

THE STONEHENGE ALLIANCE

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

c/o the Hon Secretary, Kate Fielden

Sent by email on 16 April 2018

A303 Stonehenge Public Consultation 2018 on the A303 preferred route proposals Response from the Stonehenge Alliance to Highways England

Dear Sir or Madam,

The Stonehenge Alliance is a group of non-governmental organisations and individuals, formally constituted in 2001 to oppose the Government's scheme to widen the A303 Trunk road across the Stonehenge World Heritage Site (WHS), including a 2.1km tunnel close to the henge abandoned owing to cost in 2007. Since then we have sought enhancements to the WHS and opposed developments that would cause it significant harm. Further information about the Alliance may be found on our website at www.stonehengealliance.org.uk/about-us/.

In response to Highways England's formal consultation on its preferred route proposals we have the following comments to make. They do not differ greatly from those made by us in response to the public consultation in 2017 which is attached for ease of reference.

1. General points

1.1. We strongly disagree with the proposed scheme in its entirety since it would severely and irreparably damage the WHS and its setting, along with a significant number of its attributes of outstanding universal value (OUV), in direct contravention of the World Heritage Convention, planning guidance and policy for the WHS, and the Vision and aims of the WHS Management Plan.

1.2. The 'preferred route' disregards the clear advice of the UNESCO/ICOMOS Advisory Missions to Stonehenge on Heritage Impact Assessment (HIA) and a choice of route, as well as the Decision of UNESCO's World Heritage Committee on 6 July 2017. Highways England's consultation documents barely mention the missions' advice and omit reference to UNESCO's Decision.

1.3. We deplore the fact that Highway England seeks no more than comments on a scheme intended to be implemented without asking respondents about their views of the fundamental suitability of the scheme as a whole for the WHS.

1.4. We also deplore, in any consultation to date, the lack of route choices and the absence of detailed comparative information about rejected routes that would not damage the WHS and its OUV.

1.5. Many of the points made in our response to the previous consultation remain valid for the current consultation, especially under planning policy, transport issues, consultation and value for money considerations.

1.6. The approach to consultation on the A303 preferred route and the information supplied on its potential impacts are highly inadequate. From the start, there has been lack of choices that would protect the WHS and its setting; insufficient detail on archaeology and the natural environment for informed comment; and so on. We enlarge on some of these matters, below.

2. Response to Highways England's Questionnaire 2018

Q1. The Alliance has not objected in principle to provision of a bypass for Winterbourne Stoke. We believe that such a bypass might more appropriately be constructed to the north of Winterbourne Stoke and could be provided separately from the proposed Expressway across the WHS and its setting. We make no comments at present about the proposals for the bypass, except to say that there are concerns about impacts on the historic and natural environment, notably archaeology, Parsonage Down Nature Reserve, Great Bustards and the River Till SAC, about all of which there is limited information in the documents accompanying the consultation. Any bypass should cause minimal damage to these interests and for this reason should be no more than single-carriageway.

Q2. The Longbarrow Junction proposals would destroy important archaeology in the proposed location of the junction and its slip roads. If implemented, the scheme would also impact adversely on the setting of the WHS and a number of its key monuments and monument groupings.

No indication is given of lighting, signage, fencing and other infrastructure associated with tunnel management, nor has the impact of vehicle lights been factored in to the aim in the Management Plan to reduce the impacts of artificial light on the WHS.

The extensive construction compound planned in this location would impact adversely on the enjoyment of nearby parts of the WHS by visitors for a number of years, while dust, noise and other environmental pollutants would have detrimental impacts on wildlife that are as yet unknown and unquantified in the documentation available.

Q3. We have no further comments to offer at present about proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction).

Q4. This, and other proposed so-called 'green bridges', is not what is normally defined as a green bridge in terms of location, design and function (cf. Landscape Institute Technical Guidance Note 09/2015 https://www.landscapeinstitute.org/wp-content/uploads/2016/01/TGN9_15Green-Bridges-Guide_LI-300dpi.pdf). Public safety measures across the bridge have not been specified.

Q5. The cutting on the western approach to the tunnel would change the landform of the WHS and irreparably damage its integrity.

Key monument groups would be severed. Any potential for restoration of this part of the designed landscape of the WHS and its better understanding by present and future generations would be lost. Insufficient information has been provided to assess the damage to archaeological remains that would result from the proposed works here.

It seems likely that a Beaker burial cemetery would be destroyed in part; while the cutting would pass close to the Wilsford Shaft occupying an important position near the head of the dry valley leading to Stonehenge Bottom which is also the focal point of a remarkable group of Neolithic long barrows that would be severed by the cutting.

Impacts from any increase in visitors on protected Stone Curlews in the Normanton Down reserve which have links with the Stone Curlew population in the Salisbury Plain SPA have not been addressed: the cutting and the noise from increased traffic would sever these areas; while disturbance during

construction could have even greater adverse impacts on nesting and feeding birds. Great Bustards are likely also to suffer adverse effects from the scheme in construction and operation.

Q6. The western tunnel entrances would have a dominant and highly adverse effect on the WHS and its enjoyment by visitors. The location is archaeologically sensitive, possibly partially within a Beaker cemetery and close to important barrows of the Normanton Down group.

There are inadequate details about fencing along the downgraded A303 cycle/bridleway. No information is given on the safety fencing that will be required by the new A303 cutting: its height, construction and location.

Q7. Highways England asks no question about the highly inappropriate location of the east tunnel portals within a barrow cemetery and very close to the Stonehenge Avenue. The new highway in cutting and the portals, along with noise and light, would be a major adverse impact on these sites as well as on the setting of Vespasian's Camp.

It appears that the cutting below Vespasian's Camp would be widened, threatening further archaeological potential in this area (no information given with the consultation) and further damaging the integrity of the designed landscape. The wider park of Amesbury Abbey (the Nile Clumps) would also be damaged by the proposed road works.

The plans do not explain how visitors to the Stonehenge Monument and National Trust land would access new footpaths and move about the remainder of the landscape south of the existing A303. The proposed byway link between Byways 11 and 12 would adversely impact the bird sanctuary and the Normanton Down barrow group and would be unnecessary: it would be more sensible to use the redundant stretch of the A303 to link these two byways.

Q8. The flyover at Countess Roundabout would:

- compromise the integrity and quiet enjoyment of Amesbury Abbey (Listed Grade I), its Registered Park and parts of the Amesbury Conservation Area;
- Damage the setting of Listed barns at Countess Farm;
- impact adversely on the Mesolithic site of Blick Mead, though how great that impact would be cannot be ascertained without further information on flyover construction; and
- potentially cause adverse impacts on the River Avon SAC and protected wildlife identified in this area.

Again, there is inadequate information available adequately to assess fully any of these impacts.

Q9. We have no further comments at present on proposals for the eastern section of the scheme.

Q10. The environmental information provided is wholly inadequate for consultation on a scheme of this magnitude and in such a sensitive area. Almost all wildlife surveys are incomplete giving little credibility to blanket assertions that there would be 'no likely significant effects'. Appropriate Assessments (as required under the Habitats Directive) should be undertaken in respect of the River Avon SAC and the Salisbury Plain SAC and SPA where protected species would almost certainly be affected both during and after road construction.

Information is lacking on key matters such as hydrogeology, drainage and the water table to make fully informed judgements on potential impacts arising from these issues – issues which are likely to be relevant to Appropriate Assessment.

Concerning noise impacts, much information for the WHS is also missing and, where provided, it is both simplistic and unreliable. Similarly, tranquillity assessment of present conditions is simplistic and not

substantiated through technological study and must therefore also be considered to be unreliable. No attempt has been made to justify assessment methods as requested by the Planning Inspectorate.

Q11. Further comments on the scheme

11.1. Consultation: general points

11.1.1. We have already pointed out, in our letter to Mr Parody dated 1 December 2017, that we consider Highways England's consultation on the A303 Stonehenge scheme from the outset to have been inadequate for the purpose. I attach a copy of that letter and would be grateful if its contents should also be taken into account as part of our response to the present consultation.

Key information is still lacking upon which informed judgements can be made on impacts on the natural and historic environments as well as other matters of direct relevance to the scheme, such as hydrogeology and potential impacts on ground water. I have received no more than short and unhelpful answers to the matters raised in my 1 December 2017 letter to Mr Parody. Issues covered in that letter and of continuing concern are listed below.

11.1.2. Since 2016 there have been no further 'working group' meetings on relevant topics to which we have been invited. The two we were invited to attend could hardly be termed 'working groups', as I pointed out in my letter to Mr Parody.

11.1.3. As with the non-statutory consultation, little effort has been made in this statutory consultation to engage with an audience interested in a world famous heritage site. The single event outside Wiltshire at the Society of Antiquaries was located next door to the Royal Academy holding an exhibition on Charles I, but no effort was made by Highways England to make the most of the opportunity and encourage exhibition visitors or passersby in Piccadilly to attend the event about a major road scheme affecting the Stonehenge World Heritage Site. The exhibition entrance sign was insignificant and uninformative. Appropriate exhibition venues would have been the British Museum, the National Gallery and Tate Britain. We could not even find any consultation information displayed at the Stonehenge Visitor Centre. Extra efforts were made, however, to engage with motorists during the heavily trafficked Easter holiday period both along the A303 as well as at Countess Café near Amesbury.

11.2. Misleading and inaccurate information about the scheme

11.2.1. Misleading and inaccurate information has repeatedly appeared in Highways England's public documents and press statements. We have referred to some of these in correspondence with Highways England (letter to Mr Parody, 15 January 2018, incorrectly dated 15.1.15). Other instances have been found throughout the consultation process, for example:

- "Our proposal is to build a 1.8 mile (2.9 kilometre) tunnel under the World Heritage Site . . .". (Public Consultation Booklet, January 2017, p.8. **Note:** The World Heritage Site is c.5.4km across.)
- "Stonehenge is a national and international icon and stands in a landscape without parallel in the world. Its unique and dense concentration of prehistoric monuments and sites form part of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS). . . Upgrading the A303 between Amesbury and Berwick Down is a once in a generation chance to improve this unique historic environment by:
Protecting and enhancing the WHS . . . This would help achieve the Government's aim to 'protect, conserve and transmit to future generations' the Outstanding Universal Value of the WHS." (Public Consultation Booklet, January 2017, p.12)

- “This survey work . . . is part of the company’s continuing commitment to preserving the World Heritage Site and in particular its Outstanding Universal Value.” ([Press release on behalf of Highways England on 20 December 2017](#), on archaeological survey work)
- “The proposed scheme would maintain the Outstanding Universal Value (OUV) of the WHS, which is the basis for the site being classed as a WHS.” (PEI Report Non-technical summary, February 2018, p.11)
- “The removal of traffic along the existing A303 from much of the Stonehenge landscape would improve the setting of heritage assets within the WHS, including Stonehenge itself.” (PEI Report Non-technical summary, February 2018, p.11)

Note: The WHS itself is a heritage asset of the highest significance: cf. NPPF para.132; while the settings of a number of heritage assets within the WHS would be adversely affected by the A303 scheme. Improving the setting of the henge is not the same as improving the setting of the Stonehenge WHS.

- “Permanently removing the existing road from much of the landscape (. . .) will help to conserve and enhance the WHS.” (Public Consultation Booklet, February 2018, p.52)
- Highways England’s website information on the scheme states, under “Why we need this scheme”:

“**Cultural heritage:** to help conserve and sustain the World Heritage Site and to make it easier to reach and explore.” (<http://roads.highways.gov.uk/projects/a303-stonehenge-amesbury-and-berwick-down/>)

Note. A similar statement appears in the PEI Report (p.7) and in the Consultation Booklet, February 2018 (p. 12). This is not something the scheme would achieve: the scheme would damage the WHS and, in practical terms, make it less easy to reach and explore, since most people would have to pay to visit the site via parking at a visitor-centre; and access to the byways south of the A303 would be made more difficult.

- “There is also a once in a generation chance to enhance the setting of Stonehenge. The road here passes straight through the WHS and has a negative effect on a number of historic features with outstanding universal value, as well as the stones themselves. A recent cultural heritage valuation survey we carried out suggests that society places a high value on improving the setting of Stonehenge.” (Improving journeys to the South West The case for the A303/A358 corridor (February 2018), p.15)

Note. A generation is generally considered to be 25 years. A previous scheme for widening the A303 at Stonehenge was considered fewer than 25 years ago and there is no reason to suppose that another might not be considered within a further 25 years. Outstanding universal value applies only to the WHS; the henge and other monuments are not of OUV in themselves: thus Highways England’s misunderstanding of the concept of OUV gives incorrect information. The survey referred to did not ask people what value they placed on the WHS.

- A [press release issued by Highways England for the Government](#) on 5 March 2018 re the UNESCO/ICOMOS visit, stated:

“Highways England will explain to international experts how preserving the World Heritage Site is at the centre of plans to build a road tunnel at Stonehenge.”

11.2.2. In addition to the misleading or untrue statements given as examples, above (there are others), videos and illustrations of the completed scheme shown to the public are unrealistic, indicating very low levels of traffic, few lorries, no lighting or gantries, and minimal signage and indication of fencing.

11.2.3. Such misinformation and untruths about the scheme presented throughout the advertising and consultation process is highly likely to have given the misleading impression to the general public that the WHS would be properly cared for were the scheme to be implemented which is very clearly not the case. We consider this to be unacceptable and especially so in respect of matters of consultation.

11.3. The consultation questionnaire

11.3.1. The questionnaire is lengthy and requires a certain amount of detailed knowledge of the area to complete in an informed manner. It is not designed to find out how potential respondents beyond Wiltshire whose principal concern is protection of the WHS may feel about the proposals. As mentioned above, respondents are not asked if they support or object to the scheme.

11.4. 2017 Consultation analysis

11.4.1. We were not surprised to learn that some 77% of responses to the 2017 consultation were objections to the scheme. We were very surprised, however, that these objections were apparently set aside by Highways England as irrelevant to its proposals. Many of those objections were submitted via simple pro forma responses, allowing respondents to use their own words if they wished: a facility set up by us and Friends of the Earth. Had we not provided and advertised that facility, few in the wider community at home and abroad would have known about consultation on the road scheme, let alone known how to respond to it. We estimate that 10% of these responses came from abroad. All are important in the context of potential damage to a World Heritage Site which is of global significance. These responses should all have been taken into account in reconsidering the scheme, especially in the light of UNESCO's advice. We hope that the same disregard for objections to the scheme will not be encountered under the current consultation.

11.5. The conflict between Highways England's stance on the protection of the WHS and its OUV and the explicit advice of UNESCO's World Heritage Committee

11.5.1. This conflict remains unresolved; nor is it referred to in the documentation accompanying the present consultation. The 'preferred route' clearly gives insufficient weight to protection of the WHS and its setting. Please see my letter to Mr Parody of 1.12.17 for a fuller explanation of our particular concerns on this issue.

11.5.2. A third Advisory Mission having only just been undertaken; its report and any Decision of the WH Committee this year are likely to be directly relevant to the preferred route now under consultation. The consultation should have been delayed until the UNESCO/ICOMOS report and WH Committee Decision were made available.

11.5.3. We continue to be of the opinion that the A303 project should be halted and a targeted consultation on the unresolved matter of implementing UNESCO's advice should be undertaken as allowed for under para. 76 of Planning Act 2008: Guidance on the pre-application process.

11.6. Lack of understanding about outstanding universal value (OUV)

11.6.1. Closely linked to the above conflict with UNESCO's advice, Highways England continues to demonstrate lack of understanding about OUV which has led to invalid assumptions and conclusions in Heritage Impact Assessment of the scheme on the WHS and its setting. Closer attention to the advice of

the second Advisory Mission would have been helpful, while the Decision of the World Heritage Committee last July should have alerted Highways England to the need for better understanding of OUV and what has to be protected in order to sustain it.

11.7. Value for money assessment

11.7.1. We note the doubtful monetized value of the scheme in the Strategic Assessment Report (2017), in which para. 10.5 suggests that “the Scheme is likely to lie within the low-medium value for money category of schemes”.

Para 10.7.1 of the report suggests that, on traffic-related benefits grounds, the scheme is low value for money, saying that this “fails to capture the full range of benefits of the scheme and doesn’t include the value of removing the current road from Stonehenge WHS which is a key benefit of the new scheme”. The scheme, however, would not remove the road from the WHS, and the supposed “benefit” of this aim (which would be only partially fulfilled) appears based on highly questionable data.

In conclusion

The entire project should be reconsidered, in order to take into account the advice of UNESCO and the demands of the agreed protective planning framework for the WHS. We hope that Highways England will advise the Government that consultation on the A303 scheme is premature in view of the amount of missing data and that UNESCO’s advice needs to be fully considered in this proposal.

Yours sincerely,

George McDonic, MBE
Chairman, the Stonehenge Alliance

cc. The Rt. Hon. Chris Grayling, MP, Secretary of State for Transport
The Rt. Hon. Matt Hancock, MP, Secretary of State for Digital, Culture, Media and Sport
Dr Isabelle Anatole-Gabriel, Head of Europe and North America Unit, UNESCO World Heritage Centre
Ms. Susan Denyer, Secretary, ICOMOS-UK
The Planning Inspectorate, National Infrastructure Directorate, Bristol

ATTACHMENT 1: Stonehenge Alliance response to non-statutory consultation 3.3.2017

ATTACHMENT 2: Stonehenge Alliance letter to Mr Parody, Highways England, 1.12.2017

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