

Highways England: A303 Amesbury to Berwick Down Project, Development Consent Order Application. Scheme Reference: TR010025

Responses by The Avebury Society (Reference No. 20019889) to Highways England Comments on any further information requested by the ExA and received at Deadline 4: REP5-003 submitted at Deadline 5, Section 10

Our responses, giving Highways England's paragraph numbers

10.1.1. Erosion

We repeat that contrary to Highways England's continued stance which has no foundation in fact, that:

- i. Experience has shown that exclusion of visitors at Stonehenge will encourage more visitors to Avebury. This may increase during the construction period when there may be delays on the A303 and adjoining roads.
- ii. Visitors to Avebury are of similar characteristics to those at Stonehenge.
- iii. Management of footfall may be beyond the "scope of the scheme" but Highways England should take the cumulative and knock-on effects of its Scheme on the whole WHS into account.
- iv. The 2019 UNESCO WH Committee Decision may be taken as a clear warning that the WHS may lose its status if the Scheme goes ahead. This would have a direct impact on Avebury.

10.1.2. Allocation of resources

Despite our concerns about the stances of Historic England and the National Trust, we were referring to 'Legacy funding' promised by Highways England as an outcome of the Scheme. There should be a commitment to ensuring that some of this funding should be received by Avebury and this assurance is currently lacking.

10.1.3. Damage to OUV; low value for money of the scheme; balancing of benefits and disbenefits

It is tiresome to have to point out that Highways England gives the impression of having consistently taken no notice of the points we have made. We state again the following facts.

- i. Although Highways England may have responded to some of the recommendations of the Advisory Missions, they have not followed the most important of them: to seek a solution for the A303 that does not damage the WHS or its OUV.
- ii. The World Heritage Committee's Decision in 2019 makes clear that the Scheme does not meet the requirements to protect the WHS and its OUV. This was also the view of the Committee in 2018.
- iii. The Scheme would, as Highways England agrees, be low value for money.

- iv. The overall balancing exercise against public benefit is not set out by Highways England independently of the value for money exercise (which includes the monetary benefit of the heritage contingent valuation survey).

10.1.4. WH Convention and planning policy ignored. This approach at Stonehenge would give rise to a similar stance at Avebury vis-à-vis protection of the WHS.

We reiterate that:

- i. The Scheme is clearly not compliant with the WH Convention Article 4, the Management Plan, Core Strategy Policy 59, and policy for protection of the WHS in the NSPNN. Highways England's arguments to justify its circumvention of these protective constraints are unconvincing.
- ii. As Highways England says: *"The stated primary aim of the WHS Management Plan's strategy is 'to protect the Site to sustain its OUV as agreed by UNESCO, provide access and interpretation for local people and visitors, and allow its continued sustainable economic use.'"* This is not what Highways England proposes to do.
- iii. Where a precedent is set to ignore protective policies in one part of a WHS, it would obviously be easier to ignore them in the other.

10.1.5. lack of information provided, including on numbers of visitors to Avebury

Again, we disagree. The Planning Inspectorate's acceptance of the DCO application does not mean that the application documents contained adequate information about the scheme for people to make informed judgements about it.

We have not been invited to attend any community forum meetings. The Avebury Society is not a member of the WHS Partnership Panel. The Society is represented on the Avebury WHS Steering Committee which is over-populated with representatives of statutory bodies and the National Trust who are supportive of the A303 Scheme.

10.1.6. Key Issue 27.4.1. (increase in visitor numbers)

Again, erroneous assumptions have been made by Highways England about the visitor-profile at Avebury. The National Trust can obtain accurate visitor-profile data from visitors entering Avebury Manor (who may be supposed to conform to a predictable profile); visitors to the monuments do not pass through a ticketing gate. Even so, no serious study has been presented with the DCO application.

Given that far more people, inevitably, visit Stonehenge than Avebury at present, the two places obviously cannot be compared in terms of the present visitor-patterns and numbers. This is no indication that visitor profile and numbers would stay the same if the A303 Scheme were to be implemented. Tour groups and many others will inevitably look for easier and more economical ways of seeing the prehistoric monuments of Wiltshire.

The DCO application and subsequent statements by Highways England display supreme disregard for the Avebury part of the WHS and its villagers who will without doubt be subject to greater visitor-pressure than at present.