

**RESPONSE FROM AVEBURY PARISH COUNCIL
TO HIGHWAYS ENGLAND'S COMMENTS ON OUR WRITTEN REPRESENTATION
(REP2-056)**

To the Examining Authority

Avebury Parish Council (APC) appreciates the detailed response given by Highways England to the Council's written representation. Highways England makes three observations on each of which APC wishes to emphasise its continuing concerns.

The first of Highways England's observations is that there is unlikely to be additional pressure on Avebury and its sites as a result of disruption to the patterns of visiting at Stonehenge. In part this is because Highways England does not accept that there will be disruption. Frankly it is not possible for Highways England to be sure of this one way or the other but it seems highly improbable that there will be none. In addition Highways England advances the opinion that visitors attracted by the two sites are different. Those to Stonehenge are "from the international market, visiting iconic tourist attractions, or part of an organised tour or event [whilst] those visiting Avebury are often more dedicated, in-country visitors interested in the prehistoric period and its monuments" (46-651).

Evidence in support of this striking contrast is not presented and even a cursory glance at Avebury's main car park suggests urgent need for qualification. Coaches with continental registration plates are very much in evidence, indicating that many visitors to Avebury are both international and organised. This is confirmed by the fact that many of them converse amongst themselves in mother tongues other than English. To suggest that Avebury attracts independently travelling amateur archaeologists who are British nationals whilst visitors to Stonehenge are packaged citizens from countries other than the UK touring from one iconic attraction to the next is to mislead. We believe that, so far as visits are concerned, Avebury and Stonehenge are much more readily substitutable than Highways England avers. APC is concerned that Highways England has presented no evidence to show that substitution will not occur and accordingly that it has devised no plan to mitigate impact.

The second observation is about risk management of WHS status retention. We note that Highways England has detected “no indication that World Heritage Status might be removed” (46-693). It is clear, however, that Highways England’s design revisions in response to criticisms from UNESCO-ICOMOS have not yet been found to be sufficient. Although UNESCO’s World Heritage Committee is expected to reach a decision on the point this summer, the report to the Committee by international experts is explicit. The fact that Highways England concedes that its Scheme does inflict “some adverse effects on some of the Attributes of OUV” (46-693) reinforces the fact that we cannot be confident about the outcome. APC remains concerned for the fragility of the WHS status of which Avebury is a constituent part and the significant consequences for the village and its associated sites were that status to be lost.

The third observation is about the use of Designated Funds to enhance appreciation of the WHS. We welcome the fact that Highways England commits “to work collaboratively with the World Heritage Site Partnership Panel to plan for the post-scheme future” (46-695). In particular we are pleased to see that money from Designated Funds has been allocated to three of the WHS 2015 Management Plan objectives, namely for strategies concerned with land access, sustainable tourism, and sustainable transport. These are important but APC is concerned that practical progress must also be made on the ground. We note that the Avebury WHS Transport Strategy 2015 exists and that it has been endorsed by all WHS stakeholders. It identifies many transport schemes for the benefit of road users and the WHS alike that are ready for or close to implementation. We therefore urge that in addition the Designated Fund allocates money for implementation of schemes set out in the Transport Strategy, especially but not only in relation to road safety on the A4 (see The Strategy, pages 37 to 41). These will enhance appreciation of the WHS and improve road safety on a key route in the northern part of the site, thereby helping to compensate for adverse impacts from the A303 scheme.

15 June 2019