

23 April 2018

Highways England A303 Stonehenge consultation 2018

Response from the Council for British Archaeology

To whom it may concern

Highways England A303 Stonehenge Amesbury to Berwick Down consultation 2018

The Council for British Archaeology (CBA) is an educational charity working throughout the UK to involve people in archaeology and to promote the appreciation and care of the historic environment for the benefit of present and future generations.

The Council was founded in 1944 for the 'safeguarding of all kinds of archaeological material and the strengthening of existing measures for the care of ancient and historic buildings, monuments, and antiquities' and to improve public education about archaeology.

Today it has some 500 organisational and over 5000 individual members and subscribers and its advocacy represents the public voice for archaeology in the UK.

The Council has a long-established interest in the conservation and management of Stonehenge, its World Heritage Site (WHS), and the surrounding landscape. Over the last two years we have consulted our members, held an open public debate, and engaged with our trustees in updating our position statement on the Stonehenge landscape. Our trustees have visited and walked around the World Heritage Site landscape round Stonehenge on two occasions in the last three years. At our Annual General Meeting in November 2016, our members agreed an updated position statement on the management of the Stonehenge landscape (copy attached), including three Cardinal Principles on which we base our analysis of the latest proposals for the A303:

The CBA's primary objectives are:

- to protect and conserve Stonehenge itself and its landscape of inter-related monuments
- to manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now becoming increasingly clearly understood
- to further public understanding of that increasing significance

Our key principles for assessing the proposed changes are that the siting and design of new infrastructure and land-use, (and, where relevant, the removal or alteration of the existing) should ensure:

- i. minimum damage to known or potential archaeological remains
- ii. minimum visual intrusion on monuments and landscape
- iii. maximum benefit to the visitor in terms of enhanced presentation and understanding of the archaeological significance
- iv. maximum tranquillity
- v. maximum reversibility at the end of use-life
- vi. efficient use of previously-developed areas

Given the limited options presented in the formal consultation, the CBA supports the principle of a long-bored tunnel as the road solution for the A303 which will deliver the greatest environmental gain - though we continue to believe that options including a surface route south of the WHS should also be considered in detail alongside the tunnel option. The removal of the A303 from the surface of the WHS (provided the former A303 did not subsequently become a thoroughfare for motorised traffic) would be highly beneficial and the CBA encourages Highways England on behalf of the Government to continue to work with the heritage sector and other key stakeholders to find the most beneficial achievable solution for the proposed tunnel in the area.

The CBA recognises that the latest proposals are a further improvement on previous published options, but we still have considerable concerns about the impact of the tunnel portal locations and the new surface dual carriageways on the archaeological landscape and the Outstanding Universal Value of the World Heritage Site, particularly at the western end, and also the issues raised by future Byway management.

We wish to see more detailed evidence that all the environmental issues associated with the tunnel construction have been considered and understood – for example ground water levels on the eastern side. Also, detailed information should be provided on construction methodology and the full range of implications of the construction of the tunnel (eg use of construction compounds) and all associated temporary and permanent road works which are likely to cause considerable additional damage to the archaeological landscape within and immediately adjacent to the World Heritage Site.

We remain keen to work constructively with Highways England and other stakeholders to find an achievable solution to ensure that the benefits of removing the A303 from the landscape around Stonehenge can be realised in the years to come.

1. Western section: Please provide us with any comments you may have on our proposals for the viaduct crossing of the River Till valley.

We do not support reshaping the landscape around Parsonage Down with chalk excavated from the tunnel. The area contains significant archaeological monuments, including the Coniger barrow cemetery on which this could have an adverse impact.

Full investigation and recording of archaeological remains which may be damaged by the viaduct crossing should be delivered to the highest achievable standard – a principle which should be applied to any part of the proposed A303 scheme which impacts on archaeological deposits.

2. Western section: Please provide us with any comments you may have on our proposals for the A303/A360 Longbarrow junction.

We welcome the proposal to move the road junction and the route of the A360 outside the World Heritage Site, but further archaeological evaluation is required to fully appreciate the impact of this proposal on the important archaeological deposits in the area and the setting of key monuments. The location of the proposed construction compound is of particular concern and needs to be fully evaluated.

3. Western section: Do you have any other comments about our proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction)?

We support the use of Green Bridges in principle, but further detail should be provided on their construction and future maintenance, and any implications that this may have for the Outstanding Universal Value of the World Heritage Site.

4. Central section: Please provide us with any comments you may have on our proposals for the green bridge (No.4) at or near the western boundary of the World Heritage Site.

Any new Byway must be classified as a Restricted Byway and should if possible follow the route of existing roads, eg the A360. This will minimise motorised traffic and minimise damage to buried remains and the setting of key monuments within the World Heritage Site.

5. Central section: Please provide us with any comments you may have on our proposals for the cutting on the western approach to the tunnel.

We welcome the change in the routing of the A303 as it approaches the tunnel which would reduce its visual appearance in the landscape and improve the intervisibility of the various barrow groups in the area. However significant concerns remain about the impact of the cutting on the relationship between Neolithic long barrows in this area. In particular, we are concerned about the impact of the cutting on the nearby pond barrow containing the Wilsford Shaft.

We prefer the option of using vertical cutting walls, rather than a gradual grassed slope, as this minimises the footprint of the new A303 route within the World Heritage Site. Lighting should be kept to an absolute minimum in any cuttings and tunnel entrances, and at the revised junction above the A303.

6. Central section: Please provide us with any comments you may have on our proposals for the western entrance to the tunnel.

We welcome the revised location of the western tunnel entrance, however there would inevitably still be damage to the Outstanding Universal Value of the World Heritage Site in this area with a direct impact on the field systems in the area, and on the setting of key monuments. Further evaluation work is needed to understand the full impact of the proposals.

7. Central section: Do you have any other comments about our proposals for the central section of the scheme within the World Heritage Site?

We support the indicative methodology for any tunnel, but wish to see more evidence of the potential impact on groundwater levels in the World Heritage Site. In particular, further evaluation work is required to ensure that there is no possibility of damage to the archaeological deposits at the Blick Mead site. Alongside further evaluation work in this area, we recommend monitoring of any waterlogged deposits to be put in place now to allow baseline measurements to be taken.

We strongly oppose the proposed link between Byway 11 and Byway 12 which would encourage continued use of these byways by motorised vehicles. We could not support any proposal which provides a thoroughfare for motorised vehicles across the centre of the World Heritage Site. All Byways in the World Heritage Site should be Restricted so that they can only be used by walkers, cyclists and horse riders.

8. Eastern section: Please provide us with any comments you may have on our proposals for the A303 flyover at Countess roundabout.

We prefer the landscaped option for the flyover to provide appropriate screening – and an opportunity to use some of the chalk excavated from the tunnel.

9. Eastern section: Do you have any other comments about our proposals for the eastern section of the scheme (Countess junction to just beyond the Solstice Park junction)?

We support the proposed closure of Amesbury Road and the Allington Track south of the A303, and also the Byway which continues the Allington Track to the north of the A303, which would improve the setting of key prehistoric barrows in the area. However, the proposed new road might cause further damage to archaeological deposits in the area.

10. Do you have any comments on the preliminary environmental information provided for the scheme?

A full Environmental Impact Assessment is needed and should be produced to a high standard which befits a scheme that would cause damage to a World Heritage Site, and areas of

environmental designation. Currently, insufficient information is available. Highways England should commit to making any scheme an exemplar of good practice in all regards.

There seems to be no consideration of the potential for Palaeolithic remains, although the scheme crosses areas where Pleistocene deposits (mainly Head) are mapped. Following a 'deposit-led' approach, there should at least be an assessment of the potential for Palaeolithic remains to be present.

11. Do you have any other comments you would like to make about the scheme?

We encourage Highways England to continue to work with colleagues from the National Trust, Historic England and English Heritage, and to take on board comments from other key heritage organisations with the aim of ensuring that the benefits of the proposed scheme are maximised.

Further consideration should be given to the clear advice from the recent UNESCO/ICOMOS Advisory Missions to Stonehenge.

We commend to Highways England the CBA's Cardinal Principles as a yardstick to consider any proposals and as a basis to justify further changes to the proposed scheme.

At this stage, we reserve judgement on whether the undoubted benefits of the scheme would outweigh the inevitable damage to the Outstanding Universal Value of the World Heritage Site. Further detailed information is required to enable any final proposals to be fully considered during the Planning Inspectorate's examination process.

Yours faithfully



Dr Mike Heyworth MBE
CBA Director

On behalf of CBA trustees