

THE STONEHENGE ALLIANCE

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

From: Kate Fielden, Hon Secretary,

14 December 2018

Jesse Norman, MP,
Minister of State for the Department for Transport,
Great Minster House,
33 Horseferry Rd,
London, SW1P 4DR.

Sent by email to: POCorrespondence@dft.gsi.gov.uk

Dear Jesse Norman,

A303 Stonehenge

I write on behalf of the Stonehenge Alliance to express our strong concern at the limited period allowed for registration as an Interested Party in the forthcoming examination of the Development Consent Order for Highways England's proposed A303 Amesbury to Berwick Down scheme for dualling the Trunk road across the Stonehenge World Heritage Site.

We understand that this timescale has been set by the applicant (Highways England) and not by the independent Planning Inspectorate.

The period set is from 8 December 2018 until 11 January 2019. At 34 days this complies with the legal minimum of 28 days laid down in the Infrastructure Planning regulations.

We note, however, that this date range encompasses the Christmas and New Year holiday period, allowing only 21 working days for registration. Given that many of the potential interested parties who might wish to register are organisations who will need to meet to consider their position, the time of year is especially disadvantageous. The same applies to academic institutions who will be closed for the majority of the registration period.

We consider that the period for registration can properly be considered a "consultation" and therefore falls within the scope of [Cabinet Office guidelines for consultations](#). These guidelines state: "Consultations should take account of the groups being consulted. Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action, such as prior discussion with key interested parties or extension of the consultation".

In the case of the A303 at Stonehenge, Highways England appear not only to have ignored best practice guidance, but to have curtailed the registration period at variance with their own customary practice. From the Planning Inspectorate's register of Nationally Significant Infrastructure Projects it can be seen that out of 10 highways schemes submitted for scrutiny since 2014, only once has a shorter period than 21 days been allowed. For every other scheme since 2015, it has been 26 – 33 working days.

This unusually compressed period for registration is all the more concerning, indeed almost incomprehensible, in the light of special considerations that apply to the A303 Stonehenge scheme:

- It is a project of unusual size and complexity, potentially impacting on European protected habitats and species and involving large and complex civil engineering works, including flyovers and a tunnel, a substantial part of which are within a World Heritage Site.
- The scheme is highly contentious – to cite just one example of this, ICOMOS-UK who advise UNESCO and the UK government on World Heritage Sites, have advised that “In our view, the overall preferred route project is severely flawed and its impacts cannot be readily mitigated; it is essential that the whole project be re-assessed.”
- Uniquely among major road schemes, UNESCO has intervened in the planning process to state that “The State Party needs to accept that for this iconic WH property it would be appropriate to adjust the project program and the expectations of all major participants to align with the World Heritage Committee timeframe and process, through careful attention to the ‘triggers’ which instigate statutory timeframes and deadlines”.

In light of all the above, we consider that the A303 Stonehenge scheme is especially deserving of wide public and professional engagement, and in-depth scrutiny. It is deeply concerning to see Highways England’s management of the planning process pay such scant regard to these needs.

We hope that you will, please, ask Highways England to extend the period for those wishing to register as Interested Parties in the Examination of the A303 Stonehenge scheme.

Yours sincerely,



Kate Fielden

Hon Secretary to the Stonehenge Alliance; signed in the Chairman’s absence

Copies sent to: Derek Parody, A303 Stonehenge Project Manager, Highways England
Andy McDonald, MP, Shadow Secretary of State for Transport
Caroline Lucas, MP
Baroness Randerson, Liberal Democrat Transport Spokesperson
Dr Isabelle Anatole-Gabriel, UNESCO World Heritage Centre
Richard Price, A303 Stonehenge Case Manager, Infrastructure Planning
Inspectorate

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 in the UK and abroad.
www.stonehengealliance.org.uk/about-us/