

1. The proposed solution.

The Council for British Archaeology (CBA) Wessex is a regional group of the Council for British Archaeology and includes Wiltshire and the Stonehenge and Avebury World Heritage Site within its area. It is an educational charity working to involve people in archaeology and promote appreciation and care of the historic environment for the benefit of present and future generations. The Group has a membership of almost 400, comprising both individuals and institutions. Although we work closely with the national body of the Council for British Archaeology, we are a separately registered charity. CBA Wessex has been involved in discussions about proposals for the Stonehenge visitor centre and the A303 for many years and was one of the parties invited to prepare the Management Plan for the Stonehenge and Avebury World Heritage Site.

The national body of the CBA, in conjunction with CBA Wessex, drew up a set of Cardinal Principles against which any proposed construction within the World Heritage Site should be judged. These include :-

- Minimum damage to known or potential archaeological remains.
- Minimum visual intrusion on monuments and landscapes
- Maximum tranquillity
- Efficient use of previously developed areas.

We have used these Principles in preparing our response to the current proposals.

We do not agree with the proposed option. CBA Wessex has consistently supported the concept of a bored tunnel under the World Heritage Site (WHS) and recognise that the latest proposals are an improvement on previous options (e.g. the 2.1km tunnel proposed in 2004). We also note that, by relocating the eastern portal further east, the current proposal takes into account the importance of the Stonehenge Avenue. We cannot support the current proposals as they stand as we believe that the 2.9km tunnel on offer is too short and the western portal and the proposed road to the west of that portal will have a major negative impact on the World Heritage Site. The only acceptable alternatives are to construct a longer tunnel that emerges closer to (or ideally beyond) the boundaries of the World Heritage Site or else the southern surface route (F010) which avoids the World Heritage Site altogether. We note that this southern route, while referred to in some of the documents, was not included as an option in the Public Consultation. We recognise that this southern route passes through areas that have not been studied to the same degree as the WHS and may have impacts on archaeology elsewhere but it remains a viable option especially as we understand it would be cheaper than the 2.9km tunnel currently proposed.

We are aware that ICOMOS-UK, two years ago, informed Government Ministers that “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.” These comments need to be taken into account.

2. Location of the eastern portal.

We welcome the change in the location of the eastern portal which allows the route of the Avenue to be reinstated. Ideally the portal should have been even further east but we understand that there are technical and financial restraints that may prevent this. The eastern portal is in an area that has not been so intensively studied from an archaeological viewpoint so further work is required in this area. The proposed portal is not far from the recently discovered Blick Mead Mesolithic site on the edge of the Avon Valley and there is a risk that major civil engineering work in this area could have

an impact on groundwater levels which in turn would have a negative effect on this important Mesolithic settlement site. Further evaluation work is required in this area.

### 3. Location of the western portal.

The proposed location of the western portal is totally unacceptable from an archaeological point of view both from its position near important archaeological monuments and also due to the necessity to construct a considerable length of fresh road surface within the World Heritage Site. The proposed surface roads to the west of the western portal bisect an area containing a unique cluster of Neolithic Long Barrows and Mortuary sites and this area may have been the dominant focus of Neolithic human activity in the WHS. The maps supplied with this consultation indicate a portal location close to both the Normanton Down Barrow Group (which includes the famous Bush Barrow) and the Lake Barrow Group. Some of these barrows are located within Normanton Gorse, currently an area of woodland that acts as a screen to the north of the portal, but should this woodland be cleared at some point in the future, this screen will disappear. The proposed surface roads (for both D061 and D062) are shown to pass through a small area of woodland known as the Diamond and cut directly through an area of Bronze Age field systems that are likely to include settlement evidence. There is also suspected to be a Saxon cemetery in this area.

A further major issue with the location of the western portal is its position directly on the alignment of the Midwinter Solstice as viewed from Stonehenge. Although the public flock to Stonehenge to view the sun rise on the Midsummer's Day it is now believed that the more important alignment, though on the same axis, is in the opposite direction towards the Midwinter solstice sunset. Although the portal is located in a dip in the landscape and will, we understand, be unlit, the headlights of cars approaching the portal will be clearly visible to viewers at Stonehenge. The WHS Management Plan specifically states that the astronomical alignments of Stonehenge must be maintained and the current proposal contravenes this policy.

We note that the western portal is close to the RSPB stone curlew reserve on Normanton Down which is further evidence that this location is not acceptable.

As a result of the above comments the CBA Wessex Trustees feel that the portal needs to be located further west, ideally outside the WHS, but at least it should be to the west of the Diamond plantation.

### 4. Winterbourne Stoke bypass routes.

We do not have a strong preference but on balance prefer the southern route as this avoids the Coniger Barrow cemetery and the SSSI at Parsonage Down. The southern route also ties in with the F010 route option which avoids the WHS altogether.

### 5. A303/A345 Countess Junction.

The important issues are the protection of the Mesolithic site at Blick Mead (mentioned earlier) and the archaeologically sensitive areas along the Avon Valley. The junction must take into account the setting of nearby monuments including the well known Ratfyn Barrow.

### 6. A303/A360 Longbarrow Junction.

There are significant archaeological monuments (a long barrow and numerous round barrows) near the roundabout that forms the current junction so any movement away from this spot would improve their setting. Both of the proposed A303/A360 junctions are located in potentially archaeologically sensitive areas including Bronze Age field systems which probably include evidence

of settlements. These are areas that have not yet been examined in great detail so further exploratory work would be required. Further information is required on the nature and impact of these junctions.

The design and layout of the lighting at the junctions is very important as, especially for the southern route (D062), it could be visible from Stonehenge and would be on the axis of the midwinter sunset.

#### 7. Other comments

The entire landscape within the World Heritage Site is internationally important and any action that is taken to solve the A303 traffic issues will be scrutinised right across the globe, not just now but for generations to come. It is therefore important that we do not do anything that we will regret in the future. This is the time for serious long term thinking rather than trying to solve a short term problem with a cheap solution. We have the opportunity to remove traffic from within the WHS so the Highways Agency should look again at a much longer tunnel or a southern route outside the WHS boundary.

#### 8. How did you hear about this consultation.

Received an email

#### 9. Feedback on the consultation process.

The documents that were required in order to put together a considered response were only available to download from the Highways Agency website. Some of these were hundreds of pages long and the print size on the screen far too small to be readable. This made it impossible for anyone without access to a computer and good quality printer to see all the background information. In the past we have been sent hard copies of the documentation, but this time we were told that this was not possible " .... because of the large number of pages involved". Considering the vast amount of data and the importance of this scheme, the consultation period was far too short. The public information events were just an opportunity to look at plans of the proposed scheme options, they were not opportunities to engage in detailed discussions. As an archaeological body with a significant interest in and proposals affecting the Stonehenge landscape we regret the lack of opportunity to engage in meaningful discussions about these proposals.