

THE STONEHENGE ALLIANCE

Chairman, George McDonic, MBE, BL, DIPLTP, FRTPI, DPA, FFB

From the Hon. Secretary, Dr Kate Fielden

The Rt. Hon. Grant Shapps, MP,
Secretary of State for Transport,
C/O Ms Susan Anderson,
Head of Transport Infrastructure Planning Unit,
Great Minster House,
33 Horseferry Road,
London SW1P 4DR.

Sent by email to A303Stonehenge@planninginspectorate.gov.uk on 16 May 2020

Dear Secretary of State,

A303 Stonehenge

The Stonehenge Alliance, as an Interested Party, has been alerted by the Infrastructure Planning Inspectorate, to a letter dated 4 May 2020 sent by Ms Anderson on your behalf to the applicant, Historic England and Natural England, requesting comments and further information.

Although your letter was not addressed to us, we wish to put the record straight on certain of the matters raised in your letter and hope that you will be willing to give our concerns your consideration. Our comments are titled and numbered with the matters as raised in Ms Anderson's letter.

OEMP, MW-CH8 – Ground movement monitoring Strategy

"6. The Secretary of State considers in MW-CH8 at page 59 of Table 3.2b REAC tables for the main works the trigger levels established should be subject to the approval of Wiltshire Council, consistent with the Council's approval of the HMP (MW-CH1) in Table 3.2b REAC tables for the main works at page 57 of the OEMP."

The Stonehenge Alliance would like to alert the Secretary of State to the fact that the engineering works proposed are indisputably such that would make it impossible to develop *any* scheme-wide HMP that would *protect the historic environment*, including sub-surface archaeological features that may be unknown, yet to be identified and unexcavated.

Experts Dr George Reeves and Rupert Thornely-Taylor for the Stonehenge Alliance gave evidence to the Examination In respect of the potential for ground movement and vibration to affect archaeological remains of various kinds and vulnerabilities.¹ "Trigger levels" for potential damage

¹ E.g., Document REP2-138: Written Representation on Principal Issue 11: Vibration from tunnel boring (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000757-Stonehenge%20Alliance%20-%20Written%20Representation%20on%20Principal%20Issue%2011%20Vibration%20from%20tunnel%20borin g.pdf>);

Document REP6-065: Stonehenge Alliance responses to the Examining Authority's second Written Questions (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025->

resulting from ground movement cannot be accurately established² owing to lack of precedent for establishing such methods outside urban contexts (buildings) and, especially, to the variable and unreliable nature of the Chalk bedrock of the World Heritage Site. Furthermore, once tunnelling work has begun, monitoring can only indicate potential for damage from ground movement and, unless work is halted entirely, there is no known method of remedying its effects apart from grouting. Injection of grout to consolidate the ground (if necessary even from ground level) is an approach that in itself could seriously damage or destroy archaeological remains and would not necessarily preclude ground movement as a result of tunnelling either immediately or at some future date.

That such ground movement, including subsidence, is likely to occur is evidenced by the high incidence of sink holes, fracture systems, fissures, natural solution features/voids and subsidence cavities in the bedrock as well as the highly variable nature of the Phosphatic Chalk through which the tunnel(s) would be bored. In view of the lack of evidence for accuracy in determining relevant “trigger levels” and uncertainty as to the level of ground movement that could result in damage to different kinds of archaeological remains from tunnelling, we suggest that such trigger levels will be impossible to determine successfully by the main works contractor and that Wiltshire Council is unlikely to have the requisite expertise to approve them.

OEMP, D-LAN4 – Stakeholder Engagement

“7. The Secretary of State considers consultation with Wiltshire Council on the general appearance and finishes of Countess Flyover should also take place, for consistency and be added to D-LAN4 in 3.2b REAC tables for the main works at page 65 of the OEMP.”

The Alliance raised concerns at the Examination about the potential impact of Countess Flyover.³ No comprehensive illustrations of the appearance of the proposed flyover, or indeed of the massive interchange proposed west of Longbarrow Roundabout⁴ were produced during the Examination. In view of the major impact the flyover would have on the immediate and more distant locality (including residents), Listed buildings, Amesbury Abbey RPG and the World Heritage Site, it is our view that full information on the visual impact of the flyover (and Longbarrow Interchange) ought to

[001416-Stonehenge%20Alliance-Responses%20to%20EXQ2%20questions%20and%20information%20sought%20on%20various%20topics.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001416-Stonehenge%20Alliance-Responses%20to%20EXQ2%20questions%20and%20information%20sought%20on%20various%20topics.pdf)), CH.2.9.ii on pp.5–6; Fig.2.39 on p.7; and Ns.2.7.i–iv; Ns.2.8.i–iv on pp.10–12; and Document REP8-052: Summary of oral submissions at ISH8 (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001588-Stonehenge%20Alliance%20-%20Written%20Summaries%20of%20oral%20submissions%20at%20Issue%20Specific%20Hearing%208.pdf>), Agenda item 4.3. iv. “Ground movement monitoring strategy”, a) “Through the OEMP?” on pp.3–4.

² Also agreed by the applicant: see Document REP8-016: “8.52.1. Written summary of oral submissions put at Cultural heritage, landscape and visual effects and design hearing on 21 August 2019” (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001598-Highways%20England-8.52.1%20Written%20summary%20of%20ISH%208%20held%20on%20CH,%20LV%20and%20design.pdf>), Agenda item 4.3.iv “Ground Movement Monitoring Strategy” on p. 1-16.

³ E.g., Document REP6-065: Responses to the ExA’s Second Written Questions (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001416-Stonehenge%20Alliance-Responses%20to%20EXQ2%20questions%20and%20information%20sought%20on%20various%20topics.pdf>): CH.2.8 on p.5: “Blick Mead, Vespasian’s Camp and Amesbury Park RPG Settings”

⁴ See Exam. Document PD-014: ExA’s Second Written Questions (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-001264-TR010025%20ExA%20Second%20Written%20Questions%20FINAL.pdf>): LV.2.1.vii and LV.2.2 on pp.98–99.

have been supplied and consulted upon by all interested parties. Given the sensitivity of the World Heritage Site we suggest it is wholly inappropriate to treat the appearance and finishes of such major features as a reserved matter for the Local Authority.

DAMS, paragraph 6.3.16 – Ploughzone Sampling

“9. The Secretary of State considers that the following wording should be appended to the DAMS in paragraph 6.3.16:

‘Within the WHS [“World Heritage Site”], the Scientific Committee will be consulted, independently of HMAG, before decisions are made on baseline sample size, or on decisions arising from application of the reflexive approach. Each instance of advice given by members of the Scientific Committee will be published as an addendum to the appropriate SSWSI, explaining the reasons why the outcome might differ from the advice given.’

And

DAMS, paragraph 6.3.51 – Tree Hollows

10. The Secretary of State considers the following wording should be appended to paragraph 6.3.51:

‘Within the WHS, the Scientific Committee will be consulted, independently of HMAG, before decisions are made on representative sample size, or on decisions arising from application of the reflexive approach. Each instance of advice given by members of the Scientific Committee will be published as an addendum to the appropriate SSWSI, explaining the reasons why the outcome might differ from the advice given.’

The Secretary of State would also welcome the comments of Historic England on the proposed amendments to the OEMP and DAMS above and its assessment of the extent to which the amendments might help to minimise the harm to the Stones and surrounding environment of the WHS.”

While the Alliance is pleased to note the Secretary of State’s concern to separate the advice of the Scientific Committee from that of HMAG, we wish to point out that no such separation has occurred hitherto. The Advisory Mission’s 2018 Reports is, unfortunately, ambiguous in its understanding of the composition of the Scientific Committee, sometimes underlining the need for its independence and at others indicating that HMAG is a member. Nevertheless, in its Recommendations, the Report states:

“9. The Scientific Committee should be empowered to provide unfettered advice on any matter, including alternative route or construction options, the archaeological methodologies to be used during the project and its own membership, experience and skill set, and should be at liberty to report directly to the Heritage Monitoring Advisory Group and UK statutory heritage bodies, not only to Highways England.”

From the introductory page of the Scientific Committee website

(<http://a303scientificcommittee.org.uk/>), it would appear that all of its members are independent experts:

“Its membership comprises recognised, leading, independent experts on specific aspects of the landscape of the Stonehenge WHS who can provide additional advice and make a positive contribution to the development of the project. They are all subject matter or period specialists with a specific skill set or depth of experience in aspects of the historic environment of the WHS. The Committee is chaired by Sir Barry Cunliffe and works to an agreed Terms of Reference which will enable it to fulfil the role.”

Contrary to the assertion that the committee comprises “independent experts”, however, HMAG representatives are also members of the Scientific Committee. The Scientific Committee’s Terms of Reference (ToR; <http://a303scientificcommittee.org.uk/terms-of-reference>) state that:

“The composition of the Committee will comprise:

- HMAG
- *Experts who have a required specialist skillset or expertise in a specific aspect of the landscape of the Stonehenge WHS.*"

Furthermore, the ToR indicate that the secretariat for the Scientific Committee is provided by Highways England:

"The secretariat will prepare agenda and record minutes / actions, collating the range of views and advice from both HMAG and the Scientific Committee and managing the provision and distribution of project information to Committee members. The secretariat will prepare a formal report to Highways England on meeting proceedings."

Highways England and other personnel attend and take part in Scientific Committee meetings. The minutes of the meeting on 2 July 2019, for example, (http://a303scientificcommittee.org.uk/images/documents/20190702_Scientific_Committee_Minutes.pdf) indicate that 10 "independent" archaeologists, 5 HMAG and 5 Highways England representatives attended the meeting and that it was not only "independent" archaeologists who took part in discussion.

It is clear the Scientific Committee is *not* the independent voice it was supposed to be by the UNESCO WH Centre/ICOMOS Advisory Missions; rather it has been used in support of the project. It appears to be a means of receiving the advice of independent experts and choosing to follow that advice where it is convenient to do so.

Stone Curlew Breeding Plots DCO Requirement

"11. At Deadline 9 of the Examining Authority's examination, the Applicant stated that they had secured both a 'replacement' and 'additional' stone curlew plots through a new Requirement in the draft DCO (Requirement 12 of [AS-1215]), which had not featured in previous iterations of the draft DCO [REP9-0316]. In each case, these details would need to be in accordance with the stone curlew breeding plot specification document, including a regime of management measures ([REP9-0257] and [REP9-0268]). The draft Requirement would also require the Secretary of State to consult with Natural England prior to certifying that the relevant matters have been secured.

It is considered that amendments to the wording of Requirement 12 from that submitted by the Applicant [AS-121] would be needed to ensure the tests of necessity, relevance, enforceability and precision can be satisfied. The Secretary of State therefore seeks comments from the Applicant and Natural England on the revised wording below . . ."

It is acknowledged by the applicant that Stone curlews associated with the Normanton Down RSPB Reserve would potentially be disturbed by increased public access south of the A303 following scheme implementation.⁵

It was also pointed out, by the Stonehenge Alliance and Rachel Hosier (owner of the RSPB Reserve) and her independent specialist, that Stone curlews already feed and nest in areas closer to the A303 than the Reserve and would suffer disturbance from the time that preliminary works begin, owing to movement of heavy vehicles and machinery, noise, increased people-movement in high-viz clothing, lights at night and so on.

It is therefore *at least* essential in our view that all new Stone curlew plots are in place and in operation before Scheme construction begins. There is no assurance in the Draft DCO that this would be the case.

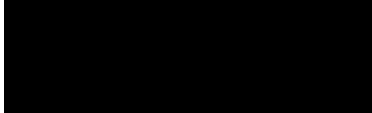
⁵ E.g., DCO APP-266, Statement to Inform Appropriate Assessment (https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000419-6-3_ES-Appendix_8.25_HRA_AppropriateAssessment.pdf), para.3.3.3, third bullet point on p.16.

Furthermore, it is our understanding that at the present time, not all of the additional Stone curlew plots have been secured: we would expect that, should the DCO be granted, it would be on condition that all such plots are secured and will be in operation before any preliminary work begins.

In conclusion

I would be grateful if you should, please, confirm that when Highways England, Historic England and Natural England have replied to your letter, their responses will be published and Interested Parties will be given an opportunity to comment on them, should they wish to do so.

Yours sincerely,



Kate Fielden (Dr)
Hon Secretary to the Stonehenge Alliance

The Stonehenge Alliance supporter-organisations are:
Ancient Sacred Landscape Network; Campaign to Protect Rural England; Friends of the Earth;
Rescue, The British Archaeological Trust; and Transport Action Network