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Our Reference No. 200119889

24 September 2019

The Examining Authority
A303 Amesbury to Berwick Down Project DCO Application (Ref. TRO10025)
The Infrastructure Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Madam and Sirs,

Response to Highways England Deadline 8 submission – 8.49 – Comments on any further information requested by the Examining Authority and received to Deadline 7 (REP8-013, Section 8)

Much of what Highways England has said in response to our comments has already been said in earlier rebuttals. We therefore address, in order, the key issues covered in Section 8 of the document which remain of particular concern to us.

1. It is disingenuous of Highways England to suggest that there would be no indirect impacts on Avebury if the A303 Stonehenge Scheme were to go ahead. That such impacts would occur is the reason why the Avebury Society, along with Avebury Parish Council, has raised serious concerns in submissions to the Examining Authority.
2. Notwithstanding Highways England's claimed merits of its A303 Scheme, UNESCO's World Heritage Committee has condemned it. Similar warnings have been given in respect of several UK World Heritage Sites (WHS). Liverpool WHS has been placed on the List of WH in Danger owing to damaging development and may lose its WH status in 2020.
3. The A303 Scheme adversely affects a single WHS in different ways. It is deliberately obtuse and clearly unacceptable to suggest that one part of an internationally designated WHS, because of its location, would qualify for 'legacy funding' arising from the Scheme and the other not.

4. The A303 Scheme is based primarily on what the Government can afford, i.e., its 'value for money'. We believe the approach to heritage valuation adopted by Highways England has not taken into account the serious damage the project would cause to the WHS, making it incompatible with World Heritage Convention obligations. Despite reporting to and engaging with international bodies since 2015, Highways England, whatever it may claim, has been unable to demonstrate that the Scheme would be in the long-term public good by enhancing and protecting the WHS. There is a real concern that should the Scheme go ahead, it would create a precedent for serious and irreversible damage through inappropriate development in a WHS. Precedence is an acknowledged tool in decision-making in planning.

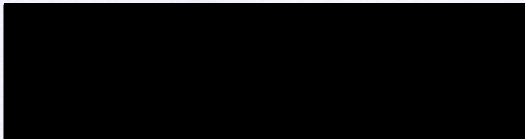
5. Not only was insufficient information provided in consultation documents for consultees to make adequately informed judgements about the Scheme, there was also a marked lack of choice of scheme options at an early stage. A southern bypass, for example, would have been a cheaper option but little information was provided on it. We were never given the option to explore a sophisticated system of traffic control which would have obviated the need for massive works through the WHS.

6. It is clear from Highways England's marked lack of interest in Avebury residents' views and denial of their concerns soundly based on first-hand experience, that an approach was adopted that gave virtually no consideration to the Scheme's impacts on Avebury. It is obvious that the Scheme would encourage many more to make a free visit to Avebury – a place already over-visited to the detriment of the monuments in terms of wear and tear and the frequent inconvenience of local residents.

7. The Avebury Society reiterates its opinion that Highways England attempts to escape close criticism either by generally claiming the issues we raise are beyond their remit or by dismissing them. We believe this attitude to be unjustified and to have led to bad decisions on their part. We again point to Highways England's paragraph on the A303 Scheme Community Forum (REP5-003, paragraph 10.1.5) which provides a classic instance of this. It states that it represents sections of the local communities "MORE DIRECTLY AFFECTED THAN AVEBURY and other towns and villages similarly farther afield from the Scheme"! What clearer statement than this could show Highways England's dismissive attitude towards the other half of the World Heritage Site?

Our well-founded fears for Avebury, should the scheme go ahead, remain unchanged.

Yours faithfully,

A large black rectangular redaction box covering the signature of Stephen Thomas.

Stephen Thomas

Acting Chairman