

THE STONEHENGE ALLIANCE

From The Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB
c/o Kate Fielden, Hon Secretary,

A303 Stonehenge Consultation Highways England.

Sent by email on 3 March 2017
to A303Stonehenge@highwaysengland.co.uk

Dear Sir or Madam,

The Stonehenge Alliance is a group of non-governmental organisations and individuals, formally constituted in 2001 to oppose the Government's scheme to widen the A303 Trunk road across the Stonehenge World Heritage Site (WHS), including a 2.1km tunnel close to the henge. Since then we have sought enhancements to the WHS and opposed developments that would cause it significant harm. Further information about the Alliance may be found on our website at www.stonehengealliance.org.uk/about-us/.

In this response to Highways England's consultation A303 proposals we have the following general points to make at this stage.

1. General points

1.1. We strongly disagree with the proposals for a 2.9km tunnel across the central part of the WHS and positioning of the west and east portals well within the WHS landscape. The scheme would be highly damaging to the WHS, its archaeology and a significant proportion of its attributes of outstanding universal value (OUV). Notwithstanding demands for 'affordability', we note a lack of understanding of OUV in the Technical Assessment Report (TAR) which has led, in our view, to invalid conclusions about damage to the WHS, its archaeology and setting. (Highways England's Q.1-3.)

1.2. The east tunnel portal would have a major adverse impact on the setting and quiet enjoyment of the Avenue, a key feature of the landscape. It would also further degrade the protected 'Nile Clumps' of trees. There is concern about damage to the Mesolithic site, Blick Mead. (Ref. Highways England Q.2)

1.3. The west portal would damage the integrity and setting of the Normanton Down barrow group. The highway emerging from the tunnel would compromise the spatial relationships between a group of Neolithic long barrows deliberately sited around the head of a dry valley in the western half of the WHS. This area is also of considerable importance for its upstanding and buried archaeology of the Bronze Age which may include fragile settlement remains of this and the Neolithic periods. (Highways England's Q.3.)

1.4. We also have serious concerns about the likely disturbance a new expressway nearby would cause to the RSPB breeding reserve for Stone Curlew (an Annex 1 protected species). No account appears to have been taken of the potential impacts on the bird reserve of new visitor patterns, if the A303 barrier to access is removed. (Highways England's Q.3.)

1.5. We have no views to offer at the present time on the Winterbourne Stoke bypass options, since they are integral to the proposed scheme that would damage the WHS. We do note, however, that both options have serious implications for archaeology (for which there is no information supplied), and for ecology and the water environment. (Highways England's Q.4)

1.6. In respect of proposals for A303 junctions with the A345 and A360, no detailed information has been provided on which to comment. It is evident that grade separated junctions would have a severely adverse impact on the setting and environment of the WHS and almost certainly on elements of its archaeology and on biodiversity and the water environment. (Highways England Q.4 and 5)

2. Comments arising under Highways England Q.7 ('Do you have any other comments?')

2.1. We deplore the lack of options for consideration that would not damage the WHS; and that insufficient comparative data is supplied against which to assess a long bored tunnel and 'do nothing' options.

2.2. We are concerned about archaeological information presumably obtained at the last minute and after the Technical Appraisal Report had been written; as well as the absence of archaeological information yet to be obtained and used properly to inform the Heritage Impact Assessment (HIA) and/or final route options. We have been verbally informed that the route across the western WHS shown in documentation provided is to be re-located: this is unsatisfactory as a basis for consultation.

2.3. The heritage impacts have been gauged using the Design Manual for Roads and Bridges assessment process instead of careful attention to the International Council for Monuments and Sites' (ICOMOS) *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* which advises that standard EIA is not appropriate for WHSs and which, unlike standard EIA, does not advise balancing of beneficial and adverse impacts on heritage assets and/or attributes of OUV. There is scant attention to the WHS as a whole – a heritage asset of the highest significance – and constant emphasis is given to that part of it within view of the henge, termed 'the most sensitive part of the WHS' – an approach rejected by all stakeholders and the Management Plan some years ago.

2.4. The scheme pays little attention to the Government's obligations under the World Heritage Convention, notably for protection of the whole WHS property; or to the demands of planning policy and guidance for WHS, which include protection of its setting as well as the WHS itself. The 'Vision' and 'Purpose' of the WHS Management Plan and a number of its priorities, aims and policies are disregarded. The importance of the 'landscape without parallel' has been overlooked in favour of standard landscape assessment.

3. In consideration of the benefits and disbenefits to the historic environment of the scheme:

3.1. The TAR, para.18.3.39 states that:

“Route Options D061 and D062 would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments”,

while para.18.3.37 advises:

“In terms of the historic environment as a whole (i.e. both within and outside the WHS), the route options would have an impact on the settings of many scheduled monuments within and around the WHS which would benefit from the removal of the existing A303. The construction of the new route would have adverse impacts on the setting of many other scheduled monuments and the fabric of one monument and numerous areas of non-designated archaeology, **this would result in a greater number of adverse effects than beneficial effects** [our emphasis]. Additionally, there would be adverse impacts on a number of listed buildings, a conservation area and a registered park and garden; resulting in adverse effects on these environmental resources.”

This could hardly be considered a beneficial outcome of the road widening scheme.

3.2. The TAR also states that ‘the route options would introduce major new infrastructure into the WHS adversely affecting important assets and key attributes of the site’s OUV, e.g. the location of the western portal relative to Normanton Down Barrow Group.’ We would also include the adverse impact of the eastern portal on the Avenue in this assessment.

3.3. The TAR, para. 18.3.38 underlines that:

“On the basis of WebTAG, the assessment would indicate that, in purely numerical terms, the adverse effects resulting from both D061 and D062 route options would outweigh the beneficial effects, with D062 overall having a slightly less adverse effect on heritage assets, particularly outside and to the west of the WHS.” It goes on to say:

“However, as set out in the NPSNN [National Policy Statement for National Networks] (2015), great weight must be given to the beneficial effect resulting from the changes to the WHS and also the beneficial impact on Stonehenge and The Avenue.”

We find no guidance within the NPSNN that would give rise to this suggestion. We also disagree with the simplistic and nonsensical suggestion in TAR para 18.3.39 that:

“In this context, a neutral score has been recorded for the historic environment, representing a balanced outcome between important beneficial impacts and a large number of adverse impacts on designated and non designated assets.”

3.4. Clearly, the scheme as a whole would result in serious disbenefits to the historic environment, notably of the WHS, that cannot be ignored.

4. Planning policy considerations

4.1. The priorities and purpose of the WHS Management Plan are only partially stated in the TAR, para. 4.4.7, as follows:

“The purpose of this Management Plan is to guide the care of the WHS in order to sustain its Outstanding Universal Value (OUV). The priority for the Management Plan is to encourage the sustainable management of the WHS, balancing its needs with those of the farming community, nature conservation, access, the landowners and the local community.”

The Management Plan actually states (p.11):

“Priorities for 2015–202. The primary purpose of this Management Plan is to guide all interested parties on the care and management of the World Heritage Site to sustain its Outstanding Universal Value. **This will ensure the effective protection, conservation and presentation of the World Heritage Site for present and future generations. It will also ensure that all decisions affecting the World Heritage Site move towards the achievement of the Vision.** [Our emphasis]

Priority 5 of the Management Plan is to “Ensure any development is consistent with the protection and, where appropriate, enhancement of the monuments and their settings and the wider WHS landscape and its setting.”

4.2. The wording of Key Policy 59 of the Wiltshire Core Strategy is incorrectly paraphrased in the TAR and Core Policy 6 (Stonehenge) is not mentioned. The opening wording of Core Policy 6 is:

“The World Heritage Site and its setting will be protected so as to sustain its Outstanding Universal Value in accordance with Core Policy 59.”

5. Transport considerations

5.1. Options

5.1.1. The primary purpose of the A303 scheme is to create an expressway. Traffic data has been presented which shows that the Annual Average Daily Flow figures for 2015 are lower by some 3,000 a day than they were than in 2003, when the previous A303 widening scheme was advanced, principally on heritage, not transport grounds.

5.1.2. On the basis of the information given, the case for dualling the A303 between Amesbury and Berwick Down has not been made.

5.1.3. It is misleading to state (TAR Executive Summary, p.1) that this section of road operates at twice its capacity when the Congestion Reference Flow for a normal two-way single carriageway road is around 22,000 to 23,000 Annual Average Daily Traffic (AADT), much the same as at present. A wide two-way single carriageway road has still more capacity.

5.1.4. The assessment of the current option fails to appraise the effects of wide area route reassignment.

5.1.5. The options considered have been prematurely discounted. The option of a 2.9km tunnel across the 5.4km World Heritage Site presented for consultation has been made after alternatives have been rejected on grounds that are arbitrary and opaque.

5. 2. Benefit Cost Ratio

The Benefit Cost Ratio is negative, and only becomes positive when notional WHS monetised benefits are added in. We believe the methodology is open to challenge. For instance, a modeller could derive a plausible Present Value of Benefits (PVB) of £2bn for the benefit to the WHS to 'pay for' doubling the length of the tunnel. Indeed it is acknowledged (TAR, para. 11.4.49) that there is a significant margin for error in the method used.

5.3. *Modelling*

5.3.1. The modelling presented is not fit for purpose. Moving to variable modelling at a later stage calls into question the credibility of any decisions made on the basis of fixed trip modelling on a highly constrained local network at this stage

5.3.2. It seems odd to base decisions on the expenditure of £1bn on a strategic trunk road on local effects (*cf.* TAR, para.10.4.10).

6. *Consultation process* (Q.7–9)

6.1. We believe the consultation process to be deeply flawed. The decision to proceed with a 2.9km tunnel was made by the Government in December 2014, apparently based largely on financial grounds, i.e. how much money it was prepared to spend on the road. No assessment appears to have been undertaken to allow an informed opinion as to why that particular budget was proposed or agreed. From that time until now there has been no public consultation on this option which is the only option before us and work is already in progress on achieving it.

6.2. Until the present consultation was announced at very short notice, ‘consultation’ appears to have been only with a few ‘stakeholders’ (TAR, p.13), including the National Trust whose land would not be physically affected. Apparently, local farmers, whose land might be affected, have not been involved in the pre-public consultation process.

6.3. Representatives from two Alliance supporter-organizations attended an Arup Atkins Joint Venture Traffic and Access Stakeholder Working Group on 18 September 2016. A second meeting to present the same information was attended by a Stonehenge Alliance representative the following day. Our representatives were told nothing about options being taken forward, making it impossible for useful discussion to take place. None of the ‘objectives’ of this stakeholder group as set out in the TAR (p.268), was even considered at that meeting, despite requests, notably for information on short-listed options.

6.4 The consultation is premature in all of the above respects. Not only has there been no meaningful dialogue between important stakeholders and Highways England, we are now presented with inadequate information on major issues, such as archaeology, biodiversity and landscape, to assess the decision process that Highways England has so far undertaken.

6.5. The consultation events held by Highways England were limited in area. Seven weeks of consultation is clearly inadequate for a scheme affecting such an internationally important site. In our opinion nothing short of a 12 week consultation with national and international publicity, to draw people’s attention to the scheme, is satisfactory. We have, for example, over 26,000 signatories to our petitions, at least 10% of whom are signatories from abroad.

6.6. It is a major flaw in this ‘consultation’ that there were effectively no options on the table, apart from a choice of bypass route for Winterbourne Stoke. In terms of the key impact of the proposals on the World Heritage Site, there is little difference between them. This consultation

is little more than a marketing exercise for a broadly predetermined scheme rather than following proper public consultation principles of involvement.

Consequently, it is our view that the scheme process should be halted until such time as a full range of options and key data are made available. Options that would do no further damage to the WHS need to be brought forward – even if their costs are more than have been currently allocated for this section of the A303.

7. Value for money considerations

The scheme as proposed offers poor or uncertain outcomes in most respects.

We have the following observations arising from TAR statements concerning Corridor D:

- No data – only perceptions or aspirations – have been provided on the need for road widening to promote economic activity and house building in the South West.
- Journey time saving as a result of road widening is negligible.
- Rat running could be dealt with without road widening.
- Road widening induces more traffic. Measures to relieve local congestion should be tried before embarking on a project that would be expensive, damaging to the WHS and ineffective within a few years.
- There would be large adverse effects on biodiversity and the water environment (TAR, p.14).
- Benefit to the historic environment overall would be adverse. (TAR 18.3.37), and within the WHS slight adverse overall (TAR, p.129)
- Correctly assessed under ICOMOS’ criteria, we believe there would be large adverse effects on the WHS that could not be offset by benefits to the central part of the WHS.
- “In terms of landscape both D061 and D062 would have a Moderate Adverse effect.” (TAR, p.13)
- “In terms of greenhouse gases all options would result in an increase in user carbon”. (TAR, p.13)
- Under willingness to pay assessment, a high response was shown to the suggestion of removing the A303 from the vicinity of the henge. No score was sought for removal of the A303 from the WHS.
- “Corridor D offered lower value for money, primarily due to the high cost of a tunnel.” (TAR, p.99).
- Overall the scheme is considered medium value for money. (TAR, p.12).
- Details given of the assessment against EAST (early assessment and sifting tool) cases: show **poor financial case and neutral for the commercial case** for Corridor D [our emphasis].

In conclusion

We believe that the current proposals are not fit for purpose, do not represent a genuine choice of options in respect of the WHS and that the consultation is inadequate and therefore flawed and it should be rerun. The current budget allocated to this section of the A303 significantly understates the economic and heritage value of this unique World Heritage Site and this should be taken into consideration.

Yours faithfully,

George McDonic, MBE
Chairman, the Stonehenge Alliance

THE STONEHENGE ALLIANCE IS SUPPORTED BY:
Ancient Sacred Landscape Network; Campaign for Better Transport;
Campaign to Protect Rural England; Friends of the Earth; and
RESCUE: The British Archaeological Trust