

## **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 response has been drafted by a working group established by our Board of Trustees. A draft of this document was circulated to all members and updated following their responses. The final version of this response has been agreed by the Board of Trustees.

##### ***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 with the WHS landscape

##### ***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. Any road scheme must include provision for the full costs of long-term archaeological storage of archives resulting from excavation and survey.

## **General Comments**

We welcome the commitment of the Government to:-

- Unite the two parts of the Stonehenge landscape divided by the A303
- Take the historic environment, including archaeology, into account
- Conduct an open consultation process
- Allocate substantial funding

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

We note that the results of recent and on-going evaluations such as those close to the proposed location of both the eastern and western portal are not yet available to us and were not available to Highways England at the point when the decision of the preferred route was taken. It is therefore premature to be proposing portal locations in advance of the results of this work being available. We would welcome confirmation that the results of all the latest research in the Stonehenge landscape have been taken into account, including the leading-edge geophysics research of the Stonehenge Hidden Landscape project. We would expect this to include an assessment of the extent to which archaeology survives below layers of colluvium, particularly in dry valleys in the chalk.

We note that there are a number of areas where details are not available at this stage, including the design of road junctions and the location of working areas that could have substantial impacts.

The route of the A303 is itself part of the historic environment and its line should be preserved, perhaps as a right of way, and including milestones and other historic features.

In summary, the Wiltshire Archaeological and Natural History Society feels that Southern Route (Option 2) is the best option to preserve and enhance the Outstanding Universal Value of the Stonehenge part of the World Heritage Site. In response to the proposal for tunnelling the A303 past Stonehenge (Option 1), we have offered significant and constructive suggestions to mitigate the impact of scheme on the WHS. We look forward to commenting further as the scheme evolves.

### ***1. Do you agree with the proposed option?***

No, we do not agree with the proposed option. Our preferred option would be the surface route south of the WHS (Option 2 Route F10). 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 ie 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. It is also a distinctly cheaper option with a major cost saving (estimated £500m).

We recognise that this option would have negative impacts elsewhere including on the open landscape which forms part of the setting of the WHS. Inevitably the area through which Option 2 passes has not been subjected to the same amount of archaeological research and survey and it is highly likely that significant archaeological and environmental impacts would be identified along the route.

If Option 2 were to be selected after this consultation, then we would expect detailed studies and impact assessments to be completed and a new consultation opened on the details of this scheme.

The remainder of this response are comments on Option 1 which, as indicated, we do not agree.

### ***2. Do you agree with the proposed location of the eastern portal?***

No. We would prefer the portal to be located outside the WHS.

We welcome, however, the location of the portal being to the east of the Avenue, allowing the re-connection of this important route at a future date. We note that there is an archaeological assessment currently under way and that the results are not available at the time of writing. However, it would appear that the location of the portal has been chosen to minimise archaeological impact. 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 important Mesolithic sites, including Blick Mead. There is a danger that the location 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.

### **3. Do you agree with the proposed location of the western portal?**

No, we do not agree with the proposed location of the western portal. This is a highly sensitive location within the World Heritage Site.

The maps provided in the consultation documentation do not adequately show the extent of the Normanton Down barrow cemetery. Several of the most important barrows, including Bush Barrow, lie outside the marked area and there are several barrows within Normanton Gorse. This downplays the impact of the portal on the barrow cemetery.

Normanton Gorse, as an area of woodland, is a relatively recent feature within the Stonehenge landscape. While it may screen the portal now, the woodland may be cleared at a future date, leaving the portal without suitable screening.

We note that geophysical survey or evaluation has not been carried out around Normanton Gorse or to the east of the wood known as the Diamond. The find of a Saxon spearhead close to the portal location suggests that there could be either a Saxon cemetery or secondary burials in an unlocated Bronze Age barrow. Substantial Saxon cemeteries have been difficult to locate using geophysics in advance of development at sites at Bulford and Tidworth.

The portal location is close to the RSPB stone curlew reserve on Normanton Down and there is a risk of disruption to nesting birds.

The portal location is close to the alignment of the winter solstice when seen from the Avenue and Stonehenge as well as being overlooked by the Sun barrow which is seen as an axial marker. Similarly, the proposed junction with the A360 is on this alignment. While we welcome the commitment to ensure that there is no surface lighting at the portal, there is a risk to dark skies within the WHS, particularly at the A360 junction. Astronomical alignments form part of the Outstanding Universal Value of the WHS recognised by UNESCO. The introduction of a dual carriageway in this section of the Stonehenge landscape would have substantial negative impacts. It is important that the open southern approach to the WHS is preserved as well as the open landscape between the remarkably well-preserved Lake and Winterbourne Stoke barrow cemeteries. Both of these cemeteries were formed around important long barrows and there are a further five within sight of the proposed location of the western portal. This is an unprecedented number of long barrows and reflects the importance of this area in the Neolithic period. The presence of important round barrow cemeteries, including that on Normanton Down, indicates that the significance of the area continued throughout the Bronze Age.

As a result, we feel that the portal should be located further to the west of the proposed location. We would prefer the portal to be located outside the WHS, but recommend that the portal should be located to the west of the linear boundary ditch that runs to the south east of the Longbarrow roundabout (SU105413 to SU105405) and forms the western edge of the Diamond plantation. The construction of a portal and road to the west of this area would require complete excavation including of topsoil in advance of the destruction of a section of important but levelled Bronze Age field systems. These are likely to incorporate settlement evidence contemporary with the later phase of Stonehenge. This would provide an opportunity to understand more about the archaeology of this part of the landscape but it should not be taken lightly.

We note that the longer the length of the tunnel, the more likely it is that ventilation shafts would be required. It is unlikely that an acceptable location and design for an obtrusive ventilation shaft could be found between Kings Barrow Ridge and Normanton Down. This factor may be key for deciding the length of the tunnel. It is essential that the tunnel is bored from the eastern portal to at least beyond Normanton Down, but this may not be necessary for an extended covered section to the west of this area, subject to possible disturbance to nesting stone curlews and archaeology located in this area.

Parts of the proposed route west of Normanton Down are shown as on an embankment. While this may preserve archaeology by burying it, it will add a visually intrusive element to the landscape which is contrary to one of our key principles noted above. An embanked road will be an invasive and unwelcome addition to the landscape.

#### **4. Which route for the Winterbourne Stoke Bypass?**

Our initial view is that we prefer the southern of the two routes (IS). This would minimise the impact on open landscape and the SSSI at Parsonage Down. It will also minimise impact on known archaeology, particularly the Iron Age and Roman settlements to the north of Winterbourne Stoke and the visual impact on the Conygar Barrow cemetery.

However, this route would require a junction between the A303 and A360 to the south of the Longbarrow junction and our comments on question 6 are relevant here. If this junction were to prove to be problematic, then we would recommend the northern route (IN).

#### **5. Proposals for the A303/A345 Countess junction**

The junction should maximise the use of existing disturbed area and minimise the introduction of new embankments. It is important to preserve the setting of nearby monuments such as Ratfyn barrow and Vespasian's Camp. The consultation document mentions the junction at Solstice Park. The area around this, particularly to the north and west, is archaeologically sensitive and so only the existing road network should be utilised.

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.

#### **6. Proposals for the A303/A360 Longbarrow junction**

If the southerly option (IS) is chosen, then the proposed location for this junction lies on the Winter solstice sunset alignment (see comments on question 3). At this location traffic heading east along the A303 would be facing directly at Stonehenge, with the danger of headlights being visible at the monument and the junction being visible on the horizon. The proposed layout appears to indicate that sections of the road and the junction will be raised above present ground level which increases the possibility of light pollution.

At this stage there is not enough information presented to understand what the impact of the junction might be. If the impacts are significant, then this would present a very strong justification for selecting the northerly route for the bypass (option IN).

#### **7. General Comments**

The background section to this document will be included here.

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