THE STONEHENGE ALLIANCE

March 2015

Issues concerning potential solutions for the A303 at Stonehenge

This note sets out issues associated with possible solutions for the A303 at Stonehenge that have been suggested by various organisations. The solutions include a 2.9km tunnel as favoured by Government, the National Trust (NT) and English Heritage (EH); and a surface dual carriageway. The Stonehenge Alliance's position is also clarified.

- 1. Bearing in mind that the World Heritage Site (WHS) was designated for its archaeological significance:
 - A twin-bored short tunnel and surface dual carriageways, long cuttings, and grade separated junctions, all within or partly within the WHS would result in significant loss of archaeology and integrity; and would be irreversible.
 - Surface dualling all the way across the WHS even on a membrane to try to protect underlying archaeological deposits would be likely to lead to some disturbance and damage. While technically reversible, once built this would be unlikely.
 - In terms of *environmental* impact, especially noise and visual damage, both options are unacceptable.
- 2. Neither surface dualling nor a short tunnel would meet the Government's commitments under the World Heritage Convention, notably Article 4: http://whc.unesco.org/en/conventiontext/.
- 3. There is no basis for assuming that wholly surface dualling would be contemplated by any Government. It has not been seriously considered before and isn't at the present time except by those who demand a solution to A303 congestion regardless of the WHS.
- 4. Any suggestion that surface dualling right across the WHS might be considered can be dismissed as scaremongering in an attempt to justify support for a short tunnel. NT land can be declared inalienable and this was threatened in the NT's Outline Statement of Case before the A303 Inquiry in 2004: http://www.savestonehenge.org.uk/nt_osoc.html:

"3. Acquisition of Land Act 1981 Act Powers to Protect Inalienable Land

- 3.1 In due course, the National Trust may have to undertake the process of considering whether to invoke the Special Parliamentary Procedure in relation to inalienable land in its ownership. By its attendance at, and participation in, the forthcoming public inquiry, the National Trust will endeavour to inform itself fully as to those matters which it would have to take into consideration at that later stage. The decisions of the Secretary of State for Transport would also be a consideration, material to the National Trust's deliberations . . .".
- 5. ICOMOS-UK, the UK branch of the International Council on Monuments and Sites, advisers to UNESCO, wrote to the Secretary of State for Transport on 5 November 2014, expressing concern about possible support at that time for a 2.4km or 2.9km tunnel, saying:
 - "We appreciate the very real need to address the issue of the A303 and recognize that a tunnel could have beneficial impacts on parts of the World Heritage property. However, we are concerned that associated portals and dual carriageways could have a highly adverse impact on other parts of the World Heritage landscape that cannot be set aside however great the benefits of a tunnel."

This indicates:

- a) that a 2.9km tunnel would not be supported by ICOMOS-UK; and, in view of its expressed concern about the World Heritage landscape, it would not support wholly surface dualling either; and
- b) that the NT and EH are wrong in their contention that a short tunnel would be of benefit overall to the WHS, regardless of whether or not it might be considered by some to be better than wholly surface dualling.

The inference must be that neither form of dualling is acceptable to ICOMOS-UK and if either were to go ahead, WHS status could be lost.

- 6. The Secretary of State has assured the Stonehenge Alliance, in a letter dated 28.11.14, that:
 - "...substantial work will be required to identify a preferred route option. This would be undertaken in consultation with relevant bodies and stakeholders, including English Heritage, National Trust, ICOMOS-UK and UNESCO's World Heritage Committee to ensure that a solution is developed that protects the Outstanding Universal Value of the World Heritage Site."

This also enables us to infer, from what ICOMOS-UK has said, that any solution would have to satisfy its and UNESCO's concern that the Outstanding Universal Value (OUV) of the WHS would be protected, regardless of whatever government is in power.

Note: Archaeologists may be reluctant at present to express their views on the matter. Many need to maintain good relations with the NT and EH in order to work in the WHS and elsewhere. They are likely to prefer to wait until a scheme is on the table before commenting, as in 2004. However, Mike Heyworth, Director of the Council for British Archaeology, has already publicly indicated concern about the 2.9km tunnel.

Stonehenge Alliance's Position: The Stonehenge Alliance wants to prevent any further damage being done to the World Heritage Site while also seeking improvements. It therefore opposes both a short tunnel and, if necessary, wholly surface dualling. It is pressing for measures to discourage use of the road at busy times, but if the Government is determined to dual the A303 at Stonehenge, the Alliance considers the road tunnel should be at least 4.5km long (the minimum distance to avoid more roadbuilding within the WHS). Ideally, the tunnel should be longer so that all the portals are well clear of the WHS.

Further information on inalienable National Trust land:

NT supports a fully bored tunnel for HS2 (apparently c.25km long) under the Chilterns Area of Outstanding Natural Beauty: http://www.nationaltrust.org.uk/document-1355766903031/:

"7. If the project proceeds it will involve taking land in which the National Trust's interest has been declared inalienable. If the scheme progresses we wish to see Hartwell House and its grounds protected by the highest levels of visual and noise mitigation possible. This means a fully bored tunnel and we remained committed to working with the Department for Transport and HS2 Ltd in seeking a suitable solution to the impacts." (Response to the High Speed Two Ltd and Department for Transport Consultation, p.2)

See also: http://www.nationaltrust.org.uk/article-1355841078618/:

"We also support the principle of a fully bored tunnel for the Chilterns Area of Outstanding Natural Beauty. This would provide significant additional protection for this nationally protected landscape and could benefit the views from Coombe Hill which we care for." ('Our HS2 petition goes to Parliament', NT press release, 23.5.14)