

Alliance asks Prime Minister to abandon scheme



The Stonehenge Alliance has written an open letter to the Prime Minister, asking for dualling of the A303 through Stonehenge World Heritage Site (WHS) to be abandoned. This follows the Government's decision not to appeal against the High Court judgment quashing development consent for the scheme.

The letter highlights that the world has changed since the project was first conceived. UNESCO, which has consistently expressed its concern with National Highways' (formerly Highways England) proposals for the road, warned in July after the Transport Secretary had approved the scheme that the WHS could be placed on the World Heritage in Danger List if the scheme went ahead unaltered. This came after the five senior planning inspectors who examined the scheme in 2019 recommended it be refused. Past Transport Ministers, both Conservative and Labour, also came out against the scheme. Even Grant Shapps accepted it would cause significant harm.

The letter also highlights the feeble economic case for the road, its huge price tag, and the large amount of carbon emissions it would generate. All good reasons not to proceed.

The Alliance is suggesting a new approach. Instead of rehashing the same damaging scheme, it is asking the Government to think again. It wants to see a full and open assessment of alternatives to the road, thoroughly explored in the context of safeguarding and enhancing the WHS, reducing road traffic and road emissions, and providing real alternatives to the car.

John Adams OBE, Alliance Chairman, said:

The climate is changing – both literally and towards this highly damaging road scheme. We need a new approach that improves people’s access to the South West without damaging the WHS or increasing carbon emissions. We need to give people real choice and that means investing in a better and fully integrated public transport network and other measures.

Building a bigger road will just create more traffic and more congestion problems in Devon and Cornwall. Now is the time to seize the moment to forge a new path for transport and heritage policy in the UK.

Published [here](#)



The Department for Transport responded on 20 October 2021 and included inter alia the following statement:

Protecting the heritage and archaeology of the site is a first order priority for Government and National Highways. We will continue to work closely with UNESCO, ICOMOS and the heritage and scientific community on next steps and look forward to preparing a State of Conservation report for submission to UNESCO by February 2022.

Published [here](#)

Open letter from The Stonehenge Alliance

THE STONEHENGE ALLIANCE [\[Notes 1and2\]](#)

**From the Chairman, John Adams OBE
C/o The Hon Secretary, Kate Fielden,**

The Rt. Hon. Boris Johnson, MP,
Prime Minister,
House of Commons,
London SW1A 0AA

*Also sent by email on 14 September 2021 to
boris.johnson.mp@parliament.uk*

Dear Prime Minister,

A303 Amesbury to Berwick Down: AN OPEN LETTER

Following a successful legal challenge and quashing of the A303 Stonehenge Development Consent Order (DCO), we understand that the Transport Secretary must redetermine the application. However, strong reasons have arisen, since the announcement of RIS2 and its funding, to abandon the road scheme and for less damaging and more sustainable solutions to be brought forward, especially at a time when public expenses are overstretched.

Harm to the UNESCO World Heritage Site (WHS). The scheme was announced in 2014 and its funding allocated prior to knowledge of the harm it would cause. Since then, three World Heritage Centre and ICOMOS advisory missions have advised less damaging options be explored. The 2021 World Heritage Committee warned the WHS might be considered for placing on the World Heritage in Danger List, should the scheme proceed unaltered.

Finding of harm by five senior Planning Inspectors. The examiners of the scheme in 2019 recommended against it, owing to the adverse impacts it would have on the WHS and its Outstanding Universal Value (OUV), notably where the western tunnel entrances would emerge in a deep cutting leading to a major interchange at the WHS boundary. They concluded that “. . . the effects of the Proposed Development on WHS OUV and

the historic environment as a whole would be significantly adverse. Irreversible harm would occur, affecting the criteria for which the Stonehenge, Avebury and Associated World Heritage Site was inscribed on the World Heritage List.” (Report, para. 5.7.326) [\[Notes 3 and 4\]](#)

It was confirmed in the High Court that the Transport Secretary found the scheme would cause significant harm to the WHS: to attributes of its OUV and its authenticity and integrity; even so, he continues to promote it. The support for the scheme of Historic England, English Heritage and the National Trust, on which he relies, may partly arise from their managerial responsibilities which would be made easier were the project to go ahead but do not accord with their conservation and protection responsibilities.

The poor economic case. The Department for Transport considered the scheme to be low value for money in 2019 and the National Audit Office and Public Accounts Committee have cast serious doubts on the Scheme’s value. Even then, the scheme’s low value was only achieved when dubious “heritage benefits” were included, making up around 75% of its economic value.[\[Notes 5 and 6\]](#) Since then, the Examiners, UNESCO and the Transport Secretary have all acknowledged significant heritage harm. Now estimated to cost in the region of £2bn, with c.£7m p.a. maintenance costs, the scheme does not stand up in terms of value for money.

Climate Emergency. The Government needs to ensure cuts in carbon emissions, of which transport is the highest emitting sector. The recent IPCC Working Group’s report [\[Note 7\]](#) highlights the need for urgency. Action to reduce road building and regulate for reduction in private car use would be a positive contribution to COP26. Dualling the London to Exeter rail line would assist in the ‘levelling up’ of poorly connected regional centres.

The Transport Secretary intends to revise the National Policy Statement on National Networks to include matters on climate change: the responsible approach would be to delay all RIS2 projects until this revision has been undertaken.

Public opinion. Our petition to the Transport and Digital, Culture, Media and Sport Secretaries asking for the A303 scheme to be reconsidered now has well over 200,000 signatures, reflecting international concern about the threat to the WHS. [\[Note 8\]](#) The legal challenge to the Transport Secretary's decision to grant the DCO was funded by more than 3,000 individuals – a significant indication of the strength of public feeling – with responses overwhelmingly against the scheme from the consultation stages.

In Conclusion

We understand your aim for renewal of economic growth after Covid 19 and that you may see expenditure on infrastructure schemes as one way forward. We do urge you, however, to reconsider Government support for the A303 Stonehenge scheme which has serious implications for the UK in terms of: expenditure and poor economic return; climate change and addressing carbon emissions; and the credibility of our leading heritage organisations' advice on heritage protection. Our country's international reputation for responsible care of its World Heritage Sites and addressing climate change are gravely imperilled.

We hope that you will assure us that the A303 Stonehenge scheme will be abandoned and that less damaging and more appropriate options will be sought in view of the significant and unforeseen changes that have arisen since the scheme was first announced.

Yours sincerely,

John Adams OBE

Reply from Department for Transport

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Tel: 0300 330 3000

Web Site: www.gov.uk/dft

Our Ref: 370529

20 October 2021

Mr John Adams OBE
The Stonehenge Alliance
By email: redacted

Dear Mr Adams,

Thank you for your open letter of 14 September regarding the A303 Amesbury to Berwick Down scheme, to which the Secretary of State for Transport was copied. The Secretary of State receives extremely high volumes of correspondence every day and is unable to respond to each individually. Your enquiry has been passed to the Correspondence Team, Roads and Projects Infrastructure Delivery Directorate for a response.

The Roads Investment Strategy 2 (RIS2) published in March 2020 reflects this Government's commitment to upgrading the A303/A358 corridor as a priority for improving connections between the South-West and London and the South-East. Upgrading the corridor is a part of a long-term aim to improve

inter and intra-regional connectivity, by providing a second reliable high-performing road connection between the South-West and the South East, in addition to the M4/M5. The A303 Amesbury to Berwick Down (Stonehenge) scheme is a key component of the corridor.

Following an Order of the High Court made on 30 July 2021, the Secretary of State's decision dated 12 November 2020 to grant development consent for the application by Highways England (now National Highways) for the proposed A303 Amesbury to Berwick Down (Stonehenge) scheme has been quashed. The Secretary of State has decided to re-determine that application.

Further details on the re-determination process for the scheme will be published on the National Infrastructure Planning page;

<https://infrastructure.planninginspectorate.gov.uk/projects/southwest/a303-stonehenge/>) in due course.

As a live planning case, it would not be appropriate for the Department to comment further on the re-determination process at this time.

Your letter makes reference to the recent UNESCO World Heritage Committee (WHC) meeting. We welcome the confirmation, in July of this year, that the WHC does not recommend that Stonehenge is added to the list of World Heritage in Danger at this time. Protecting the heritage and archaeology of the site is a first order priority for Government and National Highways. We will continue to work closely with UNESCO, ICOMOS and the heritage and scientific community on next steps and look forward to preparing a State of Conservation report for submission to UNESCO by February 2022.

Decarbonising transport is a priority for the DfT, which is why our Transport Decarbonisation Plan, published in July 2021

– the first such plan in the world – has set transport on the path to net zero by 2050. It is clear that, in any scenario, the majority of longer journeys – passenger and freight – will continue to be made by road and for this reason investment in maintaining

and upgrading the strategic road network (SRN) remains of vital importance. In contrast, short journeys of under two miles are usually made on local roads and for these we want to make public transport, walking or cycling people's preferred choice.

National Highways' Net Zero Highways Plan (also published in July) sets out how it will make the operation, maintenance and enhancement of our strategic roads net zero alongside delivering the second Road Investment Strategy (RIS2) and the benefits this will bring for road users and places along the network.

Your letter refers to the Government's intention to revise the National Networks National Policy Statement (NNNPS). We will complete the review of the NNNPS by no later than Spring 2023. This will consider new travel patterns and changes to forecasts of future transport demand, as well as the effects of significant new policy including our net zero commitment and the setting of the sixth carbon budget, and the new policy framework for stable road emissions in the medium term contained in the Transport Decarbonisation Plan.

Finally, regarding your suggestion of dualling the remaining single track sections of the London to Exeter railway line, we are pleased to advise you that Network Rail has identified proposals to improve the service performance on the West of England Line between Salisbury and Exeter including a new passing track in the Whimple/Cranbrook area and an additional platform at

Cranbrook which could improve performance, capacity and diversionary capability. The proposals are currently being assessed as part of wider value for money considerations. The

West of England Continuous Modular Strategic Planning report has been published and is available online at <https://www.networkrail.co.uk/wp-content/uploads/2020/07/West-of-EnglandStudy-Continuous-Modular-Strategic-Planning.pdf>.

Thank you for taking the time to write in with your concerns.

Yours sincerely,

**Correspondence Team, Roads and Projects Infrastructure
Delivery
Directorate**

Stonehenge at risk of being placed on World Heritage in Danger list



The inescapable facts of the situation have led UNESCO's World Heritage Committee today (22 July 2021) to confirm that if the outcome of Save Stonehenge WHS's legal challenge

allows the **A303 Stonehenge scheme to proceed** and **the scheme is not modified**, consideration will be given to placing Stonehenge, Avebury and Associated Sites on the List of World Heritage in Danger next year.

Extract from [World Heritage Committee's decision](#):

"11. Regrets that the Development Consent Order (DCO) has

been granted for the scheme; and therefore, further considers in conformity with Paragraph 179 of the Operational Guidelines that the approved A303 improvement scheme is a potential threat to the property, which – if implemented – could have deleterious effects on its inherent characteristics, notably to its integrity; State of conservation of properties WHC/21/44.COM/7B.Add, p. 63 Inscribed on the World Heritage List”

“12. Notes moreover that in the event that DCO consent was confirmed by the High Court, the property warrants the inscription on the List of World Heritage in Danger;”

*“13. Finally requests the State Party to submit to the World Heritage Centre, by **1 February 2022**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 45th session in 2022, **with a view to considering the inscription of the property on the List of World Heritage in Danger if the A303 route upgrade scheme is not modified to deliver the best available outcome for the OUV of the property.**”*

The **World Heritage Committee** agreed the draft decision unchanged as per the published extract from the [World Heritage Committee agenda](#) below.

**Extended forty-fourth session, in Fuzhou (China) /
Online meeting 16-31 July 2021**



 44th Session of the
World Heritage Committee
FUZHOU, CHINA 2021
第44届世界遗产大会

The following is a copy of the Report to the World Heritage Committee containing information on the state of conservation of Stonehenge, Avebury and Associated Sites (United Kingdom of Great Britain and Northern Ireland) followed by the Decision which has now been confirmed.

Skip to decision [here](#)

Year of inscription on the World Heritage List 1986

Criteria (i)(ii)(iii)

Year(s) of inscription on the List of World Heritage in Danger
N/A

Previous Committee Decisions see page
<http://whc.unesco.org/en/list/373/documents/>

International Assistance

Requests approved: 0

Total amount approved: USD 0

For details, see page
<http://whc.unesco.org/en/list/373/assistance/>

UNESCO Extra-budgetary Funds

N/A

Previous monitoring missions

2003 and 2006: World Heritage Centre missions; 2015, 2017, 2018: World Heritage Centre/ICOMOS Advisory missions

Factors affecting the property identified in previous reports

Need for information on the management (issue resolved)

- Site Museum project (issue resolved)
- Risks of collapse of Silbury Hill (issue resolved)
- Lack of visitor management (issue resolved)
- Upgrading of the A303 trunk road project
- Infrastructure development pressure
- Proposals for sections of dual carriageway and tunnel portals within the property

Illustrative material see page
<http://whc.unesco.org/en/list/373/>

Current conservation issues

On 4 February 2020, the State Party submitted a report on the state of conservation, available at <http://whc.unesco.org/en/list/373/documents>. Subsequently, updated information was provided by the State Party in relation to the decision-making process of the A303 scheme. The report focuses on the Development Consent Order (DCO) planning process for the proposed A303 road improvement scheme, at Stonehenge, which includes:

- a 3.3 km long tunnel, with cut-and-cover canopy at eastern and western portals;
- a c. 150m-wide 'green bridge' south of the Winterbourne Stoke Barrow Group;
- a deep cutting, approximately 1km, with vertical retaining walls containing the dual carriageway western approach roads; and
- a new flyover junction of the A303 with the A360, 600 metres west of the existing Longbarrow roundabout and the Winterbourne Stoke Barrow Group (on the western boundary of the property).

In response to Decision **42 COM 7B.32**, consideration was given to extending the bored tunnel and to greater covering of the cutting, but it was determined that the additional benefits would not justify the costs. The decision was instrumental in securing additional mitigation measures, including the c. 150m 'green bridge'. A detailed Archaeological Mitigation Strategy has been finalized to guide archaeological mitigation associated with the design and construction of the proposed road improvement.

Public Planning Hearings took place between April and October 2019. 16 hearings were conducted; two specifically directed at cultural heritage and with most of the rest also considering aspects of heritage. Decision **43 COM 7B.95** was relayed to all key parties to the hearings. The additional small-scale State of conservation of properties WHC/21/44.COM/7B.Add, p. 61 Inscribed on the World Heritage List detailed design and mitigation measures aimed at reducing harm to the Outstanding Universal Value (OUV), were also presented to the hearings.

The Planning Inspectorate reported their Recommendations to the Secretary of State for Transport on 2 January 2020. The decision-making deadline for the A303 improvement scheme was initially postponed from early April to 17 July 2020, then to 13 November 2020, in order to consult further on recent archaeological finds. The Secretary of State approved the Development Consent Order (DCO) in November 2020. Subsequently, a request for judicial review of the DCO decision was lodged with the High Court, which will likely be considered in June 2021.

The State Party has offered to discuss an appropriate measure of ongoing engagement with the Committee, the World Heritage Centre, and ICOMOS. Legally binding safeguards are proposed to ensure that heritage advice and considerations will contribute to construction, operations and maintenance.

Details are also provided on other initiatives and projects,

including a forthcoming property setting study and related boundary review, and plans for implementing the 2015 Transport Strategy at the Avebury component of the property.

Analysis and Conclusions of the World Heritage Centre, ICOMOS and ICCROM

Progress with new management and governance arrangements, implementation of an improved Transport Strategy for Avebury, introduction of Traffic Regulation Order and the proposed study of the property's setting are welcome. The setting study should be submitted to the World Heritage Centre for Technical Review by ICOMOS (noting the potential for ensuing changes to the boundary of the property).

Although consideration was given to extending the length of the bored tunnel across the property proposed as part of the A303 dual carriageway road upgrade, and to greater covering of the approach road cutting, as recommended by the Committee, the State Party determined that the additional landscape benefits would not justify the additional costs. Although small-scale design refinements that seek to reduce impact on the OUV have been made, such as a c. 150m 'green bridge' to the west of the proposed tunnel, the overall position with the proposed A303 improvement scheme has not changed substantively while the State Party has pursued the applicable national statutory planning process. The proposed tunnel still only extends across part of the property, with around 1km of the proposed new dual carriageway being exposed in a wide cutting within the open landscape.

The proposed tunnel length remains inadequate to protect the OUV of the property. As both the 2018 World Heritage Centre/ICOMOS Advisory mission and, subsequently, the Committee have advised, a longer tunnel section, which removes or substantially reduces the proposed open dual carriageway approach to the tunnel within the property, and is required in order to avoid highly adverse and irreversible impact on OUV, particularly on the integrity of the property. It is regretted

that for such an iconic World Heritage property, the argument persists that the perceived benefits of a longer tunnel do not outweigh the costs. Additionally, the approach to propose mitigation measures for the adverse impacts of the planned A303 scheme could not be considered an appropriate solution. Notwithstanding the approval of the DCO, the scheme should be modified to deliver the best available outcome for the OUV of the property.

The Committee has previously been advised that the State Party's own Heritage Impact Assessment (HIA) highlights that the current proposal would adversely affect the setting of, and relationships between, monuments and the landscape including, amongst others, the Winterbourne Stoke Crossroads Barrows, the Diamond Group and the Normanton Down Barrows. The HIA also acknowledges that the scheme would impact on the integrity of the intended spatial relationships between monuments, a key part of the prehistoric 'landscape without parallel' as inscribed.

While it is noted that the State Party is committed to engage further, if the permission which has been granted were to be upheld by the High Court, it is unclear what might be achieved by further engagement, as it would not be possible to compensate for the unacceptable adverse impacts of the present scheme, which the State Party itself has identified, and which are borne out by the findings of the 2018 mission.

The approved A303 improvement scheme threatens the integrity of the property within the meaning of Paragraph 179(b) of the Operational Guidelines. It is therefore, recommended that the Committee consider the inscription of the property on the List of World Heritage in Danger in the event that DCO consent was confirmed by the High Court. Such a decision would exacerbate this threat.

Decision: 44 COM 7B.61

The World Heritage Committee,

1. Having examined Document WHC/21/44.COM/7B.Add,
2. Recalling Decisions **42 COM 7B.32** and **43 COM 7B.95**, adopted at its 42nd (Manama, 2018) and 43rd (Baku, 2019) sessions respectively,
3. Notes the progress made with the new management and governance arrangements, and implementation of the 2015 Transport Strategy, as well as the initiative to introduce Traffic Regulation Order on roads where traffic has an adverse impact on attributes of the property, and urges the State Party to continue finding solutions to address these negative impacts;
4. Also notes the forthcoming setting study and related boundary review of the property and requests the State Party to submit the draft setting study to the World Heritage Centre for review by ICOMOS;
5. Further notes the small-scale design refinements, which have been made to the A303 improvement scheme within the property;
6. Recalls that the Committee has previously noted that the 2018 joint World Heritage Centre/ICOMOS Advisory mission and the State Party's own Heritage Impact Assessment (HIA) highlight that the current overall proposal would impact the integrity of the intended spatial relationships between monuments, a key part of the prehistoric 'landscape without parallel' as inscribed;
7. Reiterates its concern that, as previously advised by the Committee and identified in the 2018 mission report, the part of the A303 improvement scheme within the property retains substantial exposed dual carriageway sections, particularly those at the western end of the property, which would impact adversely the Outstanding Universal Value (OUV) of the property, especially affecting its integrity;
8. Notes with concern that, although consideration was given to extending the bored tunnel and to greater

covering of the cutting, as requested by the Committee, it was determined by the State Party that the additional benefits of a longer tunnel would not justify the additional costs;

9. Reiterates its previous request that the State Party should not proceed with the A303 route upgrade for the section between Amesbury and Berwick Down in its current form, and considers that the scheme should be modified to deliver the best available outcome for the OUV of the property;
10. Notes furthermore the State Party's commitment to ongoing engagement with the Committee, the World Heritage Centre, and ICOMOS, but also considers that it is unclear what might be achieved by further engagement unless and until the design is fundamentally amended;
11. Regrets that the Development Consent Order (DCO) has been granted for the scheme; and therefore, further considers in conformity with Paragraph 179 of the Operational Guidelines that the approved A303 improvement scheme is a potential threat to the property, which – if implemented – could have deleterious effects on its inherent characteristics, notably to its integrity; State of conservation of properties WHC/21/44.COM/7B.Add, p. 63 Inscribed on the World Heritage List
12. Notes moreover that in the event that DCO consent was confirmed by the High Court, the property warrants the inscription on the List of World Heritage in Danger;
13. Finally requests the State Party to submit to the World Heritage Centre, by **1 February 2022**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 45th session in 2022, **with a view to considering the inscription of the property on the List of World Heritage in Danger if the A303 route upgrade scheme is not modified to deliver the best available outcome for the OUV of the property.**

Presentation by Professor Phil Goodwin

Saving Stonehenge World Heritage Site

Stonehenge Alliance webinar on 3 June 2021

Stonehenge-A303 Amesbury to Berwick Down: The Highways England Appraisal

Phil Goodwin, Emeritus Professor of Transport Policy, UCL and UWE; Senior Fellow, Foundation for Integrated Transport.

philinelh@yahoo.com

Video recording of presentation

18:26 minutes

NOTE: *This document consists of the speaking notes and slides prepared for the presentation. It is close but not identical in every respect to the words used in the live event. References are given in the last slide. [Presentation & notes by Professor Phil Goodwin as pdf](#)*

As an introduction I should explain that I have worked in the field of transport appraisal for about 40 years, and I have been heavily critical of the many built-in biases which, I

argue, tend to favour the wrong projects. But the core of my argument today is quite different. I am going to put aside my general criticisms, and argue a different case.

HE = Highways England

1. Summary

1. HE claims that the scheme will **reduce congestion and benefit the World Heritage Site**.

2. I think the appraisal is based on a **deeply flawed** transport infrastructure strategy, not suitable for a world of Brexit, Covid-19 & Climate Change, using methods which **exaggerate benefits and understate costs**.

BUT

3. **Today I will accept all the HE assumptions and forecasts** and show that the scheme is not a good one *even under their own method*.

For sources see last slide

I argue that even if we accept every single word of the Highways England appraisal, and method, and assumptions, the scheme **as a road scheme** does not make sense. And even if we accept every single word of the method used to assess the **Heritage benefits** of the project then it *still* doesn't make sense. So I'm going to prove this using only the official numbers.

BCR = Benefit Cost Ratio

2. Benefits and Costs of A303 Amesbury to Berwick Down According to DfT Appraisal Methods

Benefit component	Lifetime £m (discounted to 2010)
Economic Efficiency of Transport System (mostly time savings)	£252
Indirect tax revenue	£87
Reduction in accidents	£4
Journey time 'reliability'	£61
'Wider Economic Benefits'	£35
Losses from extra pollution	-£86
Total Transport Benefits	£353
Total Costs	£1206
Net Loss (BCR)	-£853 (0.29)

For sources see last slide

First, let's just think of it as a typical road scheme. What does Highways England tell us about the benefits of this? The transport function of the scheme is to provide more road capacity on the A303 to cope with Highways England's own forecasts of rising traffic, mostly cars, every year for decades.

The biggest estimates of benefit will be the cash value of all the estimated time savings, on millions of journeys over 60 years. That adds up to £252 million worth. Then there are some tax benefits, some claimed reductions in accidents (they are not worth so much), more reliable journeys, a little contribution to economic growth, a small amount to be taken off for pollution. Total benefits of £353 million, which sounds a lot but the estimated costs of the scheme, at £1206 million – £1.2 billion – are over three times larger than the benefits. As a transport project, the scheme makes a loss to society of £853m.

But then, if it was just a road building scheme, you would not build a tunnel. Tunnels are far too expensive. The reason for the tunnel, Highways England tell us, is to protect the World Heritage Site from traffic. So an amount was added, for the estimated cash value of the protection of the heritage. This amounts to £955m, just under a billion pounds, for the heritage benefits of removing the road from the World Heritage Site, and now the scheme makes a surplus, a profit. I should say that it's only just a surplus. For those who like benefit cost ratios, *1.08 is not considered a good return on investment, over 60 years, and most schemes reporting these results would not get funded.*

3. Benefits and Costs of A303 Amesbury to Berwick Down

when you add on heritage benefits

Benefit component	£m (discounted to 2010)
Total Transport Benefits	£353
"Value of removing road from WHS (contingent valuation)"	£955
New Total Benefits	£1307
Total Costs	£1206
Net Surplus (BCR)	£101 (1.08)

For sources see last slide

£955 million is the key number in the whole calculation. By good fortune, this is bigger than the transport loss of £853. So where did it come from?

Highways England commissioned a survey: some face to face interviews with visitors, but mostly on-line surveys, on the

internet, with a sample of local residents taken as the people who drive past the site and enjoy the view, and a bigger sample representing the 'general population' spread over the whole country.

This survey asked people 'if they would, in principle, be willing to pay an increase in annual taxes over a three year period to support the road scheme'. If they said no, they were asked 'if the proposed road scheme would reduce their life satisfaction, and if so how much would be 'minimum they would accept in compensation'

It was made clear that they would not be asked to actually pay this tax, and they certainly wouldn't receive the compensation. It was hypothetical. (It was the sort of question that politician would generally reply 'I don't answer hypothetical questions'). But the public are more amenable and most gave answers. The report says that this represents the value that the improvements achieved by the road scheme will have for users and non-users of the world heritage site.

4. Aggregate net value judged by how much tax - they say - they would be prepared to pay	
Visitors	£25 million
Road Users	£40 million
General Population	£1.2 billion
Total	£1.3 billion

About half the people in the general population section – 1159 people – said they would be willing to pay (in principle), an average of £14.41 per year for 3 years. This was then multiplied by the adult population of 30.4 million, comes to £1,203,428,521 -ie £1.2 billion.

For sources see last slide

About half the people in the general population section – 1159 people – said they would be willing to pay (in principle), an average of £14.41 per year for 3 years. This was then multiplied by the adult population of 30.4 million, which comes to £1,203,428,521 -ie £1.2 billion. (This is then discounted back to 2010 prices to give the £955m in the previous table).

There were separate answers for the visitors and the local drivers; being few in number, the total notional tax revenue to be collected from them is small. The big notional revenue was from the 'general' sample, their individual values being multiplied by the whole adult population of the UK. These of course include the people who were not expecting ever to visit the site, or pass near it, but wanted to protect it.

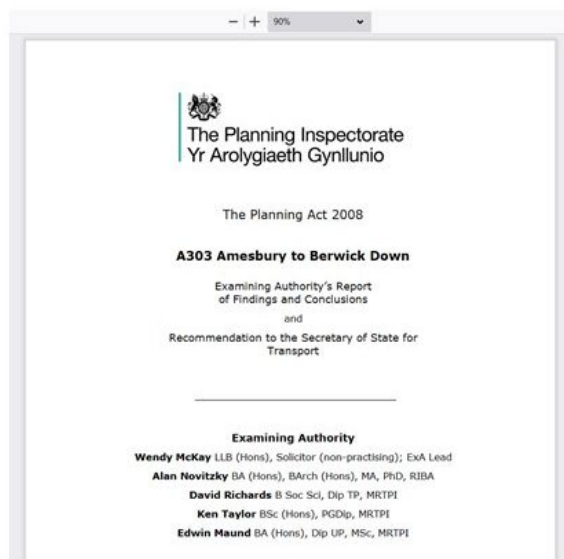
Now I guess some of you are thinking that this is a very dubious calculation, and it's true that it can be seriously criticised, on technical grounds. There is not time now to

explain those criticisms, but we can go into it later if you want. It was these criticisms which made the Inspectors appointed by Secretary of State call the answers 'inherently uncertain'.

But bear with me, I'm still *accepting* the calculations put forward by Highways England. We do not need to resolve those troubling objections, for one key reason. Among the 1500 documents of the inquiry, we now have another one, which is the most important of all, and that is the Inspectors report.

ExA = Examining Authority (ie inspectors)

5. The Examining Authority's Report



- 7.2.32 the effects of the Proposed Development would **substantially and permanently harm the integrity of the WHS**. In addition, it would seriously harm the authenticity of the WHS. The ExA finds that **permanent, irreversible harm, critical to the OUV** [outstanding universal value] would occur, affecting not only our own, but future generations.

[For sources see last slide](#)

That is a statement of considerable status in planning law. The Secretary of State can overrule it, subject to certain conditions which are currently a matter of legal dispute, but it has a continuing official status as the official document which the whole public examination system is directed to produce.

In summary, the Examining Authority concluded that the scheme would substantially harm the integrity and the authenticity of the world heritage site, causing permanent irreversible damage, affecting not only our own, but also future generations. Now my point is not whether this is right or wrong. It is that this statement itself profoundly changes the interpretation one can put on the results of the contingent valuation estimate of the heritage value of the site.

6. A survey of people, mostly by internet, asking...

- 5.3.13 “if they would be prepared to pay to support the construction of a scheme which removed the sight and sound of the road from the vicinity of Stonehenge through increased taxes”...
- 9.1.2 “While the values elicited in this study cannot be directly translated into cashable benefits, they **represent the value that the improvements achieved by the road scheme will have for users and non-users of the WHS.** They therefore form a key component of the overall cost-benefit analysis of the scheme”

For sources see last slide

This is because the answers that were given were to hypothetical questions about how much people would be willing to pay in hypothetical taxes for a project which

“removed the sight and sound of the road from the vicinity of Stonehenge”, and

“represent the **value that the improvements achieved by the road scheme** will have for users **and non-users** of the WHS. They are a key component of the overall cost-benefit analysis of

the scheme”

But this extra value is estimated by a procedure called ‘*contingent valuation*’

7. Contingent Valuation Is Contingent

How much would you pay for a scheme which will protect Stonehenge from traffic, for present and future generations?

About £1 billion

How much would you pay for a scheme which will cause permanent, irreversible harm, affecting not only our own, but future generations?

About £? Billion...

For sources see last slide

And the whole point is that contingent valuation is contingent – it depends on what information and hypothetical conditions are offered to the respondents.

We know what the answers were for a question, what would you pay in taxes for a road scheme which would protect Stonehenge for present and future generations. At that date, the details of the scheme were not known. What was known about the scheme was that its promoters stated it would protect the world heritage site. We now know something else about the scheme, which is also a key part of the official library in the appraisal, namely the Examiners’ Report.

So we can make a mind experiment. Imagine that the question was ‘*how much would you be prepared to pay in taxes for a*

scheme which would cause irreparable long term damage to the World Heritage Site for present and future generations?'. Or, to leave it more open, how much for a scheme that 'the Planning Inspectors had said' that such damage would be caused.

The mind experiment is this: would that have made a significant and substantial difference to the results of the survey? Everybody working in this field accepts that the values produced are sensitive to the way the question is presented.

I would assert that it would certainly have reduced the reported willingness to pay by between 50% and 100%, and possibly even reversed the 'willingness to pay' and 'willingness to accept compensation' so that the heritage benefit to insert into the benefit cost appraisal would have a substantial **negative** value.

In saying this, I would be implicitly accepting the entire rationale of the Highways England methodology, and only adding one element, which is a true statement about what the Inspectors had concluded. I am asserting that that way of framing the question would very substantially change the answer.

Some assertions about the future are inherently uncertain, and cannot be proved one way or another. My assertion is not uncertain in this sense, because it is not about the future. It can be tested, empirically, by means of another survey. This survey would cost much less than the first, since it would not need all the setting up and design costs. All other elements of the survey would stay the same: it is only the framing of the core question which changes, giving respondents one more piece of information, factual information, of what the Inspectors had said.

We know the result already of what people said given the

information that the scheme would benefit the site. The mind experiment is to ask ourselves what we – and they – would say if given the information that it would not benefit the site.

8. Conclusion – and a Challenge

- The transport benefits, even if they are true, are **not nearly enough** to justify the expenditure.
- The Heritage benefits, even if they were true to the question asked, would **not be nearly enough** if the question included the Inspectors assessment.
- **This can be tested**, over the summer, for a few thousand pounds and a survey which is simple, using the HE's own methodology, and transparent, open research management.

So I conclude that the work already done

1. demonstrates that the scheme would not provide transport benefits nearly equivalent to its cost, and
2. (according to my assertion, professional judgement based on some 40 years engagement with road appraisal methods), that the method has not demonstrated that it would provide heritage benefits which would make up the difference.

My point is that you do not have to agree with my judgement, because whether I am right or wrong can be tested within a couple of months at the cost of a few thousand pounds. Let us do that test – openly, transparently, with participation of both sides of the argument. We could ask the DfT's technical appraisal people, and their Advisers, to be involved. I'd

volunteer to be on the Steering Committee for a project like that, and I'm sure that dozens of other serious experts would as well.

All this would not resolve the wider problems of the UK's transport strategy and appraisal systems. They still apply. But it does make a contribution to address this project, which is unique in not even passing its promoters' own criteria.

REFERENCES

All figures and quotes are from documents of the Examination Library held by the Planning Inspectorate. It contains 1496 documents, and an index is available, with free access, at <https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a303-stonehenge/?ipcsection=docs>

Slide 1: Mine

Slides 2 and 3: Extracted from Tables 5.5 and 5.6 in <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000447-7-1-Case-for-the-Scheme.pdf>

Slide 4: Table and text from Para 1.1.10 and para 1.1.17 with its unnumbered table in <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000455-7-5-ComMA-Appendix-D.pdf>

Slide 5: Cover page and para 7.2.32 of <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-002181-STON%20%E2%80%93%20Final%20Recommendation%20Report.pdf>

Slide 6: First quote from para 5.3.13 of <https://infrastructure.planninginspectorate.gov.uk/wp-content/>

[ipc/uploads/projects/TR010025/TR010025-000447-7-1-Case-for-the-Scheme.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010025/TR010025-000447-7-1-Case-for-the-Scheme.pdf)

Second quote from para 9.1.2 of <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010025/TR010025-000455-7-5-ComMA-Appendix-D.pdf>

Slides 7 and 8: Mine

Presentation by Professor Mike Parker Pearson

Saving Stonehenge World Heritage Site

Stonehenge Alliance webinar on 3 June 2021 NOTE 1

Presentation by Professor Mike Parker Pearson

KEY POINTS

Current position:

- *This is a landscape packed with many impressive standing monuments and also below ground.*
- *This landscape represents a period of our history for which we have no written records. Consequently, the remains are the only source of information.*
- *The World Heritage Site is within an area that's been*

massively encroached upon in the last 20 years. What is left is an island of conservation where damaging development must be resisted in perpetuity.

- *This is a 1980s scheme for the 2030s, and the world has changed.*

Scale and landscape:

- *The tunnels are not long enough. 3.2 kilometres when the World Heritage Site is over five kilometres across at that point.*
- *The earthworks produced by the new scheme will completely dwarf those of the world heritage site itself.*
- *UNESCO recommended that the scheme be refused because of unacceptable damage to archaeology and negative impact on the landscape.*

Ploughsoil:

- *The road will cut through an unusually high density of prehistoric artefacts and buried features within the ploughsoil.*
- *People lived their lives on the surface. To properly understand what they were doing in successive periods of prehistory, from the Mesolithic through to the Bronze Age, intensively sampling the ploughsoil is necessary i.e. using shovels, spades and sieving the soil in metre squares.*

Loss of artefacts:

- *Research standards insisted on by Historic England and National Trust within the WHS over the last 10 years were refused by Highways England, even though this was advised by the Scientific Committee.*
- *Highways England's approach is to strip the surface and then record what has actually survived beneath the ploughsoil. Only a miniscule proportion of the total*

remains will be found.

- *Over half a million worked flints as well as likely prehistoric artefacts within the ploughsoil will be bulldozed without record or recovery.*

Reputation:

- *Highways England's approach is in flagrant breach of the usual standards met by research excavations in the WHS in which sampling may be as high as 100%.*
- *In the eyes of the rest of the world, we're not properly looking after our particular bit of the planet's world heritage.*
- *The lack of concern contributes to the UK's declining reputation for protection of the historic environment.*

Video recording of presentation

19:09 minutes

Transcript with slides

Tom Holland (NOTE 2) Let's hear now from Professor Mike Pearson. No better person to tell us why the road scheme that Kate has just been demonstrating and illustrating, why it would be so damaging in archaeological terms. So, Mike, thanks very much for coming here. Hugely grateful. Over to you.

Mike Parker Pearson (NOTE 3)

Archaeological aspects of the A303 Stonehenge Road Scheme 0:22

I want to start off with a series of questions about the archaeology, based on some of the questions that have already come in.

- What is so special about the world heritage site?
- Why should we oppose the scheme?
- What do we know about the archaeology that would be

lost?

- Isn't the archaeology in fact all going to be recorded before the road is constructed?
- Why are some archaeologists actually in favour of the scheme?

Archaeological aspects of the A303 Stonehenge Road Scheme

What is so special about the World Heritage Site?

Why should we oppose the scheme?

What do we know about the archaeology that would be lost?

Isn't the archaeology going to be recorded before the road is constructed?

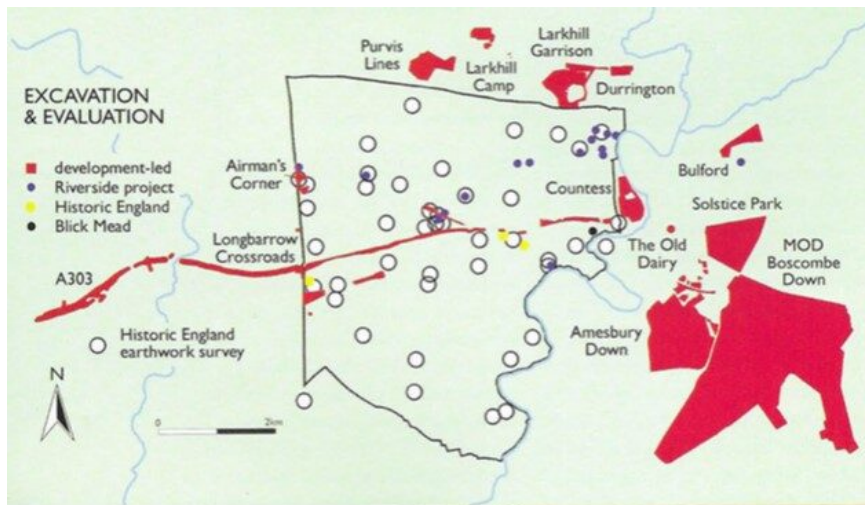
Why are some archaeologists in favour of the scheme?



SLIDE 1

Of course, it's not just Stonehenge, it's the fact that this is a landscape packed with many impressive standing monuments, in particular, but also below ground, There are not just hundreds but thousands, in fact millions of archaeological artefacts and other remains. Hardly a year goes by without some major discovery being made within the World Heritage Site that hits the international news. Of course, this is a period of our history for which we have no written records and, consequently, the remains themselves are the only source of information. So they are extremely precious because, once they

are gone, they are gone for good.



WHS boundary in black

Development in red

The Stonehenge World Heritage Site's surroundings have been massively encroached upon by development, especially in the last 20 years, leaving the WHS an increasingly isolated conservation 'island' where damaging development must be resisted in perpetuity.

The A303 road scheme would be the most extensive and damaging intrusion into the World Heritage Site since Stonehenge and Avebury were inscribed together on the UNESCO World Heritage Site List in 1986.

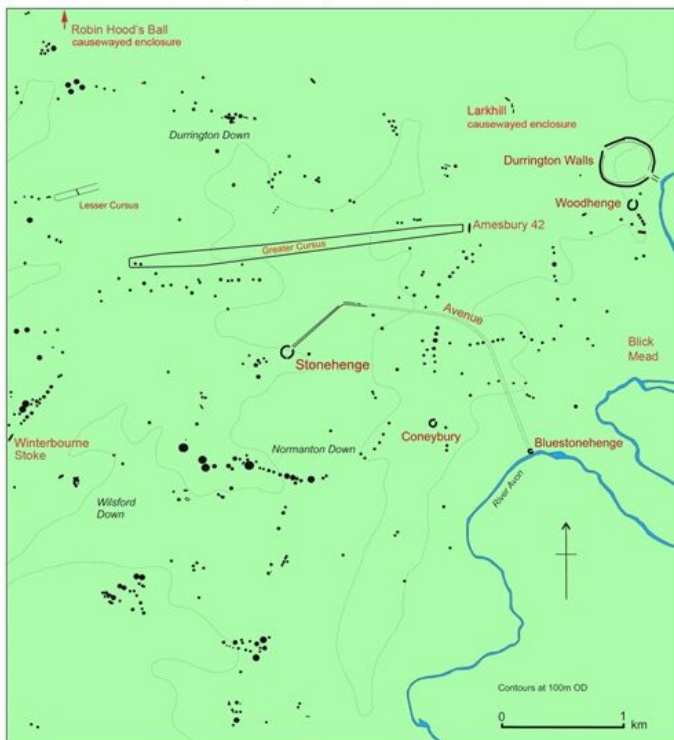
SLIDE 2

I think we have to remember that the World Heritage Site is within an area that's been massively encroached upon in the last 20 years. What is left is really an island of conservation which is now the World Heritage Site. So damaging development within that island really has to be resisted, not just in the meantime but in perpetuity. And, unfortunately, the road scheme would indeed be the most extensive and damaging intrusion since the inscription of Stonehenge and Avebury together on the World Heritage Site List in 1986.

What is so special about the World Heritage Site? 1:00

What is so special about the World Heritage Site?

Stonehenge is one of the best-known prehistoric sites in the world and it is surrounded by a remarkable landscape densely packed with numerous impressive and amazingly well-preserved monuments and other remains.



These have survived from a period of human history before writing, so they provide the only record of the people who lived there and built Stonehenge and its associated monuments.

SLIDE 3

Why we should oppose the scheme 2:53

Very simply, the tunnel is just not long enough: 3.2 kilometres. The World Heritage Site is over five kilometres across at that point.

It's a very out of date scheme, I'm afraid. I was there at English Heritage in the late 1980s when it was dreamed up. And here we are – what, 50 years later – or it *will* be 50 years later, when it actually becomes operational. And I'm afraid the world has changed in so many ways that we're all aware of. And we have to wonder whether this really is the most suitable way of solving the problems that were perceived in the 1980s.

From the archaeology, the most important thing is that that road line will ensure the complete destruction of 10 hectares of the World Heritage Site, most of it in the two stretches

outside of the western and eastern portals, where the tunnel emerges.

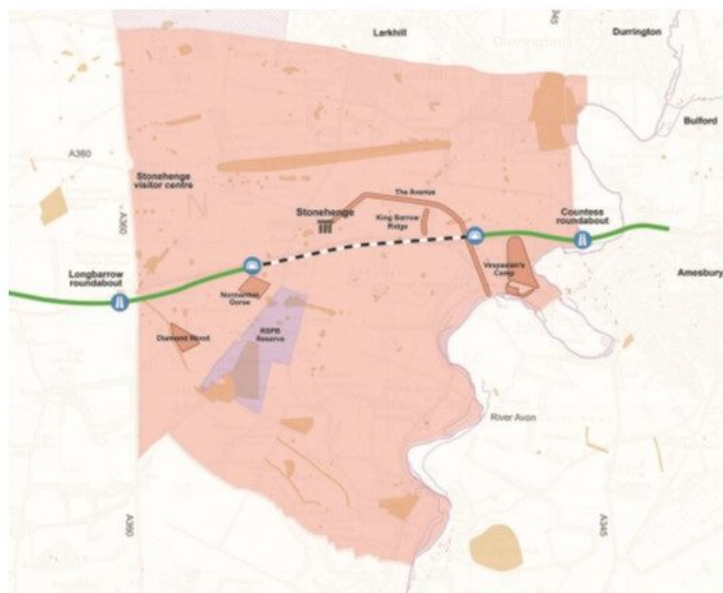
But also, the corner at the top left, the northwest corner of the World Heritage Site, is also going to be damaged by road building. And the thing about it, as you saw from [Kate's pictures](#), it's a total destruction, nothing will be left. Very different to all the excavations that have taken place for research in the World Heritage Site because everything there is simply put back. What isn't taken away for the museum actually goes back in the ground broadly in the place where it came out of.

Why should we oppose the scheme?

The tunnel (3.2km) is not long enough for the east-west width of the WHS (5.4km)

A 1980s scheme for the 2030s, and the world has changed...

Over 10 hectares of WHS land containing archaeologically important remains and artefacts will be completely destroyed



SLIDE 4

What makes Stonehenge so special? 4:40

[It] is its archaeology and its earthworks, amongst other things. Kate's already made the point that the earthworks

produced by the new scheme will completely dwarf those of the World Heritage Site itself. As already has been mentioned, UNESCO recommended that the scheme be refused because of unacceptable damage to archaeology and negative impact on the landscape. And I'm afraid what this means is that, in the eyes of the rest of the world, we're not properly looking after our particular bit of the planet's world heritage. And as already explained, it [was a recommendation] that the planning permission was indeed refused, only to be overturned.

The scheme will create the largest earthworks within the WHS, wholly out of scale with the many prehistoric earthworks that make this WHS so special



UNESCO recommended that the scheme be refused because of this unacceptable damage to archaeology and landscape within the WHS

In the eyes of the rest of the world, we are not properly looking after our part of the world's heritage

After the Public Hearing the planning inspectors rejected the scheme but their carefully considered decision was over-ruled by Grant Shapps

SLIDE 5

What do we know about the archaeology that would be lost? 5:39

Outside of the western portal, evaluation work done by contractors for Highways England, just looking at the ploughsoil, produced many thousands of artefacts. They're marked in this map here, in blue. So, the sizes of the blobs indicate the densities of finds, mostly struck flint, flint

artefacts and flint tools. And the density is quite staggering, as you can see, in several areas. The road line is the area marked in green. What we know from this is that, not only from their sampling – their 1% sample of that ploughsoil – we can reckon that there will be 381,000 prehistoric flint artefacts that will simply be destroyed, machined off, before the actual excavation of what's underneath the ploughsoil takes place.

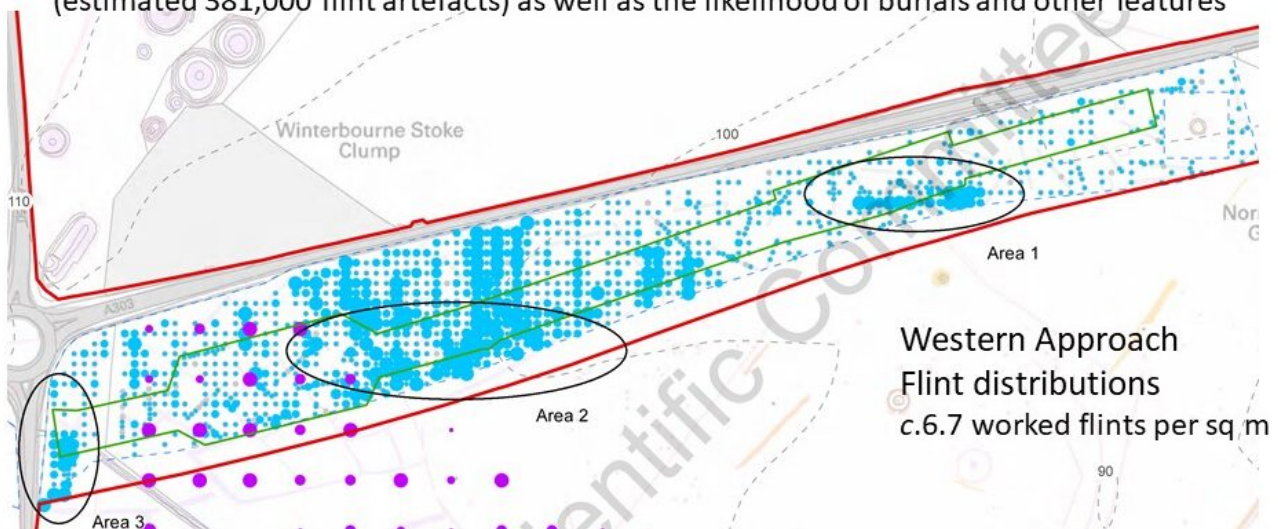
We know from preliminary analysis of these finds that a good number of them are the remains of a settlement of the period that we call the Copper Age and the Early Bronze Age. So this would be an area of settlement of people in prehistory that we know as the Beaker people. And, potentially, this was their campsite when they were building the later stages of Stonehenge, stages three and four, around 2000 BC.

What do we know about the archaeology that would be lost?

Outside the western portal of the tunnel

The road will cut through a dense scatter of prehistoric artefacts and buried features likely to be the remains of a **Copper Age-Early Bronze Age settlement** of the Beaker people c.2450-1800 BC, potentially the campsite for the builders of Stonehenge Stages 3 & 4

Previous evaluation reveals unusually high densities of artefacts within the ploughsoil (estimated 381,000 flint artefacts) as well as the likelihood of burials and other features



Eastern portal and Blick Mead 7:28

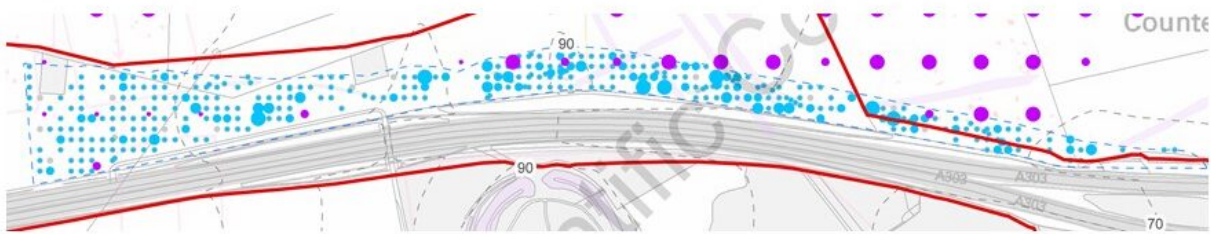
Outside the eastern portal, the densities are not quite so great. But the material recovered indicates that a lot of it derives from a period where we know very little – well, virtually nothing I have to say – about settlement in the Stonehenge landscape. And this is from the early Neolithic. This is from the time that they were building long barrows and, in fact, the western [A303 widening] route is passing through the densest cluster of Neolithic long barrows anywhere in Britain.

So, the settlement on the eastern side may be really very important. And again, an estimated 142,000 flint artefacts in the ploughsoil, under the current proposals for investigation, are simply going to be bulldozed.

Further out to the east [is] the Mesolithic site of Blick Mead. Although it is physically not affected, there is concern that the construction will create, of course, hydrological changes, lowering the water table; and there is worry that, potentially, organic deposits will be destroyed: that materials that are in deposits that are currently waterlogged may end up drying out and vanishing.

Outside the eastern portal of the tunnel

Prehistoric remains include an estimated 142,000 flint artefacts, many of them from the Early Neolithic, which are likely to be remains of **settlement before the time of Stonehenge**



Eastern Approach
Flint distributions
c.3.6 worked flints per sq m

The Mesolithic site of Blick Mead may be affected by hydrological changes to the water table, potentially destroying organic materials in waterlogged deposits



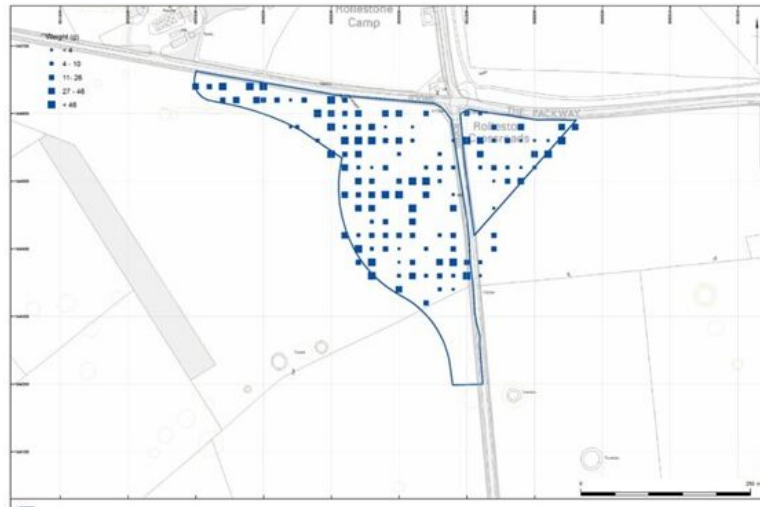
SLIDE 7

Rollestone Corner 9:01

And then, finally, the third area: a much smaller one right up in the top northwest corner and relatively small damage, but nonetheless 21,000 flint artefacts in the ploughsoil.

Rollestone Corner

Prehistoric remains to be destroyed in an area of over 6,000 sq m, including an estimated 21,000 flint artefacts in the ploughsoil



NB All estimates are detailed in *Estimating flint artefacts in the WHS ploughsoil*, submitted as a public document to the Public Hearing. It uses the statistics of 1% sampling provided by Highways England in their *Stage 4 – Archaeological Evaluations: Review of Ploughzone Lithics and Tree-hollow Distributions* of 17 May 2019. Highways England did not contest this estimate at the Public Hearing.

SLIDE 8

Why are finds in the ploughsoil so important? 9:22

For those of us who work with prehistory, the time of Stonehenge is a time when actually people in the main weren't digging pits and ditches. They were living their lives on the ground surface, living in ephemeral houses and leaving few holes into the ground: the occasional grave, the occasional pit, maybe a tree hole where a tree had blown over, dumping material in there or using it as a working area. For most of their life and work was conducted on the surface. And of course, those layers have all been ploughed and all of the finds from those activities are in that ploughsoil.

So, we as archaeologists working within the World Heritage Site have known that to really understand what they were doing in the successive periods of prehistory from the Mesolithic through to the Bronze Age, you have to intensively sample that

ploughsoil. And that means getting out there with shovels and spades and sieves and sieving the soil in metre squares to actually extract all of the artefacts. And then you can plot out, metre by metre, the distributions to give you a picture of how people lived in that landscape and how that changed through time. It's only through doing that really detailed work that you'll get that.

Unfortunately, the Highways Agency's (NOTE 4) approach is basically to strip and then record what has actually survived beneath the ploughsoil. And I'm afraid that is a miniscule proportion of the total remains.

Now they were advised by the [Scientific Committee](#) that was appointed, that equivalent standards should be applied to their work as to anyone else working in the World Heritage Site. They refused to do this. They considered it expensive, that it would take too long even though such a process could be mechanised. And the result is that they are prepared to pay for sampling that will only be minimal and we will see half a million worked flints and other prehistoric artefacts lost without recovery. Worst of all, they're just going to be scattered over various parts of the World Heritage Site completely out of context. It's an unacceptable level of damage.

Why are finds in the ploughsoil so important?

Over 90% of Neolithic-Early Bronze Age remains are in the ploughsoil (rather than in features below it) in the WHS – people lived and acted out their lives ON the surface not beneath it. Only a tiny fraction of their activities is preserved in deposits below.

For more than 10 years, **archaeologists researching within the WHS have intensively sampled the ploughsoil** by hand-digging and sieving the ploughsoil to recover finds and to plot their spatial distributions (to reveal how prehistoric people lived and worked in this landscape)

Highways England's A303 Stonehenge Scientific Committee advised them that **equivalent standards** must be applied to all archaeological excavations within the WHS, whether by universities or commercial contractors

But Highways England refused to do this – it would be expensive and would take too long, even though it could be mechanised

Over **half a million** worked flints and other prehistoric artefacts within the ploughsoil will be **bulldozed without record or recovery** – this is an unacceptable level of damage to the resource and loss of information about Stonehenge's prehistoric past

SLIDE 9

Isn't the archaeology going to be recorded before the road is constructed? 12:18

The contract company that won the contract, Wessex Archaeology, are indeed among the best archaeological contractors in the world, and I've every confidence that they'll do an excellent job if they can recruit enough staff.

At the moment, we're somewhere around 1,000 people short for working in commercial archaeology in Britain due to the current political circumstances with Europe.

But however good Wessex are, they can only do as much as they're allowed by the brief that they've been given by Highways England and by the heritage agencies who have been backing the scheme with the Department of Transport since the 1980s.

They're not going to be required to map or recover the majority of artefacts. They have so far recovered just 1 per

cent; they're talking about levels of percentage under 10, no more than 12 ½ per cent, for the rest of the work . But it shouldn't just be the ploughsoil.

Highways are not prepared to ask for even all of the sub-surface features to be excavated, notably the tree hollows, which may contain prehistoric remains. They're only going to look at just 12 ½ per cent of those, not the 100 per cent that many of us would recommend.

I'm afraid this is a flagrant breach of the usual standards that are met by archaeologists working in the World Heritage Site.

Isn't the archaeology going to be recorded before the road is constructed?

The roadlines will be excavated by Wessex Archaeology, one of the best archaeological contractors in the world, and they will do an excellent job if they can recruit enough staff

But they can **only do as much as they are allowed by the brief** set by Highways England and heritage agencies who have backed the scheme from the beginning

They will not be required to recover or map the majority of the **half-million artefacts in the ploughsoil** – so far just 1% have been recovered and Wessex Archaeology have been given a budget and schedule that will allow only a tiny fraction of the total to be saved

Excavation of **all sub-ploughsoil features** within the WHS should be 100%: Pits, ditches, postholes, stakeholes, solution hollows. This includes **tree hollows** (proposed to be sampled at 12.5% - but should be 100%)

This is in **flagrant breach of the usual standards** met by research excavations in the WHS in which sampling may be as high as 100%

SLIDE 10

Example of total or near-total recovery compared with lower percentage recovery 14:09

Just to give you an example of what this means in

archaeological terms. We were working on a number of sites between Stonehenge and the western portal back in 2008, and I just take an example that I've worked up from just one of our trenches. It was 30 metres long by 10 metres wide. So that is 300 one-metre squares.

We hand dug and sieved every single square. That's what we were required to do by English Heritage and the National Trust. These are their requirements that they didn't require Highways England to abide by.

I plotted out the distribution of what we call the diagnostic tools. Now, these are the tools that are really important because these tell us the date of activity. And they're also diagnostic of the type of activities carried out. In this case, we're looking at Bronze Age scrapers, Bronze Age flint scrapers. And you can see on the left-hand side, we actually recovered seven of them within that area. Now, they constitute something like 2% of the total flint artefacts.

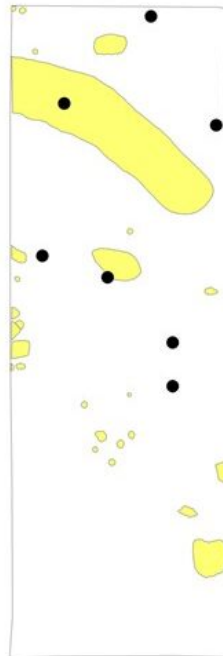
If we were to sample at 16%, which is already higher than Highways England are prepared to ask the contractors to do, we wouldn't have found any of them. Even if we sampled a third of the area, we're only likely to find just one. And even well over 50% at 64%, you can see we picked up four.

So, only at that point, would we be beginning to get an idea of the diagnostic material and what it tells us about the date and the type of activities. Of course, scrapers were used for cleaning hides, amongst other things.

Without total or near-total recovery, we will lose the vast majority of diagnostic tools (just 2% of the total flint artefacts) that reveal different activities from different periods to understand how and when people inhabited these parts of the landscape

SRP 2008

Trench 52 scrapers



16%

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32%

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64%

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SLIDE 11

Why are some archaeologists in favour of the scheme? 16:18

There's no doubt that some think that a short tunnel is better than no tunnel and that we should just settle for the compromise, close our eyes to the archaeological damage, and bite the bullet.

Some think it's entirely acceptable to lose over half a million flint artefacts in the ploughsoil and I think it can only be because they don't understand that there's valuable information on the spatial and chronological distribution of activities of the prehistoric people who lived in the landscape.

Others say "Well, we're going to do – 1, 2, 3, 4 per cent sampling". It's not adequate, because you have to do high percentage sampling to recover enough of those rare diagnostic

artefacts, as I explained with the previous slide.

Some also say that the short tunnel is better than the longer but cheaper surface route, or going round the south of the World Heritage Site and avoiding it there. But as far as we know, there is no significant archaeology in that area at all.

And finally, and I think this is quite an important reason: there are archaeologists who don't want to rock the boat. They don't want to jeopardise their standing with the heritage agencies. Many of them are consultants and they live in part off consultancy work. And we should also remember that none of the archaeologists who work for the heritage agencies who are working together with Highways England can even risk saying what they really think of this scheme. As you know, these organisations have been shedding jobs, such as the National Trust and English Heritage.

I'm afraid it is very sad but their lack of concern I think has undoubtedly contributed further to our declining reputation for being able to protect not just *our* historic environment. Remember, this is the historic environment for the World.

Why are some archaeologists are in favour of the scheme?

Some archaeologists think that a short tunnel is better than no tunnel and that we should settle for this compromise, regardless of the archaeological damage

Some seem to think it is acceptable to lose over half a million flint artefacts in the ploughsoil because they don't appreciate the information these provide on spatial and chronological distributions of activities

Some consider the most minimal sampling of ploughsoil to be adequate because they don't understand that high-percentage sampling is necessary to recover the rare diagnostic artefacts

Some consider that this short tunnel is better than the longer but cheaper 'Southern Route' which would avoid the WHS, even though there is no significant known archaeology in that area south of the WHS

And some archaeologists probably don't want to rock the boat (*i.e.* not brave enough to jeopardize their standing with the heritage agencies). And none of the archaeologists who work for the heritage agencies can risk saying what they really think of this scheme

Sadly, their lack of concern contributes further to the UK's declining reputation for protection of the historic environment

SLIDE 12

NOTES

1. Saving Stonehenge World Heritage Site webinar on 3 June [recorded here](#).
2. Tom Holland is Stonehenge Alliance President, webinar chair, and an award-winning historian and broadcaster.
3. Mike Parker Pearson is Professor of British Later Prehistory at the Institute of Archaeology, UCL. He was director of the Stonehenge Riverside Project that worked to situate Stonehenge within the archaeology of the surrounding landscape, and his thesis that the Blue Stones came from a dismantled Neolithic stone circle in Pembrokeshire recently made headlines around the world. Professor Parker Pearson is a member of the [Scientific Committee](#) for the A303 Stonehenge scheme.
4. Highways Agency was converted into Highways England in

2015 as an executive non-departmental public body,
sponsored by the [Department for Transport](#).

Save Stonehenge WHS: Court Hearing

COURT HEARING 23 – 25 JUNE



We have just learnt that only the legal teams will be permitted to attend the court hearing in person and, possibly, one or two representatives of Save Stonehenge WHS. Up to 99* interested persons can watch remotely but it will be necessary to register to do that.

[See comment about online access in New Civil](#)

[Engineer.](#)

* Corrected 23 June 2021.

The case (Save Stonehenge WHS Ltd and Secretary of State for Transport: Case no. C0/4844/2020) will be heard at the Royal Courts of Justice, Strand, London WC2A 2LL.

The start time is likely to be 10.30am on Wednesday 23 June.

Here are the details to register:

– The case (Save Stonehenge WHS Ltd and Secretary of State for Transport: Case no. C0/4844/2020) will be heard at the Royal Courts of Justice, Strand, London WC2A 2LL.

– The start time is likely to be **10.30am on Wednesday 23 June.**

– If you would like to register to watch the hearing remotely please email the listing office at listoffice@administrativecourtoffice.justice.gov.uk no earlier than one day prior to the hearing date (i.e. on Tuesday 22 June) with the Case Reference Number: C0/4844/2020.

– The Court Associate / Judge's clerk will email the link to your email address. The links may not be sent out until 15 minutes prior to the hearing is due to start. If you have not received a link by then, please email the listing office above.

Please note

People must not make any recording of any part of the hearing, to do so would be a contempt of Court. Please also ensure microphones and cameras are switched off throughout the hearing.

* The grounds for the legal challenge can be found are [here](#) together with updates.