

For the Examining Panel's convenience, here is a transcript of the notes I used for my oral submission at the Open Hearing on 23rd May 2019 at Salisbury City Hall, together with relevant cross-referenced material.

1) OUV is an absolute - damage in one area cannot be mitigated by improvements in another

Cross-references point 1:

a) <https://whc.unesco.org/en/soc/3652/>

“The governance and decision making processes for the project is sophisticated, but has not afforded sufficient priority to the OUV of the property.

While a range of issues and factors must be balanced, the appropriate approach is to avoid adverse impacts on the OUV of the property. It is not considered satisfactory to suggest that the benefits from a 2.9km tunnel to the centre of the property can offset significant damage from lengths of four lane approach roads in cuttings elsewhere in the property.”

b) ICOMOS-UK response to Highways England public consultation on proposed A303 2.9km tunnel scheme (extracted from <https://highwaysengland.citizenspace.com/cip/a303-stonehenge/results/report-on-consultation---volume-4.pdf>)

para 4 ii) Benefits to parts of a WHS cannot outweigh irreversible negative impacts on OUV in other parts of the site.

“Such a claim is made in the justification for Routes D061 and D062 when it is said that the benefits of the tunnel in the central part of the WHS will outweigh the dis-benefits resulting from damage to the setting of known archaeological sites as a result of the construction of portals and approach roads.

Direct damage to attributes of OUV is a direct threat to OUV, and this damage or threat cannot be mitigated by benefits elsewhere in the WHS.

It is a fundamental principle of WHSs that the OUV for which they were inscribed must be sustained wholly not partially; however great the benefits of an improvement project might be, these cannot compensate for loss to the attributes of OUV resulting from that same project.”

2) UNESCO WHS Convention says State Party should protect its heritage assets to the "utmost of its own resources"

Cross reference point 2: Article 4 of the WHS Convention (<https://whc.unesco.org/en/conventiontext/>)

“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, 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”

3) The a priori exclusion of route F10 from the consultation prevented the public from expressing a choice between tunnel versus no tunnel

4) Claims made by Highways England and heritage bodies about rejoining the Avenue to allow people to walk its length are false and take no account of the private land over which it passes

5) Claims made by HE and heritage bodies that linking the North and South of the WHS will allow people to explore the entire landscape take no account of private land to the south of the A303

Cross reference points 4 and 5: Map 6, Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan 2015

6) There will be an attempt by people to gain a free sight of the monument through use of the Public Right of Way network. This will result in attempts to close the PROW to vehicles.

This will remove any ability for less mobile people to see the monument without either paying or undertaking a long and arduous walk over ~2 miles

Cross reference point 6: Part 1, para 31 Wiltshire Council Written Representation (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000821-Wiltshire%20Council-%20Written%20Representation.pdf>)

“The Council wishes for a prohibition of driving order to be placed on certain public rights of way within the Stonehenge part of the WHS to restrict motorised vehicles, other than motorcycles, to preserve the maintainable surface against what the Council sees as the inevitable increase in traffic when the existing A303 is downgraded”

7) The loss of the casual encounter with this icon of prehistory through the removal of the view of Stonehenge from the road will deny to future generations the inspiration that has existed for over 4,500 years

8) The road itself has been part and parcel of the landscape, and is as much a feature of the WHS as the rest of the landscape. It, and the other trackways that converge on the monument, feature in descriptions and illustrations going back at least 300 years

9) The tunnel proposal as it stands is the wrong solution to the problem (traffic flow) that is ultimately self-solving. Autonomous vehicle technology will, within the next 30 years, allow traffic flows to increase enormously.

Cross reference: The Self-Driving Car Timeline – Predictions from the Top 11 Global Automakers (<https://emerj.com/ai-adoption-timelines/self-driving-car-timeline-themselves-top-11-automakers/>)

“Volvo CEO Hakan Samuelsson said in an interview, “It’s our ambition to

have a car that can drive fully autonomously on the highway by 2021.”

“Ola Källenius, Daimler’s new head of development, expects large-scale commercial production to take off between 2020 and 2025.”

10) Ultimately, this project does not represent value for money. Nor does it enhance the experience of visiting the landscape. It will take around 30-40 years for the scars in the landscape to heal. In the meantime, during and after construction, the landscape will be devastated by the works. A pristine area to the west will be obliterated by the new dual carriageway and - despite assurances - there is a real chance that information that may explain why this landscape was so important to people in the mesolithic, neolithic and bronze ages will be destroyed in the process.

Cross reference: Improving the A303 between Amesbury and Berwick Down (<https://www.nao.org.uk/report/south-west-road-improvements-and-the-stonehenge-tunnel/>)

“In pure economic terms, because of the high cost of building a tunnel, the Amesbury to Berwick Down project, at £1.15 of quantified benefit for every £1 spent, has a significantly lower benefit–cost ratio than is usual in road schemes. Given our experience of cost increases on projects of this kind, this ratio could move to an even lower or negative value.”

The wrong solution is - in the final analysis - worse than doing nothing.

Simon Banton