Highways England Consultation - A303 Stonehenge

Response by the Wiltshire Archaeological and Natural History Society

Background

About the Society

- Founded in 1853 to "educate the public by promoting, fostering interest in, exploration, research and publication on the archaeology, art, history and natural history of Wiltshire for the public benefit"
- The Society runs the Wiltshire Museum which holds many important collections from the Stonehenge and Avebury World Heritage Site (WHS). The collection is Designated by Government as being of national significance
- We work in partnership with Salisbury Museum which acts as the archaeological repository for archaeological archives from the Stonehenge part of the WHS
- The Society commenced the purchase of land around Stonehenge to protect it in perpetuity. The land was later transferred to the National Trust
- The Society took an active role in commenting on previous schemes for the A303
- The Society supported the development of the Stonehenge Visitor Centre and the closure of the A344
- The Society has endorsed the 2015 Stonehenge and Avebury World Heritage Site Management Plan

Our response

This draft response has been prepared by a working group established by our Board of Trustees, and has been agreed by them. This draft is being published on our website and comments from our Members are being invited. The final version of this response will be agreed by the Board of Trustees before being submitted

This response draws on our comments in response to the A303 Consultation submitted in March 2017.

Key Principles and Issues

In commenting on previous schemes for the A303, the Society identified key principles that guided its response. These were that any scheme should:-

- Minimise damage to known or potential archaeological remains
- Minimise physical impact or visual intrusion on open landscape
- Maximise the efficient use of existing infrastructure
- Maximise the reversibility of any new works

The evidence presented to the Public Inquiry in 2004 also highlighted that there were a number of issues that should be considered:-

- The possibility of one day uniting the Avenue in its full length from the River Avon to Stonehenge
- Reducing the severance of the northern and southern parts of the WHS
- Improving the setting of the barrow cemeteries in and around the WHS
- Improving access and circulation to key archaeological sites within the WHS landscape

The current scheme addresses these issues.

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Archaeological Archives

Archaeological stores in museums in Wiltshire are currently full and there is a backlog of at least 2,500 boxes of archives from developer-funded sites. This backlog includes archives from previous excavations linked to the A303. We and Salisbury Museum are working in partnership with Wiltshire Council to find a solution to this issue. We noted in our response to the 2017 Consultation that any road scheme must include provision for the full costs of long-term archaeological storage of archives resulting from excavation and survey. The issue was highlighted in the 2015 Stonehenge and Avebury World Heritage Site Management Plan (Issue 54, Section 12.6). It is imperative that the archiving of the archaeological finds from all aspects of the investigations – evaluation and full excavation (if required) are considered and appropriate resources made available. We are disappointed that no discussions on this issue have taken place.

General Comments

Our views, set out in this document, relate to cultural heritage and environment and do not address other issues.

We welcome the level of detail presented in this consultation and the open consultation that is taking place.

We note the many changes that have been incorporated in the current scheme and that many points made in our response to the 2017 Consultation have been taken into account.

We are disappointed that the results of all the latest research in the Stonehenge landscape have not been taken into account in the development of the current scheme, including the leading-edge geophysics research of the Stonehenge Hidden Landscape project. We believe that this data still needs to be considered. In March 2017 we suggested that there should be an assessment of the extent to which archaeology survives below layers of colluvium, particularly in dry valleys in the chalk. This has not yet taken place. There are also ongoing extensive archaeological investigations under way and new findings may require changes to the PEIR.

As we highlighted in our response to the March 2017 consultation, the Wiltshire Archaeological and Natural History Society feels that Southern Route (Option 2 of those proposed in 2017) was the best option to preserve and enhance the Outstanding Universal Value (OUV) of the Stonehenge part of the World Heritage Site. This would maximise the benefits to the WHS through the removal of the trunk road and associated traffic and in doing so would have minimal impact on the archaeology of the WHS. Importantly, it would alleviate three of our concerns: that severance of the northern and southern parts of the Stonehenge landscape should be avoided, that the setting of the barrow cemeteries should be improved and that there will be access and circulation to key archaeological sites in the WHS.

We expect that all areas affected within the WHS will be fully investigated (through excavation, scientific analysis, remote sensing etc) to further our understanding of this internationally significant landscape. This should include features giving a picture of the wider use of the landscape, such as periglacial features or tree throws, that might provide valuable information about the contemporary Neolithic landscape, and which may not normally be recorded.

In response to the current proposal for tunnelling the A303 past Stonehenge, we feel that the tunnel should be extended beyond the boundaries of the WHS. We note that the current scheme is for a shorter tunnel which will have a significant impact on the OUV of the WHS. However, we feel that the overall impact of the current scheme on the OUV is positive and outweighs the negative aspects of a 'do nothing' option.

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- Q1. Please provide us with any comments you may have on our proposals for the viaduct crossing of the River Till valley.
 - Given the relocation of the western portal of the tunnel, we welcome the decision to place the crossing of the River Till to the north of Winterbourne Stoke.
 - We would prefer the open option for the Till Valley viaduct as this will reduce the extent of any shadows and reduce any impact on biodiversity
 - Chalk from the tunnelling should not be deposited on Parsonage Down, which has significant archaeology. This would avoid contamination and the creation of modern earthworks.
- Q2. Please provide us with any comments you may have on our proposals for the A303/A360 Longbarrow junction.
 - We welcome the siting of the junction to minimise visibility and impact on the WHS
 - The siting will result in a substantial improvement to the setting of the Winterbourne Stoke barrow cemetery
 - We welcome the new non-motorised access along the line of the current A303 and A360
 - We are concerned about the extent of the construction compounds and would expect full
 archaeological assessment to take place. We would expect the detailed design to take the
 archaeology into account and to minimise the mitigation required by avoiding areas of
 significant archaeological potential
 - The lighting scheme for the junction should minimise light pollution
- Q3. Do you have any other comments about our proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction)?
 - We welcome the improvement to the setting of the Listed Buildings in the Winterbourne Stoke Conservation Area. This will have a major positive impact for village residents and visitors.
- Q4: 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.
 - We welcome the use of green bridges in the scheme
 - In order to enhance the setting of the Winterbourne Stoke Crossroads barrow group and to alleviate to some degree its increasing separation from its landscape forced by successive phases of road widening, we would like to see a series of lengthy green bridges between the current line of the A360 and the western portal of the tunnel. This would minimise the impact of the scheme on the OUV and be a positive benefit following the downgrading of the A303. In due course, it may be appropriate to remove the plantation to the south of the Winterbourne Stoke barrow group to restore inter-visibility with the landscape to the south, including the Lake barrow cemetery.
 - The creation of non-motorised access along the historic line of the A360 gives the
 opportunity to improve the setting of the barrows immediately adjacent to the road,
 particularly Winterbourne Stoke G21a and G21b
- Q5: Please provide us with any comments you may have on our proposals for the cutting on the western approach to the tunnel.
 - We are particularly disappointed that the results of the Stonehenge Hidden Landscapes project were not used to inform the development of the current scheme.

- We would prefer the scheme to minimise the footprint and to minimise traffic noise in the WHS by a cutting using a retaining wall
- As outlined above in our response to Q4, we would like to see a series of lengthy green bridges in this area
- All new fencing should be sympathetic to the landscape and, if practical, use the slope above the retaining wall to minimise intrusion.
- While the loss of land to a new road has a negative impact on the OUV the return of the
 previous road to chalk grassland and the design of the new infrastructure in a tunnel
 outweighs this loss and produces a neutral to slightly positive effect on the OUV.

Q6. Please provide us with any comments you may have on our proposals for the western entrance to the tunnel.

- We would prefer the scheme to minimise the footprint of the road
- All new fencing should be sympathetic to the landscape
- The design of the tunnel entrance should minimise light pollution

Q7. Do you have any other comments about our proposals for the central section of the scheme within the World Heritage Site?

General

- We would have preferred to see a longer tunnel extending beyond the boundaries of the WHS
- We welcome the relocation of the portal to minimise the impact on the setting of the Normanton Down barrow group and the RSPB Nature Reserve
- We welcome the use of a cutting to remove the intrusion of the A303 into the WHS and particularly the setting of the Winterbourne Stoke barrow group
- We would expect all milestones affected by the scheme to be protected during construction, restored where appropriate and would recommend that the advice of the Milestone Society be sought on their final location within the Scheme
- The tunnelled length would have a very significant improvement impact on the OUV

Rights of Way and diversion arrangements

- We welcome the proposed redesign of the Rollestone Crossroads that will lessen the impact of traffic on the setting of Listed Buildings in Shrewton
- The downgrading of the A303 will significantly reduce the severance of the northern and southern parts of the WHS. We welcome the improved network that will promote walking and, where appropriate, cycling and horse-riding
- We agree that the entire length within the WHS of Byways 11 and 12 should be downgraded for the use of non-motorised use only, with the sole exception of farm and emergency vehicles
- There should be no new byway created to link Byways 11 and 12

Eastern portal

- We welcome the location of the portal being to the east of the Avenue, allowing the reconnection of this important route at a future date. We would expect access to be provided to the section of the Avenue under the current line of the A303. Uniting the two halves of the Avenue would be a significant enhancement to the OUV of this part of the WHS.
- We would expect a detailed study on local hydrology to inform the detailed design stage to ensure that there is no impact on water-logged deposits alongside the River Avon. There

are sensitive peat deposits in the valley of the River Avon as well as nationally significant Mesolithic sites, including Blick Mead.

- We are concerned that the detailed design of the portal will seriously affect the setting of the Park of Amesbury Abbey and the Nile Clumps. The detailed design of the portal must seek to avoid impact on this historic landscape.
- We would prefer the scheme to minimise the footprint of the road
- All new fencing should be sympathetic to the landscape
- The design of the tunnel entrance should minimise light pollution
- The loss of land and encroachment of the historic landscape to the east of the Avenue has a negative impact but again within this section the removal of a section of the A303 and its infrastructure at the Stonehenge Road turning mitigates this. The benefits of landscaping and improved environmental protection from polluted runoff balance the construction on the existing road footprint. We would judge this section to have a neutral effect on the OUV.

Q8: Please provide us with any comments you may have on our proposals for the A303 flyover at Countess roundabout.

On the assumption that there would be no impact on the water table or on the underlying
deposits associated with Blick Mead and other similar sites along this section of the River
Avon, we would prefer the landscaped option (5.49) for the proposed Countess roundabout
flyover. We feel that this will mitigate damage to the setting of listed buildings, minimise
sound transmission, avoid the need for piling and maximising the on-site use of chalk
excavated from the tunnel

Q9: 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).

 We welcome greater protection of monuments, particularly the diversion of the byway away from the barrow to the East of Solstice Park

Q10: Do you have any comments on the preliminary environmental information provided for the scheme?

The opening up of the landscape to the south of the current A303 could lead to disturbance
of the RSPB reserve and to the Normanton Down barrow cemetery and other monuments.
There will be a need for interpretation and land management to continue to protect these
sensitive areas.

Q11: Do you have any other comments you would like to make about the scheme?

NOTE: The background section to this document will be included here.

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