

A303 STONEHENGE DCO APPLICATION

Written Representation from the AVEBURY SOCIETY

REF. NO: 2001889

I am Ewart Holmes, Chairman of the Avebury Society and am responsible for drafting this representation. I am a retired architect and town planner. I have experience in private practice; new town and local authority work; the production of Structure and Local Plans; design; development; and the conservation of buildings, townscapes and the countryside. I have lived in Avebury for many years.

The Examining Authority will, we trust, have read our Relevant Representation which is attached as an appendix for convenient reference. We note that the Panel has no further questions arising from the Society's earlier submission. This could mean that our text is very clear, or that we have missed making important points. We therefore wish to reinforce two issues relating to potential impacts on Avebury arising from the A303 Scheme which should, in our view, be of continuing interest to the Examination.

A site visit is suggested

We would also like to suggest that the Panel visits Avebury on a busy day in summer, perhaps at the summer solstice, to see something of the other half of the World Heritage Site: the impacts of large numbers of visitors on the village which is located partly within the henge, parking in the village outside the dedicated NT car park, and serious erosion of the henge from visitors' footfall.

1. Increase in visitor numbers

According to the National Trust, Avebury currently attracts between 300,000 and 350,000 visitors each year. This number is expected to increase as tourism intensifies, stimulated by Wiltshire Council's Great West Way project and other initiatives, and as a result of successful attempts by the National Trust to attract more visitors. At peak periods, of which there seem to be more and more, the site is saturated or nearly so. The proposed works to the A303 seem likely to add to the pressures on Avebury by deflecting visitors from Stonehenge to the northern part of the World Heritage Site. In feedback from visitors to Avebury we hear that those who have also visited Stonehenge have found that experience less satisfactory than walking amongst the stones in the Avebury Circle. This may be because, unlike Stonehenge, it is an open access site, offers a range of attractions other than the stone circle (for example, Avebury Manor), and is free although vehicles using the National Trust car park pay a charge, which some find sufficiently significant to be encouraged to find parking illicitly wherever they can (such as on the B4003 alongside the Avenue).

Removal of the much valued sight of the Stones from the A303 would inevitably persuade more visitors to Avebury where only the parking is charged for and I know that Avebury Parish Council has written to you on this point. We had direct experience of this in the 1980s when the Stonehenge free festival was stopped and large numbers of festival-goers came to Avebury, creating chaos on the roads and other problems, including camping (plus damage to the fabric of the monuments such as the henge, Silbury Hill and West Kennet Long Barrow), and the inevitable quantities of litter. At Avebury the visitors now run some risk in twice crossing the busy commuter route between Swindon and Devizes to visit the four quadrants of the ring.

This increased footfall also creates problems for the management of erosion of the henge which has led to some intrusive repairs to pedestrian routes, digging into the monument instead of the use of

lightweight structures placed on the surface, and not following best practice as advised by Historic England (Advice Note 2: *Making Changes to Heritage Assets*, 2016).

Whilst the Stonehenge project in any form would cost millions, some of its 'legacy' funding ought to be extended to Avebury to enhance and secure the visitor experience in this portion of the World Heritage Site and we do not believe that this is intended at present. This would be most welcome due to the limited funds available to Wiltshire County Council and the National Trust.

2. Impact on the World Heritage Site and the need for its conservation

Our second point is that the evaluation of the project by Highways England shows low to poor value for money whilst justification being offered for the project is an increase in benefit to the cultural heritage. This evaluation is more than surprising bearing in mind the 'assault' on the WHS by the intrusions of the short tunnel and the impact of the tunnel portals and cuttings. We think this methodology must be called into serious question, which ignores advice given for evaluation in World Heritage Sites, especially cultural impacts, from the World Heritage Convention to planning policy and the Management Plan for the Site. We raise this again because should Highways England or any other potential developer generate proposals for Avebury in the future based on the same assumptions, this could be very detrimental to our half of the WHS.

We should add that the scant regard given to the views of UNESCO and those of world-renowned archeologists is not a good portent for our cultural heritage: at Stonehenge or nationally.

We note, finally, that not only is there continuing lack of information on many subjects for proper assessment of the application but also a very marked lack of engagement in the application documents for the potential impacts at Avebury if the Scheme should go ahead.

Appendix: Relevant Representation of the Avebury Society

The Avebury Society, founded as a civic society in 1994, with interests in the Avebury part of the World Heritage Site (WHS), now has c.60 members. A series of inappropriate Avebury planning proposals in the 1990s brought enhanced significance to the WHS designation. This led to our participation in an Avebury Local Plan and successive WHS management plans. We are represented on the Avebury WHS Steering Committee.

We have the following objections.

1. Little consideration has been given to Avebury in relation to the A303 Stonehenge scheme which has major implications for the whole WHS. What happens to one part of the WHS sets a precedent for the other, in terms of planning safeguards and tourism including, at Avebury, potential influx of more visitors, along with problems with parking, facilities and erosion. Comprehensive studies to consider these effects should have been a pre-requisite of the scheme.
2. A c.3km tunnel was announced from the start and other viable options were not consulted upon, whereas a conference of all interested parties in 1995 agreed that a 4.5km tunnel could be an appropriate solution.
3. Promotion of the scheme involved misleading statements, e.g., that it would "protect" and "help conserve and enhance" the WHS.
4. Public consultation took place in South Wiltshire with only two exhibitions/presentations in the Avebury area at the request of the Parish Council. Our positive suggestions produced no changes. The scheme, for a WHS, should have been more widely consulted upon. Even

so, it appears those responding to consultations have largely objected (78% in the first round) and their concerns have been ignored.

5. Highways England has ignored the advice of UNESCO's World Heritage Centre and ICOMOS specialists to honour the UK's World Heritage Convention commitments, as well as their advice, and that of the World Heritage Committee, to explore options not damaging to the WHS and its OUV.

6. The scheme does not respect local or national planning policy and guidance; nor relevant European Directives and Conventions. The World Heritage Convention and the relevant WHS Management Plan vision, together with their safeguarding of the WHS have been ignored.

7. Impact Assessment conclusions do not acknowledge the substantial harm of physical and visual impacts of the scheme on the WHS as a whole, its OUV, and its setting. This is a continuing failure, despite more recent understanding of OUV.

8. We question the statement that the existing A303 damages the OUV of the WHS; and consider that the loss of the much appreciated 'free view' from the road would be a seriously adverse outcome of the scheme.

9. The A303 scheme in construction and operation would be so damaging to the WHS that the designation might be withdrawn and the years of planning and involvement of all concerned parties in the Site's protection would have been wasted, with adverse impacts on both parts of the WHS.

10. The proposals for Stonehenge are most likely to be detrimental to Avebury.