



**National
Trust**

3rd March 2017

Highways England
A303 STONEHENGE CONSULTATION

By email

Dear Sir/Madam

**A303 STONEHENGE
Road improvement from Amesbury to Berwick Down**

Thank you for the opportunity to respond to the Highways England consultation on the proposed A303 Stonehenge road improvement.

The National Trust is Europe's largest conservation charity with nearly five million members. Established over 115 years ago, our primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over 250,000 hectares of countryside, 3,620 listed buildings, and 700 miles of coastline across England, Wales and Northern Ireland. We are the largest private landowner in the UK. Given the range of our activities, we are in a position to comment both from the perspective of a landowner and as a major conservation organisation responsible for safeguarding the nation's natural and historic assets.

The Trust owns around 850 ha of the Stonehenge landscape within the World Heritage Site (WHS), which is internationally recognised for its extraordinarily dense concentration of prehistoric monuments. Most of this land is farmed by agricultural tenants, and also features extensive areas of chalk grassland with significant opportunities for wildlife enhancement. Areas of our landholding are already open for free public access but we believe the removal of the road could present opportunities to transform public access and enjoyment of the Stonehenge Landscape. Our vision is for a reunited landscape that is a global exemplar of archaeological and nature conservation best practice, enabling first class public access and sharing the story of this globally important place.

The Trust has been an active stakeholder engaging with Highways England, Historic England and others regarding proposals for improvements to the whole A303/A358/A30 corridor. We are aware of the longstanding challenges of highway access to the south-west

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via this corridor, and the important benefits for local communities, visitors and the wider economy that could arise from road improvements.

We recognise that there are strongly held views regarding the Stonehenge landscape. We believe it is important to make the right decision and that this can only be achieved through understanding and evidence appraisal. As such, the Trust has carried out two detailed assessments over the last three years with our partners on the impact of the potential road schemes on the Outstanding Universal Value (OUV) of the WHS. Our early stage assessment showed the potential benefits of a tunnel of at least 2.9km. We welcome the new position of the eastern portal and believe that – with careful design – a bored tunnel solution of sufficient length to also address the issues (outlined in our response) at the western portal could have significant benefit to the WHS; allowing a substantial section of the existing highly damaging A303 to be removed, providing improvements to monument setting, tranquillity and allowing better access for people and a richer environment for wildlife.

Our latest assessment of the impact of the proposed scheme on the OUV of WHS is attached as part of our response. As the scheme progresses and moves into the next stage of consultation and beyond we welcome Highways England's move to draw on wider scientific and archaeological expertise.

At present, the surface route of the A303 constitutes a very significant barrier to wildlife and prevents connectivity between the chalk grassland to the north and south of the road. This results in a 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 acknowledge the challenges involved with planning new road infrastructure that takes into account the needs of the local community in the context of an internationally important landscape. Whilst we support many aspects of the consultation proposals, our detailed assessment work has raised significant concerns about the western portal of the proposed twin-bored tunnel, both in terms of its vertical and horizontal alignment within the Stonehenge landscape (including its potential impact on the midwinter solstice sunset alignment) and the proximity of the portal to the Normanton Down Barrow Group

The three key points that we would like to make in response to the public consultation are summarised below.

- Firstly, the proposed tunnel scheme would succeed in removing the majority of the damaging and intrusive surface A303 and its traffic from the Stonehenge WHS, thereby re-connecting the landscape to the benefit of many of the monuments as well as people and wildlife.
- Secondly, the tunnel's eastern portal would allow for the reinstatement of the line of the Stonehenge Avenue; done sensitively this would be a major improvement on the present surface road. As per our attached response to the consultation questions, we strongly support these aspects of the proposals.

- Thirdly, and as indicated above, we are very concerned regarding the proposed location of the western portal and the alignment of that portal and the road that travels onwards and beyond the WHS. We are very concerned in particular that;
 - 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 – would have a substantial adverse impact on the OUV of the WHS.
 - The alignment (both vertically and horizontally) of the western portal and the road after it leaves the portal and passes through the WHS and on to Winterbourne Stoke needs significant improvement. This is needed in order to ensure their alignment, as well as their design, is right for this internationally-important place, an issue which will surely be addressed in detail as part of the Development Consent process.

In addition to the above, you will see that we have made comments of various levels of detail on other parts of the consultation proposals, including the eastern tunnel portal and proposed road junctions, as well as in relation to nature conservation, landscape and visual amenities and public access.

In conclusion, we believe that with careful and sensitive design, a bored tunnel of sufficient length to allow for the proposed location of the eastern portal east of the Avenue as well as to address the issues with the portal to the west, could transform the Stonehenge landscape with significant benefits to the OUV of the WHS. We would urge Highways England to consider in detail the points that we have made in response to the current consultation. As one of the world's most recognisable and truly iconic places it will also be important for Highways England to have regard to feedback from the delegation from the UNESCO World Heritage Centre and their heritage advisors ICOMOS, following their recent visit to the WHS.

We look forward to continuing to work in partnership with English Heritage Trust and Historic England to engage further with Highways England and its consultants, and other stakeholders, as the design of the scheme is progressed.

Yours faithfully



Ian Wilson

Assistant Director Operations, National Trust

Note: This letter 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 our response to the consultation questions.*