Stonehenge and the A303: Westminster speaks

Stonehenge and the A303 have been raised twice in Westminster recently. Of greatest concern was a debate on *Road Routes to the South West* in Westminster Hall on 1st March (**Hansard Col. 261WH*ff***) giving an opportunity for local MPs to promote predictable local interests. MPs demanded reassurance and action on the Government's proposed expressway to the West Country, notwithstanding the intermittent nature of traffic congestion, unequal allocation of funds, ambitions for a second railway to the South West and the likelihood of moving traffic pinch points elsewhere. Upgrading the A303 was largely seen as more important than proper protection of landscape and heritage.

Richard Burden, Labour Shadow Minister for Transport (and Westminster Forum chairman on 11 February, *see below*) proved more pertinent in addressing Roads Minister Andrew Jones:



Shadow Minister of Transport, Richard Burden: concerns for integrity of the archaeological

site

"The status quo pleases no one and it is necessary that we find a solution to the A303 and to Stonehenge. . . . can the Minister confirm when he expects a costed and timetabled set of options for the road?

In the meantime, has he asked Highways England to evaluate short-term and medium-term options to improve traffic flow and alleviate congestion?

Also, can he satisfy concerns that the current front-runner—a 2.9 km tunnel—would protect the integrity of the archaeological site, as required by article 4 of the world heritage convention? And in the event that the Government cannot satisfy the objective of providing a fully costed and timetabled proposal by 2017, what would he do?" (Cols. 272–73WH)

Roads Minister Andrew Jones, in response, said:



Minister of Transport, Andrew Jones: not reneging on commitment to build a 1.8 mile tunnel

"It is always appropriate to consider options broadly to ensure that the scheme is absolutely the right one, but there

is no doubt whatsoever here; we are committed to delivering a 1.8-mile tunnel at Stonehenge. Our objective is to be able to stand at the stones and not see cars. The tunnel will transform the experience of that important part of our national heritage, and at the same time remove an environmental problem and a traffic problem. We should not, however, confuse the development consent order process requirement to show that different options have been exhausted with reneging upon our commitment. That commitment is strong, and we are working on it closely with environmental and heritage groups.

We intend to start the process with three major improvements as part of the A303-A30-A358-corridor package of commitments. The £2 billion budget, which is for only those commitments—it is not the overall budget for the south-west—will help to deliver much-needed resilience for the region. Part of that work has to address the iconic and historically important site of Stonehenge. . . . We will build a tunnel at least 1.8 miles in length, to preserve the world heritage site at Stonehenge. . . .

The scheme has strong support from the National Trust and English Heritage; I have met with them at the stones and discussed the issue with them. On timing, there will be a formal consultation on the scheme early next year. It will go through the development consent order process—part of the planning process—in 2018. We would expect to start works on the scheme in early 2020. We have to get that right, but I hope that that timing provides some comfort." (Cols. 274–75WH)

The Minister not only failed to confirm that the Government intends to protect the integrity of the World Heritage Site but also indicated its intention to press ahead with a scheme that would only protect the view from Stonehenge and the interests of major local landowners and businesses. This

brings seriously into question the credibility and status of the consultation process on options for widening the A303 at Stonehenge.

The subject of the A303 had been raised earlier, on 11 February, at a Westminster Energy, Environment and Transport Forum seminar entitled *Priorities for the road network in England – investment, innovation and regional development*. The seminar was chaired by Shadow Transport Minister Richard Burden, MP and Baroness Kramer, House of Lords Liberal Democrat Principal Spokesperson on the Treasury and former Transport Minister.

Speakers included representatives of the Department for Transport, Highways England, the RAC, the Local Government Association, the Freight Transport Association, Transport Focus, and engineers Arup. Notable points of interest were areas of innovation and so-called 'smart transport', already proving effective in reducing congestion on motorways and air pollution and set to reduce them further in the future. Integrated transport in Greater Manchester provided an illuminating case study.

It is pleasing to note that Richard Burden in his questions addressed to Andrew Jones on 1 March, above, reflected many of our own concerns expressed by a representative of RESCUE present at the seminar, in a short article appended to the seminar transcript .

Options for the A303 at Stonehenge: where do we stand?



Severe congestion on A303 past Stonehenge is intermittent and seasonal.

The Stonehenge Alliance's position is that there should be no further damage to the World Heritage Site (WHS) through road building or any other development that would impact adversely on its fabric, archaeology, or setting.

Stonehenge's archaeological landscape is considered worldwide to be '*without parallel*'. For this reason and because the Government has already announced its proposal to finance a 2.9km bored tunnel at Stonehenge, the Alliance has argued that any tunnel solution must be longer – one that is long enough to do no further damage to the WHS.

In fact, only an option that would protect the WHS and its setting would meet the unequivocal demands of the World Heritage Convention and UK planning policy. This implies that if a tunnel is to be constructed, one some 6–7km long would be needed. Revelations concerning the Mesolithic site of Blick Mead, close to the eastern boundary of the WHS, certainly strengthen the case for such a tunnel.

Recent media attention has been drawn to a proposal for a

major detour for the A303 to relieve the WHS of some road traffic and provide a southern bypass for Salisbury at the same time. This is not the first time a Salisbury bypass has been proposed and it is likely to be highly controversial. Other A303 diversions were brought to the A303 Inquiry in 2004, including the so-called 'Parker Plan' which bypassed Salisbury to the north and was rejected by the Inspector and the Highways Agency at the time.

In view of the Government's assurance that it will honour Article 4 of the World Heritage Convention the Alliance believes Highways England should only bring forward options for upgrading the A303 that would safeguard the WHS. We await details of option proposals and will consider them carefully.

We are mindful of widely accepted studies that relief of congestion or stimulation of the economy are insufficient justification in themselves for increasing road capacity. The driving force for any activity within the WHS should be heritage, not easing congestion or encouraging economic activity. Our position on this is set out here.

Please continue to support our petition against further damage to our World Heritage.

NOTES

[1] Highways England has awarded engineering firms Arup and Atkins a joint design contract to develop a preferred option for widening the A303 between Amesbury and Berwick Down (see link to news item). One of the options to be considered will be the proposal announced in Parliament on 1 December 2014, involving damaging construction of short, twin-bored tunnels past Stonehenge, some 1.6km of new dual carriageway within the WHS, grade-separated junctions at the A345 and A360 on each side of the World Heritage Site, and a bypass for Winterbourne Stoke.

[2] Consultation on route options is expected in advance of a

final decision on a preferred scheme. See Highways England scheme update here.

The myth of a surface dual carriageway instead of a short tunnel

In 2006 nine organisations representing a large heritage and environmental constituency that reflected local, national and international views, with a diverse range of professional and public opinions, including the National Trust, joined together to set out their vision for the Stonehenge World Heritage Site (WHS):

> *"To regain the tranquillity and dignity of this unique cultural landscape, allowing present and future generations fully to enjoy and appreciate the World Heritage site as a whole."*

All agreed that the World Heritage site extended beyond individual scheduled monuments and their immediate settings, which together displayed an unique range of evidence for prehistoric society that should be safeguarded for future generations and that the long-term view must always be considered.

In its response to a proposed 2km cut and cover tunnel in 2002 the National Trust (NT) called for a long bored tunnel to maximise "protection of the integrity of the WHS" and argued for 4.5km. What then prompted NT to change its mind and support a short, damaging tunnel in December 2014?

The Trust's view now is that if we do not accept the slightly longer 2.9km short tunnel we might get something worse: a dual carriageway across the whole surface of the WHS. The Stonehenge Alliance does not accept this argument for the following reasons:

1. Bearing in mind that the WHS was designated for its archaeological significance:
    - A twin-bored short tunnel and surface dual carriageways, long cuttings, and grade separated junctions, all within or partly within the WHS would result in significant loss of archaeology and integrity, and would be irreversible.
    - Surface dualling all the way across the WHS, even on a membrane to try to protect underlying archaeological deposits, would be likely to lead to some disturbance and damage. While technically reversible, once built this would be unlikely.
    - In terms of environmental impact, especially noise and visual damage, both options are unacceptable.

2. Neither surface dualling nor a short tunnel would meet the Government's commitments under the World Heritage Convention, notably Article 4.

3. There is no basis for assuming that wholly surface dualling would be contemplated by any Government. It has not been seriously considered before, nor is it being considered at the present time, with the exception of those who demand a solution to A303 congestion regardless of the WHS.

4. Any suggestion that surface dualling right across the WHS might be considered can be dismissed as scaremongering in an attempt to justify support for a short tunnel. NT land can be declared inalienable and this was threatened in the NT's Outline Statement of Case before the A303 Inquiry in 2004:

"3. Acquisition of Land Act 1981 Act Powers to Protect

Inalienable Land 3.1 In due course, the National Trust may have to undertake the process of considering whether to invoke the Special Parliamentary Procedure in relation to inalienable land in its ownership. By its attendance at, and participation in, the forthcoming public inquiry, the National Trust will endeavour to inform itself fully as to those matters which it would have to take into consideration at that later stage. The decisions of the Secretary of State for Transport would also be a consideration, material to the National Trust's deliberations . . ."

5. ICOMOS-UK, the UK branch of the International Council on Monuments and Sites, advisers to UNESCO, wrote to the Secretary of State for Transport on 5 November 2014, expressing concern about possible support at that time for a 2.4km or 2.9km tunnel, saying:

"We appreciate the very real need to address the issue of the A303 and recognize that a tunnel could have beneficial impacts on parts of the World Heritage property. However, we are concerned that associated portals and dual carriageways could have a highly adverse impact on other parts of the World Heritage landscape that cannot be set aside however great the benefits of a tunnel."

This indicates:

a) that a 2.9km tunnel would not be supported by ICOMOS-UK; and, in view of its expressed concern about the World Heritage landscape, it would not support wholly surface dualling either; and

b) that the NT, English Heritage and Historic England are wrong in their contention that a short tunnel would be of benefit overall to the WHS, regardless of whether or not it might be considered by some to be better than wholly surface dualling.

The inference must be that neither form of dualling is acceptable to ICOMOS-UK and if either were to go ahead, WHS status might be lost.

6. The Secretary of State for Transport has assured the Stonehenge Alliance, in a letter dated 28.11.14, that:

> *"…substantial work will be required to identify a preferred route option. This would be undertaken in consultation with relevant bodies and stakeholders, including English Heritage, National Trust, ICOMOS-UK and UNESCO's World Heritage Committee to ensure that a solution is developed that protects the Outstanding Universal Value of the World Heritage Site."*

This also enables us to infer, from what ICOMOS-UK has said, that any solution would have to satisfy its and UNESCO's concern that the Outstanding Universal Value (OUV) of the WHS would be protected, regardless of whatever government is in power.

NOTES

- Archaeologists may be reluctant at present to express their views on the matter. Many need to maintain good relations with the NT and Historic England in order to work in the WHS and elsewhere. They are likely to prefer to wait until a scheme is on the table before commenting, as in 2004. However, Mike Heyworth, Director of the Council for British Archaeology, has already publicly indicated concern about the 2.9km tunnel.
- **Stonehenge Alliance's Position:** The Stonehenge Alliance wants to prevent any further damage being done to the World Heritage Site while also seeking improvements. It therefore opposes both a short tunnel and, if necessary, wholly surface dualling. It is pressing for measures to discourage use of the road at busy times, but if the Government is determined to dual the A303 at Stonehenge,

the Alliance considers the road tunnel should be at least 4.5km long (the minimum distance to avoid more road building within the WHS). Ideally, the tunnel should be longer so that all the portals are well clear of the WHS and avoid any risk of damage to the Mesolithic site at Blick Mead.

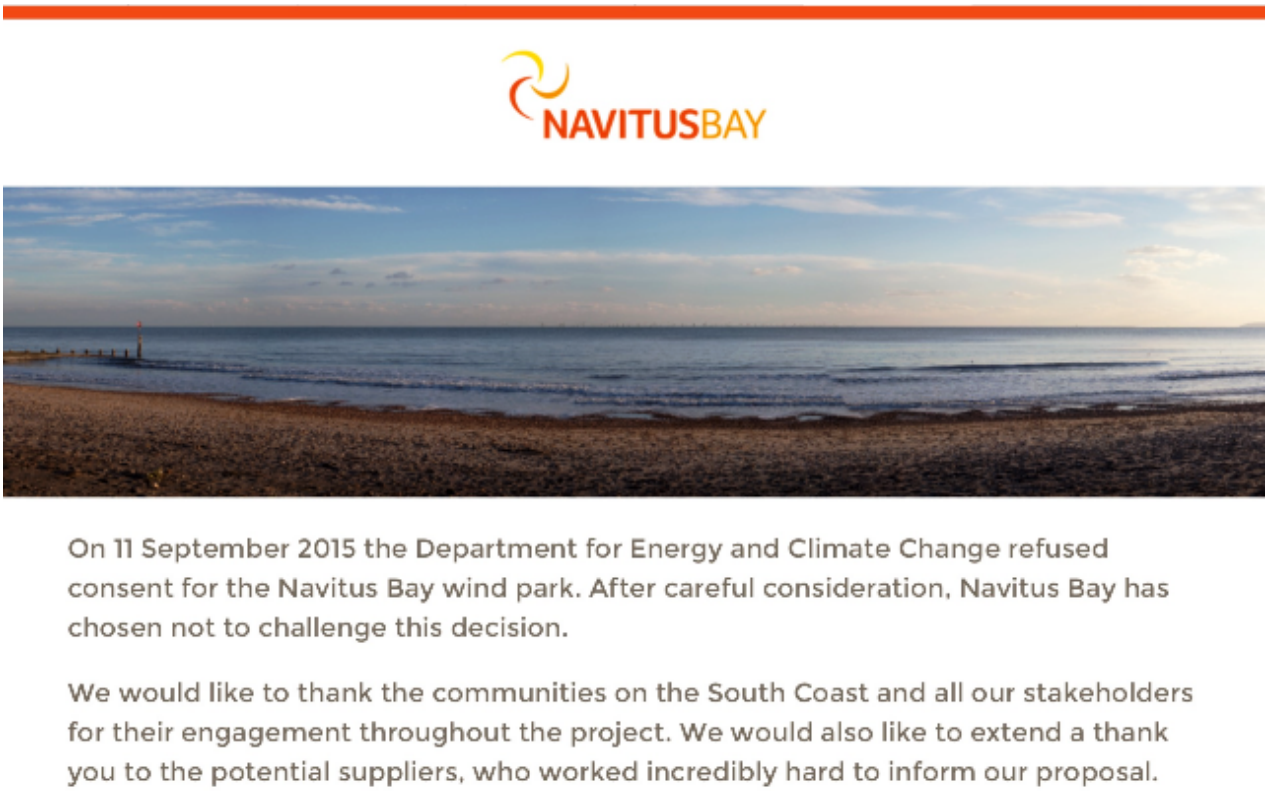
- **Further information on inalienable National Trust land:** NT supports a fully bored tunnel for HS2 (apparently c.25km long) under the Chilterns Area of Outstanding Natural Beauty: http://www.nationaltrust.org.uk/document-1355766903031/:

> *"7. If the project proceeds it will involve taking land in which the National Trust's interest has been declared inalienable. If the scheme progresses we wish to see Hartwell House and its grounds protected by the highest levels of visual and noise mitigation possible. This means a fully bored tunnel and we remained committed to working with the Department for Transport and HS2 Ltd in seeking a suitable solution to the impacts." (Response to the High Speed Two Ltd and Department for Transport Consultation, p.2)*

See also: http://www.nationaltrust.org.uk/article-1355841078618/:

> *"We also support the principle of a fully bored tunnel for the Chilterns Area of Outstanding Natural Beauty. This would provide significant additional protection for this nationally protected landscape and could benefit the views from Coombe Hill which we care for." ('Our HS2 petition goes to Parliament', NT press release, 23.5.14)*

Navitus Bay refusal: precedent for Stonehenge?



Dorset and East Devon Coast World Heritage Site

The refusal of the Navitus Bay Wind Park proposal last September may be an important precedent for the case of the Stonehenge short tunnel scheme.

Navitus Bay's application for a wind farm for just 25 years in the English Channel, off the coasts of Dorset and the Isle of Wight, was turned down in part for the impact it would have had on the setting of the Dorset and East Devon Coast World Heritage Site. The nearest wind turbine would have been some 14.7km out to sea. Objectors included the National Trust.

The Secretary of State's decision included a section on potential impacts on the World Heritage Site. Echoing Article 4 of the World Heritage Convention, the Decision Letter points out that

> *" . . . the offshore elements of the project would bring about changes in the way the World Heritage Site would be experienced or enjoyed in its surroundings and would have adverse implications for the Site's significance and its Outstanding Universal Value. . . there was a risk that the Site would be presented and transmitted to future generations in a form significantly different from what was there at the time of inscription until today."*

The Decision Letter further stated that

> *". . . there is limited scope to mitigate the impacts of the Development on the WHS and that, even with mitigation measures in place, the harm to setting, significance, and OUV of the Site carries significant weight against a decision to grant consent. . .*
>
> *"In conclusion, the Secretary of State considers that the development . . . though not damaging to the protected feature of the WHS, would adversely affect the use and enjoyment of that Site. This would have an adverse effect on the use and enjoyment of the Site irrespective of the fact that the effects are only temporary."*

The potential damage A303 widening would cause to the World Heritage Site at Stonehenge would be far greater than that of the wind park to the Jurassic Coast – and it would be permanent.

It is significant that Navitus Bay developers have since confirmed that they will not be seeking a Legal Challenge to the Secretary of State's decision. Let's hope that the example of Navitus Bay will encourage the National Trust and Historic England to reconsider their support for a short Stonehenge tunnel.

Save Stonehenge comes top of the Lush pots



Throughout the festive season Stonehenge Alliance's campaign is being promoted on the tops of popular Charity Pots by Lush cosmetics.

'Charity Pot' is a big-hearted hand and body cream that does a world of good! A **100%** of the purchase price (less taxes) is donated to the SLush fund that supports small, grass-roots organisations promoting environmental conservation, animal welfare and human rights.

The Stonehenge Alliance has been selected as one of a number of groups from around the world to benefit from this nifty way of raising awareness: in our case, of the threat of road building to the Stonehenge landscape. We have already benefited in the past year from the generosity of the Lush fund, enabling us to set up this website and carry out other campaigning activities.



The Hand and Body Lotion comes in three sizes. Ingredients are sustainably sourced using Fair Trade Colombian cocoa butter, Peruvian rosewood and Fair Trade olive oil.

We are delighted that Lush promotion has chosen to help us raise awareness of the threat of road building to the precious Stonehenge World Heritage landscape during Lush's busiest season. Thank you Lush for your partnership and for giving our petition a boost in the UK and abroad!