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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). 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 archeological 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 archeological 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,



Jude Plouviez, Chair