

From: [Susan Denyer](#)
To: [A303 Stonehenge](#)
Subject: RE: A303 Stonehenge - query re question SE.1.7
Date: 09 May 2019 12:42:43

ICOMOS-UK has a procedure for approving any submissions that are made on behalf of the organisation in respect of planning matters affecting a World Heritage site.

The submissions have to be approved by the Chair of the ICOMOS-UK World Heritage Committee. For what are considered sensitive projects, the submissions also have to be approved by the President. These are formalities that have been in place for over 15 years. The Stonehenge A303 road project is considered to be a sensitive issue.

Our AGM was held at 4pm on Thursday 2nd May. A new President was elected, from two candidates. The Chair of the World Heritage Committee was also elected.

Following the AGM the Bank Holiday intervened. Yesterday approval was given by the Chair of the World Heritage Committee and today the new President is reviewing the submission.

The final approved text will be sent just as soon as this approval process has been completed.

I do hope that this provides sufficient information on our procedures.

Regards

Secretary ICOMOS-UK
International Council on Monument and Sites, UK
70 Cowcross Street
London EC1M 6EJ
0207 566 0031
www.icomos-uk.org
@icomosuk

Registered charity: 1175871

Important Notice: The contents of this email and attachments are intended solely for the named addressee(s) and may be confidential; any unauthorised use, reproduction, or storage of the contents is expressly prohibited. If you have received this email in error, please delete it and any attachments immediately and advise the sender by return email or telephone.

In accordance with the [ICOMOS-UK Privacy Policy](#), and taking into account European Data Protection Regulations we ask you not to share personal data with third parties without prior consent of the persons involved.

ICOMOS-UK does not warrant that this email and any attachments are error or virus free.

From: A303 Stonehenge [mailto:A303Stonehenge@planninginspectorate.gov.uk]

Sent: Tuesday, May 7, 2019 5:48 PM

To: Susan Denyer <SusanDenyer@icomos-uk.org>

Subject: RE: A303 Stonehenge - query re question SE.1.7

Dear Ms Denyer

I refer to our recent correspondence with regards to ICOMOS-UK's Written Representation.

It would be helpful if the justification for the delay in submitting ICOMOS-UK's Written Representation includes an explanation as to why the change of officers should affect the timeliness of submissions and to provide details of the date of the AGM and the process for obtaining formal approval to the text.

Kind regards

A303 Amesbury to Berwick Down Case Team

National Infrastructure Planning
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Helpline: 0303 444 5000

Email: A303stonehenge@planninginspectorate.gov.uk

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

This communication does not constitute legal advice.
Please view our [Privacy Notice](#) before sending information to the Planning Inspectorate

From: Susan Denyer <SusanDenyer@icomos-uk.org>

Sent: 02 May 2019 12:29

To: A303 Stonehenge <A303Stonehenge@planninginspectorate.gov.uk>

Subject: RE: A303 Stonehenge - query re question SE.1.7

James:

As I mentioned on the phone, ICOMOS-UK is preparing Written Representations but because of an AGM at which the key officers will change, we will need some extra time to get the necessary formal approvals for our text.

We will be able to submit our document by 10th May and sincerely hope that it will be considered by the Examining Authority.

Thank you for investigating question SE1.7 and we await your response.

Regards

Susan

Secretary ICOMOS-UK
International Council on Monument and Sites, UK
70 Cowcross Street
London EC1M 6EJ
0207 566 0031
www.icomos-uk.org
@icomosuk

Registered charity: 1175871

Important Notice: The contents of this email and attachments are intended solely for the named addressee(s) and may be confidential; any unauthorised use, reproduction, or storage of the contents is expressly prohibited. If you have received this email in error, please delete it and any attachments immediately and advise the sender by return email or telephone.

In accordance with the [ICOMOS-UK Privacy Policy](#), and taking into account European Data Protection Regulations we ask you not to share personal data with third parties without prior consent of the persons involved.

ICOMOS-UK does not warrant that this email and any attachments are error or virus free.

From: A303 Stonehenge [<mailto:A303Stonehenge@planninginspectorate.gov.uk>]
Sent: Wednesday, May 1, 2019 4:45 PM
To: Susan Denyer <SusanDenyer@icomos-uk.org>
Subject: A303 Stonehenge - query re question SE.1.7

Dear Ms Denyer

Following your call this afternoon, I am in the process of finding out from the Examining Authority whether question SE.1.7 was directed to ICOMOS International or ICOMOS UK.

I will confirm in due course.

Kind regards

James

A303 Amesbury to Berwick Down Case Team

National Infrastructure Planning
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1
6PN

Helpline: 0303 444 5000
Email: A303stonehenge@planninginspectorate.gov.uk

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

This communication does not constitute legal advice.
Please view our [Privacy Notice](#) before sending information to the Planning
Inspectorate

ICOMOS-UK

WRITTEN REPRESENTATION

The Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8, Rule 13 and Rule 16 Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down

PLANNING INSPECTORATE REFERENCE: TR010025

SUMMARY:

This written representation sets out that ICOMOS-UK has consistently suggested that the improvements to the A303 route in and near the Stonehenge WHS should safeguard the whole of the WHS and its setting. It explains why we consider that the limits and status of the WHS should have been identified at the start of the overall A303 project, and why the assessment of tunnel options within the WHS and of alternative routes outside the WHS lacked rigour as they were not based on OUV. The main outcome of the three ICOMOS Advisory Missions are highlighted as are the recent relevant decisions of the UNESCO World Heritage Committee. Attention is drawn to the obligations of the World Heritage Convention and the reasons why harm to one part of a WHS cannot be mitigated by benefits elsewhere. In conclusion, our views align with those of the ICOMOS Advisory Missions and the UNESCO World Heritage Committee: we are not contesting the idea of a tunnel, but believe that one that is insufficiently long would result in adverse and irreversible damage to OUV.

CONTENTS:

1. OVERVIEW
2. ASSESSMENT OF ALTERNATIVE OPTIONS
3. ICOMOS ADVISORY MISSIONS
4. RECENT DECISIONS OF THE UNESCO WORLD HERITAGE COMMITTEE ON THE STONEHENGE PROPOSALS
5. THE WORLD HERITAGE CONVENTION
6. POTENTIAL IMPACT OF THE CURRENT PROPOSALS ON THE OVERALL INTEGRATED STONEHENGE PREHISTORIC, ARCHAEOLOGICAL LANDSCAPE AND THUS ON THE OUV OF THE WHS
7. BALANCING HARM AND BENEFITS?
8. CONCLUSIONS

OVERVIEW:

1. ICOMOS-UK is the UK National Committee of ICOMOS, which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 (the Convention) within the UK and promoting best practice in the management of UK World Heritage Sites (WHS). The maintenance of the Outstanding Universal Value (OUV) of the UK WHSs and their settings is a key objective.
2. ICOMOS-UK has consistently suggested that the improvements to the A303 route in and near the Stonehenge WHS should safeguard the whole of the WHS and its setting;
3. In order to achieve this, we have held the view that all assessments of tunnel options within the WHS and of alternative routes outside the WHS needed to be based on assessments of impact on the attributes of OUV; and that the optimal solution in terms of whether a bypass or a tunnel, needed to be considered at the earliest opportunity;
4. Furthermore, in order to facilitate these processes, we have also made our view clear that the limits and status of the WHS should have been identified at the start of the overall A303 project.
5. In our earlier response, we summarized these points and stated that we could accept in principle the idea of a tunnel for the A303, provided:
 - All options for constructing a bypass located outside the WHS have been adequately considered via a robust and consistent methodology, and an informed consultation process;
 - The tunnel is long enough to ensure that its tunnel portals, associated approach roads and cuttings do not impact in any way on the WHS or its setting;
 - That construction impacts arising from a tunnel solution do not have a permanent adverse impact on the attributes of Outstanding Universal Value (OUV);
 - All necessary Heritage Impact Assessments (HIAs) have been undertaken independently on the basis of a clear understanding of the attributes of OUV in line with *ICOMOS Guidance on Heritage Impact Assessments for Cultural Heritage properties.*
6. We do not consider that these parameters have been fulfilled.

ASSESSMENT OF ALTERNATIVE OPTIONS

7. In our view the assessment of alternative options has lacked rigour.
8. One of the key problems is that WH status was not a consideration in the early phases of the pre-consultation processes. At the first meeting of stakeholders convened by the Highways Agency in Taunton, to which ICOMOS-UK was invited to send a representative, a map of the proposed A303 route was presented, and handed out in leaflet. This did not mark the WHS, although it did

indicate Areas of Outstanding Natural Beauty (AONB) and other designations. Since then it appears that the WHS has consistently been given lower status than AONBs.

9. We consider that potential impact on the OUV of the WHS should have been given the highest priority, during the pre-consultation options assessment process, in order to allow appropriate parameters to be developed for assessing impact on OUV, as a guide for the assessment processes. In our view, this has not been the case.
10. A further issue is that comparable methodologies for assessing options in and outside the WHS have not been used as the assessments of bypass options were mainly not related to OUV.
11. For the southern F10 route no detailed HIA was undertaken in line with *ICOMOS Guidance on Impact Assessment for Cultural World Heritage properties*. In the assessment, there were claims that important archaeology would be impacted, a claim that was not justified in any detail, as highlighted in your Question CH.1.61 to Department of Digital, Culture, Media and Sport (DDCMS) and the Applicant. The assessment implied that the negative impact on yet undiscovered archaeology of the route would be greater than negative impact from a tunnel on known archaeology within the WHS. As OUV was not the main basis for the assessment, high value was not given to the fact that this route had no impact on OUV, while negative value was attributed to the route on the basis of the potential loss of archaeology and of nature conservation values that did not relate to OUV. As a result this route option F010 was excluded from further consideration.
12. Moreover no consideration was given to tunnel options or partial tunnel options outside the WHS and no reasons were put forward as to why these were not considered as a way of to mitigate perceived nature conservation impacts in a Special Area for Conservation and a Site of Special Scientific Importance and archaeological impacts.
13. We do not consider that OUV has underpinned adequately the assessment of alternative options.

ICOMOS ADVISORY MISSIONS

14. The aim of an ICOMOS Advisory mission is to offer advice to State Parties on the potential impact of development or other proposals on the OUV of a WHS before projects are fully worked up and before the World Heritage Committee considers detailed proposals. They are requested by States Parties and, as their name suggests, they are purely advisory. Such Advisory mission can provide an understanding of possible difficulties that a project might face in terms of potential impact on OUV. Three Advisory missions were requested by the UK State Party for the Stonehenge A303 project. Each of them considered the proposals that were then current.
15. The first Advisory mission was undertaken in October 2015 when the project was in its early stages and there were no specific tunnel plans or plans for the length of tunnel. This mission clearly expressed the view that if a tunnel was considered that was of a shorter length than the

WHS, then a long approach road with cuttings/embankments and entry/exit ramps to the west of a portal within the property would have the potential to impact adversely on some attributes of OUV, in terms of the integrity of the overall Stonehenge cultural landscape and visual links between monuments.

16. Although this first ICOMOS Advisory mission suggested that the part of the A303 project which engages with the WHS had the capacity to become a model of good practice on the world stage, through establishing a heritage-led steering mechanism to ensure heritage was at the centre of the decision making processes, and through amending the generic DCO process map to reflect the significant heritage activities to be undertaken, such an exemplary approach has not materialized. Instead the project appears to have been managed to allow engineering solutions for tunnels to fit the budget, and for impact assessments to be designed to fit these solutions.
17. The second Advisory mission was undertaken in January-February 2017. This concluded that the the evaluations and assessments of HIAs and preliminary HIAs undertaken for Historic England and the National Trust identify that an alternative route (the F10) would have a lesser impact on the OUV of the WH property than the tunnel options then currently under consideration and that the currently-proposed placement (option D61-62) would cause considerable damage to the OUV of the WH property, through adverse effects on the archaeological remains, on their landscape attributes, and on setting and visibility. The mission encouraged the SP to further explore the F10 route option, as they considered that it would bring significant benefits to the whole WHS and the wider Stonehenge landscape. They also recommended that an extension of the tunnel should be considered so that the Western portal would be located outside the WHS to avoid its negative impacts on the OUV of the property, its landscape, monuments and archeological richness, and would ensure that the associated approach road would not pose any threat to the property or its setting.
18. Furthermore the second mission noted that although the governance and decision making processes carried on by the State Party were sophisticated, they did not give enough weight to the heritage priority required for a WH property, and specifically the preservation of its OUV, as required by the obligations of the State Party under the Convention. The mission noted that the Highways England territorial planning process for the removal of the A303 was aimed at a major priority: to benefit traffic and development to the Southwest of the country. The mission considered that the design of the scheme within the WH property and the wider road network development must reconcile this target with avoiding adverse impact on the OUV of the World Heritage property in all its components.
19. The Third Advisory mission undertaken in March 2018 reached similar conclusions. It considered that the tunnel then proposed would remove the road from the central part of the Stonehenge component of the WHS but that the construction of four-lane highways in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity, authenticity and OUV of the WHS, particularly through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact. It recommended that the western portal should be re-located

outside the western boundary of the WHS to avoid dual carriageways within this part of the WHS.

20. The third mission considered that a surface route, which re-routes the A303 completely around the Stonehenge component of the WHS, and enables the closure of the existing section of the A303 within the WHS, would provide the best option in relation to impact on the OUV of the WHS.
21. Furthermore the third mission recognised that the State Party and its agencies must seek to balance a range of issues and factors but concluded that additional weight should be afforded to avoiding impact on WHS, in view of its OUV and the obligations of the State Party under the Convention. The Mission considered that the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how adverse impact on OUV can be avoided. The OUV of the WHS should therefore be afforded at least equal priority to other environmental considerations, including impact on AONBs and Special Areas of Conservation. In addition, the mission considered that the innovative economic modelling of the benefit-cost of the project should be refined to recognise that, insofar as the public is willing to support the construction of a tunnel, the public would presumably be willing to pay more to remove the A303 impact on the WHS completely through longer tunnel options or complete bypassing.
22. The views and advice of ICOMOS on the potential negative impacts of a tunnel that does not extend across the majority of the WHS have been clearly set out.

RECENT DECISIONS OF THE UNESCO WORLD HERITAGE COMMITTEE ON THE STONEHENGE PROPOSALS

23. The Stonehenge A303 project has been considered by the UNESCO World Heritage Committee (the Committee) at its sessions in 2017 and 2018. At both of these, the Committee provided clear views on the potential negative impact on the OUV of the overall WHS of a tunnel that does not extend across the WHS and made clear recommendations as to how the project should be amended.
24. In 2017, the Committee decision 41 COM 7B.56¹ included the following:
Expresses concern that the 2.9km Stonehenge tunnel options and their associated 2.2km of dual carriageway approach roads within the property that are under consideration, would impact adversely the OUV of the property;

Urges the State Party to explore further options with a view to avoiding impacts on the OUV of the property, including:
The F10 non-tunnel by-pass option to the south of the property,

¹ <https://whc.unesco.org/en/decisions/7014>

Longer tunnel options to remove dual carriageway cuttings from the property and further detailed investigations regarding tunnel alignment and both east and west portal locations;

In response to these requests, no further work was subsequently undertaken on the F10 bypass; the objection to it was said by the DDCMS to be supported by Prof Barry Cunliffe's views on the impact on archaeology, although no written evidence was provided. And in relation to longer tunnel options to remove the dual carriageway from the property, changes in alignment were made combined with short extensions at both ends, but leaving c1km of road within the property.

25. At its last meeting in 2018, in decision 42 COM 7B.32² the Committee made it clear that further work was needed to extend the tunnel, particularly to the west in order to avoid a long cutting for a dual carriageway within the WHS. Its decision included:

[Notes that] the rigorous investigation, evaluation, iterative design and assessment process has revealed that, if the current length of tunnel solution is pursued, the damage inflicted by the dual carriageway cuttings would impact adversely on integrity and the Outstanding Universal Value (OUV) of the property, and therefore the proposed A303 upgrade project should not proceed with the current length of the tunnel;

Notes with concern the impacts of the current design of the dual carriageway on the property, especially at the western end;

Urges the State Party to continue to explore further design refinement, with a view to avoiding impact on the OUV of the property, including longer tunnel options that do not require an open dual carriageway cutting within the property and to avoid impact due to noise, lighting and visibility; and urges furthermore, the State Party to minimize the length of the culvert part of the tunnel in order to reduce the impact on the cultural landscape and the archaeology;

Requests the Stat Party to address the findings and implement the recommendations of the March 2018 Advisory mission and encourages the State Party to continue to facilitate progress towards an optimal solution for the widening of the A303 with a view to avoiding adverse impact on the OUV of the property;

26. The Committee clearly expressed its concerns at the potential impact of the then current proposals on the western end of the property. It requested no open dual carriageway within the property, a longer tunnel and minimal 'cut and cover' culvert.
27. These recommendations have not been followed in the current plans. The open dual carriageway has been slightly shortened but through extending the covered culvert rather than reducing it as

² <https://whc.unesco.org/en/decisions/7261>

requested. The overall length of the tunnel has not been extended to remove the open dual carriageway.

28. The reason why the Committee requested a longer tunnel and the removal of an open dual carriageways was in order to reduce negative impact on the cultural landscape and archaeology, and thus on the OUV of the WHS, as stated in their decision.

THE WORLD HERITAGE CONVENTION

29. The World Heritage Convention Concerning the World Cultural and Natural Heritage, 1972³ (the Convention) aims at the identification, protection, conservation, presentation and transmission to future generations of cultural and natural heritage of Outstanding Universal Value. The Convention was ratified by the United Kingdom on 29th May 1984.
30. Under the Convention, sites are inscribed as World Heritage if they are deemed to be of ‘Outstanding Universal Value’ and thus are part of the ‘world heritage of mankind as a whole’ and deserve ‘protection & transmission to future generations’⁴.
31. To be inscribed on the World Heritage List, a property must justify OUV and satisfy one or more cultural criteria, as well as conditions of integrity and authenticity, and have in place adequate protection and management systems.
32. How a WHS justifies OUV, and the key ‘attributes’ that convey OUV, is set out in a Statement of OUV (SoOUV) approved by the UNESCO World Heritage Committee. An SoOUV consists of:
 - Brief Synthesis:* What the site consists of, why it justifies OUV and the key attributes that convey OUV
 - Criteria:* How the site has satisfied relevant criteria
 - Integrity & Authenticity:* How the site satisfies the conditions of integrity and authenticity
 - Requirements for Protection and Management:* Details of the protection and management that the State Party has put in place for the site
33. Thus, once a WHS is inscribed, it becomes the duty of the relevant State Party to ‘do all it can’ ‘to the utmost of its own resources’⁵ to sustain the OUV of that site through protecting and sustaining the ‘attributes’ that convey its OUV.

³ <https://whc.unesco.org/en/conventiontext/>

⁴ World Heritage Convention, 1972

⁵ *ibid*

34. The primary responsibility under the Convention lies with the State Party in whose territory the cultural and natural heritage is situated. However, the Convention is also clear that the OUV of World Heritage Sites means that their protection is also of concern to the international community as a whole. ‘*While fully respecting the sovereignty of the States on whose territory the cultural and natural heritage is situated, States Parties to the Convention recognize the collective interest of the international community to cooperate in the protection of this heritage*’⁶.
35. From the above it is clear that there is a formal obligation for States Parties to ensure that new development does not impact adversely on OUV. In this regard, the SoOUV is a key tool in assessing the potential impact of a project on the OUV of a WHS.

POTENTIAL IMPACT OF THE CURRENT PROPOSALS ON THE OVERALL INTEGRATED STONEHENGE PREHISTORIC, ARCHAEOLOGICAL LANDSCAPE AND THUS ON THE OUV OF THE WHS;

36. The SoOUV for the WHS (set out in Annex II) was approved by the WH Committee in 2013. This clearly sets out why the property has OUV, and the attributes that convey that OUV. The WHS in spite of its name was not inscribed for its main monument but for the way this is embedded in an overall archaeological landscape. The SoOUV includes the following:

Stonehenge sits at the centre of a landscape, which through its settlements, burial grounds, large circular ensembles of earth and wood, and an avenue approach, expands our knowledge of the use of inhabited space and its ritualistic value from the Neolithic period to the Bronze Age

The megalithic ensemble of Stonehenge, Avebury and its related sites, together form a prehistoric landscape without parallel, which has provided an insight into the mortuary culture of the period and left its mark upon the development of prehistoric science and astronomy.

The complex of monuments at Avebury and Stonehenge provides an incomparable insight into the funerary and ceremonial practices in the Neolithic and Bronze Age.

There is a need to strengthen understanding of the overall relationship between remains, both buried and standing.

37. OUV applies to the whole of the WHS and is conveyed by a range of attributes some tangible and others intangible.
38. The Stonehenge WHS was inscribed as a landscape that exhibits outstanding aspects of pre-historic culture and society. From the approved SoOUV it is clear that Stonehenge is not an

⁶ *ibid*

assembly of archaeological sites between which there are spaces that might be excavated for cuttings. Stonehenge is a massive, highly orchestrated, symbolic landscape where the main sites relate to one another in terms of uses, as well as through visual interactions and spatial relationships. As a pre-historic landscape, the Stonehenge WHS displays complex patterns of monuments laid across the underlying topography reflecting aspects of pre-historic society – it bears an ‘*exceptional testimony to a cultural tradition ... which has disappeared*’ as the justification for *Criterion (iii)* states.

39. The Justification put forward by the UK government in its nomination described the WHS as ‘*a landscape without parallel in Britain or elsewhere and provide an unrivalled demonstration of human achievement in prehistoric times*’. The views of the ICOMOS assessor, Professor Leon Pressouyre, made it clear that Stonehenge was perceived as a widespread landscape when nominated, and not simply an isolated stone temple within a secondary landscape setting.
40. The scope and extent of the nomination were put forward by English Heritage, (EH) which defined the boundaries. Indeed Francis Golding, the Deputy Chief Executive of English Heritage at the time of nomination, said in March 2004⁷ that at the time of nomination, the site was most definitely seen as a pre-historic landscape with the main henge monument being the ‘*icing on the cake*’.
41. The Stonehenge WHS thus reflects a remarkable collection of pre-historic remains accumulated over more than 1500 years of continuous use of the site. The main henge monument was almost the final flourish. To understand the main henge, it is thus essential to understand how it is related to the previous millennium and a half of development of the wider site and its highly structured remains that are visible today. The main henge sits at the centre of a complex spider’s web of linkages and crowns extraordinarily dense layers of development right across the site. The pre-historic remains are not randomly scattered across the site: they reflect tightly structured arrangements, which must be respected as a composed landscape.
42. The later monuments respected and built upon the earlier patterns and dispositions. The spatial relationships between monuments, even though they may be of different dates, are therefore highly relevant as a reflection of an evolving persistent culture.
43. The visual inter-connectedness between monuments across the site is no accident. While a full understanding of the reasons for all these visual linkages may not be known, they appear to reflect deliberate placing of the monuments in relation to the topography and to each other, in other words planned spatial relationships.
44. The ceremonial use of the site related to the main henge, the graves, and the Avenue approach must be respected.

⁷ Personal communication with ICOMOS-UK

45. The density of pre-historic remains combined with their quality and status is seen to be at variance with pre-historic remains from the rest of the UK and thus highly significant.
46. The holistic value of this pre-historic landscape and its integrity and authenticity must be key material considerations.
47. It is not sufficient to consider the impact of proposals only on ‘archaeology’ and ‘visual links’; impact must be assessed on the overall spatial patterns of monuments and their underlying topography that together combine to give the site its OUV.
48. In our view the current proposals would have a highly detrimental and irreversible impact on the OUV of the WHS. The impact arises from the fact that the western portal is within the WHS as is the dual carriageway approach road in a cutting within the WHS.
49. The proposed dual carriageway cutting and the siting of the tunnel portal would impact adversely on both authenticity and integrity. The monuments, their spatial relationships to one another, and their relationships to the underlying topography, all go to make up the overall landscape. Authenticity relates to the ability of a WHS to convey its value, while its integrity relates to its intactness. The spatial as well as visual relationships between certain monuments would be severed as would the overall coherence of the overall landscape and its ability to convey its multi-faceted meanings, but especially the way it evokes the way pre-historic societies organised symbolic spaces.
50. The length of the tunnel proposed appears to be based on cost rather than cultural heritage considerations. It is understood that the Highways Agency consider that it would be possible technically to extend the tunnel length to allow portals to be placed at the edge of the WHS (albeit this would also require detailed HIA analysis in terms of impacts on the setting of the WHS), but that they are constrained by their brief and the funds so far allocated.

BALANCING BENEFITS AND HARM?

51. We do not consider that the claim that damage to OUV from the open dual carriageway can be mitigated by benefits brought by the tunnel to the centre of the WHS can be supported. Although the UK Planning system allows for assessment of both negative impacts and benefits, in the case of WHS this simple mechanism is not possible as however great the benefits, these cannot mitigate damage to OUV. Such an approach has been accepted in a letter of objection sent recently by Historic England in respect of the ‘Tulip’ development within the city of London.
52. In assessing harm, we do not consider that nearly enough weight has been given to the harm caused by the dual carriageway cutting in the landscape.
53. Stonehenge is one of the very small number of ceremonial archaeological landscapes on the WH list that reflect ordered arrangements of prehistoric ceremonial structures with strong visual and

spatial connections. It is difficult to envisage support for an open dual carriageway in a cutting across the recently inscribed Göbekli Tepe, Turkey⁸ or next to the Pyramids in the WHS of Memphis and its Necropolis—the Pyramid Fields from Giza to Dahshur, Egypt⁹.

CONCLUSIONS

54. We consider that the key issue is whether international obligations to protect one of the world's most important pre-historic ceremonial landscapes - recognised as having the very highest international value - are being compromised by a large-scale infrastructural project that leads to part of the site being severed.
55. In our view, this is the case. And this view has been clearly set out by ICOMOS in its Advisory Missions and by the UNESCO World Heritage Committee. The idea of a tunnel is not being contested, but a tunnel that is insufficiently long to protect the whole WHS, and which would as a result inflict adverse and irreversible damage on its OUV, is not supported.

ANNEXES:

Annex 1: ICOMOS-UK's request to Register as an interested party:

Stonehenge A303 Planning Inspectorate Reference: TR010025

ICOMOS-UK wishes to register as an Interested Party for the Examination of the above application for development.

ICOMOS-UK is concerned that the A303 development proposal as it stands may impact adversely and potentially irreversibly on the attributes of Outstanding Universal Value (OUV) of the World Heritage site (WHS) of Stonehenge, Avebury and Associated sites.

We support in principle the idea of a tunnel for the A303 and seek to advocate that the tunnel be long enough to ensure that its tunnel portals, associated approach roads and cuttings do not impact adversely on the OUV of the WHS, but do not consider that this parameter has been fully satisfied.

We wish to comment on why we consider that the development proposal impacts adversely on the OUV of the WHS, in particular on the following:

- The potential impact of the current proposals on the overall integrated Stonehenge prehistoric, archaeological landscape and thus on the OUV of the WHS;

⁸ <https://whc.unesco.org/en/list/1572>

⁹ <https://whc.unesco.org/en/list/86>

- The reasons why the benefits of the development proposal within a part of a WHS, however great, cannot compensate for loss to the attributes of OUV resulting from the proposal elsewhere in the WHS;
- The obligations of the World Heritage Convention;
- The recent decisions of the UNESCO World Heritage Committee on the Stonehenge proposals and the reports of the ICOMOS Advisory Missions.

Annex 2: Statement of OUV

Stonehenge, Avebury and Associated Sites, UK

Brief synthesis

The World Heritage property Stonehenge, Avebury and Associated Sites is internationally important for its complexes of outstanding prehistoric monuments. Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.

The World Heritage property comprises two areas of Chalkland in southern Britain within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. Each area contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue, the Cursuses, Durrington Walls, Woodhenge, and the densest concentration of burial mounds in Britain. At Avebury they include Windmill Hill, the West Kennel Long Barrow, the Sanctuary, Silbury Hill, the West Kennet and Beckhampton Avenues, the West Kennel Palisaded Enclosures, and important barrows.

Stonehenge is one of the most impressive prehistoric megalithic monuments in the world on account of the sheer size of its megaliths, the sophistication of its concentric plan and architectural design, the shaping of the stones - uniquely using both Wiltshire Sarsen sandstone and Pembroke Bluestone - and the precision with which it was built.

At Avebury, the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.

There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of

time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.

Criterion (i):

The monuments of the Stonehenge, Avebury and Associated Sites demonstrate outstanding creative and technological achievements in prehistoric times.

Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world. It is unrivalled in its design and unique engineering, featuring huge horizontal stone lintels capping the outer circle and the trilithons, locked together by carefully shaped joints. It is distinguished by the unique use of two different kinds of stones (Bluestones and Sarsens), their size (the largest weighing over 40 t) and the distance they were transported (up to 240 km). The sheer scale of some of the surrounding monuments is also remarkable: the Stonehenge Cursus and the Avenue are both about 3 km long, while Durrington Walls is the largest known henge in Britain, around 500 m in diameter, demonstrating the ability of prehistoric peoples to conceive, design and construct features of great size and complexity.

Avebury prehistoric stone circle is the largest in the world. The encircling henge consists of a huge bank and ditch 1.3 km in circumference, within which 180 local, unshaped standing stones formed the large outer and two smaller inner circles. Leading from two of its four entrances, the West Kennel and Beckhampton Avenues of parallel standing stones still connect it with other monuments in the landscape. Another outstanding monument, Silbury Hill, is the largest prehistoric mound in Europe. Built around 2400 BC, it stands 39.5 m high and comprises half a million tonnes of chalk. The purpose of this imposing, skilfully engineered monument remains obscure.

Criterion (ii):

The World Heritage property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age. The monuments and landscape have had an unwavering influence on architects, artists, historians and archaeologists, and still retain a huge potential for future research.

The megalithic and earthen monuments of the World Heritage property demonstrate the shaping of the landscape through monument building for around 2000 years from circa 3700 BC, reflecting the importance and wide influence of both areas.

Since the 12th century when Stonehenge was considered one of the wonders of the world by the chroniclers Henry de Huntington and Geoffrey de Monmouth, the Stonehenge and Avebury Sites have excited curiosity and been the subject of study and speculation. Since early investigations by John Aubrey (1626-1697), Inigo Jones (1573-1652), and William Stukeley (1687-1765), they

have had an unwavering influence on architects, archaeologists, artists and historians. The two parts of the World Heritage property provide an excellent opportunity for further research.

Today, the property has spiritual associations for some.

Criterion (iii):

The complexes of monuments at Stonehenge and Avebury provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. Together with their settings and associated sites, they form landscapes without parallel.

The design, position and interrelationship of the monuments and sites are evidence of a wealthy and highly organised prehistoric society able to impose its concepts on the environment. An outstanding example is the alignment of the Stonehenge Avenue (probably a processional route) and Stonehenge stone circle on the axis of the midsummer sunrise and midwinter sunset, indicating their ceremonial and astronomical character. At Avebury the length and size of some of the features such as the West Kennel Avenue, which connects the Henge to the Sanctuary over 2 km away, are further evidence of this.

A profound insight into the changing mortuary culture of the periods is provided by the use of Stonehenge as a cremation cemetery, by the West Kennel Long Barrow, the largest known Neolithic stone-chambered collective tomb in southern England, and by the hundreds of other burial sites illustrating evolving funerary rites.

Integrity

The boundaries of the property capture the attributes that together convey Outstanding Universal Value at Stonehenge and Avebury. They contain the major Neolithic and Bronze Age monuments that exemplify the creative genius and technological skills for which the property is inscribed. The Avebury and Stonehenge landscapes are extensive, both being around 25 square kilometres, and capture the relationship between the monuments as well as their landscape setting.

At Avebury the boundary was extended in 2008 to include East Kennel Long Barrow and Fyfield Down with its extensive Bronze Age field system and naturally occurring Sarsen Stones. At Stonehenge the boundary will be reviewed to consider the possible inclusion of related, significant monuments nearby such as Robin Hood's Ball, a Neolithic causewayed enclosure.

The setting of some key monuments extends beyond the boundary. Provision of buffer zones or planning guidance based on a comprehensive setting study should be considered to protect the setting of both individual monuments and the overall setting of the property.

The survival of the Neolithic and Bronze Age monuments at both Stonehenge and Avebury is exceptional and remarkable given their age -they were built and used between around 3700 and 1600 BC. Stone and earth monuments retain their original design and materials. The timber structures have disappeared but postholes indicate their location. Monuments have been regularly maintained and repaired as necessary.

The presence of busy main roads going through the World Heritage property impacts adversely on its integrity. The roads sever the relationship between Stonehenge and its surrounding monuments, notably the A344 which separates the Stone Circle from the Avenue. At Avebury, roads cut through some key monuments including the Henge and the West Kennel Avenue. The A4 separates the Sanctuary from its barrow group at Overton Hill. Roads and vehicles also cause damage to the fabric of some monuments while traffic noise and visual intrusion have a negative impact on their settings. The incremental impact of highway-related clutter needs to be carefully managed.

Development pressures are present and require careful management. Impacts from existing intrusive development should be mitigated where possible.

Authenticity

Interventions have been limited mainly to excavations and the re-erection of some fallen or buried stones to their known positions in the early and mid-twentieth century in order to improve understanding. Ploughing, burrowing animals and early excavation have resulted in some losses but what remains is remarkable in its completeness and concentration. The materials and substance of the archaeology supported by the archaeological archives continue to provide an authentic testimony to prehistoric technological and creative achievement.

This survival and the huge potential of buried archaeology make the property an extremely important resource for archaeological research, which continues to uncover new evidence and expand our understanding of prehistory. Present day research has enormously improved our understanding of the property.

The known principal monuments largely remain in situ and many are still dominant features in the rural landscape. Their form and design are well-preserved and visitors are easily able to appreciate their location, setting and interrelationships which in combination represent landscapes without parallel.

At Stonehenge several monuments have retained their alignment on the Solstice sunrise and sunset, including the Stone Circle, the Avenue, Woodhenge, and the Durrington Walls Southern Circle and its Avenue.

Although the original ceremonial use of the monuments is not known, they retain spiritual significance for some people, and many still gather at both stone circles to celebrate the Solstice and other observations. Stonehenge is known and valued by many more as the most famous prehistoric monument in the world.

There is a need to strengthen understanding of the overall relationship between remains, both buried and standing, at Stonehenge and at Avebury.

Protection and management requirements

The UK Government protects World Heritage properties in England in two ways: firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act, and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected through the Government's designation of individual buildings, monuments, gardens and landscapes.

Government guidance on protecting the Historic Environment and World Heritage is set out in National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. The protection of the property and its setting from inappropriate development could be further strengthened through the adoption of a specific Supplementary Planning Document.

At a local level, the property is protected by the legal designation of all its principal monuments. There is a specific policy in the Local Development Framework to protect the Outstanding Universal Value of the property from inappropriate development, along with adequate references in relevant strategies and plans at all levels. The Wiltshire Core Strategy includes a specific World Heritage Property policy. This policy states that additional planning guidance will be produced to ensure its effective implementation and thereby the protection of the World Heritage property from inappropriate development. The policy also recognises the need to produce a setting study to enable this. Once the review of the Stonehenge boundary is completed, work on the setting study shall begin.

The Local Planning Authority is responsible for continued protection through policy development and its effective implementation in deciding planning applications with the management plans for Stonehenge and Avebury as a key material consideration. These plans also take into account the range of other values relevant to the site in addition to Outstanding Universal Value. Avebury lies within the North Wessex Downs Area of Outstanding Natural Beauty, a national statutory designation to ensure the conservation and enhancement of the natural beauty of the landscape.

About a third of the property at both Stonehenge and Avebury is owned and managed by conservation bodies: English Heritage, a non-departmental government body, and the National Trust and the Royal Society for the Protection of Birds which are both charities. Agri-environment schemes, an example of partnership working between private landowners and Natural England (a non-departmental government body), are very important for protecting and enhancing the setting of prehistoric monuments through measures such as grass restoration and scrub control. Much of the property can be accessed through public rights of way as well as permissive paths and open access provided by some agri-environment schemes. Managed open access is provided at Solstice. There are a significant number of private households within the property and local residents therefore have an important role in its stewardship.

The property has effective management plans, coordinators and steering groups at both Stonehenge and Avebury. There is a need for an overall integrated management system for the property which will be addressed by the establishment of a coordinating Stonehenge and Avebury Partnership Panel whilst retaining the Stonehenge and Avebury steering groups to enable specific local issues to be addressed and to maintain the meaningful engagement of the community. A single property management plan will replace the two separate management plans.

An overall visitor management and interpretation strategy, together with a landscape strategy needs to be put in place to optimise access to and understanding of the property. This should include improved interpretation for visitors and the local community both on site and in local museums, holding collections excavated from the property as well as through publications and the web. These objectives are being addressed at Stonehenge through the development of a visitor centre and the Interpretation, Learning and Participation Strategy. The updated Management Plan will include a similar strategy for Avebury. Visitor management and sustainable tourism challenges and opportunities are addressed by specific objectives in both the Stonehenge and Avebury Management Plans.

An understanding of the overall relationship between buried and standing remains continues to be developed through research projects such as the "Between the Monuments" project and extensive geophysical surveys. Research Frameworks have been published for the Site and are regularly reviewed. These encourage further relevant research. The Woodland Strategy, an example of a landscape level management project, once complete, can be built on to include other elements of landscape scale planning.

It is important to maintain and enhance the improvements to monuments achieved through grass restoration and to avoid erosion of earthen monuments and buried archaeology through visitor pressure and burrowing animals.

At the time of inscription the State Party agreed to remove the A344 road to reunite Stonehenge and its Avenue and improve the setting of the Stone Circle. Work to deliver the closure of the A344 will be complete in 2013. The project also includes a new Stonehenge visitor centre. This will provide world class visitor facilities including interpretation of the wider World Heritage property landscape and the removal of modern clutter from the setting of the Stone Circle. Although substantial progress is being made, the impact of roads and traffic remains a major challenge in both parts of the World Heritage property. The A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape. A long-term solution remains to be found. At Avebury, a World Heritage Site Traffic Strategy will be developed to establish guidance and identify a holistic set of actions to address the negative impacts that the dominance of roads, traffic and related clutter has on integrity, the condition and setting of monuments and the ease and confidence with which visitors and the local community are able to explore the wider property.

9th May 2019