

## **Reply to Highways England's Comments on Written Representations – Catalogue REP03-013**

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[Highways England Document TR10025 – Deadline 3 8.18 – Comments on Written Representations](#)

[Section 58.2 – Cultural Heritage](#)

HiEng's rebuttals are repetitive and many simply restate their position. Therefore I have addressed only selected comments since there seems little point in simply restating what has already been said.

### **58.1.1 The proposal does not comply with local, national and international policy and legislation.**

I maintain that it does not comply with legislation because as the Consortium of Archaeologists as well as the CBA have shown it would cause physical damage to the WHS that cannot be compensated for by improved experience (even if the experience were to be improved, which I do not concede). Therefore, as I argued in my submission, it fails to comply with the UK's undertakings under the World Heritage Convention. Other national legislation and policy flows from that.

### **58.1.5 The benefits claimed by Highways England are few, misleading and are overwhelmed by very serious damage that would be created to landscape and archaeological evidence.**

As I have shown in my Submissions on the Contingent Valuation Survey. Over 2,000 Relevant Representations and over 45,000 petition signatures confirm my opinion.

### **58.1.11 Moreover, there is no analysis of the risks that the tunnel would create, some of which could be catastrophic.**

My concern is about the identified engineering risks from the geology, also mentioned by the NAO. I note that HiEng does not deny that they exist nor claim that they can be negated, merely reiterating that the best design practice and regulations are being followed. I am also concerned about terrorist explosion. These could destabilise Stonehenge itself since the tunnel runs so close.

### **58.1.7 The idea of Stonehenge set in Salisbury Plain is part of the national consciousness of being British.**

The iconic status of Stonehenge would be affected by massive tunnel cuttings and portals and the Longbarrow interchange. It would be impossible to ignore the presence of these major engineering features.

**58.1.19 Responses from the public to Statutory Consultation were generally made in objection to the Scheme. Most major organisations making representations, some in support or guardedly neutral, also expressed concerns about aspects of it and about the lack of necessary or statutory information.**

HiEng does not counter that there is overwhelming opposition to the scheme, merely stating that statutory consultation processes were followed and will be taken into account during the Hearing.

Indeed, I am confident that the Inspector is taking full account of this overwhelming weight of opinion as expressed in the consultations.

**58.1.23 Many representations included negative terms ...**

HiEng simply asserts that in their opinion there will be tremendous benefits but clearly the consultees do not agree. There is little point in consulting only to dismiss the results.

**58.1.28 Many Representations say that it is a public benefit to be able to view Stonehenge from the road.**

The tunnel may be a fundamental part of the Scheme but many people disagree that Stonehenge should be removed from the view of travellers – appreciation of it has been recorded in artworks and literature for centuries.

**58.2.5 The benefits claimed for the proposal focus on the experience of the monument itself. Yet there is intense public interest in the UK and internationally in the emerging archaeology of Stonehenge's surrounding landscape**

HiEng accepts that the tunnel would remove the road from only part of the WHS.

**58.2.19 Hasty excavation during pre-construction surveys is no way to systematically research this unparalleled landscape.**

This comment is vindicated by the CBA and the Consortium of Archaeologists, who have critiqued in detail the quality of the sample investigations and the proposed excavation strategy and clearly stated that a large area of archaeology will be completely destroyed if the scheme proceeds.

My concerns about the potential damage to the Blick Mead site are also amply confirmed by subsequent submissions.