



A303 STONEHENGE CONSULTATION

MARCH 2017

Response to consultation questions

Note: This response should be read in conjunction with the enclosed document titled: '*Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017 (Snashall, Young, January 2017)*' and the letter attached to this consultation response.

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

We are pleased to have the opportunity to submit a consultation response to the Highways England proposed option which we recognise represents the best opportunity in a generation to tackle the blight of the road that dominates the landscape of Stonehenge and in doing so have a significant positive impact on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS).

We **tend to agree** with the focus on the proposed option, with its more direct route including a twin-bored tunnel of at least 2.9km. We note that while the Highways England evaluation and modelling showed the southern route (F10) would have had significant benefits to the WHS, it was removed from further consideration because it did not perform well enough against transport and economic objectives; it would have significant environmental impacts, and would not be as effective in reducing traffic in local villages.

In respect of the proposed bored tunnel option, we **strongly agree** with the removal of a substantial section of the existing A303 from the central part of the Stonehenge WHS. The prehistoric landscape is currently split in two by the A303 with tens of thousands of vehicles passing through the Stonehenge landscape every day. The heavy traffic and constant noise from the road compromises the enjoyment and understanding of the WHS, and severs both the visual relationships and access between monuments in the northern and southern halves of the WHS including the monument itself. Removing the A303 with a twin-bored tunnel would remove its substantial adverse impacts on the central part of the Stonehenge WHS, improving the setting of numerous Neolithic and Bronze Age monuments within the WHS as well as Stonehenge itself, all of which are attributes of its OUV. Indeed, finding a solution to the existing A303 is a specific action within the WHS Management Plan, which we are committed to delivering with partner organisations.

In addition, the removal of the existing A303 would reconnect the part of the landscape north of the A303 (and the monuments it contains) with those to the south, with significant benefits for public access. Members of the public would have much

greater opportunity to use existing rights of way and open access land to explore the landscape and monuments to the south. It would also remove a very significant barrier to wildlife, which prevents connectivity between the chalk grassland to the north and south of the road. This results in a very high number of casualties of species from barn owl to brown hare. The removal of this road would allow the creation of a 'bigger, better and more joined up' landscape as outlined in the Government's State of Nature report 2016.

We note that we are still in the early stages of the design of an appropriate solution and all comments we provide in this document (and the associated letter) are given in the expectation of the delivery of a considered, high quality solution for this internationally important site.

To summarise our position in respect of other aspects of the proposed scheme:

- We **strongly agree** with the reinstatement of the line of the Stonehenge Avenue, subject to certain provisos (as per our response to question 2 below).
- We **strongly disagree** with the proposed position of the western portal of the twin-bored tunnel, which we consider requires significant improvement (as per our response to question 3).
- We consider that more work needs to be done with regards to the alignment and design of the road as it leaves the Western portal and bypassing Winterbourne Stoke to explore which options would most benefit the OUV of the WHS and designated heritage assets (see under question 4). As more detail on this is made available we will respond accordingly.
- We have made brief comments on the proposed road junctions at the eastern and western boundaries of the WHS (see questions 5 and 6), although again we await further detail in due course.

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

We **strongly agree** with the reinstatement of the line of the Stonehenge Avenue. The proposed location of the tunnel's eastern portal would allow the line of this ancient processional route leading to the Stonehenge monument to be reinstated where it is currently severed by the existing A303. This major improvement in respect of the location of the eastern portal is not something that previous road proposals would have achieved. It would be highly beneficial to the OUV of the World Heritage Site and would greatly reduce the impact of the road east of King Barrow Ridge. In addition, whilst a large part of our landholding is already open for public access, we believe the removal of the road could present opportunities to improve public access through the existing network of paths and bridleways and increase enjoyment and understanding of the WHS at Stonehenge.

However, although the proposed reinstatement of the line of the Avenue is a big step forward, it is critical that the infrastructure is designed and located sensitively with regards to impacts on the OUV of the WHS if this improvement is to be properly realised. For example, it will be important to understand the impacts on the restored line of the Avenue of traffic entering the eastern tunnel portal, which may give rise to visual, aural and light pollution that could undermine the heritage benefits. There would need to be careful consideration of the distance between the restored line of the Avenue and the eastern portal and how suitable mitigation might be put in place. We understand from Highways England presentations that the ‘working assumption’ is to avoid external lighting at the tunnel portals as well as on the road outwith the tunnel portals within the WHS.

In addition, the eastern portal and the road outwith the tunnel portal will need to be carefully designed to enable public access to, and engagement with, the area around King Barrow Ridge.

Finally, in respect of this scheme, we urge Highways England to conduct detailed environmental impact assessment and evaluation in order to fully understand and in particular to avoid any potential direct or indirect impacts on the nationally significant Mesolithic site at Blick Mead.

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

Our assessment work has identified that moving the western portal south of the existing A303 does have significant benefits to the OUV of the WHS. However, the proposed location of the western portal for the tunnel and the road outwith the tunnel portal within the WHS needs significant improvement. This is due to both the portal’s proximity to and impact on the Normanton Down Barrow Group – one of the key groups of ceremonial and funerary monuments for which the WHS is designated – and the impacts of both the portal’s and road’s vertical and horizontal alignment.

The consultation’s Technical Appraisal Report states that the western portal location would be “sited optimally to the west of the Normanton Down Barrow Group”, and it appears to give considerable weight to the portal being positioned such that the road would no longer be visible from Stonehenge. The report also indicates that route option 1S should have a greater beneficial effect than 1N, as the former “avoids important archaeological remains and uses local topography to better fit into the landscape”. Finally, notwithstanding the above statements (which we address below), the report acknowledges that the western portal has the potential to cause substantial harm to the Normanton Down barrow Group and other important monuments, which would adversely impact the OUV of the WHS.

From a Trust perspective, the scheme must be tested in accordance with UNESCO/ ICOMOS guidance on whether it would conserve and enhance the OUV of the WHS.

As per our attached assessment of the impact on OUV, we disagree with the Highways England assessment of impacts on the historic environment of route options 1N and 1S. The current alignment of option 1N is unacceptable because of the level of adverse impacts on attributes of OUV, including the fact that it would bisect two newly identified long barrows and a henge type-enclosure. In respect of option 1S, the positioning of the western portal itself is unacceptable. Overall, the attached assessment clearly demonstrates that the western portal as proposed (and the associated surface roads) would cause unacceptable harm to the OUV of the WHS.

In light of our assessment of the impact of the proposed scheme on the OUV of the WHS, we would strongly advise that the western portal/exit point for traffic is moved further away from the Normanton Down Barrow Group to minimise the highly adverse impacts of the western portal of the current scheme on the WHS, and that further amendments are made to the proposals as discussed in the attached assessment. The extent to which these amendments would reduce or avoid adverse impacts on OUV could then be re-assessed.

Other issues:

- Any long distance views of the new dual carriageway in the western part of Stonehenge WHS should also be considered in the detailed design and mitigation.
- Linked to the above, any potential adverse impacts of the western portal location and road alignment with the WHS or lighting outwith the WHS on the midwinter solstice sunset alignment should be considered and avoided or appropriately mitigated in the detailed design, in order to avoid an adverse impact on the OUV of the WHS. We do, however, note that the existing A303 has a significant impact on the landscape as it relates to the midwinter solstice sunset alignment and as such its removal will have a positive impact on this attribute of the OUV of the WHS.
- More generally, measures to avoid, reduce or mitigate the impacts of noise and light pollution should be pursued, including the type of road surfacing and the detailed design of any cutting. From presentations by Highways England to the World Heritage Site Steering Committee and Partnership Panel we note that the 'working assumption' is to avoid external lighting at the tunnel portals and of the road within the WHS. We strongly support this. This is a key issue both from a visual perspective and also for European protected species of bats which are known to hunt over the Stonehenge landscape and are known to be adversely affected by lighting.
- The potential impacts on local communities affected by the route from the western portal out of the World Heritage Site should be considered.

- Any impacts on the stone curlew a rare and endangered species vulnerable to disturbance which is known to be on the RSPB reserve of Normanton Down should also be considered.

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

We consider that more work needs to be done with regards to the route from the western portal and bypassing Winterbourne Stoke to explore which options would cause least harm to designated heritage assets and provide an appropriate solution for both the local community and the natural environment.

In respect of the specific route options under consultation, our assessment has shown that 1N as currently constituted would have a highly adverse impact on the OUV of the WHS – splitting as it does the newly recognised Diamond Group of monuments. Our comments under question 3 above are however relevant, and some additional detailed points relating to the impact on the OUV of the WHS are summarised below.

In respect of option 1N, we consider it would be damaging to raise the A360 into an embankment, as this would cause adverse visual impacts on multiple attributes of OUV. It is also considered that the proposed 1.5 metre deep cutting as the route passes through the Diamond Wood towards the western boundary of the WHS is too shallow; as currently designed, it would not adequately mitigate the adverse impacts on the visual relationships between multiple key attribute groups within the WHS. To do this the depth of any cutting should be sufficient to allow HGVs to pass without disrupting the sight lines between monuments.

In respect of option 1S, it is not clear from the Technical Appraisal Report paragraphs 8.2.15 and 8.2.16 whether the new dual carriageway would pass under or over the A360 at the proposed junction between the two. Any existing tree screening should be considered as a temporary feature in the landscape that could be removed. To mitigate to some degree the adverse visual impacts on attributes of OUV, the A360 should pass at its current height with the A303 in cutting of sufficient depth to allow HGVs to pass without visual impact to monuments at the western end of the WHS. The proposed 7 metre high embankment (where 1S changes from a left hand to a right hand curve) would also have an adverse impact on attributes of OUV within the WHS (including the visual relationships between the newly recognised Diamond Group and Lake Barrow Group, and between Winterbourne Stoke Barrows and the Lake Group) and would have a detrimental impact on the OUV of the WHS. Instead, it is recommended that visual impacts here could be mitigated by placing the portion of the A303 between the Park and the western portal in a cutting of sufficient depth to allow HGVs to pass without visual impact to monuments at the western end of the WHS.

Finally, as well as the consideration of heritage issues, the potential impacts of the two route options on ecological interests, landscape and visual amenities and public access should also be given in-depth consideration. The ecological interests include designated nature conservation sites of national and international importance (River Avon SAC, River Till SSSI) to the west of the WHS.

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

The most important issues from our perspective are the design of the junction, its impacts on the OUV of the WHS, its impacts on landscape and visual amenities, its impacts on ecological interests, buildings of historical interest (Countess Farmhouse and its associated farm buildings are Grade II listed) and the implications for public access (including walkers, cyclists and horseriders). In relation to that last point and as commented earlier, a large part of our landholding is already open for public access but we believe the removal of the road could present opportunities to transform public access through the existing network of paths and bridleways and increase enjoyment of the Stonehenge landscape.

Notwithstanding the focus of this question on the Countess junction, we note that para. 8.5.11 of the Technical Appraisal refers to an opportunity to investigate an alternative junction location at the existing Solstice Park junction to the east. We would encourage further investigating the viability of this alternative junction if this would assist in mitigating the impact of a possible flyover at the Countess roundabout while maintaining local connectivity.

Finally, we also believe this junction should be considered in conjunction with improved access to the WHS. We are acutely aware (and have received feedback from the public and our members) that there is notable sadness with many people that they will not be able to see the Stonehenge Monument from the road. We believe that the design of this junction should allow for access to (and creation of) a short stop off point that allows the public to break their journey and enjoy the view of the Stonehenge landscape. This is something the National Trust has made a commitment to explore as part of any road improvement scheme.

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

The most important issues are the same as those listed under the above question, namely junction design, impacts on OUV, landscape and visual impacts, ecological impacts and implications for public access.

In the case of impacts on OUV, there would be a beneficial effect of removing the existing Longbarrow roundabout from the landscape, as it is directly adjacent to (and adversely affects the setting of) the Winterbourne Stoke Barrow Group, which lies on

the north-east side of the existing roundabout. However, in respect of the new junction, we consider that it would be highly beneficial for the new dual carriageway to pass under the A360 which should remain at grade, and that the junction with the A360 would be to the west of the present line of that road.

It is also important to ensure that access to the English Heritage Stonehenge Visitor Centre allows for successful delivery of a world class visitor offer (both during construction and after), while also ensuring the design and location of any A303 /A360 junction or related infrastructure takes the opportunity to significantly reduce the current adverse impact on the Winterbourne Stoke Barrow Group and the OUV of the WHS. This is covered in more detail in the accompanying assessment of the impacts of the proposed scheme on the OUV of the WHS.

7. Do you have any other comments?

We would like to make a number of further points that do not obviously fall under the above questions:

- Para. 8.5.12 of the Technical Appraisal Report states that the existing A303 within the WHS would be closed between Countess Roundabout and Longbarrow Roundabout for general traffic “except for local access from Amesbury”. We anticipate that the majority of the existing A303 and associated interventions (e.g. the embankment at Stonehenge Bottom) over this area will be removed and an appropriate surface cover added that meets the needs of the landscape (and the OUV of the WHS) while being a suitable grade for non-motorised traffic. There should also be suitable access for the farmers adjacent to the road to allow for efficient operation of their agricultural holding and to Stonehenge Cottages.
- We welcome the intention for the surface dual carriageway route to be unlit (para’s 8.6.3 and 8.6.4), given our concerns regarding the potential for light pollution within the WHS and its setting. We require clarification as to whether the same intention is in place for the A360 as it traverses the A303 (i.e. that it would, as currently, remain unlit).
- Para’s 8.11.3 to 8.11.5 refers to embankments that may be needed to carry the proposed dual carriageway. As a general principle the construction of embankments within the WHS would need careful treatment to avoid adverse visual impacts on the setting of heritage assets and to adversely impact on visual relationships between monuments, causing detrimental impacts on the OUV of the WHS.
- We work with four farming families who hold tenancies across the Stonehenge landscape who adapt their commercial farming enterprises where possible to take into consideration the significance of the WHS. Farming land that has such

historic environment significance brings with it additional considerations and we are greatly appreciative of the time and attention our tenant farmers give to consulting with us and seeking additional consents to complete predominately routine farm management works. The current farming systems will require a continued high level of access thorough-out the development and construction of the scheme to facilitate land management. The viability of field sizes, stock management requirements, maintenance of secure boundaries and the need for access to water for grazing sock must also not be overlooked.

Final remarks

The World Heritage Site's Statement of OUV acknowledges that the Stonehenge monument is the, "most architecturally sophisticated prehistoric stone circle in the world". It states that the Stonehenge WHS provides an "outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age". The surviving monuments and their inter-relationships represent a "unique embodiment of our collective heritage".

The attached assessment of the impacts of the proposed scheme on the OUV of the WHS notes that "the image of Stonehenge in its downland landscape is world-renowned", and that "it is an important and enduring symbol of humanity's prehistoric past and an internationally recognised symbol of Britain".

This international significance of Stonehenge and its prehistoric landscape will be an important material consideration when the Development Consent application for the proposed road scheme is submitted. In respect of heritage assets, national planning policy states:

"In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal"

[para. 5.129, National Policy Statement for National Networks (December 2014)]

The above extract serves to emphasise the importance of designing a road improvement scheme that minimises conflict with conservation interests in the context of the internationally significant heritage assets. At present, we consider that the proposed scheme does not go far enough to minimise such conflicts.

We are able to support many aspects of the consultation proposals which if designed well could provide significant benefits to the Stonehenge WHS, however, we consider that certain aspects of the proposals – in particular in respect of the western tunnel portal and associated surface roads – require significant improvement in order to

produce a scheme that could successfully negotiate the Development Consent process.

We welcome the approach taken by Highways England to date, which is a significant improvement on previous scheme proposals. We also note that UNESCO have highlighted the importance of high level engagement by Highways England with the community, key partners in the WHS and the wider stakeholder group and we hope that this good practice continues.

We are pleased to have had the opportunity to submit a consultation response to the Highways England proposed option which we recognise represents the best opportunity in a generation to tackle the blight of the road that dominates the landscape of Stonehenge and in doing so have a significant positive impact on the OUV of the WHS.