AVEBURY PARISH COUNCIL

WRITTEN REPRESENTATION: A303 EXPRESSWAY AT STONEHENGE

- Avebury Parish Council (APC) represents parishioners living in a village located in the northern part of the World Heritage Site (WHS) of whose southern part Stonehenge is the dominating feature. The various sites at and close to Avebury are open-access and currently attract some 350,000 visitors each year. These visitors generate significant income for local businesses, few in number though they are. WHS status is fundamental to Avebury's attraction. APC is acutely aware that aspects of Highways England's proposal could imperil that status. This Written Representation expresses that concern and follows APC's response last year to the consultation then being conducted by Highways England.
- 2. In responding, APC's Chairman wrote on 20 April 2018 to the Secretary of State for Transport in the following terms:

"Avebury Parish Council is concerned about impacts on the Avebury half of the Stonehenge and Avebury World Heritage Site of the proposed A303 Expressway scheme. We note that the recommendations of the UNESCO's second Advisory Mission of 6 July have not been incorporated in the preferred route announced by the Secretary of State on 12 September 2017. We urge all concerned to ensure that all ICOMOS/UNESCO recommendations are met so that World Heritage status for Avebury is neither withdrawn nor the Site is put on 'Sites in Danger' list."

3. In a reply sent on behalf of the Secretary of State, Highways England's Project Director A3030 Stonehenge, Derek Parody, said that APC should:

"Be assured that we're continuing to work with UNESCO/ICOMOS to develop and deliver this scheme that will benefit Stonehenge and the entire South-West. The purpose of building a tunnel is to bring benefits to the Stonehenge landscape, and we will continue to seek

UNESCO/ICOMOS's endorsement for the proposal we develop." Whilst we may or may not share Mr Parody's opinions about the alleged benefits of Highways England's scheme, we were relieved to read that Highways England is working with UNESCO/ICOMOS.

4. Accordingly we were surprised and disappointed to learn that UNESCO/ICOMOS does not endorse the current version of Highways England's scheme. We understand that Highways England and others on behalf of the UK government hosted an expert delegation from UNESCO/ICOMOS on a three-day visit in 2018.

The first recommendation mentioned in the report of this visit states clearly that the proposed scheme "should not proceed in its current form."¹ Whilst some improvements in recent revisions to Highways England's proposals are recognized and welcomed, the report makes a number of highly critical observations. These suggest that Highways England is a long way from achieving the endorsement from UNESCO/ICOMOS hoped for by Mr Parody in his reply to APC's letter of April 2018. Indeed it is hard to avoid the thought that the site's WHS status is in peril if Highways England's scheme is not revised fundamentally and if the revision is not fully aligned with advice from UNESCO/ICOMOS. It would be a serious blow to Avebury if the WHS lost that status or was put on UNESCO's 'Sites in Danger' list.

- 5. To this point we add a second. If Highways England proceeds with its proposal, there will inevitably be adverse consequences for those visiting Stonehenge, certainly for the duration of the works and probably thereafter. APC believes that in consequence a significant number of would-be Stonehenge visitors are likely to be deflected north to Avebury. The main site at Avebury is already saturated or nearly so, especially at peak periods. The safety of visitors crossing the increasingly busy A4361 bisecting the village cannot be guaranteed. Cars are often parked illicitly on verges and elsewhere, risking damage to buried archaeology.
- 6. APC believes that there is a very strong case for so-called legacy funding from Highways England for the northern part of the WHS. The funding would be used to implement the Avebury WHS Transport Strategy, which was endorsed by all relevant stakeholders in 2015.² The implementation outcome would be improved perceived and actual road safety for vulnerable road users and others in and around the WHS at Avebury.
- 7. In summary, therefore, APC requests that, if a proposal from Highways England on the A303 at Stonehenge is further progressed:
 - Renewed effort is made, in particular by responding fully and positively to UNESCO/ICOMOS guidance, to preserve the site's WHS status, recognising that that status is or should be paramount amongst all other considerations
 - II. Legacy funding from Highways England is made available to implement the Avebury WHS Transport Strategy, thereby improving road safety.

Stephen Stacey

Chairman, Avebury Parish Council

2 May 2019

¹ Final Report of the joint World Heritage Centre/ICOMOS Advisory mission to Stonehenge, Avebury and Associated Sites (c.373bis), 5-7 March 2019 available at https://whc.unesco.org/en/documents/168265/ ² See http://www.stonehengeandavebury.whs.org/avebury.whs-transport-strategy/