

Note from Open Floor Hearing speech: The Cultural Value of the Stonehenge Landscape

Dr Suzanne Keene¹, 31 May 2019

“Future generations will not forgive us for the damage to the site. There is no other place in the world like it, nor ever will be.” – Fiona Marshall, Relevant Representation.

Key question:

Do you accept the assertions of Highways England (HE), the National Trust, English Heritage and Historic England and various councils that it’s the monument itself that embodies the heritage value?

Or, do you accept that it is the whole World Heritage landscape and its setting that embodies the heritage value, as in the representations of UNESCO, ICOMOS, the CBA, many archaeologists and thousands of people?

Legislation, policy and cost / benefit

If the whole landscape is the heritage asset, and the tunnel would damage it, then it does not comply with the Planning Act 2008 Section 104², embodied in policies including NPPSNN, the NPPF and Wiltshire Council’s core policy^{3, 4}: the scheme can’t go ahead.

The cost / benefit calculation fails, as well, if the high heritage value of taking traffic away only from the monument itself isn’t accepted. NAO report: Without the calculated monetary value for cultural heritage, *the project would only deliver 31p of benefit for every £1 spent*⁵.

How was heritage value measured?

HE’s Contingent Valuation Survey, used to monetise heritage value, crucially did not consult on the landscape and the tunnel portals, only on the road and the monument itself⁶. No images of the tunnel portals in the landscape were shown: the cost or value to the landscape, the whole WHS, has not been monetised. This survey is now 3 years old.

A sensitivity analysis is reported but since the works on the landscape were not consulted on, this could not confirm the value of the tunnel works⁶.

The NAO has questioned the robustness of the method⁴, as have the Stonehenge Alliance

¹ Written Representation <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000723-Suzanne%20Keene-Written%20Representation.pdf>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/104>

³ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000355-6-3_ES-Appendix_6.1_HIA_Annex%201_HeritagePlanningPolicyContext.pdf

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000447-7-1-Case-for-the-Scheme.pdf>

⁵ <https://www.nao.org.uk/report/south-west-road-improvements-and-the-stonehenge-tunnel/>, <https://www.nao.org.uk/wp-content/uploads/2019/05/Improving-the-A303-between-Amesbury-and-Berwick-Down.pdf> Key Findings para 9, Economic case p. 22.

⁶ <https://www.whatdotheyknow.com/request/393073/response/964816/attach/html/5/HE551506%20AA%20GEN%20SWI%20RP%20JX%20000026.pdf.html>

and Jon Morris in their Written Representations.

Consultation results

Relevant Representations: Of 2370 Relevant Representations only 29, 1.2%, supported the scheme⁷. About 80 others raised various issues, neither opposing nor supporting.

Non-statutory consultation: 79%, 7115, of respondents opposed the proposal (only acknowledged in response to a personal email request⁸).

The correct figure of 79% opposing was published in the HE booklet, *Moving forward – the preferred route*⁹ (p. 10) but HE's Consultation Report again claims incorrectly that only 43% of respondents disagreed with the proposal¹⁰.

	<i>Non-statutory consultation, 2017</i>	<i>Statutory consultation Feb-April 2018</i>	<i>Supple- mentary consultation, July-Aug 2018</i>	<i>Inspectorate's Relevant Representations, 2019</i>
Form, online or post	3503	1412	354	
Letter, email	111	346	223	
Stonehenge Alliance proforma	1686	3220	2170	
FoE proforma	3943			
Action Network proforma			708	
FoE petition		5067		
Inspectorate's Relevant Representations				2370
Totals	9243	10045	3455	2370
				Total of all responses 25,113

Table: Numbers of responses to consultations

HE has misjudged the level of public concern about the landscape, assuming that removing the road from the monument would suffice. With 25,113 responses in total, an enormous number of people have expressed an opinion. With the Non-statutory Consultation responses, the Relevant Responses and proformas and petitions, the vast majority oppose the tunnel. The Stonehenge Alliance petition *SAVE Stonehenge* has about 44,886 signatures, still increasing.

This must call into question the monetised cultural value claimed for the proposal.

In contrast, the A303 Sparkford – Ilchester improvement elicited 1522 consultation responses¹¹ and Relevant Representations; the A27 Arundel bypass 2821 responses.

⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000723-Suzanne%20Keene-Written%20Representation.pdf> . Appendix.

⁸ Highways England Derek Parody personal email to me (on second request), 22 March 2018. ref.: 760,557

⁹ <https://highwaysengland.citizenspace.com/cip/a303-stonehenge/results/moving-forward---the-preferred-route.pdf>

¹⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000179-5-1-Consultation-Report.pdf> Section 2.5.20, Table 2.2, p. 2-16

¹¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000126-A303_5.12_Consultation_Report_Annex_K.pdf ,
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000115-A303_5.1_Consultation_Report.pdf

Risks to Stonehenge

The NAO report comments on the risks to the project¹². Additionally, there is the risk of catastrophic tunnel collapse due to explosion, accidental or intentional to create publicity. I hope that the Inspector will ask HE how they propose to analyse and contain this risk.

Conclusion

There is no massive road traffic lobby for this project nor any priority traffic based need.

Thousands of people have expressed dismay, horror and incredulity at the very idea of inflicting this massive damage on the Stonehenge landscape purely for traffic. They say that if this proposal goes ahead it will be to the international shame of the UK.

"I am appalled that this dual carriageway and tunnel is even being proposed on this ancient site of such archaeological importance¹³."

I sincerely ask the Inspectorate panel not to recommend this project for approval.

Addendum

In HE's verbal response to my presentation they claim that it is effects on the whole WHS that have fed into the cultural value. Not so.

- The Case for the Scheme, pp. 8-47¹⁴
- The contingent valuation survey: only visuals of the Stones were shown.
- Public Consultation Booklet – January 2017, p.4: Foreward by Chris Taylor – *The other big benefit ... is what can be done for Stonehenge, one of our most ancient and historic landmarks ... The A303 passes close by and is fully visible from Stonehenge, degrading its setting. ... Also p. 12,*
- Public Consultation Booklet – February 2018, p. 36: *Both the road and the tunnel have been carefully positioned to take the road and its traffic out of sight from Stonehenge.* That is clearly the primary aim.

Other booklets similarly give removing the A303 from sight from Stonehenge as the primary aim, with only passing reference to the whole landscape and other monuments.

¹² <https://www.nao.org.uk/wp-content/uploads/2019/05/Improving-the-A303-between-Amesbury-and-Berwick-Down.pdf> Project Risks, Para. 3.11, Construction risks and Engineering risks

¹³ Emma May, Relevant Representation

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000447-7-1-Case-for-the-Scheme.pdf> 8.4.1, p. 8-47