, despite an Appropriate Assessment not yet having been undertaken.

10. Sustainability

We feel that insufficient consideration and information has been given concerning this issue within the project, including matters such as local people's quality of life (noise, air pollution), induced traffic, access, walking routes, and wildlife conservation.

Finally, we agreed that it would be helpful for us to maintain contact, and that discussion on specific topics, e.g., geology and noise, would be useful to Highways England and the Alliance.

I look forward to your response to my letter and to receiving those documents mentioned above, which you kindly agreed would be forwarded to us.

Yours sincerely,

George McDonic
Chairman, the Stonehenge Alliance

cc. The Rt. Hon. Theresa May, MP, Prime Minister
The Rt. Hon. Philip Hammond, MP, Chancellor of the Exchequer
The Rt. Hon. Chris Grayling, MP, Secretary of State for Transport
The Rt. Hon. Karen Bradley, MP, Secretary of State for Culture Media and Sport
The Rt. Hon. Jeremy Corbyn, MP, Leader of the Opposition
The Rt. Hon. Sir Vince Cable, MP, Leader of the Liberal Democrat Party
The Rt. Hon. John Hayes, MP, Minister of State for Transport
Tom Watson, MP, Deputy Leader of the Opposition and Shadow Secretary of State for
Digital, Culture, Media and Sport
Andy McDonald, MP, Shadow Secretary of State for Transport
Jesse Norman, MP, Parliamentary Under-Secretary for Transport
John Glen, MP, Parliamentary Under-Secretary for the Arts, Heritage and Tourism
Lilian Greenwood, MP, Chairman, Transport Committee
Caroline Lucas, MP
Molly Scott Cato, MEP, Green Party MEP for the South West
Baroness Jones of Moulsecoomb
Baroness Bonham-Carter of Yarnbury, Liberal Democrat Lords Spokesperson for
Culture, Media and Sport
Dr Isabelle Anatole-Gabrielle, Head of Europe and North America Unit, UNESCO
World Heritage Centre
Susan Denyer, Secretary, ICOMOS-UK

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