

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 agreed by our Board of Trustees. A draft was prepared by a working group established by the Board and incorporates the results of a consultation with our members. This response reflects a consensus view and the views of individual members may differ.

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 some of these issues.

General Comments about the Scheme

Our views, set out in this document, relate to cultural heritage and environment and do not address other issues. We understand that the government has decided that improving the route of the A303 will take place and that to 'do nothing' is therefore not an option.

We welcome the level of detail presented in this consultation and the open consultation that is taking place. However, we would have preferred to see a full Environmental Impact Statement rather than a Preliminary Environmental Information Report (PEIR).

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.

UPDATE: 20.4.2018. We have been informed by Wiltshire Council Archaeology Service that the latest data was taken into account in the development of the current scheme. This sentence has therefore been marked as deleted. ~~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 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.

We would welcome the use of the Avebury and Stonehenge Archaeological and Historical Research group as a forum for the sharing of information about archaeological investigations as work progresses. The Cross Rail Infrastructure Project established a similar forum and provided detailed briefings and updates. There should be a press and information website set up specifically to share the progress and results of the archaeological investigations that are likely to take place. This would help to establish strong links with key stakeholders as well as local organisations such as WANHS and Salisbury Museum, as well as local community groups.

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.

Conclusion

We feel that the current Scheme will have a significant impact on the OUV of the WHS. Our view remains that the tunnel should be extended beyond the boundaries of the WHS and we feel that it is especially important that the western tunnel portal is located outside the WHS. We do not endorse the current Scheme and our responses to the questions in the consultation are given with the aim of minimising its impact on the WHS.

Responses to the Questions in the Consultation

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. Nor should it be placed anywhere within the setting of the WHS. 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 an 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 and environmental assessments to take place. We would expect the detailed design to take the archaeology and environmental impacts into account and to minimise the mitigation required by avoiding areas of significant archaeological potential and environmental significance.
- 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, which also improves the environment 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 would prefer the tunnel to be extended beyond the western boundary of the WHS so that there would be no requirement for green bridges within the WHS.
- We prefer the use of green bridges in the scheme as an alternative to conventional bridges.
- 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. In due course, it may be appropriate to remove the plantation to the south of the Winterbourne Stoke barrow group to restore inter-visibility and access 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 would prefer the tunnel to be extended beyond the western boundary of the WHS so that there would be no requirement for a damaging cutting within the WHS.
- 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. Throughout the scheme, fencing should take into account wildlife protection.
- While the return of the present road to chalk grassland and the design of the new infrastructure in a tunnel will improve the setting and views of the stones, the cutting will have a negative impact on the OUV of the WHS.

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 do not endorse the short tunnel as proposed.
- If a longer tunnel is not possible, then we welcome the decision to relocate the portal to minimise the impact on the setting of the Normanton Down barrow group and the RSPB Nature Reserve.

- 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 be a very significant improvement on the setting and integrity of this part of the WHS.

Rights of Way and diversion arrangements

- We welcome the proposed redesign of the Rolleston 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, but the cutting will create a new and permanent severance. We welcome the removal of traffic from the vicinity of the stones that will enable the promotion of 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, potentially allowing the re-connection of this important route at a future date. We would expect access to be provided to the section of the Avenue currently cut by the line of the A303. Uniting the two halves of the Avenue would be a significant enhancement 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 encroachment on the historic landscape to the east of the Avenue has a negative impact on the WHS but this is partly counterbalanced by the removal of traffic from the tunnelled part of the road.

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 (and we expect there to be confirmation regarding this point), 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 and 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?

- We welcome the level of detail presented in this consultation and the open consultation that is taking place. However, we would have preferred to see a full Environmental Impact Statement rather than a Preliminary Environmental Information Report (PEIR).
- 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.
- 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.

Contact: David Dawson

Director, Wiltshire Archaeological and Natural History Society

david.dawson@wiltshiremuseum.org.uk