

THE STONEHENGE ALLIANCE

From the Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB
c/o Kate Fielden, Hon. Secretary,

For the attention of Highways England
A303 Stonehenge Consultation
A303stonehenge@highwaysengland.co.uk

Sent by email on 20 July 2018

Dear Sir or Madam,

A303 Stonehenge Amesbury to Berwick Down Public supplementary consultation: July 2018

The Committee of the Stonehenge Alliance has examined the proposed three changes to the preferred route scheme as set out in the Supplementary Consultation Booklet. We have the following comments to make.

1. We deplore the continued misleading and untrue advertising of the preferred route by Highways England as seen on its A303 Stonehenge website under “Why we need this scheme”:
 - a. “An improved dual-carriageway, via a tunnel past Stonehenge, will help unlock economic growth in the South West by transforming journey reliability, increasing safety and improving connectivity with neighbouring regions, while protecting or enhancing the environment.” And
 - b. “to help conserve and sustain the World Heritage Site and to make it easier to reach and explore.” (A “key objective” of the scheme)

The preferred route would very clearly not “protect or enhance the environment” of the WHS or its setting; nor would it help to “conserve and sustain the WHS and make it easier to reach and explore”. To continue along this line and in the face of the opinion of the joint UNESCO World Heritage Centre/ICOMOS Advisory Missions is clearly disingenuous and highly misleading (see point 7, below).

2. We consider it unreasonable of Highways England to select certain aspects of the public response to the statutory consultation for further consultation without explaining, even in summary form, the number and content of responses that were received from consultees and how these informed the present consultation.
3. None of the proposed changes would ameliorate the severe damage that would be caused by the preferred route scheme to the World Heritage Site (WHS) and its outstanding universal value (OUV).
4. (Consultation Question 1) While we did not agree to the proposed connecting Byway between Byways 11 and 12, we note that no alternative has been suggested.

5. (Consultation Question 2) The proposed extension of the cut-and-cover ‘green bridge’ west of the west tunnel portals would do nothing to protect archaeological remains in the path of the cutting. Nor would it make any difference to the impacts of the road cutting and A303/A360 interchange on the integrity of the *designed* landscape of the WHS and the enjoyment and understanding of the WHS by future generations.
6. (Consultation Question 3) The proposed alteration at Rolleston Crossroads would physically impact on the WHS and its setting. In our view, any proposal to reconfigure Rolleston Crossroads is unnecessary.
7. We note that Highways England has consistently disregarded the advice of the joint UNESCO World Heritage Centre/ICOMOS Advisory Missions to respect the Government’s commitments under the World Heritage Convention in the promotion of its preferred route scheme. Of particular relevance are the findings and recommendations of the 2018 Advisory Mission which were not made known to the public at the time of the statutory consultation. Key amongst those findings and recommendations are:
 - a. “The State Party . . . should do more to consider longer tunnel options to remove dual carriageway cuttings from the WHS . . .”
 - b. “The interrelationship of the monuments and sites and the overall coherence of the archaeological landscape . . . would be adversely and irreversibly affected by new cuts, portals and construction of new dual carriageway sections.”
 - c. “The Proposed Scheme . . . will also adversely affect the integrity and authenticity, and therefore the OUV of the WHS.”
 - d. “The potential destruction of (any yet undiscovered) sites in areas impacted by the proposed dual carriageways would have an irreversible impact.”
 - e. “Although the Proposed Scheme . . . would improve the current situation in the centre of the [WHS], it should not proceed in its current form.”
 - f. “Potential surface routes for the proposed dual carriageway sections of the A303 should be reconsidered outside the WHS . . . and must include closure of the section of the A303 which runs through the WHS”.
 - g. “If a longer tunnel is further considered, its design (as currently presented in the Proposed Scheme) must be substantially refined to ensure the OUV of the WHS is fully respected, and this refinement should take precedent over any predetermined project programme or deadline.”
 - h. “If a longer tunnel is further considered, the western portal should be relocated to the west of the western boundary of the WHS.”
8. The World Heritage Committee’s 2018 Decision (also not available to consultees at the statutory consultation stage), in particular:
 - a. “Requests the State Party to address the findings and implement the recommendations of the March 2018 Advisory Mission and encourages the State Party to continue to facilitate progress towards an optimal solution for the widening of the A303 with a view to avoiding adverse impact on the OUV of the property.”
 - b. “Urges the State Party to continue to explore further design refinement, with a view to avoiding impact on the OUV of the property, including longer tunnel options that do not require an open dual carriageway cutting within the property and to avoid impact due to noise, lighting and visibility; and furthermore urges the State Party to minimize the length of the culvert part of the tunnel in order to reduce the impact on the cultural landscape and the archaeology.”

9. The Stonehenge Alliance considers that the Preferred Route scheme should be halted to take the findings and advice of the 2018 Advisory Mission and World Heritage Committee Decision fully into account and to honour the undertaking made by the Government to “manage the timing of the consent and other statutory processes for the A303 trunk road project to take into account the Committee Decisions and to ensure that the World Heritage Centre, ICOMOS and the Committee can continue to contribute to the evaluation and decision-making processes at appropriate stages of the project.” (World Heritage Committee Decision 2018)
10. Requesting the advice of highly qualified specialists that Highways England, on behalf of the UK Government, disregards, is in our view both disrespectful and unacceptable. We therefore fear that our Government intends to accept the loss of the WHS designation of the Stonehenge, Avebury and Associated Sites WHS. If that is the case, why ask for international advice?
11. The preferred route scheme is not justified as a priority on road traffic and economic grounds; while the tunnel, at best, has a lifetime of c.100 years: a small fraction of the timespan represented by a WHS which the UK Government is internationally committed to protect for future generations to enjoy.

We hope that Highways England will abandon the preferred route for the A303 in the light of the advice of the international advisory missions and the World Heritage Committee. Should proposals for A303 widening still be considered necessary, international advice to seek solutions that would not impact adversely on the OUV of the WHS should be followed.

Yours faithfully,

George McDonic
Chairman, the Stonehenge Alliance

- cc. The Rt. Hon. Chris Grayling, MP, Secretary of State for Transport
The Rt. Hon. Jeremy Wright, 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

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