

THE STONEHENGE ALLIANCE
Chairman, George McDonic, MBE, BL, DIPLTP, FRTPI, DPA, FFB

From Kate Fielden, Hon. Secretary

18 September 2019

Your ref. ENV.E.3/JLL/em/CHAP(2019)00169

Paul Speight, Esq.,
Head of Unit – DG ENV E.3 – Environmental Enforcement,
Directorate-General Environment,
BU9 – 02/184 European Commission,
B-1049 Brussels.

Dear Mr Speight,

CHAP (2019) 00169 complaint concerning proposed development of A303 Amesbury to Berwick Down road scheme across the Stonehenge World Heritage Site

Further to my email to you of 3 September, thanking you for your letter to me of the same date, I have been asked to send the following response.

The formal Examination of the A303 Stonehenge scheme finishes on 2 October 2019. There will then be a period of three months during which the Examining Authority will make its report and recommendation to the Secretary of State for Transport. He or she will make a decision on the scheme within the following three months, i.e., by April 2020 at the latest.

The special, fast-track process adopted by the UK Government for examination of a Significant Infrastructure Project has seriously limited the opportunity for us to put our views and test the evidence before the Examining Authority. It is clear to us that the provisions of EU Directives are not necessarily fully respected by the Applicant, Highways England, a company owned by the Government's Department for Transport. Those examining the scheme at a national level may, possibly, have a similar approach, especially under the current political climate. For example, no Strategic Environmental Assessment has been undertaken despite the requirement for one before the Scheme was progressed to application stage: this would appear to be a breach of EU regulations regardless of any scheme decision by the Government and we hope therefore that this issue in particular will be followed up by the Commission.

UNESCO's World Heritage Committee advised the UK Government in July 2019 not to proceed with the Scheme in its current form owing to the adverse impact it would have on the outstanding universal value of the WHS.

On behalf of the Stonehenge Alliance, I would like to ask you, please, if the Commission would consider keeping our Complaint open pending any final recommendation by the Examining Authority and decision by the UK Government. This might be considered a precautionary ‘watching brief’, in view of the significance of the A303 project in terms of the environmental and globally important cultural heritage significance of the Stonehenge World Heritage Site and its extensive ecological and archaeological interests. It might also save any unnecessary duplication of our Complaint should the Scheme be approved.

We very much hope that the Commission will consider our request favourably.

Yours sincerely,

Kate Fielden
Hon Secretary to the Stonehenge Alliance