

By email to the Highways Agency

21st April 2018

Dear Sir/ Madam,

**ICOMOS-UK RESPONSE TO HIGHWAYS AGENCY CONSULTATION ON A303
PREFERRED ROUTE PROPOSALS IN RELATION TO THE STONEHENGE,
AVEBURY AND ASSOCIATED SITES WORLD HERITAGE SITE, APRIL 2018**

ICOMOS-UK plays a leading role in helping to implement the 1972 World Heritage Convention within the UK and promoting best practice in the management of UK World Heritage Sites (WHSs). Maintaining the Outstanding Universal Value (OUV) of the UK's WHSs is a key objective

The following sets out ICOMOS-UK's response to Highways England's formal consultation on its preferred route proposals for a 2.9km tunnel combined with dual carriageways in cuttings across the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage site.

ICOMOS-UK wishes to register a strong objection to these proposals in view of the substantial negative and irreversible impact we believe that the dual carriageways at both ends of the tunnel would have on the attributes of OUV of the WHS of Stonehenge, Avebury and Associated Sites.

We consider that to suggest that this negative impact on OUV of the dual carriageways can be mitigated by benefits brought by the tunnel to the centre of the WHS, is to fundamentally misunderstand the Government commitments to sustain the OUV of the WHS, including its integrity and authenticity, made by the UK State Party to the World Heritage Convention at the time of inscription of the property on the World Heritage List.

In our view, the overall preferred route project is severely flawed and its impacts cannot be readily mitigated; it is essential that the whole project be re-assessed and a wider range of routes and construction options explored before a public consultation by the Government is recommended.

The following are the main points upon which we wish to base our objections:

1. While acknowledging that there has long been a need to do something to address the impact of the major A303 road through the WHS, and that initiatives to try and solve traffic problems are needed, we do not accept the idea that the proposed tunnel is a once in

a lifetime opportunity to solve the road problems that has to be taken even if the length of the tunnel means there would be irreversible damage to the WHS and its OUV, which we consider would be the case;

2. We consider that a 2.9km tunnel is too short to protect the WHS as it leaves some 2.2 km of the dual carriageways in cuttings at either end; the dual carriageways either side of the tunnel would cause irreversible damage to the OUV of the WHS as they would slice through the planned sacred landscape in a way that destroys the visual and physical links of the interconnected monuments, would destroy large swathes of potential archaeological evidence; and would sever the interconnectedness of the above and below ground monuments that has now been revealed through non-invasive surveys and targeted excavations;
3. Recent archaeological surveys have profoundly changed our understanding of this sacred landscape and as even better innovative scientific techniques are likely to emerge in the next few decades, we cannot afford to sacrifice parts of this landscape and the embedded knowledge within it that awaits discovery and celebration;
4. We do not consider that the full impact of the proposed project on the overall pre-historic archaeological landscape within the boundaries of the WHS has been fully acknowledged in the HIA; more emphasis has been given to the visual impact of the tunnel portals rather than on the impacts of dual carriageways and substantial cuttings emanating from those portals;
5. The whole project appears to have been retro-fitted to an initial budget, driven by road/tunnel making and not by an assumption that one of the world's most significant and iconic WHSs has to be protected;
6. We consider that a much wider range of options should have been considered in far more technical detail;
7. We consider that what has not been properly promoted in the public consultation is that the WHS is not just the main henge monument but the henge together with the extensive planned landscape that surrounds it. Various Highways Agency publications associated with the Public Consultation have suggested that the tunnel would benefit the 'Stonehenge' landscape overall rather than in reality just (possibly?) the main henge monument and its immediate setting;
8. We do not consider that the assumed potential benefits to the centre of the property from the tunnel, however apparently great, can compensate for the destruction of attributes of OUV by the dual carriageways at either end of the tunnel; the idea that access and visual benefits in the centre of the site can outweigh threats to OUV from destroyed archaeology and visual and noise intrusion beyond the tunnel is an equation that cannot be supported; major irreversible impacts on OUV cannot be mitigated by benefits elsewhere in the

property. In this sense WH properties need to be considered differently from other cultural and natural sites within the UK Planning system which accepts the idea of balancing benefits and dis-benefits and allows projects to go ahead if there are sufficient social and economic benefits that could be seen to outweigh heritage dis-benefits. We consider that this balancing approach is unacceptable for World Heritage properties. If ICOMOS, as an international organisation advising UNESCO's World Heritage Committee, accepted that social and economic benefits could outweigh impact on OUV, it would be difficult to challenge infrastructure projects or other new developments that provided social or economic benefits.

9. We believe that if 2.2km of cuttings for dual carriageways were to be approved across one of the most sacred and iconic historic landscapes in the world, it would be difficult to stop dual carriageways being constructed across any WHS and our UK reputation related to protecting cultural heritage would be severely affected.
10. We support the decision of the UNESCO World Heritage Committee at its 41st session in July 2017 that the proposed partial tunnel of 2.9 km and its associated dual carriageways in cuttings within the property do not provide an acceptable solution as the cuttings would have an a highly significant, adverse and irreversible impact on the Outstanding Universal Value (OUV) of the WHS, and its invitation to the UK government to explore further options in order to 'find an optimal solution for the widening of the A303 to ensure no adverse impact on the OUV of the property' including the F10 non-tunnel by-pass option to the south of the property and longer tunnel options to remove dual carriageway cuttings from the property;
11. We support the idea of a by-pass solution for the World Heritage site, and note that no convincing grounds have been put forward as to why the southern route entirely outside the WHS was discounted before the public consultation, other than to say it might promote 'rat running' on the remaining existing routes within and around the WHS which we consider could be managed; and we do not understand why other bypass options south of the WHS could not have been considered combined with tunnels under sensitive areas;
12. We are alarmed that no mention of this decision by the World Heritage Committee was made in the Highways Agency Consultation document;
13. We are disappointed that the Public consultation has not taken into account this decision or the key recommendations of the first two UNESCO/ICOMOS Advisory Missions and nor did it wait for the third Mission in January 2018 or its report to be issued. As these missions were invited by the Government, it is of concern that they were not considered to be relevant to the decision making processes.
14. We are also disappointed that the design process has been a closed one and, as far as we are aware, has not allowed any interaction with the wider professional and public cultural heritage sector in the UK – as envisaged and recommended by the first Advisory Mission.

15. We are alarmed that insufficient attention has been given to the long-term technical issues associated with tunnelling and tunnelling management/maintenance given the life expectancy of the project is only a hundred years; some distinguished engineers have already raised concerns as to how, in a hundred years' time (which is a very minor part of the existence of the Stonehenge landscape), the long term stability of the tunnel will be maintained without damage to the landscape above and to the sides;
16. Furthermore, we consider that insufficient attention has been given to the long-term adverse geotechnical, geomorphological and environmental effects associated with the cuttings and dual carriageway elements within and adjacent to the WHS;

We consider that the nation has a responsibility to future generations to safeguard our precious World Heritage. Stonehenge, as a total landscape linked to the development of the world's human civilisation over thousands of years, should not be sacrificed to an unsatisfactory project that will deprive the national and international community of an almost intact sacred landscape that the government has committed itself to pass on to future generations.

In conclusion, we urge the Highways Agency to put on hold the development of this A303 project to allow a wider range of options to be considered in line with the recommendations of the UNESCO World Heritage Committee. We would also urge the Highways Agency to work closely with the World Heritage Centre in conjunction with the Department of State responsible for World Heritage in the UK to find a long term, acceptable and reasoned solution that protects the integrity of the Stonehenge component of the WHS as a sacred place of global importance not just for its main henge monument but for the totality of its interconnected pre-historic landscape.

Yours faithfully

Peter Marsden
Chair, ICOMOS-UK World Heritage Committee

cc:

The Rt. Hon. Chris Grayling, MP, Secretary of State for Transport

The Rt. Hon. Matt Hancock, MP, Secretary of State for Digital, Culture, Media and Sport

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