

THE STONEHENGE ALLIANCE

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

c/o Kate Fielden, Hon. Secretary,

Ms Enid Williams
Senior Policy Advisor, DDCMS Heritage Team,
4th Floor,
100 Parliament Street,
London SW1A 2BQ.

Sent by email on World Heritage Day
18 April 2018

Dear Ms Williams,

Stonehenge, Avebury and Associated Sites World Heritage Site: State of Conservation Report, April 2018

The Stonehenge Alliance has read the above report sent by you to Dr Rössler, Director of UNESCO's World Heritage Centre. We are concerned about a number of misunderstandings and omissions in the report and wish to comment on them in order to be helpful in setting the record straight.

We address only Sections 2–3 of the DDCMS Report. Our comments are numbered according to the numbered items in the WH Committee's Decision (DDCMS Section 2: WHC, items 5–7), followed by paragraphs and/or bullet points numbered in order, according to the DDCMS' responses. We also comment on matters raised under further headings in the DDCMS Report. A copy of the DDCMS' Report with numbered paragraphs is attached, for your convenience.

DDCMS' Section 2: "Response from the State Party to the WH Committee's Decision . . ." **WHC, item 5**

Para. 5.01 (starting at top of page 2). Feedback from the 2017 consultation resulted in the majority of respondees (77%) objecting to the proposed 2.9km tunnel within the WHS. The modification of the scheme does not include a longer tunnel or a bypass as recommended in the WH Committee's Decision.

Para. 5.02. The preferred route scheme would impact adversely on the setting and interconnectivity of a group of Neolithic long barrows within the area of the newly confirmed long barrows, along with the settings and interconnectivity of major barrow groups including Bronze Age burials.

Para. 5.03. The setting of the WHS (a highly important part of it) would be even more adversely affected by the major interchange now proposed at Longbarrow than either option consulted on

in 2017. Bronze Age settlement remains related to the WHS at Longbarrow would be irreparably damaged and destroyed as a result of the interchange.

Paras. 5.04–05. The dry valley where the west tunnel portals would emerge was clearly of particular significance during the Neolithic, with a unique group of long barrows clustered at its head. Also located near the head of this dry valley is the Wilsford Shaft, another key site in the WHS, whose integrity and setting would be destroyed by the road cutting. The Normanton Down barrow group would be separated from the Winterbourne Stoke barrow group by the road cutting and the landform, obviously significant to those who developed the designed landscape of the WHS over millennia, would be irreversibly changed.

Para. 5.06. The new dual carriageway proposed within the WHS would not necessarily be in a deep cutting with vertical sides as the DDCMS advises. This is just an option. The public has been consulted on whether it prefers a deep sided cutting or a grass sloped cutting. The latter option would have a far greater impact on land take within the WHS. Therefore, to claim that land take would be minimised is premature – or perhaps an indication as to how seriously public consultation is being taken.

Paras. 5.07–09. Removal of the intrusive roundabout at Longbarrow would be welcomed if it were not to be replaced with a far more intrusive interchange including a 4-lane underpass in a deep cutting from which there would be the constant roar of traffic and visual intrusion from vehicle lights, etc. The new interchange and slip roads would destroy the surviving integrity and fragile remains of a Bronze Age settlement (and possibly earlier remains) with a direct relationship to the WHS and within its immediate setting. Future explorers in this part of the WHS would be confronted by sight and sound of a major intervention in the archaeological “landscape without parallel”, with concomitant detriment to attributes of OUV, experienced from the proposed redundant A303 modified to a byway.

Paras. 5.10–12. The eastern tunnel portals would lie close to the ancient Avenue, making it impossible to restore its integrity as a likely ceremonial pathway between the river and the henge. The new 4-lane tunnel approach roads would be constructed through an extensive Bronze Age cemetery, further destroying its integrity and presumably peaceful purpose. As before, the DDCMS response fails to comprehend that it is the landscape as a whole, including the individual monuments within it, that make the WHS of OUV: thus visual impacts and views from certain monuments are not the only issue of concern. The indications are that the WHS was known by its prehistoric inhabitants as a place through which one travelled, experiencing the sight of monuments and natural features on the journey; it is not the monuments that enjoy a setting, it is the people who walk to and fro and between them: the proposed reconfiguration of the landscape would diminish that experience rather than restoring it.

It is incorrect to say that the new scheme proposal to the east lies almost entirely within the existing highway boundary. As shown in consultation documents, the new scheme would require c.500m of entirely new 4-lane highway along with widening of the cutting below Vespasian’s Camp: thus around half of the eastern approach from Countess Roundabout would involve land take outside the existing highway boundary, much of it well outside. The proposed extensive flyover at Countess would introduce an elevated 4-lane road into the WHS landscape, causing

significant visual intrusion and leaving very little of the existing highway unaltered by the scheme.

DDCMS' Section 2: WHC, item 6

F10 non-tunnel bypass

In cultural heritage terms, paras. 6.02–04.

There appears to be no reason to suggest that a southern bypass might not be modified in terms of its route to avoid most of the problems raised by Highways England. The archaeology here may be important but the WHS designation ought to set a higher measure of protection. Recently excavated land north of the WHS, ahead of extensive Army housing construction, has revealed much important archaeology that is closely related to the WHS but this has not proved a barrier to development.

The WHS has no buffer zone, unlike more recently designated World Heritage Sites. Buffer zones are now required when designating WH Sites to help protect their settings. The planned major highway works, particularly at Longbarrow, would have a significant adverse impact on the setting of the Stonehenge WHS and would lie within any such buffer zone were it to exist. The fact that the WHS has no buffer zone should not prevent the setting of the WHS being properly considered and protected.

Arguments about traffic flow and journey time are specious. Obviously the removal of congestion would result in improved traffic flow and timing. At the same time, it can be shown that congestion on the A303 at Stonehenge is largely related to weekend holiday and seasonal traffic, unlike the regular congestion experienced in large towns and cities across the South West, e.g., Salisbury, and clearly evident on Google congestion maps. Were a southern bypass implemented, traffic flow on the local road network would be improved; rat-running could be halted with additional measures if necessary; and the present A303 would not need to remain open.

It is again specious to suggest that the two halves of the WHS would be “reunited” since they are only separated by a surface road which it is possible for pedestrians to cross. If the aim to make crossing the A303 easier were a serious one, then a light bridge or other measures would serve that purpose. Very little land in the WHS south of the A303 is available for the public to explore since it is either under cultivation or a bird sanctuary. It is understood that the intention is to continue to fence byways and footpaths to prevent access to the henge area for non-paying visitors.

In natural environment terms, paras. 6.05–06

There is no reason to suggest, certainly at the present time, that a southern bypass, with careful location of river crossings, would result in any more impact on the SAC than the preferred route; indeed, being further downstream, it might give rise to fewer problems with the water table.

Longer tunnel options, paras. 6.07–10. Arguments advanced here are not convincing and relate to cost rather than practicalities. Internationally, there are over 150 road tunnels which are 5.5km

or longer, longer than would be required to avoid the WHS, of which nearly 70 are on continental Europe. In the UK, the Channel and the Crossrail tunnels both exceed the length required to build a viable tunnel to avoid the WHS. Rat running is caused by congestion so there would be relatively little, if any, additional traffic in villages were a longer tunnel implemented. The A360 was the boundary of the WHS at designation and is not at issue. Presumably, if the A303 were placed in a long tunnel, Longbarrow Roundabout could be removed and Countess Roundabout reduced in size.

DCMS Section 2: WHC, item 7

First bullet point. From the minutes of the first meeting of the Scientific Committee (5 October 2017), it is understood that members of HMAG are not members of the Scientific Committee. Not recorded by DDCMS but also worth noting is that it was agreed in the same meeting minutes that

“membership of the committee does not imply any form of agreement to the A303 Stonehenge scheme proposed by Highways England.” And

“The committee expressed the view that the benefits to the WHS of a longer tunnel would outweigh the additional construction costs due to the unique setting of the WHS. It was a once in a lifetime opportunity that warranted the additional expenditure . . .”

Third bullet point. The Vision of the WHS Management Plan is as follows:

“The Stonehenge and Avebury World Heritage Site is universally important for its unique and dense concentration of outstanding prehistoric monuments and sites which together form a landscape without parallel. We will work together to care for and safeguard this special area and provide a tranquil, rural and ecologically diverse setting for it and its archaeology. This will allow present and future generations to explore and enjoy the monuments and their landscape setting more fully. We will also ensure that the special qualities of the World Heritage Site are presented, interpreted and enhanced where appropriate, so that visitors, the local community and the whole world can better understand and value the extraordinary achievements of the prehistoric people who left us this rich legacy. We will realise the cultural, scientific and educational potential of the World Heritage Site as well as its social and economic benefits for the community.” (Management Plan(2015), p. 10)

The preferred route scheme for the A303 would not achieve this vision; rather, it would make the benefits or legacy it aspires to impossible to achieve.

Fourth bullet point. Consultation with a local stakeholder forum is hardly sufficient for involving stakeholders and civil society who have interests in an internationally significant WHS. “Liaison” with ASHRG and the WHS Steering Committees has been limited to presentations of the scheme with accompanying question and answer sessions: these cannot be considered to be meaningful involvement. Fifteen-minute sessions with Advisory Mission delegates for selected stakeholder groups gave little time for full discussion.

DDCMS Section 3: Other current conservation issues . . .

World Heritage Property Setting Study and Boundary Review. The “specific and robust policy” in the Local Development Framework (Policy 59) refers to protection of the WH property in order to sustain its OUV. The policy requires the WH property to be “protected from inappropriate development”, as is also stated in “relevant strategies and plans at all levels”. A setting study in the light of the intended road engineering works within the WHS and affecting its setting at Stonehenge is, frankly, ridiculous and indicates that the documentation referred to has so far been disregarded. Also apparently overlooked is the fact that the WHS itself is considered to be a heritage asset of the highest significance, not simply an area within which there are a number of isolated heritage assets.

Conservation: Cultivation and Burrowing Animals. This section of the DDCMS report fails to acknowledge that serious damage to and loss of archaeological evidence has already occurred in relation to evaluation work in advance of the A303 widening proposals. Further destructive evaluation work is planned over a wide tract of land at least partially under agri-environmental schemes that encourage conservation stewardship, e.g., by fostering biodiversity and limiting plough depth. In the sensitive landscape of the WHS, where protection of archaeological remains and settings of monument groups together with appreciation of their interconnectedness is a key aim of such agri-environment schemes, it is nonsensical to undertake extensive archaeological evaluations involving use of heavy machinery on wet soils, especially where archaeological remains are likely to be fragile and close to the surface. It would have been more appropriate to follow UNESCO’s advice to seek alternatives that would not damage the WHS before undertaking what may ultimately prove to be unnecessary ground disturbance of a kind far more damaging than that involved in agriculture.

Roads and traffic. The A303 was not mentioned as an issue at the time of designation of the WHS, only closure of the A344. It is A303 *traffic* that is a problem, not the road itself. Little serious effort has been made to reduce congestion by well-established means other than road widening which in itself has been shown to have only short-term benefits.

In conclusion, I hope that you will have found our observations helpful. Clearly, we disagree with much of what is said in the Report but our views are based on active involvement in deliberations concerning the A303 and in the formulation of planning policy and the Management Plans for the WHS over many years. We would be glad to meet you to discuss our concerns, should you feel that might be helpful.

Yours sincerely,

George McDonic, MBE
Chairman, the Stonehenge Alliance

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