

THE STONEHENGE ALLIANCE

From The Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB

The Rt. Hon. John Hayes, CBE, MP,
Minister of State for Transport,
Great Minster House,
33 Horseferry Road, London SW1P 4DR.

Sent by email on 9 January 2017

Dear John,

Stonehenge World Heritage Site (WHS) and the A303

Thank you for your letter of 12 December 2016 which was acknowledged by Dr Fielden who also forwarded to you copies of our recent correspondence with the DCMS and Highways England. I am delighted that you are fully aware of the significance of and need to protect the WHS.

A number of the points raised in your letter were addressed in my letters to Secretary of State Karen Bradley and Project Manager Andrew Alcorn of Highways England. In response to the issues you raise, I should tell you that the Alliance:

- i. sees, among the many recommendations of the World Heritage Centre/ICOMOS Advisory Mission, none advising pursuit of an 'at least 2.9km' tunnel for the A303;
- ii. does not consider completion of an assessment of impacts on Outstanding Universal Value (OUV) reconciles the Government's obligations under the World Heritage Convention to protect, conserve and present the WHS *property* and transmit it to future generations, unless the *outcome* of that assessment meets those obligations;
- iii. recalls that A303 widening at Stonehenge brought to Public Inquiry in 2004 was 'an exceptional environmental scheme' to improve the setting of the Stones and would not have been brought forward solely on road transport grounds. AADF figures here were lower in 2015 than in 2004 and we have better understanding and stronger policies for protection of the whole WHS landscape for its OUV to mankind; and
- iv. notes that congestion maps provided on the Internet by Google show worse daily congestion elsewhere in the South West than that occurring at Stonehenge, with daily commuters to work impacted as opposed to journeys for holiday-makers. We think this highlights the need for traffic movement figures and analyses throughout the region and over a considerable period to see whether road widening at Stonehenge at this time may be justified in terms of necessity and public finance.

Despite your own welcome assurance of the need to protect the WHS, the Government's intentions remain unconvincing in view of its support for a 2.9km tunnel. The NNNPS underlines (para.5.131), as does the NPPF (para. 132), that WHS sites are heritage assets of the *highest significance* and that substantial harm to them should be 'wholly exceptional'.

It appears to us that ICOMOS' *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* has been misunderstood by your advisers. The Guidance recommends assessment of impacts on WHSs which are of OUV and on heritage assets or attributes that are

the reason for that OUV. It does not advise the balancing of adverse and beneficial impacts on attributes of OUV – the exercise apparently undertaken in arriving at a short tunnel plan for the A303; rather, it says that in certain circumstances it may be necessary to balance the adverse impacts of development against potential public benefit (*see* paras. 5-13 and 6-2). It also advises consideration of development options that would not damage the property (para. 6-3).

We hope that the Government has come to realize that a road tunnel for the A303 within the boundaries of the WHS – or indeed any other road widening option that impinges on the WHS and/or its setting – would not meet its World Heritage Convention obligations. We trust that alternatives are now being considered that would honour those obligations.

I would be grateful if you should, please, advise me on the following questions.

- i) Will Highways England, in its consultation on options for the A303 at Stonehenge, provide data on the ‘lower levels of economic performance’ in the South West as compared with the wider region and the rest of the UK, at the same time bearing in mind the positive benefits of regional diversity and the widely understood character of the South West as a holiday destination that has long been understood to be especially valued for the low impact of this tourism on its environment and heritage?
- ii) Will forthcoming consultations with the Advisory Mission and the general public on the future of the A303 include viable options that would not damage the WHS at all?
- iii) Will Highways England produce, for the forthcoming public consultation on options:
 - a) detailed A303 traffic flow data over the past 20 years;
 - b) full details of impacts over the same period of north-south traffic flows joining and crossing the A303 in the Amesbury to Berwick Down area; and
 - c) realistic forecasts of the potential impacts of traffic induced on to the A303 over time, should the road be widened?
- iv) Has Highways England been asked to consider immediate implementation of cheaper and simpler solutions to part-time A303 traffic congestion and rat running in the WHS area, partly to assess whether road widening is necessary at the present time?

I look forward to hearing from you and would like you to know that representatives of our supporter organisations would be glad to meet you to discuss our concerns should you feel that might be helpful

Yours sincerely,

George McDonic, 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
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