



17 February 2017

To whom it may concern,
Highways England consultation
re the A303 at Stonehenge

Dear Sir or Madam,

A303 Stonehenge public consultation

The Avebury Society was founded as a civic society in 1994. Its interests are those normally expected of a civic society and relate principally to the Avebury part of the WHS. We have around 100 members, most of whom live in or close to Avebury. We are represented on the Avebury WHS Steering Committee and the Avebury and Stonehenge Archaeological and Historical Research Group. We comment on planning applications and took part in consultations on the new (combined) WHS Management Plan.

Avebury Society members attended a useful presentation by Highways England's traffic consultants to Avebury Parish Council on 7 February 2017. The Society had submitted questions beforehand and it was a meeting attended by the public.

The consultants explained the projected proposal and the brief they were given which was not jointly prepared with the client. They were clearly conscientious road builders. In answering questions on archaeology and the protection of the World Heritage Site (WHS), it was explained that the brief on these aspects was provided by English Heritage (now Historic England) and the National Trust who had provided their conclusions to Government in 2014.

Examining what is known about this work undertaken by Historic England and the National Trust, it was clearly acceptable for Government but appeared to ignore or misunderstand ICOMOS guidance on Heritage Impact Assessment for WHS which reminds States Parties of their commitment under the World Heritage Convention and pays particular attention to consideration of the WHS as a whole. It reverted to standard ways of measuring benefits against disbenefits in their impact study: enhancement v damage. It also fell into previous errors of giving value to individual features, visible and unknown, without remembering that the WHS was designated as a whole and is considered to be a heritage asset of the highest significance – including the sometimes subtle historic landscape.

There are also concerns about the speed and limited nature of the archaeological evaluations undertaken in a WHS where it would be expected that more detailed and lengthy evaluation would be required, and that decisions on portal locations and a choice of route would have been based on consideration of already-known archaeology. We understand that yet more archaeological evaluation is to be undertaken. Information on which to make reliable decisions is still lacking and consultees have not been provided with any reports to assist on this matter.

We have heard, for example, that the National Trust and Historic England would like revisions to the positioning of the western portal: we would naturally like to think that this involves moving the portal and new road beyond the WHS and its setting.

Because the Government has chosen to deal with this project as a National Significant Infrastructure Project, outside the usual planning system and offering a single damaging option for the WHS, there is at present no opportunity significantly to change the current proposal which appears largely decided: this brings into question the whole issue of consultation on a pre-emptive decision and one apparently made on considerations of cost instead of environment and archaeology. We would like to see the project put on hold until such time as full information is made available and options that would not damage the WHS are fully explored and compared with the one currently offered. Consultation on what is essentially a fait accompli cannot be considered to be proper consultation.

It should be remembered that in the past, the designation of WHS and Government's ongoing responsibility were divorced from the planning system. This has largely been corrected by dint of hard work and perseverance over the last 25 years. All Wiltshire County Council planning policies and the WHS management plan are highly protective of the WHS. But Government has ignored these controls and policies and opted for a process without adequate democratic involvement.

We also find it difficult to understand why Government is not proposing a less damaging option for the WHS and, if necessary, seeking funding for it outside its own resources.

It is for these reasons we are completing the questionnaire with our views and will be sending copies of this letter to ICOMOS and UNESCO. We are most concerned about the irreparable damage the current, largely fixed, proposal would cause to the WHS and the serious implications the scheme has for Avebury. The WHS should be protected and transmitted to future generations in line with the Government's Convention undertaking.

Yours sincerely,

A black rectangular box redacting the signature of Michael Daley.

Michael Daley
Chairman, the Avebury Society