

Re-determination of the Application for the A303 Stonehenge Scheme: National Highways' response to the Secretary of State's request for comments on the Findings and Recommendations in the Final Report on the joint WHC, ICOMOS, ICCROM Advisory Mission to Stonehenge

Comments by the Consortium of Stonehenge Experts

General points:

- We welcome the report of the Advisory Mission (AM) which reinforces the World Heritage Committee's (WHC) earlier recommendation that the A303 Stonehenge Scheme should not proceed in its current form.
- We are concerned that the Stonehenge WHS might be placed on the List of World Heritage in Danger and ultimately delisted unless the current scheme is fundamentally amended.
- We are extremely disappointed that National Highways (NH) has failed to substantially amend the archaeological mitigation strategy and other aspects of their scheme despite the failings identified by Planning Inspectors' report, the WHC's decisions and the High Court Judgement.

Specific points:

- With regard to NH comments about the AM's concerns for archaeological matters (Table 2.6–2.9, 2.11), we consider that NH's unchanging approach to archaeological evaluation and proposals for archaeological salvage and mitigation remains wholly inadequate.
- We set out these concerns about evaluation, methodology and proposals for salvage and mitigation in our document 'Consortium of Stonehenge experts' submission on National Highways' response to Redetermination 4' (2 August 2022); some of the concerns have not been addressed by NH at all and others unsatisfactorily.
- The draft DCO proposals (including the DAMS and OEMP) for archaeological salvage and mitigation fall far short of the standards of retrieval of artefacts and buried features that are required for the WHS. The current proposals would result in unacceptable loss of archaeological materials and information.
- The majority of independent members of the Scientific Committee, many of whom are also members of our Consortium of Stonehenge Experts, are opposed to the road scheme. Yet the views of Scientific Committee members were only selectively adopted by NH who only accepted the majority opinion when it coincided with their own plans, and ignored it when it did not.

Conclusion:

None of the key issues identified by the AM has been satisfactorily addressed by National Highways. Among these are:

- The Scheme should not proceed in its present form.
- An alternative should be sought to the scheme that does not impact on the WHS, notably bypass option F010.
- Re-siting any new Longbarrow Junction to avoid being too close to the WHS boundary.
- A **comprehensive** archaeological salvage and mitigation programme is required for works affecting the WHS

As the Advisory Mission clearly states, the Scheme should not proceed in its present form. If it were to be implemented, the UNESCO WHC would be right and justified in placing the Stonehenge and Avebury World Heritage Site on the List of World Heritage in Danger, prior to its removal from the World Heritage List.