



Stonehenge and Avebury World Heritage Site Coordination Unit (WHSCU)

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Introduction

The Stonehenge and Avebury World Heritage Site Coordination Unit (WHSCU) welcomes the opportunity to submit comments on National Highways response to the Statement of Matters relating to the A303 Stonehenge Amesbury to Berwick Down Scheme (the Scheme). A key role of the WHSCU is to offer impartial and independent advice on issues relating to the implementation of the Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan (WHS Management Plan) and its overarching aim, the protection of the WHS and its OUV. The WHS Management Plan represents the UK's commitment to its international obligations under the UNESCO WHC [REP8-065].

The WHSCU would like to re-iterate that the Scheme has the potential to remove the harmful impacts of the A303 in line with the vision and aims of the WHS Management Plan. The below ground element of the twin bored tunnel would enhance the landscape in an extensive area of the WHS. It would also remove its intrusion on the midwinter sunset astronomical alignment. The emergence of the tunnel within the WHS landscape, however, gives rise to major surface infrastructure which conflicts with key aims and policies of the WHS Management Plan. The current proposal would still require substantial amendment to align with these aims and policies, particularly regarding the cuttings to the tunnel portals, the proposed new Longbarrow Junction and the Countess flyover. Although the additional covered section of road and deeper, steeper sided cutting design would reduce its intrusion, there would still be considerable severance of and visual impact on the landscape [REP2-139, REP8-065]. As recommended in REP2 -139 ('Summary'), *'harm should be avoided through reconsideration of a longer bored tunnel taking the portals to beyond the WHS boundary and away from the most significant elements of its setting'*.

As the Scheme put forward has not changed substantially, the earlier submissions by the WHSCU are still relevant namely [REP2-139, REP8-065].

Background

As one of the most preeminent sites in the world, the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS) is a designated heritage asset of the

highest significance. The site is considered by UNESCO to be '*so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity*' [para 49 Operational Guidelines]. One of the qualities that makes the WHS of Outstanding Universal Value (OUV) is the '*exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel.*' (WHS Management Plan 2015, p.26, Statement of OUV).

The WHS is a hugely symbolic landscape where the monuments have been deliberately placed in relation to the topography and each other creating a web of interrelationships across the landscape. The World Heritage Centre/ICOMOS 2015 Advisory Mission (p.18) identified the need for a 'landscape' 'perspective' in relation to the Scheme that continued outside the boundary of the property, thus emphasising the importance of the Site's setting.

Each WHS has a Statement of OUV which forms the focus of all protection and management decisions. The Statement of OUV for the WHS was adopted by UNESCO in June 2013. In addition to illustrating how the Site meets the UNESCO Criteria, the Statement also contains a description of the Integrity and Authenticity of the Site and an outline of the Protection and Management arrangements needed to assist in the protection of the WHS and its OUV. Seven Attributes, or aspects of the WHS which are associated with or express OUV, have been identified in the Statement of OUV. The Attributes are not themselves individually of OUV but together they express the OUV of the WHS. There is an underlying obligation to sustain the OUV and thus avoid harm to its attributes.

RESPONSE TO BULLET POINT FOUR – Environmental Information Review

Cultural Heritage

National Highways states that '*The Applicant's cultural heritage assessment remains consistent with the 2015 Management Plan policies*' [Redetermination 1.4, para 3.1.8].

The Proposed Development is assessed in the HIA as having a slightly adverse effect on two attributes, but a beneficial effect on the remaining five [APP-195, Table 3, p.21].

Below is a brief summary of how the proposed Scheme would affect the OUV Attributes, Integrity and Authenticity of the Site and therefore does not comply with the key WHS Management Plan Policies (WHS Management Plan 2015, p.32-37).

Attributes of OUV

Attribute 1: Stonehenge itself as a globally famous and iconic monument.

It is difficult to fully appreciate the impacts that the Scheme, including the tunnel section, will have on peoples' relationship with the iconic Stonehenge monument.

Attribute 2: The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.

The excavation works needed would potentially lead to a serious loss of heritage assets associated with the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.

Attribute 3: The siting of Neolithic and Bronze Age funerary and ceremonial monuments in relation to the landscape.

Attribute 5: The siting of Neolithic and Bronze Age funerary and ceremonial monuments in relation to each other.

Attribute 6: The disposition, physical remains and setting of the key Neolithic and Bronze Age funerary, ceremonial, and other monuments and sites of the period, which together form a landscape without parallel.

The planned major engineering works within the WHS and its setting would irreversibly harm the settings of monuments and the relationship between them as well as the wider setting of the WHS landscape. Monument groups affected by the Scheme include the Winterbourne Stoke Crossroads barrows, the Diamond Group and the Normanton Down barrows. Wider relationships between Neolithic long barrows would also be affected. HIA and landscape assessments have not adequately considered the potential impacts of the Scheme in relation to the spatial relationships between monuments and sites, or between these and the landscape.

Attribute 4: The design of Neolithic and Bronze Age funerary and ceremonial monuments in relation to the skies and astronomy.

Known astronomical alignments and the ability to perceive them would, however, be improved but only if lighting and light spill associated with the Scheme is kept to an absolute minimum.

Attribute 7: The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists, and others.

The proposed Scheme would have the potential to adversely impact the spirit of place which has inspired architects, artists, historians, archaeologists and others for centuries.

Whilst it is difficult to fully appreciate the impacts of the Scheme on Attributes 1 and 7, the right design detail relating to lighting could result in a benefit to Attribute 4. However, the Scheme will impact negatively on Attributes 2, 3, 5 and 6.

Integrity

Integrity is defined as the wholeness or intactness of the cultural heritage of the WHS. The Proposed Development is assessed in the HIA as having an overall slightly beneficial effect on the authenticity, integrity and OUV of the WHS. [HIA, section 12, para 12.5.4].

The WHS suffers from the adverse effects of the current A303 surface road which is seen to harm the integrity of the WHS. However, the effects of the road are largely reversible. The Scheme would introduce permanent visual and physical severance where none currently exists by introducing cuttings between key barrow groups particularly the Winterbourne Stoke, Diamond and Normanton Down Groups in the Western part of the WHS. The spaces between the monuments are extremely important to understanding how the landscape was used and evolved in the Neolithic and Early Bronze Age periods.

The WHS Management Plan indicates that some elements which might help us to better understand the significance of the WHS are outside its boundaries. The possible

extension of the WHS to the north and west to enhance its integrity are discussed (WHS Management Plan 2015, p.35). The proposed Longbarrow Junction, an extremely large engineering structure, would be located in an area which might be integrated into the WHS. The position and scale of the proposed junction have the potential to reduce our understanding of the heritage assets beyond the current boundary.

The A303 Scheme, as currently proposed, would substantially and permanently harm the integrity of the WHS, now and in the future.

Authenticity

Authenticity is defined as the truthfulness and credibility of the evidence for the Site's OUV.

The WHS is considered remarkable for the completeness and the concentration of its archaeological remains *'Interventions have been limited mainly to excavations and the re-erection of some fallen or buried stones to their known positions in the early and mid-twentieth century in order to improve understanding. Ploughing, burrowing animals and early excavations have resulted in some losses but what remains is remarkable in its completeness and concentration'* (WHS Management Plan 2015, p.28).

The A303 scheme, a large modern infrastructure project within the WHS and its setting, would alter the readability of the historic landscape and how it was used; it would also cause the destruction of evidence important to the archaeological record. *'The survival and the huge potential of buried archaeology make the property an extremely important source for archaeological research, which continues to uncover new evidence and expand our understanding of prehistory'* (WHS Management Plan 2015, p.28 Statement of OUV). Adverse impacts on physical remains would destroy and potentially inhibit future discoveries that might come about through technology yet to be designed. The extensive excavations needed for the Scheme could prevent transmission of knowledge to future generations.

The engineering works would therefore seriously harm the authenticity of the WHS.

WHS OUV

The EIA and HIA both indicate some adverse impacts of the Proposed Development on the WHS and its OUV, although it is assessed in the HIA as having a slight beneficial overall effect on the WHS OUV [APP-195, para.11.3.2].

The acknowledged adverse effects on the Attributes, Integrity and Authenticity of the WHS, however, are not in keeping with the vision, aims and policies of the WHS Management Plan. In addition, there would be considerable harm to both landscape character and visual amenity, notwithstanding the mitigation proposed.

The combined effects of the proposed Scheme, on the OUV and the WHS, demonstrate it does not accord with WHS Management Plan Policy 1d: *'Development which would impact adversely on the WHS, its setting and its attributes of OUV should not be permitted'* (WHS Management Plan, p.90).

Nor would the Scheme meet the requirements of Policy 3c: *'Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself'* (WHS Management Plan, p.105).

It is the WHSCU's view that the Scheme does not meet the crucial Management Plan Policy 1a: which states that *'Government departments, agencies and other statutory bodies responsible for making and implementing national policies and for undertaking activities that may impact on the WHS and its environs should recognise the importance of the WHS and its need for special treatment and a unified approach to sustain its OUV'* (WHS Management Plan, p.83).

Any major infrastructure development in an internationally important site described as a "landscape without parallel" would be a very great challenge. The question still remains as to whether sufficient weight has been given to the protection of the WHS and its OUV.

Even with a part-bored tunnel solution, and despite design refinements, the current road proposal would require substantial mitigation related to above ground infrastructure in any attempt to align it to the Management Plan, vision, aims and policies. This applies particularly to the western portal and expressway. Covering the gap between the tunnel canopy and the Green Bridge would enhance both visual and physical links between barrow groups and other archaeological features as well as their settings. It would also provide better opportunities for exploration of the WHS and movement through it, enhancing visitors experience and understanding of the WHS. It would not, however, prevent the loss of archaeological evidence or the effects of major element of infrastructure on the WHS elsewhere.

Extending the bored tunnel out of the WHS would provide the best solution to adequately protect the OUV of the property.

RESPONSE TO BULLET POINT FIVE – Any Other Matters

World Heritage Committee Decision 44 COM 7.B.61

The 2021 adopted World Heritage Committee (WHC) decision [44 COM 7B.61] records that *'the approved A303 improvement Scheme is a potential threat to the property, which - if implemented - could have deleterious effects on its inherent characteristics, notably to its integrity'* and *'that in the event that DCO consent was confirmed by the High Court, the property warrants the inscription on the List of World Heritage in Danger'* (Paras.11 and 12).

The Examining Authority concluded that *'the effects of the Proposed Development on WHS OUV and the historic environment as a whole would be significantly adverse. Irreversible harm would occur, affecting the criteria for which the Stonehenge, Avebury and Associated World Heritage Site was inscribed on the World Heritage List'* [Report, para. 5.7.326].

National Highways finds *'In conclusion, while we expect that the SoS will take the World Heritage Committee Decision 44 COM 7.B.61 into account in his redetermination of the application for the Scheme, for all the reasons stated above the points raised in the Decision do not affect the case for the Scheme and development consent can and should be granted'* [Redetermination 1.5, para. 1,2,17].

Whilst the design refinements to the Scheme are to be welcomed, they do not align the Scheme to the WHS Management Plan, vision, aims and policies and have not removed the harm that prompted the WHC and Examining Authority responses. Any approved Scheme needs to avoid adverse impacts on the WHS and its OUV in line with our international obligations and the national and local policy framework.

There is a chance that the WHS will be placed on the List of World Heritage in Danger by the WHC if the DCO for the Scheme, in its present form, is granted. If this were to happen and the Scheme goes ahead, the WHS could then be deleted from UNESCO's World Heritage List as Liverpool – Maritime Mercantile City was in 2021.