

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Cc:** [REDACTED]  
**Subject:** Avebury Society Response  
**Date:** 20 June 2019 17:47:01  
**Attachments:** [REDACTED]

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Dear Sir or Madam,  
Please find attached our response to Highways England's comments  
on the Written Representation of the Avebury Society (REP2-057)

Susan Rogers (Hon Sec, Avebury Society)

## **Response to Highways England's comments on the Written Representation of the Avebury Society (REP2-057)**

### **27.1 General and cross-topic questions**

**Key Issue 27.1.1.** Our concerns were expressed in relation to erosion that already occurs from over-visiting at Avebury and that increased visitor footfall arising from less easy access to Stonehenge would exacerbate an already serious problem which is not being resolved according to best practice.

**Key Issue 27.1.3.** We note the 'warm words' about future allocation of resources relying upon the partnership of the NT and English Heritage. This is a matter of concern to us, bearing in mind the relative silence of these two organisations during the Examination on many critical matters, not least the importance of the recent discoveries at the western end of the proposed tunnel and ignoring the advice of UNESCO.

**Key Issue 27.1.5.** The World Heritage Centre/ICOMOS advisory missions consider that the scheme would damage the OUV of the WHS which means that it would not be sustained. The report of the advisory bodies to the World Heritage Committee in 2019 agrees – as does the Draft Decision prepared for the Committee's consideration (ref. 27.1.6). Highways England's application documents indicate that the scheme is low value for money and would be poor value for money without the monetary benefit of a wholly unconvincing heritage valuation survey which did not ask participants what value they would place on removing the A303 from the WHS (ref. 27.1.6–8).

The balancing exercise for the scheme overall should obviously include the cost benefit analysis, since the cost of the scheme is crucial to consideration of any benefits it might be suggested to have (ref. 27.1.9).

The scheme does not meet the requirements of Article 4 of the World Heritage Convention or the vision and purpose of the Management Plan to protect the WHS (ref. 27.1.10). It does not conform to the requirements for protection of the cultural heritage of the WHS in the NSPNN (ref. 27.1.11) or local plan policy for the WHS (Core Policy 59) (ref. 27.1.13). If all these constraints are ignored at Stonehenge then they could also be ignored at unknown cost to Avebury. Plans for an Avebury bypass, mooted over 40 years ago, were scrapped because of the sensitivity of the archaeological landscape even before it was designated a WHS. If the archaeological landscape of Stonehenge is damaged, then a precedent would be set for any renewed proposals for an Avebury bypass or any other major development proposal at some future date. So far, no such proposals at Avebury have received planning consent.

### **27.2 Draft Development Consent Order**

**Key Issue 27.2.1.** The application documents failed to supply adequate information on alternatives, the natural environment and, until very late in the day, archaeological evaluation. We note the overwhelming number of objections to the scheme from respondents, even if their

views were “taken into consideration”. We have not been invited to join the Local Community Forum and presume that it does not include Avebury representatives (ref. 27.3).

Highways England has provided no visitor survey at Avebury to support their erroneous assertions about the visitor-profile (ref. 27.3.1).

#### **27.4. Socio-economic effects**

**Key Issue 27.4.1. (Increase in visitor numbers).** We could have contributed to the findings had we been asked, likewise Avebury residents (ref. 27.4.3). We consider such information should have been sought by Highways England directly as it would perhaps have corrected the inaccurate assumptions made about the Avebury visitor-profile and numbers (ref. 27.4.7). It is ludicrous to suppose that access around a mile or more away for walkers and cyclists only via rights of way to Stonehenge (where they are not allowed to wander freely among the Stones) would not persuade many to come and park their cars at Avebury where visitors can walk a short distance over the henge and to other monuments without charge. There is no question in our minds that the A303 scheme would result in increased visitor numbers to Avebury and exacerbate the problems we already experience (ref. 27.4.8).

