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6th April 2018

## **Highways England's A303 Stonehenge consultation 2018**

### **The response from RESCUE, The British Archaeological Trust**

To whom it may concern,

#### **Highways England's A303 Stonehenge consultation**

Rescue is a non-party political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad ([www.rescue-archaeology.org.uk](http://www.rescue-archaeology.org.uk)). We do not receive any state support and are entirely dependent on the contributions of our members to support our work. We've been campaigning since our foundation in 1971, to support the cause of British Archaeology. Our Council follows developments at Stonehenge and we have published articles on Stonehenge planning matters in *Rescue News* which is sent to all members.

In responding to Highways England's current consultation on proposals for widening the A303, we wish first to record our strong objection to the preferred route scheme even though no space is given in the formal questionnaire to record such an objection. We also wish to record our disappointment that Highways England's scheme pays scant regard to the advice of UNESCO/ICOMOS Advisory Missions in 2015 and 2017 and the decision of the World Heritage Committee in July 2017. We consider this to be a national disgrace and hope that it will not be compounded by implementation of the scheme as it now stands.

#### **Our answers to the Questionnaire are as follows**

**Question 1.** *Please provide us with any comments you may have on our proposals for the viaduct crossing of the River Till valley.*

We note the density and complexity of archaeological remains identified by geophysical survey and evaluation undertaken in connection with an earlier scheme to widen the A303 in this area. We would expect full investigation and recording of the archaeology in advance of any scheme implementation together with assured funding for written excavation reports and long-term storage of finds; these criteria should also be met for the whole route of the proposed road scheme, should it be implemented, wherever ground disturbance might occur.

**Question 2.** *Please provide us with any comments you may have on our proposals for the A303/A360 Longbarrow junction.*

The archaeology at this location is particularly sensitive and clearly related to the World Heritage Site (WHS). The part-scheduled Bronze Age settlement here is of considerable significance, especially in its relationship to the Winterbourne Stoke barrows of similar date within the WHS and aligned on the ridge NE of the earlier Neolithic Longbarrow. Construction of an extensive interchange at this location and so close to the WHS boundary is, in our view, unacceptable. We are also concerned about the impacts on the archaeology of the very large construction compound proposed here and haul roads to and from it. There would be extensive ground disturbance over a sizeable area and it is hard to see how this would not impact on archaeology and the setting of the WHS.

**Question 3.** *Do you have any other comments about our proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction?)*

There is insufficient information at present to gauge the full extent of potential loss of/damage to archaeology in this location. The marked (and unrealistic) absence of street furniture and lighting in Highways England's documentation and video makes it difficult to assess the full impacts of the junction when in operation; but even without this detail, the two roundabouts, underpass and slip roads would obviously have a severely adverse impact on the setting of the WHS both day and at night.

**Question 4.** *Please provide us with any comments you may have on our proposals for the green bridge (No.4) at or near the western boundary of the World Heritage Site?*

It isn't clear to us what the purpose of the bridge is; how safe it would be for pedestrians or what measures would be needed to make it safe.

**Question 5.** *Please provide us with any comments you may have on our proposals for the cutting on the western approach to the tunnel.*

The cutting, which would pass between elements of a unique grouping of Neolithic long barrows in this part of the WHS is, in our view, unacceptable. It would not only permanently divide this part of the WHS and key monuments and monument groups it would also compromise their settings. The cutting would be very close to the Wilsford Shaft, destroying the integrity of its geomorphological location, its setting in the landscape and its originally intended relationship to settlement and other archaeological remains in the vicinity. The proposal contravenes the advice of the World Heritage Committee to the Government to explore options for the A303 that do not involve dual carriageway cuttings within the WHS.

**Question 6.** *Please provide us with any comments you may have on our proposals for the western entrance to the tunnel.*

The western tunnel entrance could, potentially, disturb Beaker burials associated with Scheduled round barrow Wilsford G1; it would certainly compromise the integrity of this highly important burial group and our ability in future to ascertain its prehistoric relationship to earlier and later burials and activity in this area of the WHS. There is little information concerning archaeological evaluation here and towards the western boundary of the WHS. The proposed tunnel 'canopy' would not prevent removal of archaeological remains beneath it. The standard practice of archaeological evaluation and investigation on development sites is not appropriate in this WHS where we have still so much to learn about the wider interrelationships of sites and monuments in what was effectively a designed landscape used and curated over many generations.

**Question 7.** *Do you have any other comments about our proposals for the central section of the scheme within the WHS?*

Our concerns about the west tunnel entrance are covered under Question 6, above. We have similar concerns about the east tunnel entrance which not only requires construction of c.500m of new 4-lane highway to access it but would also necessitate further excavation of the cutting below Vespasian's Camp, not far from Blick Mead Mesolithic site.

The tunnel portals would be cut close to the route of the Stonehenge Avenue; they and the new highway would bring major adverse effects to a monument worthy of proper restoration in the landscape. As elsewhere, the road scheme proposals demonstrate no understanding of the nature of the WHS in paying little regard to the wider landscape and its possible meaning to those who created its monuments, and lived and worked within it. The Avenue here is out of sight of Stonehenge but its existence indicates a designed route to or from the river to the henge, on which travellers passed natural and man-made landmarks along the way, such as Vespasian's Camp and the Bronze Age cemetery through which the A303 already runs, well before first sight of the henge. The proposed new road cutting and portals would dominate this ancient valley route both visually and aurally, permanently separating key monuments from one another, compromising the remains of the prehistoric ensemble and making it less easy in future to comprehend it.

In a landscape such as this, it is not acceptable simply to excavate and record without being able to relate what is found to what we are only beginning to understand may have been intended as a whole. Again, we point to UNESCO's advice not to place dual carriageway cuttings within the WHS and to its concerns about the impacts of the road scheme on the setting of Vespasian's Camp and on the site of Blick Mead. The proposed diversion of a link between Byways 11 and 12 is illogical in not following a field boundary; furthermore, it would pass unacceptably close to the Normanton Down barrows, compounding the impact of the present byways on this highly important barrow group with views to the henge.

**Question 8.** *Please provide us with any comments you may have on our proposals for the A303 flyover at Countess Roundabout.*

The flyover, whether on piles or an embankment, would become a dominant feature with adverse visual and noise impacts on the locality. There would be adverse impacts on Listed barns at Countess Farm, and Grade I Listed Amesbury Abbey and its Registered parkland; while the Amesbury Conservation Area would not be 'conserved or enhanced'.

The extent of Blick Mead's Mesolithic remains is unknown; they may continue below the present A303 and, if so, any such levels could be damaged by piling and/or by compression beneath the weight of the flyover. Not enough information is provided about the archaeology north of the A303 and its possible relationship to Mesolithic Blick Mead and later Saxon and Medieval settlement in this area. Nor is enough information supplied to indicate potential changes to water levels during and after road construction: such changes could have highly adverse effects on waterlogged archaeology.

**Question 9.** *Do you have any other comments about our proposals for the eastern section of the scheme (Countess junction to just beyond the Solstice Park junction)?*

This area, noted for its Saxon settlement remains at Countess East, is already heavily disturbed by roads and development damaging to the setting of the WHS. The A303 proposals would compound and add cumulatively to an already visually and aurally adverse situation. The unfortunate visual impact of Bronze Age barrows separated by roads by Solstice Park is a telling reminder of what is now proposed for the WHS. The new road link proposed between Allington Track and Amesbury Road would pass through a barrow cemetery and alongside scheduled barrows where there might be other, hitherto unidentified burials not far beneath the surface.

**Question 10.** *Do you have any comments on the preliminary environmental information provided for the scheme?*

Insufficient information is provided upon which to consult.

**Question 11.** *Do you have any other comments you would like to make about the scheme?*

In view of UNESCO's advice we are surprised that this scheme is being progressed.

We note the volume of objections to a 2.9km tunnel scheme in consultation last year and question why, apart from recording them, no notice appears to have been taken of them. We fail to understand the purpose of consultation if the outcome is pre-determined. Such opposition as there was – and indeed still is – to the A303 Stonehenge short tunnel ought to have led Highways England to revise the scheme to meet those objections, which appear largely to have been based, as are those of UNESCO, on concerns about damage to the WHS.

The scheme proposals appear to pay little regard to the NPSNN paras 5.120–38; or to the Government's obligations under the World Heritage Convention.

Heritage Impact Assessment appears not to have taken properly into account the fact that the WHS is a heritage asset of the highest significance, nor does it appear that the concept of outstanding universal value has been understood.

We are concerned about the lack of choices in the initial consultation and the lack of detail in consultation documents for the present consultation, making it difficult to know what some of the key impacts of the scheme might be, including archaeological and water table impacts, and the visual intrusions of road furniture and lighting (including vehicle lights) and noise.

Some of Highways England's statements about the impacts of the scheme on the WHS in the press and in consultation documents are misleading. The scheme would not, for example, 'help to conserve and sustain [or 'enhance'] the WHS'. We are also concerned that the images and video produced to accompany the consultation give an inaccurate indication of what the scheme would look like in operation. Presentation of this kind is not appropriate for public consultation on such an important project.

**Question 12.** *How did you hear about this consultation?*

We were advised by letter from Highways England.

Rescue was invited to take part in a single 'Heritage Forum' meeting prior to the consultation in 2017 (referred to in our response to the non-statutory consultation); we have not been invited to any further such meetings since then. Our concluding paragraphs in our earlier response (attached) are still relevant – as are further comments made by us in that response and we hope that it will be taken into account in this consultation.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Jude Plouviez', with a stylized, cursive script.

Jude Plouviez, Chair



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**February 2017**

**Highways England's consultation on the A303 at Stonehenge response  
from RESCUE**

To whom it may concern,

**Highways England's A303 Stonehenge Consultation**

RESCUE is a non-party political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad ([www.rescue-archaeology.org.uk](http://www.rescue-archaeology.org.uk)). We do not receive any state support and are entirely dependent on the contributions of our members to support our work. We've been campaigning since our foundation in 1971, to support the cause of British Archaeology. Our Council follows developments at Stonehenge and we have published articles on Stonehenge planning matters in *Rescue News* which is sent to all members.

In responding to Highways England's consultation on proposals for widening the A303, including a 2.9km bored tunnel, we have the following objections and observations, placed in the order set out in the A303 Stonehenge Questionnaire.

**Question 1. *To what extent do you approve of our proposed option?***

*Answer.* Not at all. We strongly disagree with the proposals and with the suggestion that 'out of sight of Stonehenge' is acceptable in a WHS that encompasses a wider landscape, much of it out of sight of Stonehenge and equally considered to be of outstanding universal value (OUV). Furthermore, it appears that changes in the visibility of the henge for those travelling towards it are integral to its positioning in a landscape of monuments through which one passes.

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

*Answer.* We strongly disagree with the location proposed. The tunnel portals and expressway entering them would lie just east of the Avenue, one of the most important prehistoric features in the Stonehenge landscape. The setting of the Avenue and its future enjoyment by visitors would suffer major adverse effects from visual, light and noise intrusions. There are further concerns about the physical and environmental impacts of new road engineering on the important Mesolithic site of Blick Mead which lies beside and possibly partly under the A303 below Vespasian's Camp.

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

*Answer.* We strongly disagree with the location proposed. There would not only be major adverse impacts on the setting and enjoyment of the Normanton Down barrow group, of which the famous Bush Barrow is a part, but also on an unusual grouping of Neolithic long barrows through which the expressway would pass, damaging the integrity of their relationships to one another and the landscape, the topography of which clearly influenced their placement. We have seen no report of recent geophysical survey work in the western part of the WHS in the area south of the present A303. Nevertheless, an extensive Bronze Age field system is known, through which the expressway would pass, and it would be fair to suggest that within it may be evidence of a Bronze Age settlement and, possibly, of earlier settlement remains. Woodland and field boundaries affected by the proposals may also mask remains of archaeological material associated with the development and use of the Stonehenge landscape as a whole by its Neolithic and Bronze Age inhabitants.

We understand from the media that there are plans to realign and/or mitigate the impacts of the western portal owing to its proximity to the Normanton Down barrows and location on the Stonehenge midwinter solstice axis but, despite any such efforts, we are convinced that an expressway should not be located in such a sensitive area. There is a lamentable lack of information provided for us to take into account the findings of archaeological evaluations already completed and yet to be undertaken in this area of the WHS. For any further survey work in this area, we would expect rigorous examination to the same standard and incorporating multiple geophysical techniques as undertaken by the Stonehenge Hidden Landscape Project. We suggest that this is not a Site in which standard evaluation ought to be undertaken owing to the potential for loss of fragile evidence in ploughsoil or just beneath.

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

*Answer.* No archaeological evaluation work has been presented for our assessment of the proposed bypass routes. The northern route, examined for the earlier A303 Improvement scheme, clearly contains much archaeology still in situ, including extensive ancient field systems and water meadows. There are multiple geophysical anomalies yet to be examined. There are Listed buildings and Conservation Areas in villages on which one or other of the routes could have impacts, notably on setting and of noise. It is evident that both routes will be sensitive archaeologically, especially where they lie within the setting of the WHS where particular care and protection are required. Aerial photography indicates that the southern route crosses highly sensitive archaeological ground between the A360 and the villages of Winterbourne Stoke and Berwick St James.

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

*Answer.* We are concerned about potential disturbance of archaeological remains in this area of Saxon and medieval settlement. We have already mentioned concerns about Mesolithic remains at Blick Mead and possibly elsewhere in this area, including beneath the A303, and there are also likely to be archaeological remains of later date in this location. We would expect full evaluation, investigation and recording in advance of any engineering work undertaken. This includes work in areas of construction compounds and drainage treatment areas.

We note the presence of Vespasian's Camp, the Conservation Area adjoining the A303, Amesbury Abbey Registered Park and Garden, and Listed buildings – all in the vicinity and all of which would be adversely affected by noise and/or visual impacts of any flyover.

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

*Answer.* The principal issues must relate to the archaeology and setting of the WHS and its attributes of OUV. A grade-separated junction visible and audible within the WHS and/or its setting would bring major adverse impacts that would and could not be offset by improvements elsewhere in the WHS. Should the road scheme be approved, we would expect a positive improvement to the setting of the Winterbourne Stoke long barrow and the Bronze Age barrows associated with it: moving the junction only slightly further away would not fulfill this expectation. Again, there is likely to be highly sensitive archaeology west of the A360, including any Bronze Age remains disturbed by construction of the present roundabout.

**Question 7.** *Do you have any other comments?*

*Answer.* We are astonished that such an inadequate scheme has been brought forward for the Stonehenge half of the WHS, notwithstanding issues of cost and apparent demand for an expressway. We are particularly concerned about the evident disregard for the World Heritage Convention and planning policy and guidance for development in the WHS.

The Technical Appraisal Report states, at 18.3.39 :

“ . . . a Neutral score has been recorded for the historic environment, representing a balanced outcome between important beneficial impacts and a large number of adverse impacts on designated and non designated assets. Route Options D061 and D062 [the options now before us] would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments. These adverse impacts are a result of changes to the setting of the monuments and the relationships between monuments and the landscape. Both options would cross a scheduled linear boundary monument resulting in a very large adverse impact and D061 would have a large adverse impact on two scheduled barrow complexes north of Winterbourne Stoke. Both options would also adversely affect listed buildings, a conservation area and a registered park and garden at the eastern end of scheme around Amesbury. The partial removal of the A303 would deliver benefits for over 50 scheduled monuments, including Stonehenge and other high and very high value scheduled monuments within the WHS, resulting in a range of slight to very large beneficial impacts for both D061 and D062.”

The partial removal of the A303 from the WHS would result in a number of major adverse impacts on heritage assets within the WHS and its setting, including the WHS itself. The methodology used to arrive at a 'neutral' score for the historic environment overall is highly questionable in this case, where ICOMOS guidance warns against the standard EIA approach for cultural WHS without adaptation, and does not suggest that positive and negative impacts should be weighed to arrive at a scale of impact.

**Question 8.** *How did you hear about this consultation?*

*Answer.* Word of mouth. Letter to Rescue representative.

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

*Answer.* We are surprised at the limited locality and advertising of this consultation on a major project adversely affecting a WHS of international significance.

Rescue was invited and sent a representative to a 'Heritage Forum' prior to announcement of the consultation. Contrary to expectation, this was a presentation of the scheme brief and had little specifically to do with heritage. No details of any scheme proposals under consideration were given to allow for comment on heritage aspects, despite the Technical Appraisal Report's statement that 'this forum will be used to disseminate information about the heritage aspects of the scheme' (p.272).

Despite the requirements of the NSIP process, we think a choice of options should have been offered, including one that would do no damage to the WHS.

It is unfortunate that we have not been provided with enough information, especially on archaeological matters, to enable us to comment adequately on potential impacts of the proposed scheme.

In our view, the project ought to be reconsidered and re-evaluated in the light of the demands of the World Heritage Convention and planning policy. If road widening is justified, new options should be brought forward, such as a longer tunnel that would protect the WHS and its setting.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Jude Plouviez', written in a cursive style.

Jude Plouviez, Chair