Tim Parker, Esq., Chairman, and the Trustees of the National Trust
20 Grosvenor Gardens
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SW1W 0DH

Sent by email on 16 January 2018

Dear Chairman and Trustees,

A303 Stonehenge: misunderstandings in published statements and in the Trustees' stance

A number of statements in the Trust's current members' *Magazine* lead us to wonder if there are misunderstandings within the Trust and especially among the Trustees about the location and extent of the Stonehenge World Heritage Site (WHS); the Trust's policy on the road scheme; our motion put to the 2017 AGM; and the protective planning and management framework that exists for this exceptional landscape whose boundaries are clearly delineated as required under the 1972 World Heritage Convention.

The following statements appear in the Trust's *Magazine* (Spring 2018), pp.23–24.

1. "National Trust AGM Report 2017" (pp.23–4). The report says:

> "A members' resolution was proposed about the A303 at Stonehenge, Wiltshire, advocating different measures to resolve the decades-old conundrum of a trunk road passing so intrusively close to a World Heritage Site. In response to the proposal for a tunnel longer than 1.8 miles or a different route, the Trust's red lines, and its determination to hold Highways England to account, were set out."

The A303 Trunk road passes not "close to" but right across the WHS. The motion did not make any proposals for "a tunnel longer than 1.8 miles or a different route"; indeed, the motion was deliberately not prescriptive in this respect.

Despite giving assurances at the AGM concerning a part of one of the most important landscapes in the World, the Trustees advised the members in response to our motion to ask the Trust:

i) not to reaffirm the Trust's founding principles in relation to the Stonehenge WHS;
ii) not to respect the World Heritage Convention and agreed planning and management constraints for the WHS;
iii) not to acknowledge that a short tunnel for the A303 at Stonehenge would damage parts of the WHS for ever;

iv) not to concur with other conservation and environmental bodies and insist that any road engineering or tunnel should cause no further damage to the WHS; and

v) not to work with others to seek solutions to A303 traffic problems that do not damage the WHS and its setting.

2. Under "Members' resolutions", (*Magazine,* p.24), the Trust's Secretary says:

> "We are working closely with Historic England and English Heritage to help inform and challenge Highways England to deliver a final design that protects and enhances the World Heritage Site."

The Trust supports an A303 tunnel "at least 1.8 miles" long. Such a tunnel, now part of Highways England's "preferred route", would not meet the strict criteria for protection of the WHS. It would not, as the Trust's Secretary says in the *Magazine*, "protect and enhance the World Heritage Site."

The Secretary goes on to say in his article:

> "We will continue to work with government and other key parties, including UNESCO and the International Council on Monuments and Sites, to find a solution *that both protects and enhances the World Heritage Site and finally addresses the major adverse impacts the existing A303 has on this extraordinary place*." (Our emphasis)

3. The Secretary's *Magazine* article states that the Trustees agree to maintain their current policy position on Stonehenge and the A303. Members are directed to "current policy statements" via a post in "Our views" on the Trust's website. In this website post, "Stonehenge A303 Road Improvement Scheme", and its linked post, "Our response to the Preferred Route announcement", there appear to be some misunderstandings about perceived benefits of the preferred route proposal. Most worrying, however, are repeated assertions that the Trust is working with others to find a solution that "protects and enhances the World Heritage Site".

Unless the Trust has radically changed its stance, the oft-repeated statement that the Trust is aiming for a solution that "protects and enhances the WHS" must be considered ambiguous, to say the least. Furthermore, the Trustees should be aware that both UNESCO and ICOMOS have condemned the short tunnel scheme and that working against these bodies' advice can hardly be termed "working with" them.

We therefore ask the Trustees to assure us, please, that they will undertake the following actions.

i) Fully inform themselves about the extent and nature of the WHS and the planning safeguards that exist for its protection – and that of its setting.

ii) Familiarise themselves with the advice given by UNESCO's World Heritage Committee in July 2017 and note that Highways England disregards that advice in its preferred route for the A303. Note that the studies produced by specialists for the Trust on the impact of proposed tunnel options on the outstanding universal value (OUV) of the WHS show that a 2.9km tunnel would cause adverse impacts on the WHS and its OUV; and that both UNESCO and ICOMOS have advised that such adverse impacts cannot be offset by benefits of a tunnel to the central part of the

WHS (i.e. to provide the "overall benefit" the Trust repeatedly claims in public statements).

iii) Consider the Trust's reputation in view of the above concerns and the possibility of the WHS being placed on the List of World Heritage in Danger should the Government proceed with the A303 preferred route.

iv) Decide upon and make known a clear policy on the A303 at Stonehenge. Does the Trust *really* seek a solution that "protects and enhances the World Heritage Site" or one that protects and enhances only the central part of the WHS owned by the Trust? Can the Trustees' current position in giving the Charity's conditional support for the preferred route and in the face of UNESCO's advice be truly considered to be for the "benefit of the nation"?

v) Ensure corrections are made to the *Magazine* articles and website posts we refer to and that the minutes of the AGM are a correct record of the proceedings. Re-examine all statements on the A303 scheme made by the Trust with the aim of removing ambiguities in the Trust's position and its perceived benefits of the scheme.

We remain deeply concerned that the National Trust should have adopted an approach at Stonehenge that departs from its stated aim to work to "preserve and protect historic places and spaces – for ever for everyone". By advocating severe damage to the WHS and its setting, the Trust not only supports preclusion of proper conservation and enjoyment of the WHS for future generations but also acts against the interest of our own generation in undervaluing and degrading the national and international importance of this very special place.

We are encouraged that the Trust intends to hold Highways England to account and remain hopeful that the best outcome – protection and enhancement of the World Heritage Site – will indeed be the aim of the Trust from now on.

As members of the National Trust we would be glad to assist in furtherance of that aim, should we be invited to do so, and we shall naturally continue to hold the Trustees themselves to account. We look forward to hearing from you.

Yours faithfully,

Kate Fielden (Dr)
and on behalf of John Adams, MBE
Dr Chris Gillham
Tom Holland
David Wilson

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National Trust

Dr Kate Fielden

31st January 2018

Dear Dr. Fielden,

Thank you for taking the time to write and thank you again for your contribution to our AGM. I have read through your letter and I am aware that the issue of the proposed road improvement scheme at Stonehenge is soon to be considered again by Trustees, so it is helpful to have your thoughts in advance of that meeting.

Before I get to the detail of your letter, I would like to first apologise for the editing error you pointed out in our magazine about the location of the road. I am sorry that you felt that our summary of the issues you raised at the AGM was not a fair representation of your proposal. I would like to take this opportunity to reassure you that the National Trust and its Trustees are very clear that the A303 runs through the World Heritage Site (WHS) and about the issues that you raised at the AGM.

I have spoken to our project team about your specific concerns and I am happy to provide some more clarity on our position.

First and foremost, we do not believe that our position on the road scheme runs counter to our founding principles. The National Trust has extensive governance requirements for this project, each of which has tested that the approach we have taken is aligned with our founding principles and our strategy. In addition to this we are not alone in our position on the road scheme. We share a common position with Historic England, the statutory body who provide expert advice to DCMS on the care and protection of the World Heritage Site. We, like Historic England, are committed to protecting the WHS.

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We have also engaged closely with UNESCO and ICOMOS. To date there have been two Advisory Missions to consider the evolving road scheme, both of which we have played an active role in. We expect there to be a further Advisory Mission and we believe that Highways England have addressed many of the concerns raised by the last Mission. These Advisory Missions form part of an iterative process. No one yet knows the position that the World Heritage Committee will take with regard to the final scheme proposals, but we will continue to use ICOMOS and UNESCO's own guidance to assess the impact of the scheme. Our red line remains that we will only support a scheme that this assessment work tells us will protect the WHS. We are using our own Historic Environment Advisory Group (made up of acknowledged external experts) to stress test our thinking and assessment work. Highways England has also recruited a Scientific Committee to ensure they receive a broad range of advice on how best to protect the WHS.

We acknowledge that the proposed scheme will have an impact on the WHS but we believe that with the right design and appropriate mitigation the scheme would benefit the WHS. Our approach and our assessment work is entirely based on ICOMOS and UNESCO's own guidance that requires impacts on all of the attributes of Outstanding Universal Value of the WHS, together with impacts on the WHS' integrity and authenticity to be considered in order to reach an overall conclusion. Although it is true that the proposed tunnel would remove the road from much of the National Trust's landholding this has played no part in our decision making process.

I understand that the project team have offered to meet with you again to discuss this with you further. Given the complexity of the issue this may well be the best way to continue to engage on this matter, but the Trustees will no doubt continue to take an ongoing interest in this important issue.

Best wishes,

Tim Parker
Chairman

Tim Parker, Esq.,
Chairman, The National Trust,
20 Grosvenor Gardens,
London SW1W 0DH.

Sent by email on 14 February 2018

Dear Chairman,

A303 Stonehenge: misunderstandings in published statements and in the Trustees' stance
Thank you for your letter to me of 31 January 2018 which I have passed to those others on whose behalf my letter to you and the Trustees of 16 January was written.

It appears, from your letter, that you have not forwarded our letter to the Trust's Trustees, to whom it was addressed. We would be grateful if you should, please, let us know if that is the case and, if so, whether you will now make sure that our letter is forwarded to them.

We would also be grateful for your reassurance that the Trustees will consider what we have said in our earlier letter, and that they will ensure that the actions we ask them to undertake will be carried out.

Your letter to us indicates that you believe that the Trust is "committed to protecting the World Heritage Site" though this is clearly not the Trust's current position, even if you are being told it is so by the project team.

We were disappointed to see that the Trust's press release on 8 February states that a 2 mile tunnel for the A303 at Stonehenge would potentially 'protect and enhance the World Heritage Site' and 'protect the unique landscape of the World Heritage Site': this, again, would be impossible. We trust that this matter will also be addressed by the Trustees.

We look forward to hearing from you.

Yours sincerely,

Kate Fielden
and on behalf of John Adams, OBE
Tom Holland
Dr Chris Gillham
David Wilson

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Dr Kate Fielden

14th March 2018

Dear Kate,

Thank you for our letter of 14th February. I am writing to reassure you that your letter and my response were circulated to the Board.

The Board recently gave careful consideration to the Highways England proposals for Stonehenge, including all the points you raised in your previous letter. Whilst we believe Highways England do need to make further improvements to the scheme, it remains our view that if designed and delivered to a high standard, the proposal on the table from Highways England could provide an overall benefit to the World Heritage Site.

We will be setting out our position in more detail when we respond to the formal public consultation. We are also continuing to engage closely with colleagues at ICOMOS and UNESCO who recently visited the site.

Best wishes,

Tim Parker
Chairman

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Tim Parker, Esq.,
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Sent by email on 6 April 2018

Dear Chairman,

A303 Stonehenge: misunderstandings in published statements and in the Trustees' stance

Thank you for your letter to me of 14 March in answer to our letter of 14 February in which you reiterate the Trustees' position which has been known to us for some time.

We are surprised that, despite having circulated our original letter (16 January 2018) to the Board of Trustees to whom it was addressed, you responded to me on 31 January apparently without having first consulted them.

You have not mentioned the concerns we raised about misleading and inaccurate information about the A303 scheme in the Trust's Spring 2018 Magazine for members and in statements to us and in the Trust's press release of 8 February. We would be grateful for your reassurance that this very serious issue will now be addressed and, at the very least, the inaccurate statements in the members' Magazine will be corrected.

We note that the Trust's "close engagement" with colleagues at ICOMOS and UNESCO has not led to close agreement with their hitherto very clear advice to the UK Government.

Yours sincerely,

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and on behalf of John Adams, OBE
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National Trust

Dr Kate Fielden

15th May 2018

Dear Kate,

Thank you for your letter of 6th April. I apologise for the delay in replying.

I have shared your original correspondence with the Board and the position I explained in my letter of 14th March is that of the Board. I accept that the piece in the members' magazine could have been better worded but I believe the Trust's position and yours was made clear. I do not consider any lack of clarity in the wording to be sufficiently serious to warrant the inclusion of a correction in a future edition.

Best wishes -

Tim Parker
Chairman

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THE SUNDAY TIMES 100 BEST NOT-FOR-PROFIT ORGANISATIONS TO WORK FOR 2018

Tim Parker, Esq.,
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Sent by email on 31 May 2018

Dear Chairman,

A303 Stonehenge: misunderstandings in published statements and in the Trustees' stance

Thank you for your letter to me of 15 May 2018 and for sharing our original correspondence with the Board of Trustees. We are disappointed by your response to our concerns.

We plan to share our correspondence with you with our supporters and will shortly be placing it on the website of the Stonehenge Alliance for that purpose.

Yours faithfully,

Kate Fielden (Dr)
on behalf of John Adams, MBE
Dr Chris Gillham
Tom Holland
David Wilson

to whom copies of this correspondence have been sent