

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Response from the Avebury Society
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The Avebury Society

Ref 2001889

A303 Stonehenge DCO application: response to National Highways' further information requested by the Secretary of State for Transport.

The Avebury Society has reviewed the further information supplied by National Highways to the Secretary of State's Statement of Matters, dated 30 November 2021, concerning the proposed works to the A303 in the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS).

The Society is very concerned that National Highways has hitherto either ignored the Society's representations or has not responded to them in any meaningful way. Further, National Highways has made no proposals to meet any of the Society's concerns outlined at the Relevant Representation stage and reiterated in our following representations to the Examination. We reproduce our Written Representation, below, along with updated comments in bold and we would be grateful if the Secretary of State should take them into account:

Relevant Representation received by the Planning Inspectorate 10.1.19

1. Little consideration has been given to Avebury in relation to the A303 Stonehenge scheme which has major implications for the whole WHS. What happens to one part of the WHS sets a precedent for the other, in terms of planning safeguards and tourism including, at Avebury, potential influx of more visitors, along with problems with parking, facilities and erosion. Comprehensive studies to consider these effects should have been a pre-requisite of the scheme. **No such studies have been undertaken.**
2. A c.3km tunnel was announced from the start and other viable options were not consulted upon, whereas a conference of all interested parties in 1995 agreed that a 4.5km tunnel could be an appropriate solution. **It appears that UNESCO's World Heritage Committee agrees that a longer bored tunnel would be more appropriate; similarly, the Examining Authority which recommended refusal of the scheme.**
3. Promotion of the scheme involved misleading statements, e.g., that it would "protect" and "help conserve and enhance" the WHS. **Such statements have not been withdrawn despite ourselves and others drawing attention to them.**
4. Public consultation took place in South Wiltshire with only two exhibitions/presentations in the Avebury area at the request of the Parish Council. Our positive suggestions produced no changes. The scheme, for a WHS, should have been more widely consulted upon. Even so, it appears those responding to consultations have largely objected (78% in the first round) and their concerns have been ignored. **It appears that the considerable majority of respondents also objected in their Relevant Representations.**
5. Highways England has ignored the advice of UNESCO's World Heritage Centre and ICOMOS specialists to honour the UK's World Heritage Convention commitments, as well as their advice, and that of the World Heritage Committee, to explore options not damaging to the WHS and its OUV. **Their advice continues to be ignored, despite the possibility that if the scheme goes ahead, the WHS would lose its designation.**

6. The scheme does not respect local or national planning policy and guidance; nor relevant European Directives and Conventions. The World Heritage Convention and the relevant WHS Management Plan vision, together with their safeguarding of the WHS have been ignored. **No change.**

7. Impact Assessment conclusions do not acknowledge the substantial harm of physical and visual impacts of the scheme on the WHS as a whole, its OUV, and its setting. This is a continuing failure, despite more recent understanding of OUV. **We understand that the Secretary of State himself found significant harm to the WHS, its OUV and attributes, as revealed in the High Court Judgment which quashed the decision to proceed with the scheme.**

8. We question the statement that the existing A303 damages the OUV of the WHS; and consider that the loss of the much appreciated 'free view' from the road would be a seriously adverse outcome of the scheme. **We, along with many others, maintain these views.**

9. The A303 scheme in construction and operation would be so damaging to the WHS that the designation might be withdrawn and the years of planning and involvement of all concerned parties in the Site's protection would have been wasted, with adverse impacts on both parts of the WHS. **We were right in our prediction and the WHS is now under threat of de-listing. We sincerely hope that the scheme will be abandoned so that we may retain our WHS and continue to work for its safeguarding.**

10. The proposals for Stonehenge are most likely to be detrimental to Avebury. **This remains true, for all of the above reasons.**

As matters stand today, it is very likely that the WHS will be put on the List of WH Sites in Danger if a DCO is granted for a scheme as currently proposed. The WHS would then be removed from the List when physical works commenced. The impacts of the A303 scheme, and the loss of WHS status, will damage the Avebury part of the WHS as well as Stonehenge. This is especially the case at Avebury which is an open site where visitor numbers cannot be controlled and where damage to monuments and their settings will certainly occur.

We remain very concerned that consultation is now being conducted on a scheme that is unchanged, despite the strength of opposition to it.

The Avebury Society has already made representations on the A303 road scheme on six occasions and urges that the application for a DCO now be refused.

31 March 2022

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