

A303 Stonehenge - the proposed option

The full response from the Council for British Archaeology:

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:

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 the World Heritage Site (WHS) around Stonehenge. Over the last year we have consulted our members, held an open public debate, and engaged with our trustees in updating our position statement on the management of the WHS. The final document (available at <http://new.archaeologyuk.org/stonehenge>) was agreed by members in General Meeting in November 2016 and contains 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

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 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 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.

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The CBA recognises that the latest proposals are an improvement on previous options (eg the 2.1k tunnel examined at public inquiry in 2004), 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.

We also have concerns that the implications for the eastern side of the WHS have not yet been sufficiently examined - and that not all the results of recent investigations and considerations, which would inform our view and that of others, are yet in the public domain.

We are therefore not able to support the current proposals, particularly due to the damage which would be done to the western side of the WHS by the proposed location of the portal and the new road build within the WHS, however we are 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.

Key features of the proposed option

2. To what extent do you agree with our proposed location of the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:

We welcome the change in the location of the eastern portal to allow the line of the Avenue to be reinstated in this area. Before a definitive view can be formulated on this proposal, however, further archaeological evaluation work is needed to understand the character and survival of archaeological deposits in this area (which has not received detailed attention hitherto) and to consider the impact on nationally important heritage assets, such as Vespasian's Camp.

Further evaluation is also needed regarding the potential impact of any proposed works on groundwater levels which may affect the survival of archaeological deposits associated with the Mesolithic site at Blick Mead.

3. To what extent do you agree with our proposed location of the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:

We strongly disagree with the proposed location of the western portal, and the implication for the surface route of the dualled A303 within the WHS. The location of the portal and surface road will have a major negative impact on the nationally important heritage assets in the area, and their setting, which would constitute substantial harm.

There are two key components to our disagreement. Firstly, in particular, the portal is too close to the Normanton Down barrow group, including the Bush Barrow, and the Lake Barrow Group.

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Secondly, the proposed portal location is highly sensitive in relation to the alignment of the midwinter solstice sunset which is now recognised to be an important – some would say the most important - astronomical alignment and which needs to be maintained and enhanced - as stated in the WHS Management Plan.

We also have reservations about the construction of a considerable length of fresh road surface within the WHS, in an area containing significant heritage assets, which may have been the dominant focus of Neolithic human activity in the WHS and also contains evidence of Bronze Age activity.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:

Further to our comments in relation to Q3 above, of the two options the proposed southern route takes the road further away from sensitive barrow groups, but further consideration is needed for the exact line of the bypass to avoid the issues discussed in Q3.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

Further detailed archaeological work is needed in the area of the proposed junction to ensure that any damage to sensitive archaeological deposits is mitigated appropriately and to avoid damage to the Outstanding Universal Value of the WHS.

There needs to be wider engagement with archaeologists working in the area, particularly in relation to the Mesolithic site at Blick Mead, to ensure that the methodology for any archaeological evaluation work is appropriate and proportionate to the potential significance of the archaeological evidence which may be disturbed.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

Further detailed archaeological work is needed in the area of the proposed junction to ensure that any damage to sensitive archaeological deposits is mitigated appropriately and to avoid damage to the Outstanding Universal Value of the WHS.

There needs to be wider engagement with archaeologists working in the area to ensure that the methodology for any archaeological evaluation work is appropriate and proportionate to the potential significance of the archaeological evidence which may be disturbed.

The issue of lighting will also need extremely careful consideration, taking into account the impact on astronomical alignments identified as important and protected in the Management Plan.

7. Do you have any other comments?

The option for a surface route for the A303 routed outside the WHS to the south has not been presented as a formal option in the public consultation, though it is mentioned in some of the consultation documents.

We would support further exploration of this option which may have the potential to avoid damage to the WHS and to achieve maximum benefit from the removal of the A303 from the entire area of the WHS without damaging the archaeological deposits in the WHS. However, we are mindful that there may be as yet unknown damaging impacts to deposits (known and unknown) south of the WHS, along with other negative impacts that need to be considered. The precautionary principle embedded in environmental stewardship must be followed to ensure that a long-term, sustainable solution is achieved for any major intervention which is proposed for the WHS.

We commend to you the principles included in our updated position statement on Stonehenge to guide future consideration for the plans for the A303, and would like to emphasise that this proposal is the subject of enormous national and international interest. All those involved will be judged by present and future generations on the quality of what is achieved - the eyes of the world truly are upon us.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

There has been limited opportunity for facilitated public discussion and detailed discussion with the heritage sector during a relatively short consultation period, notwithstanding the local exhibition events.

The lack of detailed information on the results of recent archaeological evaluation work within the World Heritage Site has been particularly unfortunate, given the international importance of the archaeology of the WHS.

The CBA has offered to host a meeting to bring together specialists and other stakeholders to work with Highways England to find an achievable solution to ensure that the benefits of removing the A303 from the landscape around Stonehenge can be realised in the coming years. We reiterate that offer here and suggest that a meeting in the summer, once the results of the consultation have been analysed and the results of the latest archaeological evaluations have been published, would be timely.