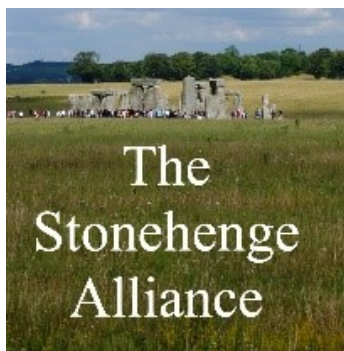


## Statement by the Stonehenge Alliance, 12 November 2020



- The Stonehenge Alliance deeply regrets [the decision by the Transport Secretary, Grant Shapps](#) to give permission for the A303 Stonehenge Tunnel scheme on 12th November.
- The decision by Transport Secretary Grant Shapps to drive a chasm through Stonehenge World Heritage Site will send shock waves around the world, not least because the independent Examining Authority recommended it be refused permission. The decision goes [against the advice of UNESCO's World Heritage Committee](#), it will undermine the UK's legal commitment to address Climate Change and is contrary to the advice of many experienced archaeologists.
- A claim for judicial review is statutorily permitted and must be made to the High Court during the period of 6 weeks beginning with the day after the day on which the statement of reasons (decision letter) is published.
- The Alliance is taking legal advice and will carefully consider its next steps.

See also our [summary of case based on 11 issues of concern which was submitted to the Planning Inspectorate on 25 September 2019](#).

### 1. Introduction

The A303 Stonehenge Scheme Examination has been undertaken and the Examining Authority's Report was submitted to the Secretary of State for Transport on 2 January 2020. His decision on the Scheme has been twice delayed until 17 July and 13 November, the latter due to the [major find at Durrington Walls](#). The decision by the Transport Secretary is now awaited by or on 13 November.

The Scheme would upgrade the A303 to Expressway standard with a short c.3km tunnel with twin portals in deep dual-carriageway cuttings, all within the World Heritage Site (WHS), and two grade separated junctions on its boundaries. [See images of Highways England's proposal](#). [2]

The Chancellor indicated in his Budget speech on 11 March 2020 that Her Majesty's Government continues to support the scheme.

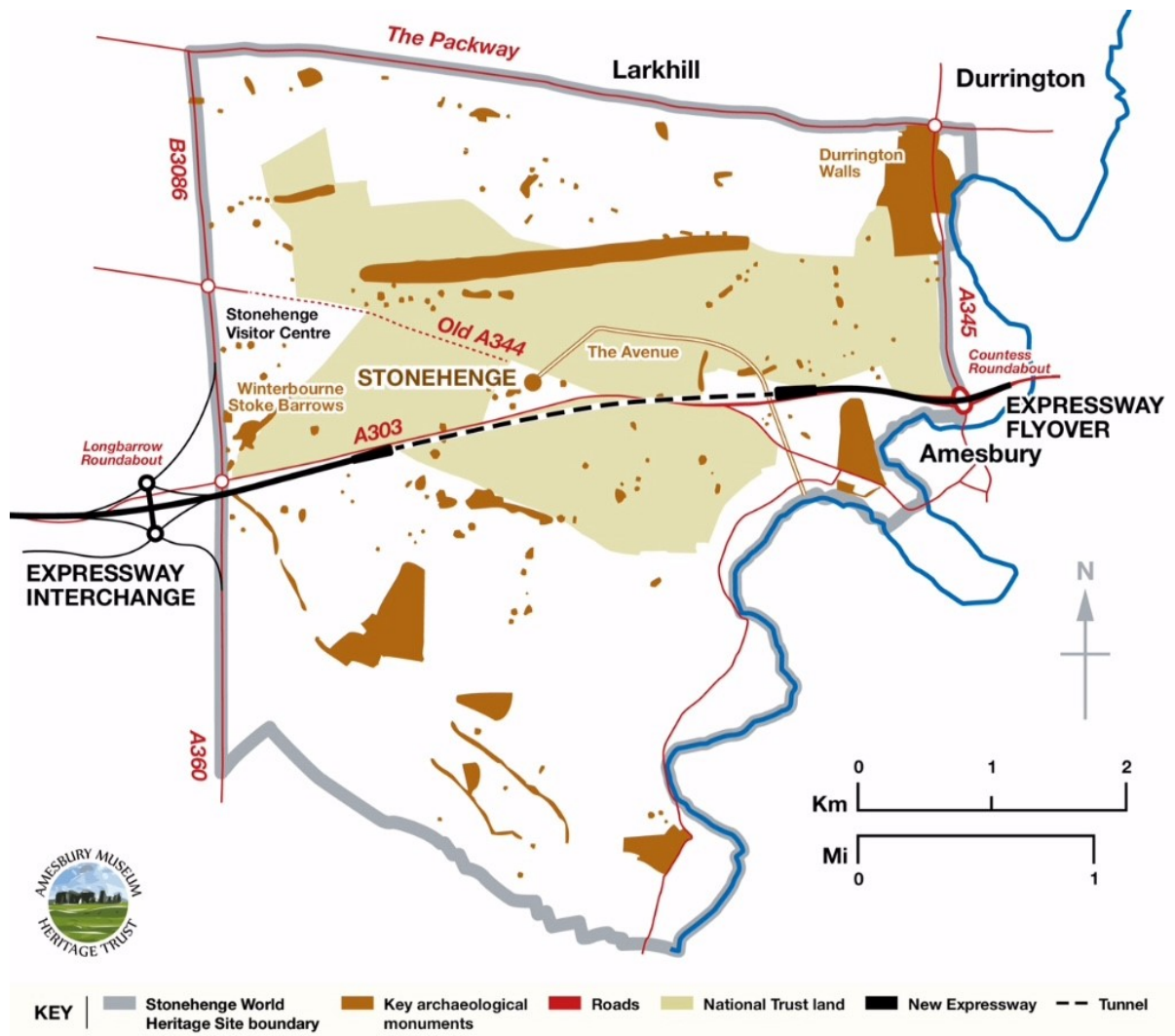
### 2. HMG's position

HMG is a signatory to the 1972 [World Heritage Convention](#) [3] and thus committed to protecting the whole World Heritage Site (WHS). Article 4 of the Convention reads:

*"Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory [i.e., its designated World Heritage Sites], belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain."*

- A World Heritage Site is designated for its outstanding universal value to mankind.

- The World Heritage Convention applies to the whole WHS.
- Protecting a WHS also protects its outstanding universal value: the two are inseparable.
- Government planning policy demands protection of a WHS *and its setting*.



### 3. UNESCO's position

HMG has invited three joint UNESCO World Heritage Centre/International Council on Monuments and Sites (ICOMOS) specialist missions (in 2015, 2017 and 2018) to see and advise on the A303 Stonehenge proposals. The [2018 Advisory Mission's report](#) [4] recommends exploration of bypass and longer tunnel options, saying the road scheme "should not proceed in its current form". UNESCO's World Heritage Committee Decisions in 2018 and 2019 [5] reiterate that advice.

Ignoring UNESCO's advice could lead to loss of World Heritage status: international disgrace.

#### 4. Archaeological damage that would arise from the A303 scheme

- Around 26 sq. km (10 sq. miles) at Stonehenge, together with a similar area at Avebury, was designated a WHS in 1986 for its remarkable Neolithic and Bronze Age remains. These *designed* landscapes, with interrelated monuments and sites, include avenues and other features linked to the topography and water. Deep dual-carriageway cuttings and tunnel entrances would destroy archaeology and the integrity of the WHS.
- The A303 Preferred Route is strongly [objected to by 22 archaeologists](#), [6] leading specialists in the archaeology of the WHS. Their views were reiterated at the Examination of the Scheme.
- The integrity of the famous Blick Mead Mesolithic site, beside and possibly under the present A303, would be severely compromised by a massive flyover.

#### 5. Consultation

***The non-statutory consultation (2017)*** on route options was deeply flawed in offering a short (2.9km) tunnel under only part of the WHS, with bypass options to the west for Winterbourne Stoke village, i.e., a single option for the WHS, damaging to both the Site and its setting.

- Lack of information on options discarded by Highways England (including a WHS bypass), precluded informed judgement and comparison with the option chosen.
- The scheme was mainly advertised and exhibited locally by Highways England. Only one exhibition was held outside Wiltshire, at the Society of Antiquaries in London.
- Seventy-seven per cent of c.9,000 respondees to this consultation objected to the short tunnel within the WHS, irrespective of the Winterbourne Stoke bypass options.

***The 2018 Statutory (February–April) and supplementary (July–August) consultations*** on the Preferred Route were similarly highly unsatisfactory.

- Exhibitions and publicity were largely restricted to local media and venues, with a single afternoon exhibition outside Wiltshire at the Society of Antiquaries in London.
- Information was (and still is) lacking in key areas, such as archaeology, the natural environment and hydrogeology, making fully informed judgements impossible.
- Misinformation in scheme documentation and media statements by scheme promoters continued and gave the impression that the WHS and its OUV would be protected.
- Outright objections to the scheme, including those made via Stonehenge Alliance and Friends of the Earth websites (reaching a wider group, including people from abroad) have substantially increased since the first consultation.

#### 6. Cost and value for money

- Capital cost was set by HMG in September 2017 at an upper limit of £1.6bn. (Estimated cost was £1.3bn in December 2014). Annual tunnel maintenance costs would be c.£7m. The cost has now risen to around £2bn.

- The Scheme is to be paid for by the Public Purse. May 2019 National Audit Office and July 2019 Public Accounts Committee reports [7] have cast serious doubts on the Scheme's value for money.
- Economic assessment conclusions in the September 2017 [Scheme Assessment Report](#) [8] include:

*"10.5.12. Based on those impacts that can be quantified, the Scheme is likely to lie within the low-medium value for money category of schemes."*

*"10.7.1. A conventional approach to appraisal, which focuses on the traffic related benefits delivered to users of the road network, would suggest that the scheme has low value for money. However, this fails to capture the full range of benefits of the scheme and doesn't include the value of removing the current road from Stonehenge WHS which is a key benefit of the new scheme."*

Important note: the scheme would not remove the road from the WHS.

- The [Whitehall Monitor 2018](#) [9] (Fig. 6.5 et seq.) gives a red delivery confidence rating for the A303 Stonehenge scheme in 2017: i.e., successful delivery appears to be unachievable.

## 7. Who stands to gain? (supporters of the Government's scheme)

- **Historic England** answers to the DCMS and is governed by the Historic England Commission which has overall responsibility for English Heritage Trust's collections. Historic England Commissioners are among the Trustees of English Heritage Trust of which Historic England is the sole member.
- **English Heritage Trust**, manager of Stonehenge visitor-centre, is likely to follow HMG's lead. The Trust would benefit from an enhanced setting to the henge and an increase in paying visitors, since motorists' view of the Stones from the A303 would be lost.
- **The National Trust** owns land around Stonehenge from which the A303 would be removed into a tunnel. The Trust might also gain financially if it were to develop its own visitor-centre and charge to see the view of the Stones from the road lost to motorists in future. ***The support of the NT for the scheme is instrumental.***
- **Local people** hope to be rid of traffic congestion and rat-running. Any traffic flow improvement would be temporary, since road widening is known to induce more traffic: see, e.g., a [2017 CPRE publication](#) [10] which also demonstrates that widened roads rarely bring hoped-for economic benefits and increased housing to a region. Congestion is a national problem and Stonehenge is but one of numerous bottlenecks. Congestion maps reveal lengthier and more frequent congestion in other parts of the country.

## 8. Who stands to lose from the scheme?

- **Present and future generations**, who, under the terms of the WH Convention, are promised permanent protection of the WHS

- **The many millions of A303 travellers**, who value the view of the Stones from the road
- **Those who would like to see the henge in future** and would (mostly) be obliged to pay
- **Our nation**, whose pride in and understanding of an iconic and fundamental part of its heritage would be irretrievably lost. *Note:* October 2018 was the centenary of the gift of Stonehenge to the nation by Sir Cecil Chubb.
- **Those concerned about the wildlife of the WHS**, including the Great Bustard Group, and the RSPB whose WHS bird sanctuary hosts protected Stone Curlews.
- **Our Government**, whose Convention promise would be broken and, being responsible for an incalculable loss to the world, would be subject to international censure.

## 9. Climate change implications

- Other events have arisen since completion of the Scheme Examination, to some of which we have already drawn the Transport Secretary's attention.
- On 27 February 2020 a judgement against a 3rd runway at Heathrow was won by climate change campaigners, in part based on HMG's commitment to net-zero carbon emissions by 2050. This has implications for new road building and a challenge has now been brought by the Transport Action Network against HMG for its next Road Investment Strategy (RIS2), which includes the A303 Stonehenge Scheme.
- Government advisers, such as the [Office of Rail and Road](#), suggest that the roads investment strategy should be re-examined. The Committee on Climate Change, in its June 2020 [Report](#) said that, in terms of net zero carbon emissions, "*we are not making adequate progress in preparing for climate change*"; and that "*Overall, the Committee recommends that investments in low-carbon and climate adaptation infrastructure must be at the heart of measures to restore economic growth following COVID-19.*" The report places emphasis on home working, stating that "*higher investment in resilient digital technology including 5G and fibre broadband should therefore be prioritised over strengthening the roads network.*"

## 10. What should be done?

- Place the A303 Stonehenge scheme on hold. Seek alternative options not damaging to the WHS, as advised by UNESCO and the large majority of consultation respondees.
- The climate emergency declared by the Government and its commitment to net zero carbon emissions by 2050 will be accompanied by substantial changes predicted in car journeys and use over the next 10-20 years. Implementing interim traffic management measures at Stonehenge should therefore be considered.
- Road widening might not be necessary within 50 years – a small fraction of the period of human use of the WHS.
- Find better ways of spending £2bn. In terms of transport alone, the South West would benefit from a rail investment programme such as that outlined by the [Peninsula Rail Task Force](#) [11], whilst smart measures to discourage road use at busy times, improve traffic flow and prevent rat running could be implemented straight

away at relatively little cost provided the local Highway Authority (Wiltshire Council) and Highways England were properly resourced to work together.

- The South West would also benefit from improved bus provision: this is an area where connectivity, especially for rural communities, is lacking. Urgent road repairs are also needed now.
- HMG should introduce statutory protection for UK World Heritage Sites, so that these highly-regarded places receive the safeguarding they need if they are to survive intact. This would not mean that no development should be allowed but that new development should not damage a WH Site's intrinsic qualities and integrity.

## NOTES AND REFERENCES

1. The Stonehenge Alliance is supported by: Ancient Sacred Landscape Network, Campaign for Better Transport, Campaign to Protect Rural England, Friends of the Earth, RESCUE: The British Archaeological Trust and many individuals in the UK and abroad. <http://stonehengealliance.org.uk/>
2. For Highways England's images of A303 Preferred Route, see <http://stonehengealliance.org.uk/a303-stonehenge-scheme-images/>.
3. *Convention Concerning the Protection of the World Cultural and Natural Heritage*, UNESCO, 1972. <https://whc.unesco.org/archive/convention-en.pdf>
4. *Final Report on the joint World Heritage Centre / ICOMOS Advisory mission to Stonehenge, Avebury and Associated Sites 5 – 7 March 2018*, UNESCO World Heritage Centre and ICOMOS, June 2018. <https://whc.unesco.org/en/documents/168265/>
5. Decision: 42 COM 7B.32: Stonehenge, Avebury and Associated Sites (United Kingdom of Great Britain and Northern Ireland), UNESCO World Heritage Centre, 2018. <https://whc.unesco.org/en/decisions/7261/>; and 2019: <https://whc.unesco.org/en/decisions/7543>
6. "A303 Stonehenge consultation feedback from a consortium of Stonehenge experts". Response to Preferred Route consultation, 23 April 2018. <http://stonehengealliance.org.uk/wp-content/uploads/2018/06/Consultation-letter-from-Stonehenge-archaeologists-23-April-2018.pdf>
7. National Audit Office Report "Improving the A303 between Amesbury and Berwick Down" (May 2019): <https://www.nao.org.uk/wp-content/uploads/2019/05/Improving-the-A303-between-Amesbury-and-Berwick-Down.pdf>; and Public Accounts Committee Report "Transport Infrastructure in the South West" (July 2019) <https://publications.parliament.uk/pa/cm201719/cmselect/cmpublic/1753/175302.htm>
8. Highways England, *A303 Stonehenge Amesbury to Berwick Down Scheme Assessment Report*, Vol. 1, September 2017. <https://highwaysengland.citizenspace.com/cip/a303-stonehenge/results/sar-volume-1.pdf>
9. Institute for Government, *Whitehall Monitor 2018: "Delivering Major Projects"*, Fig.6.5 and following text. <https://www.instituteforgovernment.org.uk/publication/whitehall-monitor-2018/delivering-major-projects>

10. Campaign to Protect Rural England, *The end of the road? Challenging the road-building consensus*, March 2017.  
<https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>
11. Peninsular Rail Task Force, *Closing the gap The South West Peninsula strategic rail blueprint*, November 2016. <https://peninsularailtaskforce.files.wordpress.com/2016/11/prtf-closing-the-gap.pdf>