



# **Report to the First Secretary of State and the Secretary of State for Transport**

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**HIGHWAYS ACT 1980**

**ACQUISITION OF LAND ACT 1981**

**ROAD TRAFFIC REGULATION ACT 1984**

**THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) ORDER 200**

**THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) SLIP ROADS  
ORDER 200**

**THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT)  
(DETRUNKING) ORDER 200**

**THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) SIDE ROADS  
ORDER 200**

**THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) COMPULSORY  
PURCHASE ORDER (NO. ) 200**

**THE A303 TRUNK ROAD STONEHENGE IMPROVEMENT (COUNTRESS  
ROUNDAABOUT TO LONGBARROW CROSSROADS) (PROHIBITION OF  
CERTAIN CLASSES OF TRAFFIC AND PEDESTRIANS) ORDER 200**

**AND**

**THE A303 TRUNK ROAD STONEHENGE IMPROVEMENT (STONEHENGE  
BYWAY) (PROHIBITION OF MOTOR VEHICLES) ORDER 200**

Dates of Inquiry: 17 February 2004 to 11 May 2004

Ref: HA61/4/3

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### **Stonehenge Report - Abbreviations**

AADT	Average annual daily traffic
AAG	Amesbury Link Road Action Group
ACT	Association of Council Taxpayers - South Wiltshire
AONB	Area of Outstanding Natural Beauty
BBT	Byways and Bridleways Trust
CBA	Council for British Archaeology
CEMP	Contractor's Environmental Management Plan
Ch	Scheme chainages, denoting the distance in metres along the

	published scheme, with Ch 0 starting at Berwick Down
CPRE	Campaign to Protect Rural England
CRRG	Countess Road Residents' Group
CRTN	Calculation of Road Traffic Noise
cSAC	Candidate Special Area of Conservation
CSERGE	Centre for Social and Economic Research on the Global Environment
dB	Decibels
DCMS	Department for Culture, Media and Sport
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department of the Environment, Transport and the Regions
DMRB	Design Manual for Roads and Bridges
DTA	Drainage Treatment Area
EAR	East Amesbury Residents
GOMMMS	Guidance on the Methodology for Multi Modal Studies
ha	Hectares
HGV	Heavy goods vehicle
ICOMOS	International Council on Monuments and Sites
ICOMOS - UK	The UK Committee of the International Council on Monuments and Sites
km	Kilometres
kph	Kilometres per hour
£m	Million pounds
m	Metres
MILS	Monument Immediate Landscape Setting
MOD	Ministry of Defence
NNR	National Nature Reserve
NPV	Net present value

POST	Parliamentary Office of Science and Technology
PPG	Published Planning Guidance Notes
SAWTAG	South and West Transport Action Group
SNCI	Site of Nature Conservation Interest
SPZ	Source Protection Zone for groundwater abstractions
SSSI	Site of Special Scientific Interest
SWARMMS	South West and South Wales Multi Modal Study
The Byway Regulation Order	The A303 Trunk Road Stonehenge Improvement (Stonehenge Byway) (Prohibition of Motor Vehicles) Order 200
The Compulsory Purchase Order	The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200
The Detrunking Order	The A303 Trunk Road (Stonehenge Improvement) Detrunking Order 200
The JV	The Joint Venture Team of Balfour Beatty/Costain
The Line Order	The A303 Trunk Road (Stonehenge Improvement) Order 200
The Side Roads Order	The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200
The Slip Roads Order	The A303 Trunk Road (Stonehenge Improvement) Slip Roads Order 200
The Tunnel Regulation Order	The A303 Trunk Road Stonehenge Improvement (Countess Roundabout to Longbarrow Crossroads) (Prohibition of Certain Classes of Traffic and Pedestrians) Order 200
The World Heritage Convention	The United Nations Educational, Scientific and Cultural Organisation Convention for the Protection of the World Cultural and Natural Heritage
TRF	The Trail Riders Fellowship
TRO	Traffic Regulation Order
WANHS	Wiltshire Archaeological and Natural History Society
WHS	World Heritage Site



## **CASE DETAILS**

### **The A303 Trunk Road (Stonehenge Improvement) Order 200**

- This draft Order would be made under Sections 10 and 41 of the Highways Act 1980, and is known as "the Line Order".
- The Line Order was published on 5 June 2003, and there were 1,391 objections outstanding to it and to the scheme generally at the commencement of the local inquiries.
- The Line Order would establish the centre line of the proposed new section of the A303 trunk road between Berwick Down and Amesbury, points A and B on the Line Order Map.

**Summary of Recommendation: that the Order be made as drafted.**

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### **The A303 Trunk Road (Stonehenge Improvement) Slip Roads Order 200**

- This draft Order would be made under Sections 10 and 41 of the Highways Act 1980, and is known as "the Slip Roads Order".
- The Slip Roads Order was published on 5 June 2003, and there were 20 objections outstanding specifically to it at the commencement of the local inquiries.
- The Slip Roads Order would authorise ten new slip roads, which would be trunk roads, providing access between the existing road system and the proposed new section of the A303.

**Summary of Recommendation: that the Order be made with modifications.**

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### **The A303 Trunk Road (Stonehenge Improvement) (Detrunking) Order 200**

- This draft Order would be made under Sections 10 and 12 of the Highways Act 1980, and is known as "the Detrunking Order".
- The Detrunking Order was published on 5 June 2003, and there were 20 objections outstanding specifically to it at the commencement of the local inquiries.
- The Detrunking Order would authorise the removal of the trunk road classification from those parts of the existing A303 trunk road which would be superseded if the Line Order and the Slip Roads Order were made.

**Summary of Recommendation: that the Order be made as drafted.**

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### **The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200**

- This draft Order would be made under Sections 12, 14 and 125 of the Highways Act 1980, and is known as "The Side Roads Order".
- The Side Roads Order was published on 5 June 2003, and there were 20 objections specifically to it at the commencement of the local inquiries.
- The Side Roads Order would authorise the improvement of certain highways, the stopping up of other highways, the construction of new highways and the stopping up and in some cases the provision of new private means of access to premises, in each case as listed in the Order.

**Summary of Recommendation: that the Order be made with modifications.**

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### **The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order (No ) 200**

- This draft Order would be made under Sections 239, 240, 246 and 250 of the Highways Act 1980 and Section 2 of the Acquisition of Land Act 1981, and is known as "the Compulsory Purchase Order".
- The Compulsory Purchase Order was published on 12 June 2003, and there were 19 objections specifically to it at the commencement of the local inquiries.
- The Compulsory Purchase Order would authorise the compulsory acquisition of the land and interests necessary to carry out the proposals in the Line Order, the Slip Roads Order and the Side Roads Order.

**Summary of Recommendation: that the Order be made with modifications.**

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### **The A303 Trunk Road Stonehenge Improvement (Countess Roundabout to Longbarrow Crossroads) (Prohibition of Certain Classes of Traffic and Pedestrians) Order 200**

- This draft Order would be made under Sections 1, 2 and 122A of the Road Traffic Regulation Act 1984, and is known as "The Tunnel Regulation Order".
  - The Tunnel Regulation Order was published on 21 August 2003, and there were 6 objections specifically to it at the commencement of the local inquiries.
  - The Tunnel Regulation Order would prohibit pedestrians and certain classes of traffic from using the tunnel which would be provided under the Line Order and certain of the slip roads which would be provided under the Slip Roads Order.
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**Summary of Recommendation: that the Order be made with modifications.**

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**The A303 Trunk Road Stonehenge Improvement (Stonehenge Byway) (Prohibition of Motor Vehicles) Order 200**

- This draft Order would be made under Section 1, 2, 22 and 122A of the Road Traffic Regulation Act 1984, and is known as "the Byway Regulation Order".
- The Byway Regulation Order was published on 21 August 2003, and there were 7 objections specifically to it at the commencement of the local inquiries.
- The Byway Regulation Order would prohibit most motorised vehicles from the byway between Longbarrow Crossroads and Stonehenge Road which would be provided under the Side Roads Order.

**Summary of Recommendation: that the Order be made with modifications.**

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**1 INTRODUCTION**

- 1.1 The A303 trunk road links London with the South West of England, from the M3 in the east to the A30 and, by way of the A30, to the M5 and the A38 in the west. It is a key route for long distance commercial and holiday traffic, and it is part of the Trans European Route Network, a network of routes running across the continent, intended to create efficient links to all parts of Europe, including peripheral regions. Plans showing how the A303 fits into the national and the regional road network will be found at figures 2 and 3 respectively in Document DD12.
- 1.2 Much of the A303/A30 is dual carriageway, and the section of the A303 between Amesbury in the east and Berwick Down in the west is the first single carriageway section encountered by a driver travelling on the M3 and the A303 to the South West after leaving London.
- 1.3 The published scheme would upgrade the 9km section of single carriageway which currently runs past Stonehenge and through the village of Winterbourne Stoke. Extending to 12.4km of dual carriageway, the scheme would include a 2.1km twin bored tunnel through the heart of the Stonehenge World Heritage Site (WHS) designed to remove the impact of roads and traffic from the landscape setting of Stonehenge. The scheme would also provide a bypass for Winterbourne Stoke.
- 1.4 Further west, the Secretary of State for Transport has agreed with recommendations to upgrade the remaining single carriageway sections of the A303 as far as Ilminster, and has asked the Highways Agency to consider options for the upgrading of the route between Ilminster and the M5, reinforcing the strategic importance of the A303/A30 route.

- 1.5 The Line Order (Document DD1) would establish the centre line of the proposed new section of the A303 trunk road between Amesbury and Berwick Down. Between Amesbury and Longbarrow Crossroads (some 2.5km west of Stonehenge), the route would be along the corridor of the existing A303, with the tunnelled section just to the south of the existing road. Between Longbarrow Crossroads and Berwick Down, the route would run generally to the north of the existing A303.
- 1.6 The Slip Roads Order (Document DD2, as modified in HA/0/53) would authorise new slip roads to provide access between the existing road system and the proposed new section of the A303. The Detrunking Order (Document DD3) would remove the trunk road designation from those parts of the existing A303 which would be superseded. The Side Roads Order (Document DD4, as modified in HA/0/53) would authorise the improvement of the highways listed in that Order; the stopping up of other highways; the construction of new highways; and the stopping up of existing private means of access to land and premises, with the creation of new private means of access where necessary. The Compulsory Purchase Order (Document DD5, as modified in HA/0/53) would authorise the compulsory acquisition of the land and interests necessary to carry out the proposals in the Line Order, the Slip Roads Order and the Side Roads Order.
- 1.7 The Tunnel Regulation Order (Document DD6, as modified in HA/0/53) would prohibit pedestrians and certain classes of traffic from using the proposed tunnelled section of the A303 and the slip roads giving the closest access to and egress from that section of the route. The Byway Regulation Order (Document DD7, as modified in HA/0/53) would prohibit most motorised vehicles from the byway between Longbarrow Crossroads and Stonehenge Road proposed to be provided under the Side Roads Order. The exceptions would be vehicles carrying people with disabilities, the vehicles of statutory undertakers or the emergency services, agricultural vehicles, and vehicles being used to gain access to Stonehenge Cottages.
- 1.8 Assisted by Mr C I Cochrane, who is a specialist archaeology Inspector, I held concurrent inquiries into the seven Orders listed above at The Guildhall in Salisbury on 17 and 18 February 2004 and at Cross Keys House in Salisbury on 19, 20 and 25 February, 2, 3, 4, 5, 9, 10, 11, 12, 16, 17, 23, 24, 25, 26 and 30 March, 1, 2, 6, 7, 8, 14, 15, 16, 20, 21, 22, 23, 27, 28, 29 and 30 April and 11 May 2004.
- 1.9 I take this opportunity to express my gratitude to Mr Cochrane for his unfailing support and assistance during the preparation for the inquiries, the hearing of the inquiries and the preparation of this report.
- 1.10 I carried out an unaccompanied site inspection of the area affected by the Orders on 16 November 2003, and a site visit accompanied only by Mr Cochrane on 27 January 2004. We made a further unaccompanied site visit on 28 April 2004, and accompanied site visits on 4, 5, 6 and 7 May 2004. The accompanied site visits included a visit to Stonehenge during the hours of darkness between 9 pm and 10.15 pm on 4 May 2004, and,

on 7 May 2004, a visit to Brighton to see the A27 Road Tunnel under part of the South Downs, and a visit to Twyford Down.

- 1.11 At the opening of the inquiries, there were 1,391 objections outstanding to the Line Order and to the scheme generally. They included objections from the Town Councils of Amesbury and Devizes, and from the Parish Councils of Bulford, Bishopstone, Cherhill, Whiteparish, Little Cheverell and Mere. There was also an objection from the National Trust. Wiltshire County Council and Salisbury District Council were broadly in support of the published scheme, but had made objections concerning points of detail. The same position was taken by English Heritage.
- 1.12 Objections which had been submitted by English Nature, the Environment Agency and the Wiltshire Fire Brigade were withdrawn before the opening of the inquiries.
- 1.13 When the inquiries opened, there were 20 objections specifically to the Slip Roads Order; 20 objections specifically to the Detrunking Order; 20 objections specifically to the Side Roads Order; 19 objections specifically to the Compulsory Purchase Order; 6 objections specifically to the Tunnel Regulation Order; and 7 objections specifically to the Byway Regulation Order.
- 1.14 During the inquiries, 56 further objections were received to the scheme generally. They included objections from the Parish Councils of South Newton, Barford St Martin and Tisbury.
- 1.15 During the inquiries, nine objections to the Line Order and to the scheme generally were withdrawn, together with four objections to the Slip Roads Order; four objections to the Detrunking Order; six objections to the Side Roads Order; five objections to the Compulsory Purchase Order; one objection to the Tunnel Regulation Order; and one objection to the Byway Regulation Order. In each case the objection was unequivocally withdrawn in writing. Those withdrawn objections included the outstanding reservations of Wiltshire County Council and English Heritage. In addition, during the inquiries, the Druid Network and the British Druid Order changed the nature of their submissions to the inquiries from objections to representations.
- 1.16 The main grounds of objection to the Orders were as follows:
- The road should not be improved. Instead, action should be taken to reduce the traffic which it carries.
  - The scheme proposed is inadequate, and it would be better to do nothing in the short term rather than to implement an unacceptable scheme.
  - A scheme should be implemented which removes traffic from all or from a larger proportion of the WHS than would be achieved by the published scheme proposals. To achieve this, a longer tunnel is necessary.
  - Traffic should be taken away from Stonehenge and the WHS by improving the A303 at grade, but on a line more distant from the WHS than the published scheme.

- The A303 should be improved on line, at grade.

- 1.17 There were 28 representations of support for the Orders in advance of the opening of the inquiries. They included support from the Department for Culture Media and Sport, from the Parish Councils of Winterbourne Stoke and Steeple Langford and from the Berwick St James Parish Meeting. During the inquiries, 10 further expressions of support for the published scheme were received, including support from the Parish Councils of Durnford, Idmiston and Woodford.
- 1.18 Thirty nine objectors appeared at the inquiries, some having arranged joint representation. There were eight appearances at the inquiries on behalf of supporters of the published scheme. In addition, sixteen parties appeared at the inquiries to make representations on the published scheme or on alternatives proposed to it.
- 1.19 The Highways Agency confirmed that all necessary statutory formalities in connection with the promotion of the Orders had been complied with.
- 1.20 In giving notice of the inquiries, the Secretary of State directed that any person intending to submit to the inquiries that any highway or proposed highway to which the draft Orders related should follow an alternative route or that, instead of improving, diverting or altering a highway to which the Orders related, a new highway should be constructed on a particular route, should provide details of those alternatives by 19 December 2003. In response to that direction, six alternatives were proposed. They were publicly advertised on 29 and 30 January 2004 (Document HA/0/47). One of them was withdrawn during the inquiries on the settlement of an objection.
- 1.21 At the second Pre Inquiries Meeting, Counsel for the Highways Agency indicated that the Agency had been discussing with objectors before 19 December 2003 certain other alternatives, which it had originally been understood were not to be pursued at the inquiries. In the event, it had transpired that objectors wished to pursue three of these additional alternative schemes. They were publicly advertised by the Highways Agency on 26 and 27 February 2004 (Document HA/0/48). The Highways Agency agreed to draw them up in detail, and to provide a reasoned response to them. Because of the length of the inquiries, there was also time for people who would be affected by these additional alternatives to respond to the advertisement of them. I therefore accepted them for consideration at the inquiries.
- 1.22 During the course of the inquiries, a number of other alternative routes or alternative approaches to dealing with traffic along the A303 in the area of Stonehenge was suggested, either in evidence at the inquiries or in written submissions. In line with the guidance contained in paragraphs 6.17 to 6.21 of Document CD/INQ/1, wherever I considered that it was possible to hear evidence which might be of assistance to the Secretaries of State in determining the case for or against the Orders, without prejudicing either the promoter of the Orders or people whose interests might be affected by the proposals, I heard that evidence and have reported on it. Apart from the nine alternatives referred to in the two

previous paragraphs, however, none of these additional alternative routes was advertised.

- 1.23 Each of the alternatives considered at the inquiries is described in detail in section 7 of the report. The extent of the support for or opposition to each of the alternatives is noted when the alternative is described and discussed. The lines of the alternatives considered in detail at the inquiries are shown on Document HA/0/32.
- 1.24 This report contains a brief description of the site of the proposals which are the subject of the Orders, the gist of the cases presented, and my conclusions and recommendations. Lists of appearances and inquiries documents are attached as Appendices A and B respectively.
- 1.25 The inquiries documents include proofs of evidence submitted to the inquiries and summary proofs read at the inquiries. My report takes account, however, not just of the proofs of evidence, but of the evidence as given, together with points brought out in cross examination. A transcript of the proceedings forms Document AA/0/2.

## **2 DESCRIPTION OF THE SITE AND ITS SURROUNDINGS**

- 2.1 The existing A303 runs on an east-west orientation across the southern edge of Salisbury Plain, following an undulating route. From the west, the road runs along the prominent ridgeline of Berwick Down before descending into the village of Winterbourne Stoke and crossing the valley of the River Till. The road then rises again to Longbarrow Crossroads, which is located on high ground on the watershed between the River Till and the River Avon. The dry valley of Stonehenge Bottom creates another dip in the route, before it rises to the prominent ridgeline at King Barrow Ridge, and then falls once more to Countess Roundabout in the valley of the River Avon. The locations mentioned in this section of the report can be identified on Figures 4 to 6 (the last mentioned comprising nine sheets) in Document HA/1/3.
- 2.2 Although of much earlier origin, the A303 route was established as a turnpike road in the 18<sup>th</sup> Century, and its alignment has not changed a great deal in the area of Stonehenge and Winterbourne Stoke since those times. The section north of Amesbury was constructed as the Amesbury Bypass in the 1960s, comprising a dual carriageway through a significant cutting and the Countess Roundabout junction with the A345, to replace the old route which had run through the centre of Amesbury. The roundabout was designed to accommodate an A303 flyover. The old road still exists to the west of Amesbury as Stonehenge Road, leading on to the westbound carriageway of the A303 improvement just east of King Barrow Ridge.
- 2.3 In the west, the existing single carriageway trunk road passes through the northern part of the village of Winterbourne Stoke. The historic core of the village lies to the south of the A303, with more recent houses, the local garage, the public house and farm buildings on the north side of the road.

- 2.4 From the village, the 2-lane single carriageway A303 climbs the east side of the Till Valley to reach Longbarrow Crossroads. This is an at-grade roundabout junction with the single carriageway A360. Situated in the open countryside with extensive views of adjoining barrow monuments, wooded areas and more distant ridgelines, the roundabout has 10m high lighting columns. This location and Countess Roundabout, which has similar lighting columns, are the only lit sections of this length of the A303, which crosses otherwise dark, open downland at night, where there are few immediate light sources apart from some distant sky glow from urban areas.
- 2.5 In the dry valley of Stonehenge Bottom just to the east of the Stonehenge monument the level of the trunk road was raised by several metres and widened at the time of the construction of the Amesbury Bypass to provide an improved junction layout between the A303 and A344 road to Devizes, which lies some 25km away.
- 2.6 The A344 leaves the A303 at this Y-junction in a north-westerly direction, passing between Stonehenge and its Visitor Centre and car park. The junction does not allow right turns from the A344 on to the A303 westbound. There is a central right turning lane for A303 westbound traffic to access the A344.
- 2.7 In addition to its function for long distance traffic, this section of the A303 also serves the local needs of the town of Amesbury just to the south and the village of Winterbourne Stoke. Durrington and Bulford and the Army barracks at Larkhill to the north are served via the A345 from Countess Roundabout, and the A345 continues up the Avon Valley to Marlborough (at a distance of 38km) and Swindon (which lies some 55km away). To the south, the military airfield of Boscombe Down lies next to the A345.
- 2.8 The Stonehenge WHS is bounded to the east by the A345 and to the west by the A360. Its boundary is shown on Figure 2.1 of Volume 1a of the Environmental Statement (Document DD10). The A360 forms a direct link between Salisbury (17 km to the south of Stonehenge) and Devizes, intersecting with the A303 at Longbarrow Crossroads and, 1.4km north at Airman's Corner, meeting the A344 west of Stonehenge, where it bears north-west to pass through the village of Shrewton about 3km north of the A303. The predominantly military area of Salisbury Plain lies to the north of Larkhill and Shrewton.
- 2.9 Both the A303 and A344 roads pass through land owned by the National Trust at the centre of the World Heritage Site (see Figure 5 in Document HA/1/3).
- 2.10 Several minor roads and rights of way running in a north-south direction connect with the relevant section of the A303 published scheme. At Winterbourne Stoke, the B3083 has staggered T-junctions with the A303 which lead north to the village of Shrewton and south to Berwick St James and Stapleford.



- 2.11 Travellers on the A303 at present have extensive views over the chalk downland scenery as the highway undulates through the area. Between King Barrow Ridge and Stonehenge Down, there are open views of the Stonehenge monument in both directions. The monument forms a landmark on the journey between London and the West Country, and for those who make local journeys.
- 2.12 There is clear visible evidence of military presence in the landscape around Stonehenge, which sits in a slightly elevated position in the centre of a natural shallow bowl formed by higher ridges and downland in every direction. The large buildings at Boscombe Down airfield are visible from Stonehenge on the far horizon to the east, and the barracks and training buildings at Larkhill can be seen to the north. The existing roads and traffic of the A303 and A344 and the existing Stonehenge Visitor Centre and car park are prominent in the landscape.
- 2.13 Almost the whole of the village of Winterbourne Stoke and the north-west part of Amesbury town centre are designated Conservation Areas. The Winterbourne Stoke Village Conservation Area covers a group of cottages and the village church alongside the banks of the River Till, and several are listed buildings.
- 2.14 The historic core of the village of Winterbourne Stoke follows a linear pattern of development alongside the River Till. The mainly residential buildings face on to the road or have gardens next to it, and comprise an intimate setting of vernacular buildings in local materials, closely related to the landscape setting. Later 20<sup>th</sup> Century development has spread along the A303, including houses, a garage and a public house, which has been modernised to attract passing trade.
- 2.15 The Amesbury Conservation Area extends southwards from the A303 to include the historic centre of the town, numerous listed buildings and the partly wooded Amesbury Abbey Park. The Conservation Area is well screened from the A303 by vegetation. The Park is a Grade II\* Registered Historic Park, with its own distinctive character, containing several additional listed buildings and structures. On the north side of and adjacent to Countess Roundabout and Countess Road, the old house and its group of barns at Countess Farm are listed buildings. In recognition of the historic significance of the roads through the site, a number of the milestones along the A303 and A344 are listed Grade II.
- 2.16 Between the King Barrow Ridge and Countess Roundabout, the landscape is much more enclosed. The dense trees around the roundabout, Vespasian's Camp Iron Age Hillfort, Amesbury Abbey Park and the groups of trees known as the Nile Clumps form the character of this landscape. The Nile Clumps are the remains of old planted groups of beech trees on the east slopes of King Barrow Ridge, to the north of the A303. They are said to represent the positions of Nelson's ships at either the Battle of the Nile 1798 or the Battle of Trafalgar 1805, as viewed from the Abbey. Fourteen Nile Clumps north of the A303 are protected by Tree Preservation Orders. Two Nile Clumps were partially removed by the 1960s bypass scheme, and only survive as linear groups of replacement planting within the A303 highway boundary.

- 2.17 The grounds of Amesbury Abbey lie within the Avon Valley, on slightly raised ground within the floodplain. They contain the remains of a designed landscape dating from the 18<sup>th</sup> Century onwards, consisting of grassland beneath mature parkland trees. Today the Park is almost entirely enclosed by woodland to the north, east and west, and there is no public access. In addition to the Abbey itself, two lodges on the A345, Diana's House and Kent House, the old bridge over the Avon, known as Grey Bridge, and the Baluster Bridge on the old carriageway leading north-west from the house are all listed buildings.
- 2.18 The urban area of Amesbury extends to the north-east quadrant of the Countess Roundabout where there is a trunk road service area, Countess Services, which includes a petrol filling station, a restaurant and overnight accommodation. Residential development extends further north along both sides of Countess Road.
- 2.19 Stonehenge is designated a WHS due to its high concentration of important archaeological sites. It is actually the southern part of the whole nomination, which is titled the '*Stonehenge, Avebury and Associated Sites World Heritage Site*', but in practice it is treated as a distinct and separate entity from Avebury, which lies more than 25km to the north. The WHS at Stonehenge covers an area of some 2,665ha, and contains 416 individual monuments which are grouped into some 175 scheduled areas with the benefit of statutory protection. The numbers ascribed to sites in this report follows the numbering of sites in the Environmental Statement. This was the system used at the inquiries (and is therefore the system used in the transcript of the inquiries) for referring to sites. There is a table at pages 28 to 32 of Volume 2 Part 1 of the Environmental Statement which reconciles the Environmental Statement Site numbers with other listing references such as the list of Scheduled Monuments, Listed Buildings and the Sites and Monuments Record. Other sites with statutory protection lie outside the WHS area. Details of those within an area of some 34 sq km around Stonehenge are contained in Document DD105.
- 2.20 The Stonehenge monument forms the focus of a number of important ritual and funereal monuments on Salisbury Plain, many of which are also remarkably intact.
- 2.21 The Avenue, a monument of parallel banks, leads away from the stone circle for a distance of some 2,780m, changing from north-east to an easterly direction across King Barrow Ridge, and then south-easterly to meet the River Avon to the south. The Avenue is crossed by the main A344 and A303 roads, and it is not readily visible to the east of King Barrow Ridge and the south of the A303, where the fields are cultivated.
- 2.22 Further north within the WHS lies the Cursus monument, a very long linear earthwork, which extends across much of the area from east to west, south of Larkhill.
- 2.23 Surrounding the focal area of Stonehenge are numerous early Bronze Age round barrows, dating from early in the second millennium BC. These are

- mostly grouped in cemeteries, and form distinctive features clustered around the stone temple and earlier Neolithic long barrows. The numerous barrow groups are typically associated with the tops of the ridgelines where there are extensive open views of Stonehenge and other barrow groups.
- 2.24 Daytime visitors have a clear view of the security arrangements at the site. The immediate environs of the Stones between the A344 and A303 are fenced off, and visitors proceed from the car park to the underground shop/café/ticket office and, via a subway under the A344, to gain ramped access to the monument. In addition to the high security fences, there are roped-off surfaced footpaths, raised pedestrian decking bridges and other structures for the protection, maintenance and security of the area.
- 2.25 The car park caters for large numbers of cars and coaches every day. It has a large tarmac surface, which slopes to the north below the level of the A344. There are temporary public conveniences in the north-west corner, which have timber screen cladding, perimeter fencing and information boards for visitors. The southern boundary to the road and the central strip is landscaped with trees for screening.
- 2.26 The published scheme for the A303 Improvement is shown in Figures ENG 6.1 to 6.9 inclusive in Document HA/2/3. From the west, the route would follow the existing road before curving north to pass Scotland Lodge Farm, avoiding Parsonage Down SSSI. It would continue to curve to cross the B3083 and the River Till north of the village of Winterbourne Stoke. The new road would then cross the existing alignment of the A303 to the west of Longbarrow Crossroads so as to run south of the existing trunk road and allow for a new grade-separated junction with the A360.
- 2.27 East of Longbarrow Crossroads, the new road would be mainly in cutting, widening the existing A303 to a dual carriageway, shifted slightly to the south, and incorporating the 2.1km twin-bored tunnel section past Stonehenge through the centre of the WHS. The new dual carriageway would rejoin the existing dual carriageway (Amesbury Bypass) approximately 1km west of Countess Roundabout, crossing The Avenue monument at grade. The scheme would include the improvement of the Countess Roundabout, where a grade-separated A303 flyover would be constructed.
- 2.28 Beyond the central core of the WHS, the land-take for the published scheme, like the existing A303, would be located close to other Scheduled Ancient Monuments within the WHS. These comprise two long barrows, eleven round barrows, a ring ditch, an enclosure, a linear earthwork, The Avenue and a hillfort. These monuments are listed in Table 1 within Document DD103.
- 2.29 West of Winterbourne Stoke, the landscape is dominated by the well-preserved Iron Age hillfort of Yarnbury Camp with extensive traces of field systems and other smaller enclosures. This lies well outside the trace of the published scheme.
- 2.30 To the north of Winterbourne Stoke, the landscape is dominated by two well-preserved Bronze Age barrow groups, The Coniger and the

Winterbourne Stoke West Group, both containing well-preserved Scheduled Ancient Monuments. Although well outside the study area for the new road, it is likely that the published scheme would affect their settings. The area of the route to the east of Winterbourne Stoke has few recorded archaeological sites, but traces of a possible palisade and an extensive array of buried pits found by geophysical survey suggest that the area has potential for important new discoveries.

- 2.31 The area around Longbarrow Crossroads contains many well-preserved monuments, particularly Neolithic and Bronze Age barrows and later prehistoric boundary earthworks to the north of the A303, but the land alongside the route to the east of Longbarrow Crossroads contains few known archaeological remains.
- 2.32 The Stonehenge triangle between the A303 and A344 containing the Stones also contains a group of round barrows close to the A303, and nearby on the south-west side there are scheduled barrows which form outliers to the important Normanton Down Group to the south of the study area. East of Stonehenge, King Barrow Ridge has a most impressive array of scheduled Bronze Age barrows immediately alongside the A303.

### **3 PROCEDURAL SUBMISSION**

- 3.1 During the course of the presentation of their objection to the Orders, the Stonehenge Alliance asked me to rule that the Highways Agency should be directed to carry out additional sensitivity testing of the evidence the Agency placed before the inquiries on transport economics.
- 3.2 Professor Phil Goodwin, Professor of Transport Policy at University College, London, appeared as an expert witness on transport economics for the Stonehenge Alliance. He submitted that the sensitivity tests which had been carried out by the Highways Agency on their traffic and economic assessments were not broad enough to encompass current thinking in transport policy. He suggested that there was a need to consider the sensitivities of traffic to various changes in the parameters influencing it, compared with those used in the National Road Traffic Forecasts published in 1997. He argued that a major and fundamental reassessment was taking place of the forecasts on induced traffic; that the sensitivity of traffic to changes in price was now thought to be significantly higher than it had been at the time of the 1997 Forecasts; and that emerging policies on congestion charging, fuel prices and demand management were likely to have a bigger effect than previously assumed.
- 3.3 A higher sensitivity to price would be likely to lead to a higher sensitivity of traffic volumes to travel time or travel speed, and Professor Goodwin argued that the latest research suggested that the perceived value of time might not increase by the same proportion as the increase in real incomes, as had previously been assumed.
- 3.4 His contention was that, while the National Road Traffic Forecasts should continue to be used, it was inappropriate to ignore the emerging

information which might call those forecasts into question. Sensitivity tests should therefore be carried out to recognise the question marks raised by the latest research evidence. It was not enough to claim, as the Highways Agency did, that the variances would all be subsumed within the low growth/high growth envelope in the overall economic outturn of a scheme assessment. Professor Goodwin's contention was that they would change the position or size of that envelope, and could change the outcome of the cost benefit analysis. When the Department for Transport itself carried out these calculations for its own ten year plan to 2010, it became apparent that there was a very substantial impact, even within a ten year time frame, on the calculation of the traffic effects of its overall package of policies on roads and otherwise.

- 3.5 The research evidence to which he was referring was not secret or contentious; it was shared openly between professionals working in this area of activity. As an example, the National Transport Model Working Paper number 3 was before the inquiries as Document HA/0/27.
- 3.6 Professor Goodwin suggested that sensitivity tests with a 10% change in the cost of motoring and a different travel time elasticity should be carried out by the Highways Agency, together with a projection of the value of travel time savings less than proportional to real income. There should also be an assessment of what would happen to the costs and benefits of the scheme if, during its lifetime, there was a changed national picture on how the Government manages demand on the road network as a whole - distance based charging, or using price or other methods to influence traffic volumes.
- 3.7 In response, the Highways Agency pointed out that, while the National Road Traffic Forecasts and the prescribed methodology were being reviewed, they had not been changed. The traffic and economic analysis was carried out in the same way for all schemes which were candidates for the national road programme in order that a fair assessment could be made by comparing like with like. This particular scheme had come forward, however, not on that basis alone, but as an exceptional environmental scheme. Induced traffic played only a small part in the make up of the traffic which would use this particular scheme, and, even if it were doubled, it would not make a huge difference to the traffic on the A303. Given that there would be no significant change in traffic flows, there would be no issue in terms of the design of the scheme. The introduction to Document HA/0/27 specifically made the point that the elasticities reported in the paper should not be taken as guidance to adopt for scheme appraisal. They might in the longer term lead to changes in the national transport model, but they were not to impact on appraisal now.
- 3.8 I considered that statement to be very important. It followed the line taken in paragraphs 6.2 and 6.3 of "Notes for the Guidance of Inspectors Holding Inquiries into Orders", which I had made a core document at the first Pre Inquiries Meeting (Document CD/INQ/1). Paragraph 6.2 of that Document provides that

*"The merits and foundations of policies, methodologies, design*

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*standards, economic assumptions and forecasts of traffic growth adopted by the Government are not matters for argument at inquiries. Any arguments about them should take place at national level."*

That position was also taken in a statement made in the House of Lords by a Government Minister on 25 February 1976 which is set out in Appendix A to Document CD/INQ/1, and in the judgement of Lord Diplock in the case of *Bushell & Another v Secretary of State* [1980] 2 All England Reports at page 608.

- 3.9 Although Professor Goodwin later made the point that these statements were made many years ago, it is the case that they were repeated and endorsed in the issue of Notes for Guidance produced in November 2003, which was the version before the inquiries.
- 3.10 In the light of that guidance, I ruled that no further sensitivity testing was required of the Highways Agency, but I promised to report the application for a ruling on this matter fully to the Secretaries of State.
- 3.11 The documents in which information is contained which has a bearing on the subject matter of this application are Documents SA/7/1, SA/7/2, SA/7/3 and SA/0/14; HA/0/3, HA/0/6, HA/0/27, HA/3/1, HA/13/21, HA/13/22; CD/INQ/1; and the transcripts of the inquiries proceedings for Day 17 am pages 9 to 31, pages 48 to 58 and pages 60 to 62. My ruling on the matter is set out in the transcript for Day 18 am at pages 2 to 5.

#### **4 THE CASE OF THE HIGHWAYS AGENCY**

The material points are:

##### **Background and history of the scheme**

- 4.1 Proposals for the improvement of the A303 between Berwick Down and Amesbury have been the subject of study and consultation since 1991. Between 1991 and 1993, over 50 possible routes for this section of the A303 were considered. Following consideration by the Landscape Advisory Committee, which was at that time the relevant advisory body on route options, four possible routes were subject to public consultation in 1993. They included a route which envisaged a tunnel of 500m in the immediate area of Stonehenge. The result of that consultation was, however, a conclusion that there was no obviously right solution, and no consensus on which option should be taken forward. As a result, it was decided to investigate further options for the improvement of the A303.
- 4.2 This investigation took place over the following two years. During that time, English Heritage and the National Trust hosted a one day international conference to consider solutions both for the road improvement and the creation of a new visitor centre for Stonehenge. The conference found in favour of further consideration of routes to the north of Stonehenge and of longer tunnel solutions. Reservations about the impact which some options would have on the WHS led the then

- Minister for Transport to withdraw some options from further assessment.
- 4.3 A public exhibition of the routes still regarded as possible options was held in September 1995. This was followed by a Planning Conference in November 1995, under an independent Chair, designed to give the public and interested organisations an opportunity to explore and debate the possible ways of overcoming the problems on this stretch of the A303.
- 4.4 While the Highways Agency did not advocate any particular route at the Planning Conference, the Agency did make it clear that a long tunnel solution (of 4km) had been studied, and had been rejected as unaffordable. Despite that, the Conference decided to support only a long tunnel solution beneath the WHS, even though the difficulty of funding such a scheme from the Roads Programme was recognised. The Conference also recognised the urgent need for a Winterbourne Stoke bypass, and recommended that this should be taken forward as a separate scheme.
- 4.5 In 1996, after considering the report of the Chairman of the Planning Conference, the then Secretary of State for Transport withdrew the scheme from the Roads Programme, save for the proposed bypass of Winterbourne Stoke, on the basis that a 4km long tunnel was not an affordable solution, even recognising the importance and sensitivity of the WHS.
- 4.6 The matter rested there until late 1997, when Ministers from the Department for Culture, Media and Sport (DCMS) and from the then Department of the Environment, Transport and the Regions (DETR) reviewed the situation, and concluded that the improvement of the A303 was an essential element of a comprehensive project to return Stonehenge to its natural setting by removing the impact of traffic.
- 4.7 Following this review, English Heritage made a proposal for the on line dualling of the A303, with a 2km cut and cover tunnel in the area of Stonehenge. This proposal had the support, in principle, of the National Trust.
- 4.8 The new proposal was considered as part of the Roads Review instigated by the Government in 1997. A joint working party comprising representatives from DETR, DCMS, the Government Office for the South West, English Heritage, the National Trust and the Highways Agency was established to oversee a further study. This was carried out in accordance with the DETR's new methodology for the appraisal of schemes in the Roads Review (Document DD36). It compared the new proposals with three representative routes included in the comparative studies undertaken between 1991 and 1995.
- 4.9 The study concluded that the proposed 2km on line tunnel would provide significant benefits to the setting of Stonehenge within the WHS. The support of English Heritage, as the Government's adviser on heritage matters, and the National Trust, as the major landowner within the WHS, meant that the scheme would be deliverable. It was acknowledged, however, that the higher costs and lower economic return of the 2km

tunnel option (as compared with the other schemes evaluated as part of the study) meant that it was likely that funds from other sources, additional to the Roads Programme, would be required for the 2km tunnel option to progress.

- 4.10 In July 1998, the scheme, incorporating the 2km tunnel, was included as an "exceptional environmental scheme" within the Roads Review targeted programme of larger scale improvements. (Document DD33). At least a third of the funding (now a fixed sum of £70m) was to be provided from heritage sources, in recognition that the tunnel component of the scheme was being included specifically to secure environmental benefits for Stonehenge.
- 4.11 Following public consultation during January 1999, the scheme including the 2km cut and cover tunnel was announced in June 1999 as the preferred route for the A303 improvement. The scheme would incorporate a bypass for Winterbourne Stoke, and, following issues raised in the public consultation, it was announced by the Secretary of State for Transport in July 2000 that it would include a grade separated junction at Countess Roundabout.
- 4.12 After further development work on the scheme, a contract was awarded to a joint venture of Balfour Beatty/Costain (the JV) in March 2002 to continue scheme development to the stage of the publication of draft Orders. The JV has also been contracted to construct the scheme, subject to a decision to make the Orders, thereby offering the opportunity for a speedy start to be made on construction in the event of the Orders being approved.
- 4.13 Following the preferred route announcement, other tunnel options (in addition to the 2km cut and cover tunnel) were reviewed, to ensure that the best investment decision could be taken on the provision of a solution through the WHS. Although construction from the surface had consistently been shown to be the least costly tunnel construction technique, it was recognised that a cut and cover tunnel would cause greater disturbance during construction than a bored tunnel, and would also have greater potential for damaging undiscovered archaeological resources. It was therefore decided to carry out further assessment of a bored tunnel alternative with the benefit (following the appointment of the JV) of contractor input. During this process, it was identified that an extension of the proposed tunnel by approximately 100m to the east would bring significant benefits, by taking the eastern tunnel portal further away from the residential properties at Stonehenge Cottages and King Barrow Ridge.
- 4.14 Various organisations and individuals asked at this time for the benefits of a long bored tunnel through the WHS similar to that identified at the 1995 Planning Conference also to be assessed. In addition, it was agreed that an intermediate tunnel option, some 2.7km long, would be evaluated. The comparison between these tunnel options is contained in Document DD60.
- 4.15 The tunnel options comparison was submitted to Ministers in late 2002.



The result was an announcement on 10 December 2002 that Ministers were satisfied that the preferred scheme tunnel length should be increased from 2km to 2.1km, and that the method of construction should be changed from cut and cover to bored. The additional benefits that would be secured by these changes were considered to justify the additional investment cost; but Ministers were not persuaded that the longer tunnel options would secure sufficient additional environmental benefits to justify the further cost which they would incur.

4.16 The draft Orders before the inquiries were therefore prepared and published in June and August 2003. The Line, Slip Roads, Detrunking, Side Roads and Compulsory Purchase Orders were the subject of further public consultation, with an open exhibition held over three days from 12 to 14 June 2003. As a consequence of the response received following publication of those Orders, two further changes were made to the scheme proposals before the opening of the inquiries. These are:

- the omission of a dividing wall between the tunnel portals at the entrances to the tunnel bores, and
- revised traffic management arrangements to apply during the carrying out of maintenance work in the tunnel bores.

The original proposal for traffic management during tunnel maintenance was for the traffic from the tunnel bore in which maintenance was taking place to be diverted between Longbarrow Crossroads and Countess Roundabout via the B3086, The Packway (a minor road running through the centre of Larkhill) and Countess Road North (A345). This would take place at night time (between 11 pm and 5 am) during mid week, when traffic was at its lightest. The need for such a diversion would, however, have arisen twice in each month (once for each tunnel bore), and would have introduced additional levels of night time traffic noise to residential properties in Larkhill and along Countess Road North. The revised proposal put before the inquiries is to operate traffic under contraflow in the non-affected tunnel bore, while maintenance works are carried out in the other bore.

### **The need for the scheme**

4.17 Travelling west from London along the M3 and A303, the route is a continuous dual, 2-lane carriageway as far as Amesbury, where the Countess Roundabout is the first at-grade, non-priority junction encountered. The route then reduces to a single carriageway just to the east of Stonehenge at King Barrow Ridge, and continues for a distance of 9km, passing through the village of Winterbourne Stoke, before reverting to a dual carriageway at Berwick Down.

4.18 This stretch of the A303 between Amesbury and Berwick Down carries an annual average traffic flow of between 22,000 and 33,000 vehicles per day, some 9% of which are heavy goods vehicles (HGVs). The figure of 22,000 vehicles is the average flow that travels daily through Winterbourne Stoke, and 33,000 vehicles is the average for the section east of Stonehenge and the junction with the A344. These flows are more than a single carriageway can accommodate satisfactorily, so that

queues are a regular and predictable sight. Between 1992 and 2002, the average growth rate of traffic on the A303 in the Stonehenge area was 4.1% per year, compared with 2.4% per year for rural trunk roads nationally.

- 4.19 Weekends, in particular, see an increase in the average flows down to the West Country on a Friday, and a corresponding increase returning to London on a Sunday. Westbound traffic is often at a standstill at the start of the weekend, with queues building up from Countess Roundabout and from the point where the A303 reduces from dual to single carriageway. Similarly, queues build in an easterly direction at the end of the weekend. This situation becomes even worse at holiday times, given the attractiveness of the South West as a holiday destination.
- 4.20 The nature and layout of the A303 and the flows along it also give rise to a number of safety problems. Although the overall accident record of the existing road is not substantially different from the national average, there are concentrations of accidents at the Y-junction with the A344 in Stonehenge Bottom and on the approaches to Winterbourne Stoke. There are problems where the carriageway reduces from dual to single carriageway at King Barrow Ridge, and the roundabouts at Countess and Longbarrow provide a further source of accidents. In addition, there is evidence of accident clusters near the large layby next to Scotland Lodge Farm and at the junction with the B3083 to Berwick St James. Over the five years between 1 January 1998 and 31 December 2002, there were 143 personal injury accidents on the section of the A303 covered by the scheme, with a total of 234 casualties (6 fatal, 19 serious and 209 slight).
- 4.21 Accidents involving death and serious injury are tragic events in themselves. They also have to be dealt with by the emergency services, and that can mean closing the road for several hours, especially on the single carriageway section of the A303, where there is no spare road space available for temporary traffic management. With limited or no alternative diversion routes available, the inevitable consequences are long delays and stress for those held up by the accidents. The same consequences can arise from other incidents, such as vehicle breakdowns, or from maintenance works which have to be undertaken from time-to-time to ensure the safe operation of the road network. All this, combined with the regular congestion that occurs anyway from the high volumes of traffic using the A303, serves to create a bottleneck along this section of the key route to the South West and makes journey planning unreliable.
- 4.22 To improve road safety in Winterbourne Stoke, a 40mph speed limit has been imposed through the village. Together with "gateway" road markings, enhanced speed limit signs, street lighting and a speed camera, this action has reduced accidents in the village; but some accidents still occur. Moreover, the action taken to bring the danger to the attention of motorists has a damaging effect on the character of the village. The special measures could be removed if the published scheme were to be constructed, thus helping to restore the character of the village.

- 4.23 The community of Winterbourne Stoke is also badly affected by the severance created by the A303 where it runs through the northern part of the village. There are about 100 properties in Winterbourne Stoke and all but 20 are located to the south of the trunk road. The intrusion of 22,000 vehicles per day brings attendant hazards and high levels of traffic noise which have an impact on everyday life and adversely affect the setting of the village Conservation Area. Residents face difficulties reaching the garage/shop, the public house and the bus stop for buses to Amesbury and Salisbury, all of which are situated on the north side of the A303. All this gives rise to the need for a bypass of Winterbourne Stoke, to remove traffic from the community.
- 4.24 With the proposed new dual carriageway improvement upgrading 9km of existing, unsatisfactory single carriageway, it would be possible to operate and maintain the road in the future with much less disruption to road users. There would be carriageway space available to carry out maintenance and to deal with incidents while keeping the traffic flowing and, with the new road being safer, accidents would be happening at less frequent intervals, thereby reducing, if not avoiding, associated delays.
- 4.25 The proposed tunnel would be under continuous CCTV surveillance, and there would be immediate means of communicating information to road users and issuing instructions in the event of incidents or accidents. A rapid response service would be available in partnership with the emergency services. Close liaison with the emergency services would be maintained at all times.
- 4.26 The need for this scheme is not based, however, solely on normal road scheme considerations such as highway efficiency, accident record and community severance. The scheme has been included in the roads programme as an "exceptional environmental scheme" because of its proximity to Stonehenge, regarded by many as the UK's premier prehistoric monument, and famous internationally as an icon of this country.
- 4.27 Stonehenge, Avebury and Associated Sites (Site C373) was inscribed on the World Heritage List in 1986 under the World Heritage Convention. The Government had ratified the Convention in 1984, and thereby accepted an obligation to protect, conserve, present and transmit to future generations the cultural and natural heritage value of the site.
- 4.28 In addition to the highway benefits of the improvement proposals for the A303, the published scheme is intended to secure environmental and heritage benefits for Stonehenge, by removing the effects of roads and traffic from the setting of the monument within the heart of the WHS. That is the sole reason for the inclusion of the proposed tunnel within the scheme, and the basis upon which the planned heritage contribution to the overall cost of the scheme is justified.
- 4.29 The removal of traffic from the immediate area of the Stonehenge monument is one of the three principal components of the overall Stonehenge Project. The other two main components are English

Heritage's planned relocation of the Visitor Centre for Stonehenge from its present location adjacent to the A344 to a new site north east of Countess Roundabout, and the National Trust's Stonehenge Estate Land Use Plan (Document DD68), which describes proposals for the reorganisation of land use and management across the National Trust estate within the WHS. Both of these are dependent on the road improvement scheme for their delivery.

- 4.30 The proposed new location for the Stonehenge Visitor Centre at Countess Roundabout anticipates the provision of the grade separated junction included in the published scheme. Final approval to the A303 improvement is also a condition precedent to the release of £25m of heritage lottery funding for the proposed Visitor Centre. The National Trust Land Use Plan also depends upon the removal of roads and traffic in order to secure its objectives within the WHS.
- 4.31 Although those two elements of the Stonehenge Project are dependent on the achievement of the road improvement scheme, there is no such dependency in reverse. The published scheme stands independent of the other two components of the Stonehenge Project, and is promoted as a stand alone scheme.

#### **Traffic forecasts**

- 4.32 To provide traffic flows for the environmental and economic assessments of the improvement proposals, a SATURN computer-based 12 hour traffic model was developed. The study area included not just the section of the A303 proposed to be improved, but also all the major routes within the adjacent communities of Amesbury, Winterbourne Stoke, Shrewton, Larkhill, Strangeways, Durrington, Bulford and Salisbury. Data for the development of the model was derived from roadside interview surveys carried out in 1994, 1997 and 1998, and from manual classified counts carried out in 2000. Forecast traffic flows have been prepared by determining expected changes in the study area and adjusting the zoning system and highway network to reflect those changes. Future year forecasts have been prepared using growth assumptions consistent with the National Road Traffic Forecasts, with the resulting trips assigned to the links in the highway network to produce forecast year link flows.
- 4.33 Forecast traffic flows have been produced for a Do-Minimum scenario (the existing traffic situation plus traffic from any expected development, but without the published scheme), for a Do-Something scenario (the A303 improvement and the closure of the A344, but with the Visitor Centre remaining at Stonehenge), and for a Do-Something scenario with the Visitor Centre relocated to Countess Roundabout. Since the relocation of the Visitor Centre has yet to be determined, it is possible that the Centre would still be in its present location at the planned opening of the scheme in 2008. That scenario has therefore been used for the economic assessment of the scheme. The planned relocation of the Visitor Centre would give rise to higher traffic flows at Countess Roundabout, however, and thus represents a worst case scenario for assessing the traffic impacts at that location. It has therefore been used in the environmental assessment.

- 4.34 An assessment has also been carried out to determine whether any induced traffic would have material effects on traffic flows on the A303 at Stonehenge. The conclusion reached is that, whilst there could be some additional induced traffic using the A303, it could be satisfactorily accommodated by the published scheme, along with the worst case Do-Something scenario, without any adverse effect on operational efficiency or road safety.

### **The scheme proposals**

- 4.35 The layout of the 12.4km published scheme is shown in Figures 6.1 to 6.9 inclusive in Document HA/2/3. The proposal is for a dual two lane carriageway. The carriageway type was determined using the forecast traffic flow in the anticipated scheme opening year of 2008. Each carriageway would have a width of 7.3m. The section of the road which would be in the open air would have 1m hardstrips to the side of each carriageway. In the tunnel, there would be kerbs, with 1m wide footways to either side. The tunnel would also have two lanes in each direction, because a tunnel with a single lane each way would not be acceptable for safety and operational reasons. The road would not be lit except through the tunnel and at the Countess Roundabout junction, where the roundabout would be lit. At Longbarrow Crossroads, it was originally planned to provide modern "full cut off" lighting, but in response to various representations received during the course of the inquiries, the Highways Agency would now intend to provide no lighting at that location; other measures would be pursued to make the junction layout evident to drivers and to enable it to operate safely.
- 4.36 The proposals envisaged by the published scheme are described below, from the west to the east. The description includes reference to scheme chainages (Ch) denoting the distance in metres along the scheme, with Ch.0 starting at Berwick Down.
- 4.37 The published scheme would tie in to the line and level of the existing dual carriageway at Ch.900. The only work to be carried out in the section of existing dual carriageway between Ch.0 and Ch.900 (apart from signing and road markings) would be the construction of a new layby at Ch.350 on the eastbound carriageway. The proposed route would diverge to the south of the line of the existing A303 between the western tie-in and the Winterbourne Stoke access at Ch.1980, at which point the proposed road would be approximately 2m above the level of the existing A303. An existing Bridleway (Berwick St James 3) which meets the existing road at around Ch.1400 would be diverted to the east, to run parallel to the proposed route, joining the existing A303 near the Winterbourne Stoke western access junction.
- 4.38 The western access junction at Winterbourne Stoke would provide access to the village by means of west facing slip roads and an underpass of the proposed A303. The existing A303 east of this junction to a point some 800m west of Longbarrow Crossroads would remain as a detrunked highway to give access to the village of Winterbourne Stoke.

- 4.39 East of the Winterbourne Stoke western access junction, the proposed A303 would cross the line of the existing road at approximately Ch.2040 and would head in a north-easterly direction to bypass the village. A layby would be provided at Ch.2200 on the westbound carriageway in an area where it would be hidden from most viewpoints. The route would pass through arable fields to the north of a recently investigated Iron Age enclosure at Ch.2600 and to the north of Scotland Lodge Farm between Ch.3000 and Ch.3300. The route would maintain a distance of 80m from the centre of the nearest carriageway to the boundary of the Parsonage Down SSSI (part of the Salisbury Plain Candidate Special Area of Conservation (cSAC)) between Ch.2500 and Ch.2800. Over the 300m length where the published scheme would pass closest to Parsonage Down, the road would be in a cutting, which would attain a maximum depth of just over 10m.
- 4.40 At Ch.3000, where the new road would be in a cutting approximately 8m deep, a 'green' bridge is proposed to provide mitigation primarily for bats moving between a tree belt at Scotland Lodge Farm and Parsonage Down. This bridge would not be for public use. Additional land acquisition is proposed at this point for tree and shrub planting to strengthen the links with existing vegetation and to reduce the landscape and visual effects of the cutting.
- 4.41 From the 'green' bridge, the proposed route would descend into the valley of the River Till, passing from cut to fill at Ch.3100. The B3083, which would be re-constructed over a length of approximately 700m, would pass over the route on a new overbridge at Ch.3630. This new bridge would also serve as an agricultural access. To help blend the route into the dry valley in this location, extensive earthworks shaping is proposed, designed in such a way as to enable the adjacent landform to be largely returned to agriculture up to the highway boundary. The land around the B3083 would also be raised to the level of the side road to integrate it into the surrounding contours. This would allow a false cutting to be created south of the route to screen it from houses in Winterbourne Stoke.
- 4.42 From the B3083 overbridge, the proposed route would level out to enter a shallow cutting some 400m long and would then cross the River Till flood plain on a viaduct, some 200m in length. The height of the viaduct would be kept as low as practicable in order to minimise its intrusion on the valley. The level of the proposed viaduct is constrained, however, by the need to provide 3.7m minimum headroom to the existing bridleway (Winterbourne Stoke 4).
- 4.43 From Ch.4190 the route would climb to the east, crossing the line of an existing bridleway (Winterbourne Stoke 6B) at Ch.4700, which would be diverted over the new road via an overbridge. A layby would be provided at Ch.4500 on the eastbound carriageway in an area where the proposed landscape earthworks would restrict views of parked vehicles from Winterbourne Stoke. The proposed route would continue uphill to the east of the bridleway, passing out of shallow cutting at Ch.4770 and continuing to climb through the centre of a dry valley north of the existing A303 at up to 8m above existing ground levels.

- 4.44 At Ch.5340 a small mammal underpass would be provided to facilitate the movement of some mammals on the line of an existing hedgerow. The proposed route would continue to climb to its maximum elevation at Ch.5600, which is approximately the location at which the new road would cross and run to the south of the existing A303.
- 4.45 To blend the road into the adjacent landform, to screen it from view and to enable land to be returned to agricultural use, extensive earthworks mitigation is proposed between the River Till viaduct east abutment and the point at which the new road would cross the line of the existing A303 at approximately Ch.5600. This would also serve to screen part of the viaduct (and its abutment) and the new road to the east (with its layby) from Winterbourne Stoke.
- 4.46 After crossing the line of the existing A303 the new route would run parallel to and south of the existing road for a distance of approximately 700m, descending to pass under the A360 via a new grade-separated junction at Longbarrow Crossroads.
- 4.47 The route would pass beneath the A360 at Ch.6260. Slip roads would run up to two new four-arm roundabouts on the A360, one to the north and one to the south of the route, connected by a single overbridge. The westbound on-slip would link up with a three-arm (unlit) roundabout located south of the new road some 800m to the west at Ch.5440, and would accommodate access into Winterbourne Stoke to and from the east. Shrubs and hedges would be planted between the roundabouts and slip roads to tie in with the existing vegetation and screen views of the proposed junction. The layout of the proposed junction would be such that the northern roundabout would be further away from the Winterbourne Stoke Barrow Group than is the existing roundabout at Longbarrow Crossroads.
- 4.48 From Longbarrow Crossroads the route would enter the WHS, following the corridor of the existing A303 for a distance of approximately 1500m, falling gradually to enter the tunnel at Ch.7880, just to the west of the prehistoric tumuli and long barrow that lie close to the existing road north of Normanton Gorse. The published scheme would be at or below existing ground level for the whole of this length, entering the final approach to the tunnel in a cutting, at a maximum depth of 14m.
- 4.49 To the west of the western tunnel portal, a tunnel control building would be provided at Ch.7650. The building would be designed to be hidden as much as possible by setting it into the sideslope. The building would be visible from the new road, but otherwise would be largely out-of-sight.
- 4.50 The tunnel would run to the south of the existing A303, passing beneath Stonehenge Bottom to emerge east of Stonehenge Cottages at Ch.9980. The low point of the tunnel would occur at Ch.9190 beneath Stonehenge Bottom. At this location, the roof of the tunnel would have a very shallow depth of cover to the existing ground level, and surface works would be needed to enable tunnelling to take place safely. These surface works would involve strengthening the ground above the tunnel to

prevent it collapsing where the tunnelling operation takes place. Extensive ground-dewatering operations would also be needed during tunnel construction in the vicinity of Stonehenge Bottom.

- 4.51 To comply with the aims and objectives of the Stonehenge WHS Management Plan, the existing A303 and A344 causeway at Stonehenge Bottom and the cutting constructed in the 1960s, which extends down the valley slope from Stonehenge Cottages to Stonehenge Bottom, would be re-graded in order to recreate as closely as possible the landform and levels that relate to the historic turnpike road thought to exist below the present A303.
- 4.52 On completion of the tunnel, the surfacing of the existing A303 would be removed along its length between Stonehenge Road and Longbarrow Crossroads and a byway would be provided instead. The byway would provide an east-west route for those classes of user prohibited from using the tunnel under the Tunnel Regulation Order and for which no reasonably convenient alternative route exists. These non-tunnel users would be pedestrians, cyclists, horse riders and horse drawn vehicles. (Motorcycles of less than 50cc would also be excluded from using the tunnel, but would be diverted to the north via the Packway). Motorised vehicles would be prohibited from using the byway by means of the Byway Regulation Order. The byway would connect Byway Amesbury 12, Bridleway (now reclassified as Byway) Amesbury 11, the new footpath to be created along the line of the A344 and Bridleway Amesbury 10 at King Barrow Ridge.
- 4.53 Where the proposed byway follows the same line and level as the existing A303 (between the western tunnel portal and the A344), it would have the same width as the existing road. Elsewhere, where the proposed byway would follow a line parallel to the existing road, it would be given a width of 12m. This width is similar to that of other existing byways in the vicinity and would permit shared use on a green sward by the classes of user referred to above. A 3m width of hard surface construction within the overall designated 12m width would be provided to facilitate a smooth passage for users.
- 4.54 The existing A344, which joins the A303 at Stonehenge Bottom, would be closed to traffic between Byway Amesbury 12 and Stonehenge Bottom and all westbound traffic which presently uses the A344 past the Stones would be diverted along the new A303 to Longbarrow Crossroads, and then via the A360 to the crossroads at Airman's Corner. The same diversion, in reverse, would apply for eastbound traffic. A footpath would be provided along the line of the stopped-up A344 between the proposed new byway at Stonehenge Bottom and Byway Amesbury 12.
- 4.55 Where the route emerges from the proposed tunnel at the eastern tunnel portal, the road would be in a cutting, 14m deep, 100m to the east of Stonehenge Cottages. Neither of the tunnel portals would be visible from Stonehenge. The route would then continue to join the line and level of the existing A303, passing over The Avenue at Ch.10400. There would be no disturbance of any archaeological evidence of The Avenue that may be buried beneath the existing A303. Any excavation in this area would



- be restricted to the area of highway land between existing highway drainage ditches, where the ground has been previously disturbed.
- 4.56 Stonehenge Road would be closed to traffic by means of a gate, beyond which access would be for emergency vehicles only. However, there would be a link from Stonehenge Road for pedestrians, cyclists and equestrians via the new byway created through the WHS over the tunnel, which would extend past King Barrow Ridge and Stonehenge Cottages to join up with Stonehenge Road. Private access to Stonehenge Cottages would also be accommodated.
- 4.57 A second tunnel control building would be located in an area of land adjacent to Stonehenge Road, and most of the facilities, including plant rooms, fire fighting water tanks and drainage sumps would be placed underground. This eastern tunnel control building would not be permanently staffed, but a small car park would be provided off Stonehenge Road.
- 4.58 East of The Avenue, the route would descend at close to the same line and level as the existing dual carriageway past the Iron Age hill fort of Vespasian's Camp towards Amesbury and the junction with the A345 at Countess Roundabout.
- 4.59 The junction at Countess Roundabout would be grade-separated, and the new road would be carried above the A345 via two separate bridges spanning the roundabout, with an embankment, some 6m high, between the bridges across the centre of the existing roundabout island. There would be planting around and within the junction to screen the elevated traffic.
- 4.60 The existing underpass at Countess Roundabout would be retained during most of the construction of the new junction. With the opening of the junction, however, there would be a substantial reduction in traffic flow into the roundabout and this would permit the installation of an at-grade signalised crossing for pedestrians and other non-motorised users. The existing underpass (which does not meet modern standards, is in a poor structural condition, and is not long enough to span the entire width of the new junction) would then be filled in.
- 4.61 The route would tie in with the existing A303 in the area where it crosses the River Avon, with the scheme limit lying some 150m to the east at Ch.12400. From this point eastwards the existing A303 continues as a dual carriageway. The River Avon bridge itself would be unaffected in line and level, but would need re-surfacing. This is an operation that would only affect the existing road and would in any event be needed as maintenance in due course without the scheme.
- 4.62 The design of the published scheme would significantly improve existing drainage arrangements along the A303. The existing road surface of the A303 discharges its rainfall run-off directly into roadside ditches, and then into the underlying chalk aquifer, or in places directly into the Rivers Till and Avon. The run-off can carry pollutants, such as oil, diesel and de-icing salts. Moreover, if a road traffic accident was to involve a petrol

tanker, for instance, which was to spill its load, the petrol would discharge directly into the aquifer or rivers. The published scheme would incorporate Drainage Treatment Areas (DTAs) at various locations along its length to collect, treat and clean the run-off and any accidental spillage before it is allowed to discharge by infiltration into the chalk aquifer. There would be no direct discharge into the Till and Avon, except at times of flood, when the diluting effect of large volumes of floodwater would avoid any adverse effect on water quality.

- 4.63 The existing A303 is designated as a 'high load' route. The headroom clearance required below overhead structures along such routes is 6.45m, compared with a normal headroom requirement of 5.3m. If the scheme's structures, particularly the tunnel, were raised to achieve the higher clearance, there would be environmental disadvantages and the additional costs would be substantial. To avoid these consequences, it is intended that high loads would continue to use the existing A303 through Winterbourne Stoke and, when reaching Longbarrow Crossroads, would divert via the A360, the Packway and the A3028 past Durrington and Bulford to rejoin the A303 east of Amesbury. The A3028 is already part of the current route for the passage of high loads. In fact, there have only been four recorded high load movements along this route in the past 10 years, so that this diversion would not cause undue disturbance to the affected communities.
- 4.64 The cost of constructing the planned scheme is estimated to be £192m (at 2003 prices), excluding preparation and land costs. The contribution to this total cost from DCMS would be £70m.
- 4.65 The earliest possible date for a start on construction would be Spring 2005. Achieving this date would be dependent on the outcome of the public inquiries, and would be subject to the satisfactory completion of statutory and administrative procedures, and the availability of funds. Once started, the construction would take some three and a half years to complete.

#### **Design standards**

- 4.66 Subject to the points dealt with in the next paragraph, the scheme complies fully with the design requirements of the Design Manual for Roads and Bridges (DMRB).
- 4.67 In relation to geometric standards for a road with a design speed of 120 kph, eight departures from standards in respect of horizontal and vertical alignment have been needed, all in the area of Countess Roundabout. After scrutiny, these have all been accepted by the Highways Agency's Technical Approval Authority, so long as high friction anti-skid surfacing is included over a 300m length in each direction on the immediate approach to the slip road merges. This feature has been incorporated in the scheme.
- 4.68 While the DMRB deals in detail with the design of roads and bridges, it contains mainly advice and principles regarding tunnels, with few mandatory provisions. The requirements concerning tunnels which do

exist in DMRB have been followed, however, in the design of the proposed tunnel. The European Union draft Tunnel Safety Directive (Document DD81) is likely to be ratified during 2004. Almost all the requirements contained in the latest draft would be met by the scheme proposals. To the extent that the scheme proposals do not meet the requirements of the latest draft Directive, full compliance would require only minor changes of design or approach, which could be achieved without change to the draft Orders and without significant environmental effect. The anticipated cost of such compliance could be met from the contingency provision for the scheme.

- 4.69 The main bores of the tunnel would be supported by a primary sprayed concrete lining and a permanent concrete secondary lining, with a waterproof membrane between them. This method, known as the New Austrian Tunnel Method, has been used widely in the UK and overseas, and is particularly suited to variable conditions such as those found on the line of the proposed Stonehenge tunnel.
- 4.70 In a twin bore tunnel, passenger escape routes through fire doors are one of the specific requirements, and cross passage connections between the main bores would be at regular intervals. A centre bore service tunnel would be provided, which would also be useful for tunnel maintenance.
- 4.71 In line with normal international practice, in the event of a major fire, self rescue would be the primary response. Emergency points would be provided at regular intervals on alternate sides of the carriageway, containing an emergency telephone, fire extinguishers, a hose reel and a push button alarm. Each bore would be equipped with systems enabling any fire to be quickly detected and accurately located. The tunnel would have closed circuit television coverage, monitored from a remote station. It would be provided with a means for maintaining the radio communications of the emergency services, public radio services and mobile phone networks. In addition, a public address system would operate to provide advice to motorists who had stopped or left their vehicles. Few tunnels worldwide currently have a fire suppression or sprinkler system installed, but research is under way to evaluate the potential benefits of including such a system. A decision on whether or not to include a fire suppression system would be taken when the results of that research are available. If it is decided to provide such a system, the cost of doing so could also be met from the scheme contingency provision.
- 4.72 The number of vehicles and people in the tunnel during any incident would be minimised by closing the tunnel to traffic as soon as an alarm was raised. This would be achieved using traffic signals and barriers.
- 4.73 The tunnel would have a longitudinal ventilation system, with jet fans mounted in the roof to provide a flow of air or to augment the natural flow caused by moving vehicles. To ensure that driver vision would not be impaired in the tunnel, lighting would reduce progressively within the tunnel to give a safe adaptation from external to internal light levels. A similar provision would be made at the exit, to assist the transition back

into daylight. Tunnel lighting would be at its peak during bright daylight, reducing automatically to a minimum at night. For environmental reasons, the approach roads to the tunnel would not be lit during normal tunnel operation.

- 4.74 The design of road tunnels requires a consultative approach, bringing in the expertise of those who would operate the tunnel and respond to any emergencies that may arise. The relevant organisations, including Wiltshire Fire Brigade and the Police, have met regularly in a Tunnel Design and Safety Consultation Group. This Group has agreed to the safety facilities currently proposed for the Stonehenge Tunnel, and would continue to meet for the remainder of the design period to review any further facilities which may be proposed.
- 4.75 The same approach has been adopted in relation to other disciplines during the design and development of the scheme. There has been continuing liaison with relevant agencies, whose response has led to modifications to the scheme to remove or reduce potential adverse impacts identified, or to enhance benefits.
- 4.76 Archaeology in particular has followed the above process, but has also been the subject of regular liaison group meetings with the specialist archaeological advisors of English Heritage, the National Trust and Wiltshire County Council. As the investigation results were reported, the specialists were party to discussions on further work that was needed, and written programmes of investigation were produced for every area of land affected by the scheme. All these investigative programmes were agreed by the parties before work was undertaken. The results were then fed back and discussed in order to inform fully the development and design of the scheme.
- 4.77 Since August 2000, information on the state of archaeological knowledge and the results from surveys associated with the scheme have also been passed to interested parties through meetings of the Archaeology and Interpretation Group convened by English Heritage. This group, which has met on eight occasions, includes representatives of sixteen organisations (such as the Prehistoric Society, Rescue, the Council for British Archaeology (CBA), the UK Committee of the International Council on Monuments and Sites (ICOMOS - UK), the Wiltshire Archaeology and Natural History Society (WANHS) and others). Presentations have also been given to two meetings arranged by the CBA, one in London and one in Salisbury.
- 4.78 As well as the archaeological constraints, considerable time and attention has been dedicated to ecological issues, and in particular to avoiding potential impacts on the internationally important Parsonage Down and River Avon cSACs. This has involved close working with both English Nature and the Environment Agency. There have been frequent meetings and discussions with both agencies, separately and together.
- 4.79 Other environmental topics have also benefited from an equally rigorous and comprehensive approach, through consultation with the relevant statutory agencies.

- 4.80 In acknowledgement of the high level of public interest in this scheme, a Public Community Liaison Group was established to inform local groups, Councillors and interested parties of progress on the scheme and to receive feedback on issues. Invitees to these meetings include upwards of 20 different organisations that have an interest in the scheme development. These include WANHS, the Campaign to Protect Rural England (CPRE), CBA, the Order of British Druids, the Pagan Federation, Friends of the Earth and the Countess Road Residents' Association, as well as Parish, Town and District Councillors. The Ministry of Defence (MOD) also attends, and has been closely involved in the development of the scheme over the years, bearing in mind the close proximity of its interests.
- 4.81 Rights of way user groups have been consulted through workshops held to discuss the rights of way issues along the scheme. Attendees included Wiltshire CC, Salisbury DC, Wiltshire Bridleway Association, The Ramblers' Association, the British Horse Driving Society, the National Trust (as an affected landowner) and motorised user groups such as the Trail Riders' Fellowship.
- 4.82 In addition, there have been numerous meetings with individuals (with affected landowners in particular) and groups (such as Winterbourne Stoke Parish Council) to discuss issues that have arisen during the development of the scheme and to keep people informed.
- 4.83 The need to consult and maintain close liaison will continue should further development of the scheme be undertaken if the Orders are made.

## **The environmental impact of the scheme**

### ***Landscape and visual***

- 4.84 The landscape impact and visual effects assessments for the published scheme have been carried out in accordance with the requirements of the DMRB.
- 4.85 The A303 crosses the southern edge of Salisbury Plain, which forms part of a great sweep of chalk downland extending across much of southern England. The landscape of the area is dominated by the rolling chalk downland which is of high scenic quality and designated a Special Landscape Area by Wiltshire County Council, except for small parts around Countess Roundabout and Larkhill. This is an open landscape with long distance views across successive ridgelines, interrupted by blocks of woodland which form prominent features. As well as a number of dry valleys typical of the chalk downland, there are more enclosed, fertile and well vegetated valleys along the Rivers Till and Avon, containing attractive settlements and scattered dwellings. The attractiveness of the landscape, combined with the richness of historic, cultural and archaeological features of national and international importance, together serve to give the area a special visual quality.

- 4.86 The scheme has been designed to optimise beneficial landscape and visual effects, and to avoid, reduce or remedy adverse effects so far as possible. This has been achieved by changes to the originally drawn route alignment and by planning to use material excavated from the tunnel to shape the ground around the road, making it appear to have been constructed following the contours of the land. This would reduce visual intrusion, and blend the road into the landform. Seeding of grass and wild flowers and tree and shrub planting would also take place in keeping with the landscape character of the area. Within the WHS, the top 2m of cutting would be cut at a shallow gradient and returned to agriculture. This would allow the fence line to be set below the surrounding levels, greatly reducing the area over which it would be visible.
- 4.87 The scheme would deliver a major beneficial effect on the Stonehenge Monument Immediate Landscape Setting (MILS), and a minor beneficial effect on the downland ridges at King Barrow Ridge. In visual terms, the scheme would have a substantial or moderate beneficial effect on Stonehenge, the visible section of The Avenue, and 22 barrows (counting only those which are evident from a distance) in the major ridgeline groups around Stonehenge and Winterbourne Stoke. For visitors to Stonehenge, one of the top five visitor attractions in Britain, the scheme would improve the views across the rolling chalk downland between Stonehenge and its immediately surrounding monuments by removing from sight the existing roads and traffic.
- 4.88 For residents of Winterbourne Stoke, the scheme would substantially reduce intrusion by removing all the through traffic from the village.
- 4.89 Not all the landscape effects would be positive, however. The wider road corridor west of Longbarrow Crossroads junction would encroach into open countryside. The proposed River Till viaduct, although as low to the ground as reasonably possible, would still be visible from five properties on the north side of Winterbourne Stoke, including one property where the effects would be substantially adverse. The central part of the viaduct would be visible through scattered trees in the flood plain, and there would be a major adverse effect on the water meadows close to the viaduct. Either side of the tunnel, the portals and approach cuttings would form a new locally visible feature within the WHS, but the visual effect would be minimised by allowing natural vegetation to establish on the slopes over time. At Countess Roundabout, elevating the A303 would affect the setting of listed buildings at Countess Farm, but this could be reduced over time by planting to screen views from the buildings.
- 4.90 Travellers on the A303 would lose all views of Stonehenge. While this would be seen as a major disbenefit by many, it would not be possible to maintain these views at the same time as providing views free of traffic for the benefit of those who visit Stonehenge.
- 4.91 On balance, however, the published scheme would bring substantial overall landscape and visual benefits, particularly given the international importance of the landscape surrounding Stonehenge.

### ***Ecology and biodiversity***

- 4.92 The ecological assessments for the published scheme have been carried out in accordance with the requirements of the DMRB. Because the guidance in the DMRB on assessing ecological value or effects is quite limited, however, assessment methods for the scheme have been developed based on the draft guidance of a national working group convened under the auspices of the Institute of Ecology and Environmental Management. These assessment methods were discussed and agreed in advance with English Nature. In fact, the findings made as a result of the survey work carried out have also been discussed with English Nature, as have the mitigation measures proposed. This has resulted in the production of an agreed statement between the Highways Agency and English Nature (Document HA/0/45), which is discussed in more detail at 4.108 to 4.112 below.
- 4.93 For the most part, the existing A303 past Stonehenge crosses an intensive agricultural landscape with few hedges. There is a number of specially designated sites sufficiently close to the route of the scheme to warrant detailed consideration. These are the River Avon cSAC (which includes the River Avon System SSSI and the River Till SSSI), the Salisbury Plain cSAC (which includes the Parsonage Down SSSI), the Salisbury Plain Special Protection Area (designated under the Birds Directive, 79/409/EEC) the Stonehenge Down Site of Nature Conservation Importance (SNCI) and the Countess Farm Swamp SNCI.
- 4.94 The interests for which the River Avon cSAC was designated are the presence of bullhead, brook lamprey, Atlantic salmon, Desmoulin's whorl snail and watercourses of plain to montane levels, with ranunculion fluitantis and callitricho-batrachion vegetation. Not all of these interests occur in or near the sections of the river system affected by the scheme proposals. There are also other important species associated with the rivers, including aquatic macroinvertebrates, riverine birds, otters and water voles. The Till is a tributary of the Avon, joining it (via the Wylve and the Nadder) further downstream, below Salisbury. The Avon is a perennial river, whereas the Till is a winterbourne that is normally dry or ponded in the summer months through Winterbourne Stoke. Maintaining the water quality and the flow of groundwater is crucial to supporting the ecological value and status of the rivers.
- 4.95 Parsonage Down SSSI is one of the most important chalk downland sites in Britain, supporting many uncommon plant species. Stonehenge Down SNCI is important for its chalk grassland communities and for the lichen communities supported by the Stones themselves. Countess Farm Swamp SNCI is noted for its population of Desmoulin's whorl snails.
- 4.96 There are other valuable ecological resources in the area of the published scheme, but outside the designated sites. They include the habitats of bats, great crested newts, badgers, quail, barn owls and stone curlews. Information on all valued ecological resources is provided in the Environmental Statement (Documents DD9, 10 and 11).
- 4.97 The extensive surveys of all the ecological resources, both within and

outside the above sites, which have been undertaken in consultation with English Nature and the Environment Agency, have fully informed the design of the scheme, assisted by early contractor involvement. English Nature was fully consulted on the scope of the ecological surveys, and agreed the geographical and temporal scope of each of them. English Nature also endorsed the survey methods.

- 4.98 Careful alignment of the route over the River Till on a viaduct and a carefully controlled construction process would ensure that the integrity of the River Avon cSAC would not be adversely affected, either during or after construction. There would be slight impacts on different species on a very local basis, some positive and some negative, but overall the effect would be neutral. Post construction, the rivers should experience some benefit as a result of the installation of drainage treatment and spillage interception arrangements which do not currently exist.
- 4.99 At Parsonage Down, the route would be kept in a cutting far enough away (some 80m) to avoid any significant impact on the SSSI or the cSAC. This view is shared and endorsed by English Nature.
- 4.100 At Stonehenge Down SNCI, post construction slight beneficial impacts are envisaged for some 10% of the chalk grassland within the SNCI as a result of a reduction in localised traffic spray. The temporary effect of dust deposition during construction would be very local to the haul road. Unusually, this would be metalled past Stonehenge, to minimise dust generation. This would limit the construction impact on the lichens at Stonehenge to temporary slight adverse significance, and post construction the effect would be broadly neutral.
- 4.101 At Countess Farm Swamp SNCI, there would be no measurable effect on the vegetation or on the population of Desmoulin's whorl snails during construction, and post construction the impact would be neutral.
- 4.102 Outside the designated sites, mitigation for the impact on bats includes the provision of a green bridge. The post construction impact of the scheme on bats is assessed to be neutral, and the construction effects would be between neutral and temporary slight adverse. The post construction impact on the great crested newt would be slight to moderate beneficial, with the construction impact broadly neutral, given a careful translocation exercise. In relation to badgers, during construction temporary intermediate adverse effects might occur, but in the longer term the installation of extensive badger fencing and crossings should render the effects of the scheme neutral.
- 4.103 Reduced light pollution arising from the construction of the proposed tunnel would result in a significant benefit for stone curlews. The tunnel would also reduce the collision risk with traffic for barn owls. On the other hand, increased speeds achieved by traffic on the surface level improved A303 would increase the collision risk for barn owls in those sections of the route. Overall, there would be a complex balance of positive and negative influences for birds arising from the scheme, relating mainly to noise levels, collision risk and the effects of new field boundaries, so that overall a net neutral effect could be envisaged.



- 4.104 That assessment takes no account, however, of the considerable effort being put by the Highways Agency into securing off site mitigation of the effects of the scheme for birds and other fauna and flora. Extensive negotiations have been undertaken with landowners off the line of the scheme to increase habitat provision for, for example, barn owls, other farmland birds, bats, great crested newts and other amphibians and reptiles, as well as for uncommon arable plants. This is a process which continued during the inquiries, and the position as at 28 April 2004 is set out in Document HA/0/44. That document identifies the measures on which preliminary agreement has been reached between the Highways Agency and individual landowners. Those preliminary agreements would be finalised if the scheme were to be endorsed and the Orders made. With that off site mitigation, the neutral effect referred to in the previous paragraph would become a positive one.
- 4.105 A significant benefit of the scheme in ecological terms would derive from the reconnection of land over the proposed tunnel, with potential benefits to a variety of important wildlife. This should facilitate the achievement of ecology-related aims of the WHS Management Plan.
- 4.106 New native tree and shrub planting in appropriate locations, a notable increase in the proportion of native species-rich hedgerows along the route, the creation of more extensive species-rich grasslands on road verges than currently exist, and off-site ecological enhancements (where possible, by agreement with landowners) should all be of net ecological benefit.
- 4.107 On balance, despite some residual effects of permanent slight adverse significance, the published scheme would achieve or facilitate the achievement of net gain in the value of ecological resources in the area in the long term.
- 4.108 The impact of the various proposals to improve the A303 in the area of Stonehenge have been discussed between the Highways Agency and English Nature since 1991. That discussion became more intensive once the preferred route was announced in 1999. The impact of the proposed scheme required consideration by English Nature under the provisions of volume 11, section 3, part 4 of the DMRB and under Council Directive 92/43/EEC (the Habitats Directive) and the Birds Directive.
- 4.109 English Nature has agreed that significant effects on the Parsonage Down SSSI as a result of the published scheme are not likely, and therefore that an Appropriate Assessment under the Habitats Regulations 1994 as amended is not required in relation to that SSSI.
- 4.110 In relation to the river SSSIs, English Nature has agreed that the survey data presented in the Environmental Statement is adequate to feed into any assessment of the potential ecological impacts. English Nature is also satisfied that the Statement to Inform the Appropriate Assessment (Document DD132) and the accompanying document entitled "Construction Methods Including Environmental Considerations" (Document DD87) prepared by the Highways Agency provide adequate

information for an appropriate assessment under the Habitats Regulations. English Nature has indicated (in Document HA/0/45 at paragraph 4.6.6) that, with all mitigation fully and effectively implemented, the published scheme should not adversely affect the integrity of the River Avon cSAC.

4.111 English Nature has also agreed in principle, and endorsed as appropriate and feasible, the mitigation proposed by the Highways Agency during and post construction for the protection of birds.

4.112 Should the scheme be approved to proceed, English Nature would continue to be consulted over design and construction regarding protected sites and European species.

### ***Drainage and water quality***

4.113 The published scheme crosses chalk over its whole length. The chalk is an important aquifer, supplying the main flow to both the River Avon and the River Till. No ground water source for public water supply would be affected by the scheme. Private licensed abstractions in the area are small scale, apart from a licensed well at Springbottom Farm, 2km south of the published scheme, which is in fact disused.

4.114 To protect the most sensitive water environment of the area which would be affected by the proposed scheme during construction, extensive mitigation measures would be put in place. Particular care would be taken to prevent silt laden run off from entering the Avon or the Till. There would be a programme to monitor water quality in the rivers, both upstream and downstream of the construction works, and emergency procedures would be put in place to deal with any accidental spillage. Groundwater would be pumped away from Stonehenge Bottom to allow tunnel construction to take place in dry conditions. The water would be pumped to soakaway sites. Groundwater modelling has shown that there would be no adverse effect on either the Till or the Avon.

4.115 In the longer term, the tunnel would act as a partial barrier to groundwater flowing southerly beneath Stonehenge Bottom. Drainage measures would therefore be provided to promote the passage of groundwater across the top of the tunnel to prevent undue rising of water to the surface.

4.116 The scheme's drainage design would avoid any direct discharge to the Rivers Avon and Till, other than in extreme storm events, when the force of the flow would prevent any pollution. Instead, run-off would be channelled into DTAs where the water would be treated and cleaned before being allowed to soak away into the ground. This would be a significant improvement over the existing road drainage which offers no protection against accidental spillage and no treatment of routine drainage. Consequently the scheme would provide better protection for the water environment.

4.117 The careful design and construction of the viaduct crossing of the Till Valley would ensure no adverse impacts in terms of either flood regime

or water quality, and the flood regime/water quality of the Avon would be unaffected by the scheme.

- 4.118 Measures agreed between the Highways Agency, the Environment Agency and English Nature to maintain the quality and flow of the water environment in the area should the Orders be made are contained in Document HA/0/46, a schedule of understandings and undertakings. They would include meeting acceptable flood risk standards, ensuring that adequate access is provided to the affected rivers for future maintenance and improvement works, protecting surface waters and groundwaters from pollution, maintaining existing surface and groundwater drainage regimes, and ensuring the protection and nature conservation of the water environment and its associated habitats. The Highways Agency would ask that, if the Orders are made, the understandings and undertakings set out in Document HA/0/46 should be recognised, and that the Secretaries of State should accept them for implementation and regulation by the Highways Agency and/or the Environment Agency and English Nature as essential measures to protect and safeguard the water environment of the area affected by the trunk road proposals.

#### ***Archaeology and cultural heritage***

- 4.119 Stonehenge, Avebury and Associated Sites (Site C373) was inscribed on the World Heritage List in 1986 under the United Nations Educational, Scientific and Cultural Organisation Convention for the Protection of the World Cultural and Natural Heritage 1972 (The World Heritage Convention). The Government ratified the Convention in 1984, and thereby has an international obligation to identify, protect, conserve, present and transmit to future generations the cultural and natural heritage values of sites inscribed on the World Heritage List. WHSs are places of outstanding universal value. For a site to be included on the World Heritage List, it must satisfy a number of criteria. From the WHS Management Plan Summary (DD64),

*"Stonehenge is considered to:*

- *represent a masterpiece of human creative genius;*
- *exhibit an important interchange of human values over a span of time; and*
- *bear a unique or at least exceptional testimony to a cultural tradition which has disappeared".*

- 4.120 Although more than a thousand stone circles still survive in Britain from the Neolithic period, Stonehenge is the most famous and extensive. It is described as the most evolved and architecturally complex circle of Neolithic and Early Bronze Age Britain. Dating from about 3100 BC, the stone circle underwent several phases of construction and change before it was finally abandoned around 1100 BC. The transportation, shaping and erection of the huge stones to form the monument indicate the highly organised social structure and knowledge of astronomy of Neolithic society.

- 4.121 Stonehenge has been interpreted as a temple with astronomical and calendrical alignments, capable of observing the rising sun at mid-summer and the setting sun at mid-winter. Built in 3 identified phases, the stone temple structure is a circular monument of stone monoliths, paired stones and trilithons with lintels, surrounded by a series of earthen banks and ditches. The astronomical significance of Stonehenge is undisputed. To the builders and users of Stonehenge over several millennia the night sky and the movements of the sun and moon were of profound importance.
- 4.122 To many visitors today, the sense of inspiration of the place is enhanced by experiencing it at Solstice sunrise or on a starlit night. The solitary location in the open landscape enhances the night sky experience. However, the presence of traffic on both main roads causes a high degree of light pollution on starry nights, as well as intrusive noise during both day and night time.
- 4.123 While the Stonehenge monument is well known and recognised by all, the WHS also contains a uniquely rich concentration of prehistoric sites. There are over 400 Scheduled Monuments within the WHS. Indeed, the whole of the study area for the Stonehenge Improvement is rich in cultural heritage, with many archaeological features existing outside the WHS, including some Scheduled Monuments.
- 4.124 There are also Conservation Areas in Winterbourne Stoke and Amesbury. The Winterbourne Stoke Conservation Area extends southwards from the A303 over much of the village and contains several listed buildings. The Amesbury Conservation Area also extends southwards from the A303 to include the historic centre of the town containing numerous listed buildings, and Amesbury Abbey Park. The Park is a Grade II\* Registered Historic Park which also contains several listed buildings and structures and has its own character, distinct from the town Conservation Area, though both share the same designation boundary. There are other listed buildings just north of the A303 in Amesbury at Countess Farm, and there is a number of Grade II listed milestones along the A303 and A344, indicating the historic nature of the roads in the area.
- 4.125 To assess the potential impacts of the published scheme, survey areas were defined in which different forms of impact could occur, whether direct or indirect. Within those survey areas, the cultural heritage resource was identified using a variety of survey techniques, from document based research, through physical excavation to assessment of aerial photographs. The scope, specification and standards of those surveys were agreed with English Heritage, Wiltshire County Council and the National Trust, and the results were discussed with them.
- 4.126 Great efforts have been made to find a route that has no direct impact on any Scheduled Monument, a difficult proposition when working in one of the richest archaeological landscapes in the country. The published scheme succeeds in that aim. Moreover, it would have no direct impact on any Grade I or Grade II\* Listed Building, Registered Park and Garden or Conservation Area. This potential outcome has been achieved by modifying the scheme, if possible, where a potential problem has arisen.

Thus, an exciting discovery led to a change in route alignment at the western end of the scheme to avoid a previously unexplored Iron Age settlement discovered near Winterbourne Stoke. A comprehensive programme of further investigations, building upon what has already been done, would be carried out before and during construction, which would add significantly to knowledge about the Stonehenge landscape.

- 4.127 A number of Grade II listed milestones would be affected by the scheme. The proposal would be to reposition them as close to their original positions as possible. They are not presently in their original pockets. This repositioning would require Listed Building Consent, which would be applied for if the scheme is approved. The milestones are the only Grade II listed items affected by the scheme.
- 4.128 The WHS contains an outstanding concentration of prehistoric ceremonial and funerary sites, many of them well preserved, though some have been degraded by the agricultural use of the area over the centuries. At the centre of the WHS stands the stone circle of Stonehenge, between groups of contemporaneous barrows, which line the crests of the ridges around it. The published scheme would enable Stonehenge and its nearby associated monuments to be re-united. The Avenue leads away from Stonehenge, though it is severed by the A344 and is not readily visible on the ground to the east of King Barrow ridge. East of King Barrow Ridge, The Avenue is crossed by the existing line of the A303. The published scheme would have no direct impact on the remains of The Avenue in that area. If the published scheme were carried out, it would result in a situation no different from that which applies at present to the east of King Barrow Ridge and south of the existing crossing of the A303.
- 4.129 The relationship between the natural topography and the layout of the monuments forms a distinct core area to the WHS, referred to as the MILS, in which there are few traces of ordinary inhabitation from any period of the past.
- 4.130 Not every cultural heritage component of this rich landscape is equally important, but the value of each has been assessed using a process which evaluates the importance of each site, assesses the magnitude of the impact of the scheme (direct or indirect) on that site, and determines the significance of the effects, relating the importance of the resource to the magnitude of the impact. The importance of archaeological remains, both below ground and upstanding features, Listed Buildings and Registered Parks and Gardens has been determined using the modified version of the DCMS non statutory criteria for the scheduling of ancient monuments as implemented by English Heritage. The application of this method is described fully in paragraphs 5.2.6.2 to 5.2.6.8 of the Environmental Statement, chapter 1 volume 5 (Document DD9).
- 4.131 It is acknowledged that some direct impacts would occur to remains of lesser importance. There would be a moderate adverse direct impact on the sporadic buried remains of field boundaries and prehistoric activity of minor importance (Sites 2 and 3 shown on Document HA/7/3, figures CHG 2.1 to 2.4). There would be a moderate adverse impact on the post medieval water meadows crossed by the River Till (Site 14). Two barrow

groups to the north of Winterbourne Stoke would receive minor (in the case of Site 11) and moderate (in the case of Site 12) adverse effects on their settings. To the east of the River Till, buried traces of field systems and boundaries (Sites 8 and 9) associated with hillwash deposits (Site 9A) would be directly impacted by the road. There would be moderate adverse effects to the Winterbourne Stoke barrow group (Sites 26 and 26A) and a second long barrow on Wilsford Down (Site 32), and a minor adverse effect on outlying barrows (Site 25) and on Vespasian's Camp (Site 71). There would be a minor direct adverse impact on field systems (Site 19), and a major direct adverse impact on a scatter of buried pits, field systems and boundary ditches (Sites 17, 23 and 30). There would also be a major adverse impact on the buried remains of a boundary ditch (Site 38), the remains of an Anglo-Saxon settlement at Site 88, and on scattered pits at Site 66. Within the MILS, however, the only adverse impact would be the moderate direct adverse impact on remains of minor importance at Stonehenge Bottom (Site 48). That is where reinforcement is required to allow the tunnel to be bored beneath the ground.

- 4.132 On the other hand, the published scheme would result in highly beneficial effects for sites within the MILS, not least Stonehenge (Site 49), The Avenue (Site 50) and the barrows near Stonehenge (Sites 51 and 64), with major beneficial effects also for the Normanton Down barrows (Site 40), the Cursus (Site 52), the barrows on Coneybury Hill (Site 56) and New King Barrows (Site 59).
- 4.133 Overall, the removal of roads from the core of the WHS would have a significant beneficial effect for those who wished to contemplate the Stonehenge monument and its relationship to other ancient sites visible from Stonehenge, in a landscape freed from roads and their traffic both during the day and at night time.
- 4.134 The impacts of the published scheme have been reviewed systematically throughout its length, but the implications have also been reviewed for the WHS as a whole (in section 7.10 of Document HA/7/1, pages 127 to 135). The review draws particular attention to the key attributes of the WHS, those which led to its inscription, namely Stonehenge together with the associated Neolithic and Bronze Age funerary and ceremonial sites and their immediate settings.
- 4.135 The loss of and impact on cultural heritage resources would be insignificant in comparison with the benefits which the scheme would bring to the WHS. The published scheme would make significant contributions to the objectives of the WHS Management Plan, not least objective 9, which seeks the restoration of the core of the WHS. Moreover, the significance of the effects which would result from the carrying out of the published scheme have not been adjusted to include any benefit from archaeological investigation and recording or from the comprehensive mitigation strategy which has been prepared in consultation with English Heritage, Wiltshire County Council and the National Trust.
- 4.136 Winterbourne Stoke Conservation Area would benefit considerably from

the removal of A303 traffic. The effect on the Amesbury Conservation Area, nearby listed buildings and the adjacent Registered Historic Parkland would largely be neutral. The proposed scheme would be well screened from the historic park by existing vegetation, which is planned to be augmented as part of the scheme. There would be some limited adverse impacts on listed buildings at Countess Farm.

- 4.137 No route through the WHS, however carefully selected, can avoid some adverse impact. Nevertheless, the major heritage benefits secured by the published scheme would substantially outweigh the known adverse effects that would occur at a limited number of sites. Overall the scheme would have a highly positive effect upon the heritage resource.

### ***Air quality***

- 4.138 The local air quality impacts on human health of the published scheme would be negligible. This is true for the opening year (2008), the air quality compliance year (2010), and the design year (2023). Relevant air quality standards would be met at all receptors along the route corridor by a considerable margin. No mitigation of any sort is therefore required.
- 4.139 Nor would the published scheme result in any of the vegetation related air quality thresholds being exceeded within any ecologically protected area.
- 4.140 Within the area covered by the traffic network for the scheme, greenhouse gas emissions would increase by some 4% with the published scheme in place. That area generates 0.1% of total UK road transport emissions. Overall greenhouse gas emissions from the UK are falling (by 5.6% between 1990 and 2001), but the 22% of the overall total attributable to road transport increased by 6.9% over the same period. Against that background, the road transport emissions from the published scheme can be regarded as insignificant when compared to the year on year change in emissions from other sources.
- 4.141 Without mitigation in place, two ecologically sensitive receptors and four nuisance related locations would exceed the acceptable threshold for the impact from construction dust, but this is applying worst case assumptions (in terms of the worst case month, and no damping effect from retained soil moisture). When the sites are assessed with best practicable means mitigation measures in place, however, none of the locations would exceed the acceptable dust threshold.
- 4.142 Post-construction, with traffic being taken further away from Winterbourne Stoke and placed in a tunnel past Stonehenge, air quality would improve in the village and at the Stones. Such improvement would have little material consequence, however, as existing health related pollution levels are well within relevant air quality thresholds.
- 4.143 Within the proposed tunnel, the normal air movement caused by the flow of traffic would provide the ventilation necessary to disperse vehicle emissions from within a relatively confined space.

### **Noise impact**

- 4.144 The evaluation of traffic noise has been carried out in accordance with the Government's standard methodology contained in the Department for Transport memorandum Calculation of Road Traffic Noise.
- 4.145 Traffic noise from the existing A303 and A344 detracts from the visitor experience at Stonehenge, as well as causing disturbance to residents of Winterbourne Stoke, particularly to those living next to the A303.
- 4.146 By removing roads and traffic, the scheme would secure major significant reductions in traffic noise levels of up to 30 decibels (dB) and would restore a peaceful and quiet setting to the Stones. This would produce a dramatic transformation for visitors.
- 4.147 Properties next to the A303 in Winterbourne Stoke would enjoy similar noise reductions, although there would be slight increases at the façades of a few properties facing the new road, and a major increase at one property. There would also be slight or moderate increases at a number of archaeological sites and public rights of way to the west of the tunnelled section of the scheme, but these are sites to which most visitors make only short visits. There would be little material change in noise levels where the A303 runs past the northern fringes of Amesbury. Outside the proposed tunnel, a quiet road surface would be provided for the main carriageway and slip roads, except for the small area of anti skid surfacing which is necessary on the approaches to the Countess Roundabout.
- 4.148 In overall terms, the scheme would produce a considerably improved traffic noise climate at Stonehenge and Winterbourne Stoke, with limited adverse consequences elsewhere. No property would be eligible for an offer of sound insulation for traffic noise arising from the proposed scheme under the Noise Insulation Regulations 1975 (as amended).
- 4.149 In terms of construction noise, there is no recent national guidance to be followed, so noise limits have been agreed with the Salisbury District Council Environmental Health Officer. They are set out in table 2 of Document HA/6/2.
- 4.150 The predicted construction noise levels would exceed the daytime criteria in table 2 for one month at one residential receptor. They would exceed the evening noise levels at eleven dwellings for one month. This evening noise must be balanced against the wider environmental benefit of the earlier opening of the Winterbourne Stoke bypass element of the scheme, which it would facilitate. There would be no night time construction noise impact. There would, however, be daytime construction noise impacts at archaeological sites to which the public have access and on public rights of way. Again, it should be borne in mind that those are sites to which most users would make only short visits.
- 4.151 The scheme would have no material effect in terms of air or ground vibration either during construction or use, except potentially at the Heel Stone, which is located about 4m from the edge of the carriageway of the



A344. Despite its close proximity to the A344, the Heel Stone is only at risk of being affected by ground vibration in the event of the A344 falling into a state of disrepair, in which case HGVs travelling on the uneven road surface could produce a magnitude of vibration that might affect the Heel Stone. The closure of the A344, as part of the published scheme would avoid this risk.

***Impact on land use***

- 4.152 Outside Amesbury and Winterbourne Stoke, most of the land on either side of the A303 is in agricultural use. The broad, sweeping chalk downlands are largely used for arable farming, whereas the alluvial river valley bottoms and steeper side slopes are generally used for pasture, grazed by sheep and cattle.
- 4.153 The most concentrated land use occurs at Stonehenge, which attracts some 800,000 paying visitors each year to view the Stones. English Heritage estimate that a further quarter of a million people use the Visitor Centre car park for a free view of the Stones through the chain link fence alongside the A344.
- 4.154 Although Stonehenge attracts large numbers, with more than half being from overseas, the visitors tend to be on the way to another location, such as Bath or Salisbury, and there is limited ancillary use spilling over into Amesbury or nearby communities.
- 4.155 There is an extensive rights of way network to either side of the A303, but, from survey counts undertaken, its use is not heavy, and may be suppressed by the flows of traffic along the A303, making it difficult to cross or to walk along the road safely.
- 4.156 Adjacent and to the north east of Countess Roundabout is a trunk road service area, Countess Services, which includes a hotel, a petrol filling station, shop and restaurant.
- 4.157 The general amenity of the area is enhanced by the stretches of water in the river valleys. These are enjoyed by anglers and others alike, with the Avon river system being well known for the quality of its fishing.
- 4.158 Within the WHS, there are utilities services (electricity, water and telecommunications) underground and alongside the A303, and there is also a high voltage overhead electricity line carried on transmission towers which crosses the A303 in the vicinity of The Avenue to the east of King Barrow Ridge. There are further services in the vicinity of Countess Roundabout, including a foul sewer pumping station located on the central island of the roundabout. There are also services in Winterbourne Stoke, including an oil pipeline which runs northwards across the proposed route of the scheme.
- 4.159 The land in the WHS around Stonehenge is subject to a Land Use Plan which was produced by the National Trust in 2001 (Document DD68). The intention is to return arable land to chalk grassland around the Stones (within a wider landscape of low-intensity mixed farming) in order

to enhance the setting of the monument, conserve archaeology, enhance nature conservation and improve public accessibility to the wider landscape. This intention is being supported by the Department of Environment, Food and Rural Affairs (DEFRA) which, since 2002, has been providing special grants to farmers via the Countryside Stewardship Scheme to encourage them to convert fields to pasture around Stonehenge, in order to stop plough damage in the archaeologically sensitive fields of the WHS.

- 4.160 No property would be demolished as a result of the construction of the scheme.
- 4.161 Most of the land which would need to be acquired to deliver the scheme would be agricultural. The construction of the proposed A303 Stonehenge Improvement would affect 143.53ha of agricultural land, but some 90ha would be restored to agriculture following completion of the proposed works, together with 3.43ha of existing highway land. The scheme would result in the permanent loss of 2ha of land classified as Grade 2 and almost 38ha of Grade 3a land. DEFRA has been consulted on the permanent loss to agriculture of this quantity of land within the "best and most versatile" grades. The response is that DEFRA "does not consider the loss of approximately 40ha of BMV land to be an issue" at this location. The DEFRA consultation response of 17 October 2003 is at Appendix B of Document HA/11/4. DEFRA's concern that surplus soil should be reused in a beneficial manner would largely be met by reuse in the landscape mitigation areas. To the east of the River Till there is an area of 9.32ha of land, currently classed as Grade 3b, which could be raised to Grade 3a by reuse of better quality sub and topsoils arising from the scheme.
- 4.162 The design of the scheme has sought to minimise the impact on farming operations by generally limiting severance of farm holdings and by providing reasonable and safe access arrangements. The very limited land take from any individual farm would mean that no farm would have its viability brought into question as a result of the scheme.
- 4.163 The implementation of the National Trust's Land Use Plan would be facilitated by the published scheme, as would the proposed relocation of the Stonehenge Visitor Centre by English Heritage to the north east side of Countess Roundabout. These elements combine to form the Stonehenge Project, the means by which many of the aims and objectives of the WHS Management Plan are to be secured.
- 4.164 Elsewhere, the effect of the scheme is largely neutral, with one or two exceptions. In Winterbourne Stoke the petrol filling station/shop is largely reliant on passing trade. The scheme would remove through traffic from the village and, with the loss of this passing trade, the petrol filling station/shop would probably have to close. The public house could be similarly affected, though with the improved environs adjacent to a quieter road, there would be an opportunity for realigning the public house towards a different market.
- 4.165 In Amesbury, the scheme itself would have no significant effect on land

use, except in improving Countess Roundabout, making it easier and safer to gain access to the existing Countess Service Area, and making it easier and safer for people to go into Amesbury for shopping or other activities.

### ***Construction impact***

- 4.166 Construction would take some three and a half years, with a start currently programmed for early 2005. During the construction period there would be temporary effects on local residents, visitors to Stonehenge, travellers generally, and wildlife.
- 4.167 A Contractor's Environmental Management Plan (CEMP) would be implemented to control construction activities, protect sensitive areas and restrict disturbance to reasonable levels. The CEMP would require the application of stringent controls in relation to such matters as: limiting noise and dust; protecting water quality; avoiding pollution spills; protecting flora and fauna; managing waste; and creating a safe, healthy working environment. Extensive monitoring would be undertaken throughout the construction period to ensure the effectiveness and success of the controls, in liaison with the relevant statutory authorities. An experienced, full time public liaison officer would be appointed and based at the Stonehenge Visitor Centre to provide information for the public regarding the construction process and to be the first point of contact for any complaint.
- 4.168 To minimise disruption to road users, one lane of traffic on the A303 would be maintained in both directions throughout the construction period. All existing traffic movements with the A345, A344 and A360 would be maintained throughout, and all rights of way would be kept open. A 50mph speed limit would be imposed on the A303 and affected side roads within the limits of the scheme, except for the stretch through Winterbourne Stoke, where the existing 40mph limit would remain.
- 4.169 The main construction site compound would be located in the south west corner of Longbarrow Crossroads, outside the WHS, but strategically located halfway along the length of the scheme. Access to the site, for the delivery of materials, would be limited to the existing A303 and the interacting 'A' roads, the A345 and A360 in particular. The number of HGVs requiring access to the construction site would be between 50 and 100 per day. Delivery of materials would take place outside peak traffic times whenever possible.
- 4.170 Whilst the total construction period would last some three and a half years because of the length of time needed to bore the tunnel and fit the mechanical and electrical equipment, parts of the scheme could be completed within shorter timescales. The western half of the scheme could be opened after two years, providing a bypass and relief for Winterbourne Stoke. The Countess Roundabout junction could also be completed earlier, within two years, allowing traffic to flow more freely past Amesbury.
- 4.171 The total fill requirement for embankment construction and landscape

mitigation outside the proposed tunnel is approximately the same as the quantity of chalk which would be removed during the tunnel boring operation and from cuttings. It is therefore not anticipated that there would be any need to export excavated material from the site.

### **Impact of the scheme on travellers**

- 4.172 Today's view of Stonehenge from the existing A303 is valued by many. This would be a considerable loss. Instead, the tunnel would become a completely different feature along the A303 that is otherwise rural in character.
- 4.173 A new dual carriageway between Amesbury and Berwick Down, with clear signing and improved laybys would, however, accommodate safer journeys with less delay and disruption. Travellers would enjoy a considerably enhanced service and would experience much less stress than they do at present.

### **Community impact**

- 4.174 Through Winterbourne Stoke, the removal of A303 traffic from the village would significantly reduce community severance, creating a safer, quieter and more pleasant environment. At least 95% of today's traffic would be removed from the village. This reduction would completely change the local environment. The existing A303 would be down-graded and residents would find it much easier to cross and pass along the road, by any mode and for any activity, whether enjoying a cycle ride or walking to and from the bus stops.
- 4.175 At Countess Roundabout, removing through traffic from the roundabout and slip roads would benefit residents along Countess Road and others travelling north-south to and from Amesbury.
- 4.176 The removal of the existing roads adjacent to Stonehenge would restore the integrity of the landscape and would improve access both locally and to the surrounding areas, in compliance with the aims and objectives of the WHS Management Plan.
- 4.177 All existing rights of way would be retained and improved, particularly through the creation of a new byway and footpath in the WHS, but also by removing the barrier that the existing A303 presents to rights of way users between Amesbury and Berwick Down. Journeys would be made substantially safer for pedestrians, cyclists and equestrians, and their amenity would be much enhanced by the improvements proposed.

### **Policy context**

- 4.178 The published scheme complies well with policies and plans, from national through to local level, both statutory and non-statutory. The scheme is fully compliant with relevant national transport policies and, as an "exceptional environmental scheme", achieves a high degree of compliance with most other relevant policies. This arises from careful route selection, good design incorporating many beneficial mitigation

measures and early, extensive consultation with the main interested parties. The incorporation of a 2.1km long tunnel, the "hiding" of traffic, the removal of existing roads and a bypass for Winterbourne Stoke would bring many benefits that ensure compliance with policy.

- 4.179 The Government's White Paper "A New Deal for Transport - Better for Everyone" (Document DD32) establishes the national transport policy context for the A303 Stonehenge Improvement. The White Paper recognises that "parts of the trunk road network are under considerable stress" (paragraph 3.124 of the White Paper). To address the associated problems of congestion and safety, the White Paper states that all decisions on road investment will be taken in the context of a new approach to appraisal. It is the application of this approach, involving the consideration of heritage and environmental benefits, as well as transport benefits, which led to the conclusion that the published scheme should be included in the Government's Targeted Programme of Improvements as an exceptional environmental scheme.
- 4.180 Further west along the A303/A30 route, several other potential improvements were considered as part of the South West and South Wales Multi-Modal Study (SWARMMS) (Document DD54). Since the Stonehenge A303 improvement had already been included in the Targeted Programme of Improvements, it was specifically excluded from SWARMMS. The SWARMMS report of May 2002, however, recommending that there should be a significant programme of road construction to create a high quality dual carriageway route between the south east and the south west, reinforces both the strategic nature of the A303/A30 route and the importance of the Stonehenge improvement. If the Stonehenge improvement were not to be carried out, that section of the A303 could remain the only single carriageway section of the route between London and Cornwall. With the Stonehenge scheme, the improvement to the A303/A30 corridor would help to reduce peripherality and to increase the competitiveness of the south west region, in line with the Regional Planning Guidance (Document DD146).
- 4.181 The published scheme would greatly increase opportunities for walking and cycling within the countryside, in line with national policy, through proposals to safeguard and extend the rights of way system, particularly in the area around Stonehenge.
- 4.182 In terms of land use policy, the development plan for the area includes the Wiltshire Structure Plan (2011) adopted in 2001 (Document DD147) and the Salisbury District Local Plan adopted in 2003 (Document DD149). There is a new deposit draft alteration to the Wiltshire and Swindon Structure Plan (Document HA/0/4), dated October 2003, but this is just starting on the process of consultation. All these plans include specific and supportive references to the A303 Stonehenge improvement scheme, including references to the tunnel in the area of the Stonehenge Monument, the Winterbourne Stoke bypass, and the flyover at Countess Roundabout.
- 4.183 Under the World Heritage Convention, the Government is required to ensure that there is a management plan in place for each WHS in UK.

The Stonehenge WHS Management Plan was published by English Heritage in 2000, and has been commended by UNESCO's World Heritage Committee. During 2000, it was adopted as a material consideration for development control purposes by Salisbury District Council. The Management Plan (Document DD65) has a total of 26 objectives aimed at conserving and improving the universal value of the WHS. The Plan envisages a landscape which includes an extended core zone of permanent grassland, surrounded by a wider landscape of sustainable, low intensity mixed farming.

### **Economic assessment**

- 4.184 The scheme would improve the safety record of this stretch of the A303 between Berwick Down and Amesbury. The accident blackspot at the Y-junction with the A344 would be removed, and motorists would no longer have to negotiate the hazards presented by other at-grade junctions (particularly Countess Roundabout and Longbarrow Crossroads); the changing carriageway standard west of Amesbury and west of Winterbourne Stoke; and, in places, the winding, steep sections of existing single carriageway. The new dual carriageway scheme, with its grade-separated junctions, would allow through traffic to pass unimpeded, and there would be relatively light flows of local traffic left to negotiate the new, improved junctions.
- 4.185 The scheme would also relieve the congestion that occurs regularly today at Countess Roundabout and along the single carriageway stretch of the A303. Traffic would be able to flow freely without interruption along the new dual carriageway, leading to reduced and more reliable journey times.
- 4.186 A COBA analysis of the scheme has been carried out. This calculates the road user benefits accruing over a 30 year period by allocating monetary values to time savings, reduced accidents and lower vehicle operating costs. The benefits are then compared with the scheme costs to determine the economic return.
- 4.187 The construction cost of the scheme is estimated to be £192m (at 2003 Quarter 2 prices). If preparation and land costs are included, the total cost of the scheme would be around £200m. The operating cost of the tunnel would be £1.3m per year at current prices, and this has been taken into account in arriving at the present value of costs for the scheme. The balance of benefits set against cost, expressed as Net Present Value (NPV), discounted to 1998, is minus £35m, assuming low economic and traffic growth in the future, or plus £85m, assuming high growth.
- 4.188 At high growth, the scheme therefore gives a positive economic return, whilst at low growth the return is negative. This is a reflection of the high cost of the scheme, because of the tunnel construction. However, the tunnel is also a function of the "exceptional environmental" status of the scheme, and is needed to secure the environmental benefits the scheme is intended to deliver. Accordingly, the investment cost is considered to be justified even with a negative economic return at low

growth.

### **The Compulsory Purchase Order**

4.189 The Compulsory Purchase Order provides the authority for the acquisition of land and rights required for the construction of the new trunk road. The Order also includes areas of land needed to mitigate the effects of the scheme. In the design of the scheme, care has been taken to minimise the amount of land to be acquired, whilst complying with the appropriate design requirements. The area of land covered by the Compulsory Purchase Order is the minimum needed for the construction of the scheme and its associated mitigation measures. The reason for the acquisition of each plot of land covered by the Compulsory Purchase Order is given in the remarks column of Document DD5, 3 of 5, in the revised version contained within Document HA/0/53. The total amount of land covered by the Compulsory Purchase Order in the modified form in which the Highways Agency would wish it to be made is 178.1ha. It includes no land which is part of a common or public open space. It does, however, include inalienable land held by the National Trust.

### **Modifications requested to the Orders as drafted**

4.190 During the course of the inquiries, revisions to the published scheme have been agreed by the Highways Agency with third parties. It has also become clear that minor corrections to the Orders are necessary as a result of information received during the inquiries. These revisions are set out in detail in Documents HA/0/2, HA/0/13, HA/0/38 in Appendix A to Document HA/0/42, and in Document HA/0/50. These Documents also explain the justification for each of the requested modifications. The principal matters to which they relate are:

- the detailed specifications of replacement private means of access
- improved provision for cyclists at Longbarrow Crossroads
- the cutting slope design within the WHS
- the line and width of the proposed byway through the WHS
- the extent of the stopping up of the A344 to allow ongoing access to the existing Visitor Centre car park
- an amended layout for DTA 6 to avoid excavations
- an amendment to the shape of the retaining structure at Countess Roundabout
- provision for the automatic recognition of any vehicular rights subsequently found to exist over any public right of way affected by the published scheme.

4.191 The requested modifications mainly affect the Side Roads Order and the Compulsory Purchase Order, although there are also minor technical amendments to the Slip Roads Order and the Tunnel Regulation Order (explained in Document HA/0/13) and to the Byway Regulation Order (explained in Document HA/0/38). Each of the proposed changes could be made as a modification in accordance with either paragraph 8 of Schedule 1 to the Highways Act 1980 or paragraphs 4 and 5 of Schedule 1 to the Acquisition of Land Act 1981. Where appropriate, consents have been received from all landowners affected by the proposed changes, and

copies of the relevant correspondence are contained in Appendix K to Document HA/0/42. Those Orders which the Highways Agency seek to be made in an amended form are shown in that amended form with maps printed to reflect the amendments sought in Document HA/0/53.

4.192 In the form contained in those Orders, the published scheme would:

- address the under capacity of the single carriageway A303
- reduce accidents on the A303
- provide a bypass for Winterbourne Stoke
- remove the impact of roads and traffic from the immediate area of Stonehenge
- open the way for wider public access to the land in the immediate area of the Stonehenge monument and
- open the way for the relocation of the Stonehenge Visitor Centre from its present position very close to the Stonehenge monument.

The Highways Agency seeks the making of the Orders in that form.

## **5 THE CASES OF THE SUPPORTERS**

The material points are:

### **5.1 English Heritage**

5.1.1 English Heritage considers that something must be done to relieve Stonehenge from the effects of modern motor traffic. The major roads that pass close to the Stones are long established, and although their existence is to be regretted, the present position must form the starting point from which decisions are to be taken. Whilst it can be argued that it is wrong to introduce such infrastructure as proposed into the WHS, it would be wrong to ignore the fundamental reality of the present situation. English Heritage considers that the proposed scheme is acceptable from a conservation viewpoint, and that it offers an opportunity that must be grasped.

5.1.2 English Heritage has been an active consultee in the planning of this project. It has not been uncritical of elements of the scheme, and a number of perceived defects has been resolved through discussion. Objections were lodged to the published scheme, and English Heritage originally appeared before the inquiries as both a conditional supporter and as an objector. Discussions continued with the Highways Agency before and during the inquiries, however, which have resolved outstanding issues. As a result, English Heritage has been able to withdraw its remaining objections and finally to offer wholehearted support for the scheme (as evidenced in Document EH/0/3). Subject to the Highways Agency's agreed modification not to provide standard road lighting at the Longbarrow Crossroads junction but to investigate and provide alternative measures, English Heritage recommends approval of the Orders.



### ***The World Heritage Convention***

- 5.1.3 World Heritage is defined as natural and cultural heritage of outstanding universal significance, which it is the duty of the international community as a whole to protect. WHSs are inscribed under the terms of the 1972 World Heritage Convention (Document DD100). A total of 176 States has now ratified the Convention.
- 5.1.4 The application of the Convention is governed by the World Heritage Committee, which meets annually, and comprises 21 members. The Committee is responsible for the implementation of the Convention by determining strategy, deciding on nominations of WHSs and monitoring the state of conservation of existing WHSs. State Parties report periodically on how each is discharging its responsibilities under the Convention. Reactive monitoring involves the Committee dealing with an actual or potential issue at a particular site, whereby the Committee Secretariat seeks the comments of the State Party and the relevant advisory body – ICOMOS for cultural sites and the International Union for Conservation of Nature and Natural Resources for natural sites.
- 5.1.5 WHSs are places of outstanding universal value, which are recognised as such under the World Heritage Convention, as being natural, cultural or mixed. Under the Convention, Stonehenge is inscribed in Document DD61 as a cultural site, which can be: -
- Monuments (architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features of outstanding universal value from the point of view of history, art or science).
  - Groups of buildings (groups of separate or connected buildings which, because of their architecture, homogeneity or their place in the landscape, are of outstanding universal value from the historic, aesthetic or ethnological or anthropological point of view).
  - Sites (works of man or the combined works of nature and man, and areas including archaeological sites which are of outstanding universal value from the historic, aesthetic or ethnological or anthropological point of view).
- 5.1.6 Since 1992, this category of WHS has been recognised to include also cultural landscapes, which represent “combined works of man and nature” and are illustrative of the evolution of human society and settlement over time. These can be: -
- Clearly designed landscapes such as gardens and parklands.
  - Organically evolved landscapes evolving from an initial social, economic, administrative and/or religious imperative in association with, and in response to its natural environment.
  - Associative cultural landscapes included by virtue of powerful religious, artistic or cultural associations.

Cultural landscapes can be comparatively large areas.

- 5.1.7 The World Heritage Committee has set out criteria for establishing outstanding universal value and authenticity (for cultural sites) or integrity (for natural sites) in Operational Guidelines. The United Kingdom ratified the Convention on 29 May 1984, and the UK's first WHSs, including Stonehenge, Avebury and Associated Sites, were inscribed in 1986, before the recognition of cultural landscapes in 1992 and the latest version of the Operational Guidelines of 1999 (Document DD66).
- 5.1.8 English Heritage is the Government's statutory adviser on the historic environment, advising DCMS on the application of the World Heritage Convention and on the preparation of World Heritage nominations and management plans.

### ***Stonehenge World Heritage Site***

- 5.1.9 The basis upon which the Stonehenge WHS was held to have outstanding universal value in 1986 is stated in the nomination document (DD61), the ICOMOS evaluation of the nomination (Appendix 1 to Document EH/1/1), and comments made by the World Heritage Committee at the time of its inscription. The nomination is clearly focussed on the two great stone circles of Avebury and Stonehenge, plus other important monuments, mainly in State care. Although the landscape is referred to, it is not the primary focus of the nomination. The boundaries of the WHS have been drawn to include specific sites, and the ICOMOS evaluation focuses on the megalithic monuments.
- 5.1.10 When the first great monuments were built in this area, Stonehenge did not exist, but, once it was developed, it became the central focus of activities for centuries. It is clearly the case that the central area immediately surrounding it has a particular relationship with Stonehenge, as reflected in the barrows grouped along the crests of ridges visible from the stone circle.
- 5.1.11 The northern boundary of the WHS is formed by the Packway between Rolleston Camp and the A345 roundabout at Durrington. On the east side, the boundary follows the west bank of the River Avon and the west side of Countess Road. In the south, it follows parish boundaries past Roxhill to the A360 and the western boundary is along the A360/B3086 roads.
- 5.1.12 The area was not inscribed for its landscape, but for Stonehenge itself and its associated monuments, and that is supported by the way in which its boundaries have been drawn. The boundaries are arbitrary because they tend to follow easily recognised linear features or arbitrary lines such as the edge of the relevant map sheet. The landscape of Stonehenge runs well beyond the designated boundaries of the WHS. The Operational Guidelines of the World Heritage Committee make it clear that all areas within the boundary of a WHS need not be of equal value.
- 5.1.13 The boundary of the WHS encompasses over 2,500ha of land containing a high density of buried and visible archaeological sites and monuments.

In addition to the Stonehenge monument itself, the boundary includes a number of important barrow groups sited along ridge lines: Cursus Barrows, Normanton Down Barrows, New King and Old King Barrows, Lake Barrows and Winterbourne Stoke Barrows; also Woodhenge and the henge enclosure at Durrington Walls, The Avenue and the Cursus earthworks. Much of the area surrounding the WHS is also considered to be of archaeological importance.

- 5.1.14 Whilst no additional statutory control flows from its inscription, Government guidance contained in Planning Policy Guidance Note (PPG) 15 confirms that the recognition of a site as a WHS is a key material consideration in dealing with development proposals, as explained in paragraphs 2.22 and 2.23. Paragraph 6.37 of the PPG encourages the preparation of comprehensive Management Plans for WHSs. English Heritage has played a leading role in developing Management Plans for all English sites, including Stonehenge and Avebury.

### ***The World Heritage Site Management Plan***

- 5.1.15 With regard to the outstanding universal value of the Stonehenge WHS, the Management Plan emphasises the megalithic structures, other well-preserved archaeological sites and the relationships between them. Whilst it recognises that Stonehenge forms the focal point of the site, the Management Plan makes the case that, if nominated now, the WHS would be treated as a cultural landscape.
- 5.1.16 The responsibility for management rests with the owners of the WHS. Within the Stonehenge area, English Heritage manages the stone circle and 30ha of land around it, advises upon planning and scheduled monument consent applications and implements, together with other stakeholders, the Stonehenge WHS Management Plan. Concern about the conservation and management of the Stonehenge WHS has intensified as a result of increased pressure from large numbers of visitors and the impact of traffic on the A303 and A344 through the site. In addition, post-war intensification of agriculture, recreational use of the countryside and military activity have all changed the WHS landscape.
- 5.1.17 Around 1990, a number of key stakeholders in the WHS, including English Heritage, the National Trust, the Highways Agency and local authorities held discussions about the major problems of roads and visitor facilities, which led to the drafting of the Stonehenge Master Plan (Document SA/0/9) in 1998. The Master Plan (now renamed "The Stonehenge Project", and referred to at paragraphs 4.29 and 4.163 above) proposed to remove roads and traffic from the vicinity of the Stones by placing the A303 in a 2km tunnel, to reunite Stonehenge and its surrounding monuments, to improve visitor access and to provide a new, world-class visitor centre outside the WHS.
- 5.1.18 In November 1998, English Heritage led a wider partnership to produce a WHS Management Plan (Document DD65), which was prepared by a large group of stakeholders, including the partners in the Stonehenge Project. The Management Plan was published in June 2000 and has subsequently been adopted by Salisbury District Council as Supplementary Planning

Guidance. The Management Plan provides an overall strategy for the conservation and sustainable use of the WHS. Its primary concern is to conserve the outstanding universal value of the cultural heritage assets of the site.

- 5.1.19 It is not agreed, however, (as some objectors contend) that the Management Plan has redefined the outstanding universal value of the WHS. Only the intergovernmental World Heritage Committee is able to agree the outstanding universal value of a site in the context of the World Heritage Convention, and this can only be done through a re-nomination of the site.
- 5.1.20 The issues, overall vision, objectives and implementation strategy are all set out in the Management Plan. In the long term, all farm land in the core zone would be restored to permanent grassland and all inappropriate structures and roads removed or screened to provide an improved landscaping setting for the Stones, the protection of the archaeology from ploughing, and an area carefully managed for open access on foot for visitors. The zone would be primarily managed for archaeological, landscape and nature conservation, and for the access and enjoyment of the very large number of visitors who it is anticipated will continue to concentrate, at least initially, in the core zone.
- 5.1.21 Outside the core zone, improved archaeological and ecological conservation and management would be balanced with the needs of farming and military activities. The Plan makes it clear that the central area of the WHS needs special treatment, involving the removal of the A303 and A344 roads (Objective 23); the improvement of visitor access (Objectives 18, 19, 20 and 21); and the reversion from arable use to pasture to improve the setting and protect the archaeology of the site (Objective 9). Throughout the Management Plan, there is an emphasis on the greater significance of the core of the WHS over the outer areas of the site. The Plan says at paragraph 3.2.61 "*As ICOMOS have acknowledged, the existing boundary as defined largely fulfils a buffer zone function.*"
- 5.1.22 Management Plan Objective 23 calls for comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety, and enhance the historic environment. Amongst other measures, it suggests the implementation of a scheme for dualling the A303 in a tunnel and the closure of the A344. While the Master Plan spoke of a tunnel of 2km, the Management Plan speaks of "a tunnel of appropriate length". English Heritage takes the view that the presently proposed tunnel of 2.1km would reunite the landscape in the immediate area of the Stones, reduce visual and noise pollution around the Stones, and provide increased and safer public access to the Stones and the immediate area. A significant part of Objective 23 would therefore be addressed by the Highway Orders.

### ***The road proposals***

- 5.1.23 The Government was committed to dealing with road problems at Stonehenge at the time of the site's inscription as a WHS in 1986.

Discussions led to the Government proposal for a 2km cut-and-cover tunnel in 1998, which was supported by the National Trust and English Heritage, and endorsed both nationally and internationally by the World Heritage Committee and ICOMOS. This proposal formed the basis for the preferred route announced by the Highways Agency in 1999.

- 5.1.24 The Highways Agency carried out further studies regarding tunnel length and construction method. On reviewing these in 2002, English Heritage concluded that a cut-and-cover tunnel would not be acceptable due to its likely impact on the archaeology and landscape of the WHS. Despite some adverse impact in the western part, it was considered however that a 2.1km long bored tunnel would meet the objectives of the WHS Management Plan to remove the roads and re-unite the landscape of the core area of the WHS.
- 5.1.25 This scheme would then also facilitate the achievement of other key objectives of the Management Plan, notably the improvement of visitor access (Objectives 18, 19 & 20) and the creation of a pastoral downland landscape in the central area (Objective 9). These objectives could not be achieved without the removal of the A303 and A344 from the central area of the WHS.
- 5.1.26 When the Master Plan, with its specific reference to a tunnel of 2km, was published in 1999, it was endorsed by a number of bodies, including the National Trust (in Document DD62, the publicity brochure for the Master Plan) and ICOMOS, who commended it to the World Heritage Committee in 2001 (Document DCMS/1/1), one year after the Management Plan was published. If the Management Plan had been intended to change the length of the tunnel so that it extended, for example, past the point at which The Avenue is crossed by the A303, it could not have referred to the Master Plan in the terms in which it did, as a "mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered" (Document DD65, paragraph 1.5.11).
- 5.1.27 English Heritage acknowledges that longer tunnel options would reduce the adverse impacts of the published scheme on the WHS itself, but takes the view that these alternatives would have greater environmental effect elsewhere, which would have to be balanced against additional benefits. It is doubtful that any of these schemes would be achievable, whereas the extent to which the published scheme would deliver the key objectives of the Management Plan outweighs the inevitable costs of the proposed highway scheme, which is considered to be an acceptable response to the needs of the WHS.
- 5.1.28 Because of the unprecedented level of archaeological investigation for a road scheme such as this, English Heritage is reasonably certain that direct impact on archaeological remains would be minimal. However, there would be some adverse impact on the setting of the WHS, particularly in the west, and to some extent in the east (although this would be a small addition to the damage caused by the road works undertaken there over 30 years ago). It is believed that the huge

benefits of the present proposals for Stonehenge and the WHS would outweigh the likely impacts on the landscape on its periphery.

***Legislative and policy framework***

- 5.1.29 The published scheme would affect a number of designated and protected features of the historic environment, including scheduled monuments, other archaeological sites, listed buildings, two conservation areas, a registered historic park and garden and the Stonehenge WHS. Under the Ancient Monuments and Archaeological Areas Act 1979, a number of nationally important monuments in the WHS have been scheduled and protected from direct impacts upon them. There are currently 416 individual archaeological sites within the WHS, which are scheduled as 175 groups or areas of monuments. This represents a major concentration of nationally important and protected monuments. The consideration of the setting of scheduled ancient monuments is dealt with in paragraph 8 of PPG 16 – Archaeology and Planning.
- 5.1.30 The Wiltshire Structure Plan for the period up to 2011 contains policies for the protection from inappropriate development of archaeological and historical features, including the WHSs of Avebury and Stonehenge. The policies also presume in favour of preservation in situ rather than development where nationally important features are involved. Whilst recognising that world heritage inscription does not bring additional statutory controls, the Structure Plan highlights the outstanding international importance of inscribed sites as a key material consideration in planning decisions.
- 5.1.31 In paragraph 7.10 of the Structure Plan, concerning the Stonehenge WHS, the policy seeks to minimise the effects of road traffic, provide adequate visitor facilities and to develop access between sites in the WHS and its hinterland.
- 5.1.32 The Salisbury District Local Plan, adopted in June 2003, has several policies regarding the historic environment, including listed buildings, historic parks and gardens, and ancient monuments and archaeology. Specifically, Policy CN 24 for the Stonehenge WHS stipulates that development that would adversely affect the WHS will not be permitted. The Stonehenge WHS Management Plan has been adopted by the District Council as Supplementary Planning Guidance to the Salisbury District Local Plan.
- 5.1.33 It was suggested during the inquiries that the words ‘to the utmost of their resources’ in Article 4 of the World Heritage Convention impose a legal obligation on the UK Government, in dealing with WHSs within the UK, to exclude from consideration the availability of financial resources and the reasonableness of public expenditure in the context of competing needs for such expenditure. That is not a tenable interpretation of the Article. It would mean that even the poorest of countries would always have to put not only the protection but also the presentation of its WHSs ahead of feeding the hungry, healing the sick, housing the homeless and providing security for the vulnerable. This defies common sense.

- 5.1.34 English Heritage considers that, in any decision on a curatorial matter, a judgement has to be made as to what is reasonable, including such cost considerations. This position is supported by the reference in Article 4 itself to a State doing "all it can", rather than, for example, "everything which is possible"; by the reference in Article 5 to a State "endeavouring, in so far as possible ...", which endeavours are limited to those which are "appropriate for each country"; and by the reference in Article 24 to "making rational use of the resources available in the State concerned".
- 5.1.35 In any event, while the Government would obviously seek to comply with international obligations, it is clear from the judgement of the House of Lords in *J H Rayner v Dept of Trade* [1990] 2 AC 418 at 476 D-G, 477 A, 483 C499-500 D (Document EH/0/5) that such international treaties do not directly impose any domestic legal obligation, and compliance is a matter for Government.
- 5.1.36 Criticisms were levelled by some objectors at the Environmental Statement in this case. English Heritage has played a part in guiding the formal environmental assessment which has been undertaken, as have bodies such as the National Trust and Wiltshire County Council. It is important to remember the words of Lord Justice Carnwath in *Jones v Mansfield District Council* [2003] EWCA Civ 1408 (Document EH/0/5);

*"It needs to be borne in mind that the EIA process is intended to be an aid to efficient and inclusive decision making ... not an obstacle race."*

The question that needs to be asked is whether the public lack the available data to identify and assess the main effects in environmental terms of the road proposals contained in the published scheme. English Heritage believes that, while you could always continue to add information to what is already known, there is more than adequate data on which a judgement can be made in this case.

### **Alternatives**

- 5.1.37 With regard to the alternatives, English Heritage considers that aspirations for the ideal have to be tempered by what is realistically achievable. Beyond the current length of the tunnel, the law of diminishing returns sets in. The greater cost of longer tunnels is not reasonable when set against the improvements they would achieve. It is concluded that longer tunnel schemes are not realistically achievable, and the current proposals are the only way that the concerns of the World Heritage Committee can be met and the objectives of the Management Plan can be attained.

### **English Heritage objections to the published scheme**

- 5.1.38 The following objections concerning various aspects of the published scheme were made by English Heritage initially, but these have now been resolved: -

*a) Cut slopes & fence design*

- 5.1.39 Initially, the scheme proposed a fairly relaxed profile of 42° for cutting slopes through the WHS, with a 'notch' at the top of the slopes to accommodate stock fencing out of view from adjoining land. However, the 'notch' proposal would remove further land-surface, additional to that already required for the cutting, amounting to some 20,000 sq m of land within the WHS.
- 5.1.40 English Heritage would prefer the least amount of ground disturbance, and the fencing notch is considered to be unnecessary. Although it would result in some slight intrusion, English Heritage prefers that the stock fence should be at natural ground level, thus leaving 20,000 sq m of land undisturbed. Whilst a steeper angle of cutting slope would be preferred for the same reason, it is accepted that this might not be technically feasible.
- 5.1.41 The Highways Agency has now agreed to modify the slopes and omit the 'notch' to reduce the area of ground subject to disturbance.

*b) Lighting and signage*

- 5.1.42 Objections were made to the proposals to include lighting columns on the two new roundabouts and the linking road at the Longbarrow Crossroads junction. Concerns were raised about the daytime impact on the Long Barrow situated to the north-east of the proposed northern roundabout and to the night-time impact of street lighting at this site and over the wider landscape of the WHS. Lighting at this junction would place a light source in an otherwise dark part of the night sky, when viewed from the central area of the WHS.
- 5.1.43 Consultants acting for the Highways Agency have examined this matter and issued a report on the basis of which the Agency has agreed not to install overhead lighting, but rather to adopt and study other methods for securing safety at the junction. English Heritage has therefore been able to withdraw this objection.

*c) Drainage Treatment Areas*

- 5.1.44 The published scheme includes a number of DTAs to accommodate surface water run-off from the road. English Heritage objected to the location and shape of DTA 5, close to the Scheduled Ancient Monument of Vespasian's Camp, an Iron Age hillfort. In the published scheme, DTA 5 would be located parallel to the outer ramparts of the hillfort, within the dry valley adjacent to its western side. This would adversely affect the setting of Vespasian's Camp, as the character and topography of the area is important to understand the amenity of the monument.
- 5.1.45 English Heritage now accepts that studies of alternatives show that they would create their own problems. This objection has therefore been withdrawn.



*d) Traffic Regulation on Stonehenge Byway*

- 5.1.46 With the proposed exclusion of pedestrians and certain classes of vehicles and traffic from the 2.1km tunnel past Stonehenge, the existing A303 would be converted to a Byway through the WHS. As proposed, use of the Byway would be restricted to emergency vehicles, agricultural motor vehicles needing access, motor vehicles used by statutory undertakers and local authorities, invalid carriages and specified disabled transport vehicles (including those driven by designated representatives from English Heritage or the National Trust) and any other vehicles authorised by the traffic authority. All other vehicles excluded from the tunnel and the Stonehenge Byway would be diverted around the northern route using the A360, Packway and A345 roads.
- 5.1.47 Whilst it is desirable to keep motor usage to a minimum in line with the objectives of the WHS Management Plan, English Heritage would need to use vehicles to transport people with physical disabilities to and from the proposed new Visitor Centre. It would also be necessary to retain vehicular access along the A344 to the existing Visitor Centre car park in the event of the new Visitor Centre project being delayed beyond the opening of the new A303 scheme. Changes to the Draft Traffic Regulation Order to meet these points have been agreed by the Highways Agency, and this objection has also been withdrawn.

**Overall conclusion**

- 5.1.48 It is always open to bodies to change their minds. The weight accorded to the views of those who do should be affected by the reasons given for the change. The National Trust says that its view about the acceptability of a 2km tunnel changed mainly because it became clear that a longer tunnel could be achieved without intermediate ventilation shafts. So far as ICOMOS - UK is concerned, the carrying out of engineering works on the surface of the WHS, the creation of a dual carriageway in cutting within the WHS, and the continued severance of the buried part of The Avenue were not seen as being unacceptable when the Master Plan was prepared.
- 5.1.49 The published scheme would remove the A344 from the vicinity of the Stones. It would remove the severance of the visible part of The Avenue caused by that road. It would remove the sight of the A303 from the Stones. It would improve access to the whole of the WHS. It would enhance visitor appreciation of the whole of the WHS. There would be some harm to the WHS arising from the scheme, but that harm must be weighed against the benefits which would arise from it.
- 5.1.50 English Heritage concludes that its specific concerns have been met, and that the published scheme is the most appropriate scheme for achieving the objectives of the Management Plan. It is the view of English Heritage that the benefits to the historic environment and WHS would greatly outweigh the disbenefits, and therefore the proposed scheme is fully supported.

## **5.2 Wiltshire County Council**

- 5.2.1 The County Council supports the published scheme, and generally adopts the cases put forward on behalf of the Highways Agency and English Heritage. The published scheme is in accordance with the transport policies of the adopted Structure Plan (Document DD147), specifically Policy T11 and the Key Diagram, which shows an on-line improvement of the A303. This policy also provides that the improvement should include a Winterbourne Stoke bypass and a Countess Roundabout flyover. All of this would be achieved by the published scheme. The combination of a tunnel and bypass would achieve significant environmental and cost benefits through the re-use of tunnelled material.
- 5.2.2 The proposed road improvement scheme would also be in accordance with the heritage policies of the Structure Plan. Policy HE1 fully supports the Stonehenge WHS Management Plan, which includes the A303 Stonehenge improvement. During preparation and adoption of the Structure Plan, the A303 improvement scheme consisted of a 2km cut-and-cover tunnel, which was considered to be in accordance with Policy HE1. The published scheme with a bored tunnel offers improvements and therefore accords with Policy HE1.
- 5.2.3 Whilst it acknowledges the publication of the Management Plan, the Structure Plan refers to the Stonehenge Master Plan as providing a scheme in accordance with its policies. The Management Plan does not replace the Master Plan, which also contains the requirement that any improvements should not lead to an increase of traffic on the local highway network, particularly on the Packway to the north. The published scheme would achieve this objective.
- 5.2.4 Unlike the detailed proposals in the Master Plan, the Stonehenge Management Plan does not specify any length of tunnel to be provided. Objective 23 of the Management Plan states:-

*"Measures should be identified which will provide comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety and enhance the historic environment".*

Paragraph 4.6.4 of the Management Plan states that a strategy to achieve the objective includes:-

*"placing the A303(T) in a tunnel, closure of the A344 and related landscape restoration schemes within the Stonehenge "Bowl"...".*

It accepts that tunnelling might have an inevitable detrimental effect on archaeological assets along the A303 corridor, but indicates that this should be balanced against the major benefits for the WHS which a tunnel would deliver. Whilst the length of tunnel is not specified, the published scheme would meet the objective. The Stonehenge Bowl refers to the extent of the proposed landscape restoration scheme rather than the length of tunnel required, and the proposed tunnel in the published scheme would be within the "Bowl".

- 5.2.5 As the Structure Plan recognises in the explanatory text (paragraph 26.26 at page 77), it would not be possible to close the A344 to traffic until after the completion of the A303 Improvement Scheme and the tunnel section. The Wiltshire County Council Performance and Improvement Plan – June 2003 – supports improvements to the Stonehenge WHS.
- 5.2.6 The County Council’s Environment and Transport Committee considered the proposed A303 improvement and the Stonehenge Master Plan in February 1999. It was resolved to support the provision of a tunnel for the A303 past Stonehenge, the closure of the A344, and appropriate alterations of other rights of way to allow the restoration of the landscape (Document WCC/1/2). The Stonehenge WHS Management Plan Consultation Draft was considered by the Committee in November 1999 (Document WCC/1/3), when the principles were agreed by the County Council, who resolved to assist in implementing measures to control access by vehicles on byways within the WHS.
- 5.2.7 At the County Council’s Regulatory Committee of 23 July 2003, it was resolved to advertise Traffic Regulation Orders (TROs) under the Road Traffic Regulation Act 1984 to prohibit motorised vehicles from using the A344 between Airman’s Corner and Byway Amesbury 12 and from using other byways within the WHS following the confirmation of the A303 Stonehenge Improvement Scheme Orders. Bridleway Amesbury 11 was reclassified as a Byway following a public local inquiry held during the course of these inquiries, but the County Council had already committed itself to publish a TRO prohibiting motor vehicles from using it should that reclassification be confirmed. Four other rights of way within the WHS, presently classed as bridleways or footpaths, are also the subject of claims of vehicular rights. The County Council has also resolved (Document WCC/1/4) to prohibit motor vehicles from using these rights of way, should they be reclassified.
- 5.2.8 In October 2003, the County Council resolved to support the Orders promoted at these inquiries by the Highways Agency because it considered that the published scheme would improve road safety and reduce congestion, thus making journey times more reliable, and the removal of roads and traffic from the vicinity of Stonehenge would improve its landscape setting and enhance the historic environment. The village of Winterbourne Stoke would also benefit from the removal of trunk road traffic through the village, the reduction of traffic noise, elimination of community severance and improvement in road safety.
- 5.2.9 The closure of the A344 between Stonehenge Bottom and Byway 12 and the prohibition of motor vehicles from the remainder of the site would eliminate accident risks at the junctions of the A344 with the A360 at Airman’s Corner and with the A303 at Stonehenge Bottom, which have poor accident records. Although the distance would be greater, journey times between Amesbury and Shrewton would increase by less than half a minute, due to the higher speeds on the new dual carriageway compared to the existing A344.

- 5.2.10 The proposed tunnel and the new Stonehenge Byway would bring significant benefits to the rights of way network and reduce severance caused by the A303. The proposed Stonehenge Byway would accommodate most traffic prohibited from the tunnel, and link together existing rights of way to allow for circular routes and enhanced access to the WHS.
- 5.2.11 The County Council has expressed concern that the detailed design of the published scheme should include measures to maintain or enhance, as far as is reasonably practical, the archaeological and environmental features of this nationally and internationally significant heritage site.
- 5.2.12 It is noted that the National Trust, whilst opposing the Orders, has not put forward an alternative scheme of its own or supported any of the published alternative routes. The County Council agrees with the view quoted by the National Trust that:

*"the opportunity the nation now has to heal the injuries Stonehenge and its setting have suffered in the course of the last hundred years or so ought not to be wasted."*

It is considered that the scheme with its innovative form of funding has finally produced an attainable solution, and the opportunity must not be lost.

### **Overall conclusion**

- 5.2.13 The published scheme would provide a solution to the environmental and traffic-related problems on the A303 between Amesbury and Berwick Down, which would strike an acceptable balance between benefits, impacts and costs. The proposals therefore are seen as being in accordance with the development plan policies and the scheme is fully supported by the County Council.

## **5.3 Winterbourne Stoke Parish Council**

- 5.3.1 The Chair of Winterbourne Stoke Parish Council stated that most people in the village support the proposed A303 Stonehenge Improvement Scheme. This small community has been waiting many years for a long-promised bypass. The village is a Conservation Area and is within an area of Special Scientific Interest, but it is currently rendered noisy, polluted and extremely dangerous due to the current route of the A303 through the village High Street.
- 5.3.2 Each day more than 60 vehicles turn on to and off the A303 from the village at peak hours when traffic is heavy. This is a dangerous, life-threatening experience on the normal journey to work. Primary school children are collected from and delivered to their homes in a special arrangement by the County Council to avoid the danger, but older children face significant risks in waiting on or crossing the A303 for the service bus to school.

- 5.3.3 The village has no shops and access to those in Shrewton or Berwick St James requires travel on the A303 via junctions where accidents regularly occur. The villagers suffer from pollution in the form of noise, fumes and chemical deposits on the highway. Because the road and other systems were not designed to cope with the amount of traffic they currently carry, there is perceived to be an adverse effect on the health of those who live beside the road.
- 5.3.4 The Parish Council and others have discussed these issues with the Highways Agency, and are satisfied that the plans for the new road and the benefits of current technology would address the current problems and reduce the effects on the village and its surrounding area. The proposed scheme would allow the residents of Winterbourne Stoke to enjoy rural pursuits and offer to all the benefits of being in a beautiful part of rural England.
- 5.3.5 **Councillor I West**, a Member of Wiltshire County Council, Salisbury District Council and Winterbourne Stoke Parish Council, also appeared in his own right at the inquiries to express deep concern about the accident record for the section of the A303 which runs through the village. Between 1986 and 1994 there were 137 accidents, including 10 fatalities, with particular concentrations at Winterbourne Stoke village and the Longbarrow Crossroads with the A360. Many people from Winterbourne Stoke and surrounding villages have been injured in accidents over the years, and the proposed bypass would remove this danger from the community.
- 5.3.6 The Environmental Statement shows the predicted accident savings over a 30 year period for the proposed scheme based on national average rates for high and low traffic growth. For low traffic growth over the period, the predicted savings in casualties would be 24 fatalities, 154 serious and 1,298 slight injuries. These reductions in accidents would be 20% greater for high growth traffic flows.
- 5.3.7 The problems that the A303 causes to Winterbourne Stoke village were clearly recognised in notes to the 1995 Salisbury Conference, which stated that the road is on a poor alignment, passing through the village with housing on both sides, and that traffic calming measures had been introduced, but there were no pedestrian crossing facilities. The only protective measure today is a fixed-site traffic speed camera to enforce the speed limit through the village.
- 5.3.8 The proposed scheme would bring relief to the residents of Winterbourne Stoke through the removal of between 22,000 and 33,000 vehicles average per day, many of which are large lorries. This would bring a more normal life to the village and enhance the quality of life for the community as a whole. The 7.2km of single carriageway past Winterbourne Stoke is effectively a bottleneck on the 133km long dual carriageway A303 from London. Frequent accidents close this section of the trunk road for many hours, and the whole area becomes gridlocked, with vehicles trying to find alternative routes via Salisbury, Shrewton, Larkhill, Bulford and the A36 through the Wylde valley. The proposed

dual carriageway would bring economic benefits to employment and tourism in South Wiltshire and the West Country.

5.3.9 It is believed that the published scheme meets all other objectives. The tunnel would remove traffic for sufficient distance from the Stones to avoid disturbance both during and after construction. The scheme is the right solution, and it has support from most parties: particularly the Departments for Transport and Culture Media and Sport, Wiltshire County Council, Salisbury District Council, English Heritage, English Nature, the Environment Agency and many Town and Parish Councils.

5.3.10 Councillor West presented two petitions in support of the published scheme. The first was signed by 130 residents of Winterbourne Stoke (Document IW/0/1), and the second was signed by 12 children who live in the village (Document IW/0/2).

#### **5.4 Councillor C Mills**

5.4.1 Representing villages in the Till Valley on Salisbury District Council, Councillor Mills acknowledges that the published scheme might not be the perfect solution, because it does not meet all the objectives set by the numerous parties involved, but it does nevertheless provide a practical and financially feasible project. Highway safety at Stonehenge Bottom would be achieved, and the traffic flow at Countess Roundabout would be improved. The village of Winterbourne Stoke would have its long-overdue bypass, and the Stonehenge Monument would be isolated from modern traffic.

#### **5.5 Mr H N Colthurst**

5.5.1 It is generally accepted that the A303 trunk road needs to be widened from Countess Roundabout at Amesbury to Yarnbury Castle, west of Winterbourne Stoke in order to cope with increased traffic volumes in the summer and to relieve Winterbourne Stoke by way of a bypass. The proposed dual carriageway with a bored Stonehenge tunnel and Winterbourne Stoke bypass represents the best and most sensible option for improvement of this route.

5.5.2 The desire to enhance Stonehenge and the surrounding Downs for heritage reasons is of national concern. The scheme should also preserve the existing countryside of Southern England. South Wiltshire contains many sites of unique historical and archaeological interest around Stonehenge as well as areas of outstanding natural beauty within the Woodford, Till and Wylde Valleys. It is considered therefore that the road improvement should follow as far as possible the existing A303 rather than to adopt a new route.

5.5.3 With regard to the published scheme, apart from the bypass diversion north of Winterbourne Stoke, the route would preserve the character of the existing countryside. The proposed bypass viaduct across the Till Valley needs careful consideration of the structure, the preservation of water flow and wildlife and its assimilation into the surrounding

landscape. The elimination of through traffic in the village of Winterbourne Stoke would be a considerable benefit.

5.5.4 The tunnel would be a proper long-term solution, which would meet both heritage needs and the needs of future generations of tourists. Nearby residents have some reservations about the loss of views of Stonehenge that would result from the scheme, particularly from those who regularly drive past the monument and see it in the early morning. This would be offset, however, by the proposed new network of byways and bridleways, which would allow similar views for those on foot, bicycle or horse etc.

5.5.5 The Chairman of the Berwick St James parish meeting wrote to the inquiries to add support to the case put forward by Mr H N Colthurst.

## **5.6 The (International) Pagan Pride Project - UK Division and Techno Pagans Unlimited**

5.6.1 There are 13 countries throughout the world in membership of the International Pagan Pride Project. TechnoPagans Unlimited is the Welsh Druid Order. Both organisations have considered the proposals for Stonehenge, and offer full support to the published scheme, including, in particular, the proposed 2.1km bored tunnel.

5.6.2 Stonehenge is not a museum. It is part of a living landscape. All land is sacred, but the country must meet the needs of the living as well as honouring the ancient past. In the 21<sup>st</sup> Century, provision must be made for people to travel efficiently.

5.6.3 It is very pleasing that the A344 will ultimately be closed in the immediate area of Stonehenge, because the closeness of that road is offensive to the experience of every visitor to Stonehenge.

5.6.4 The displacement of archaeological artefacts is an unavoidable consequence of construction. Artefacts unearthed during the construction process should be publicly displayed, so that present and future generations may increase their knowledge of our ancient history.

5.6.5 As regards the possible unearthing of human remains, these should be reburied locally rather than being put on public display, but reburial need not be immediate. Archaeologists must have the opportunity to increase our knowledge of the past before any reburial takes place.

5.6.6 If any reburial or other ceremony takes place at Stonehenge before, during or after the completion of the proposed scheme, it is important that all Druid and Pagan organisations should have equal access to perform such rites according to their respective traditions. Such rites should be brief, and should not unduly delay the progress of work.

5.6.7 Welsh speaking Druid traditions have a special kinship with Stonehenge, because the bluestones brought to Stonehenge came from the Preseli mountains in Wales; but other Druid and Pagan groups, unaffiliated with any organisation which has appeared at the inquiries, should not be excluded from involvement with any rites associated with the launching

of the proposed scheme or any rededication of the site on completion of the work. Contemporary Pagans of all denominations feel a special relationship with the Stonehenge site. All requests for involvement should therefore be equally respected, honoured and met.

- 5.6.8 The assurance offered by the Highways Agency in response to that request that they would wish to treat equally and fairly all Druid and Pagan groups is very much welcomed. Without that positive response, the line would have been taken that no Druid or Pagan rites should be performed in connection with the work, and decisions on the disposition of archaeological finds (including human remains) should be left to the archaeologists involved in the project.

## **5.7 Department for Culture Media and Sport (written submission)**

- 5.7.1 Stonehenge and the immediate surrounding area are in the ownership of the DCMS. The stone circle and a small parcel of adjoining land was given to the Government for the benefit of the nation in 1918. A copy of the Deed of Gift will be found at Document DCMS/1/8. The covenants governing the gift are no longer enforceable. English Heritage manages the monument on the Department's behalf under Section 34 of the National Heritage Act 1983.

- 5.7.2 The World Heritage Convention of 1972 introduced the concept of "outstanding universal value" in this context and the need to preserve such sites of value for the world heritage of mankind as a whole. The UK ratified the Convention in 1984, and today DCMS has policy responsibility for the implementation of its provisions, and represents the UK on the World Heritage Committee.

- 5.7.3 The World Heritage Committee is served by the World Heritage Centre, within UNESCO, as the Secretariat of the Committee. There are three organisations which assist the Secretariat, one of which is ICOMOS. ICOMOS provides advice to the Secretariat on cultural heritage. It attends meetings of the World Heritage Committee as an observer. Neither ICOMOS, nor ICOMOS-UK has a statutory role in advising the UK Government on WHSs. English Heritage is the Government's statutory advisor on the historic environment.

- 5.7.4 Under the World Heritage Convention, the Government is committed to the "identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage". The Convention has not, however, been incorporated into domestic law, nor has it been the subject of any special domestic legislation. Consequently, the Convention is not enforceable directly in any domestic court or tribunal, and its interpretation and implementation is a matter for the State parties and the World Heritage Committee.

- 5.7.5 Objectors refer to the statement in Article 4 of the Convention that "each State Party will do all it can to this end, to the utmost of its own resources..." as meaning that the Government should not decline to take steps for the protection or conservation of WHSs on grounds of cost. This, however, is considered to be a flawed argument, because it was not



the intention for State Parties to be committed to unlimited expenditure on WHSs, without regard to any other calls on the public purse.

5.7.6 In the French and Spanish texts of the Convention, the phrase "...to the utmost of (the State Party's) own resources..." translates as "...maximum resources available...". Therefore, the availability of Government resources can only be answered in the context of the full range of financial demands and priorities of all the Government's functions.

5.7.7 Although there is no statutory designation of WHSs in the UK, there are statutory protections for historic assets within those sites through planning law, particularly in the Ancient Monuments and Archaeological Areas Act 1979. The status of WHSs is recognised in PPG 15, and WHS status is a material consideration in planning law. PPG 15 also recommends the preparation of Management Plans for WHSs, which are submitted to the World Heritage Centre at UNESCO and, in this case, adopted as Supplementary Planning Guidance by the relevant local planning authority.

5.7.8 The nomination of Stonehenge, Avebury and Associated Sites for inscription on the World Heritage List (Document DD61) focuses on the stone circles, and the document sets out management problems resulting from the increased popularity of Stonehenge and indicates proposals for improvement. When the nomination was considered in 1986, the UK Government was requested to study possible solutions to the problem of the A344 road crossing The Avenue at Stonehenge (detour, digging of a tunnel etc), and to inform the Committee of the results at its next meeting. At the tenth session of the Committee in 1986, the site was inscribed, and it was recorded that the Committee was satisfied by the assurances provided by the authorities of the UK that the closure of the road which crosses The Avenue at Stonehenge was receiving serious consideration as part of the overall plans for the future management of the site.

5.7.9 Stonehenge and Avebury were inscribed a WHS in 1986 under criteria (i), (ii) and (iii) of the Guidelines. These provide for inscription of sites which:

- (i) represent a masterpiece of human creative genius;*
- (ii) exhibit an important exchange of human values over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design; and*
- (iii) bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared.*

5.7.10 The inscription for Stonehenge sets out the justification for nomination:

*"Stonehenge and Avebury are the two most important and characteristic prehistoric monuments in Britain. They represent the Henge monument par excellence, as the largest, most evolved and best-preserved prehistoric temples of a type unique to Britain.*

*Together with the associated sites and monuments they provide a landscape without parallel in Britain or elsewhere and provide an unrivalled demonstration of human achievement in prehistoric times."*

- 5.7.11 Several objectors, notably ICOMOS-UK, the CBA, the Prehistoric Society and the National Trust, argue that the justification for inscription and the definition of the site's "outstanding universal value" demonstrate that each part of the WHS is of equal significance in the landscape, so that greater importance should not be attached to the henge monument. It should be noted however that the boundaries of the WHS are somewhat arbitrary. They use existing fixed boundaries such as roads, parish boundaries and the River Avon for the sake of clarity. They do not define the historic landscape. The nomination document and justification for the inscription give clear precedence to the Stonehenge monument, and this is reflected in the Stonehenge Management Plan.
- 5.7.12 The outstanding universal value for the Stonehenge site is as set out in the justification for inscription. It is not considered that the acknowledged outstanding universal value is a characteristic of the whole site. The Operational Guidelines (Document DD66) encourage State Parties to use a system of management zones. They state that "*while an existing or proposed protected area may contain several management zones, only some of those zones may satisfy criteria for inscription*". Contrary to some claims, there is no requirement to protect the integrity of a WHS that has been inscribed as a cultural site. Integrity is only required for natural WHSs, in contrast to cultural sites which must have authenticity as well as outstanding universal value and a legal mechanism for protection.
- 5.7.13 Since its inscription, the World Heritage Committee has reviewed developments at Stonehenge on a regular basis in 1987, 1992, 1994, 1998, 2000, 2001, 2002 and 2003. Concerns were expressed during those reviews about the A344, tourism pressure and the proximity of the A303 to Stonehenge. In 1998, the Committee expressed satisfaction with management proposals, whilst stressing the need to complete the management plan and to close the A344 road passing close to the monument.
- 5.7.14 In 2000, the Committee commended the preparation of the management plan, and noted that the UK would follow an ICOMOS recommendation for careful evaluation and assessment at each stage of its implementation. In response to the 2001 UK proposals to close the A344 and place the A303 in a 2km tunnel near the stone circle, ICOMOS stated that it was in full agreement with the proposals and that the cut-and-cover tunnel would be a feasible project that would not cause any damage to the archaeology and the environment on the site.
- 5.7.15 Further reactive monitoring reports from UK followed in 2002 and 2003, when the UK reported that their preferred option was a 2.1km bored tunnel, which would minimise the impact of the road scheme on the WHS due to its less intrusive construction techniques. This was welcomed by the Committee and, following a visit by a member of the World Heritage

Centre to the public exhibition in June 2003, it was not considered necessary to amend the report or to recommend that the Committee should support a 4.5km tunnel. However, at the last Committee meeting, ICOMOS stated that it is now in favour of a 4.5km tunnel rather than the 2km tunnel previously proposed. The decision to change from a cut-and-cover method of construction to a bored tunnel was welcomed by ICOMOS and the World Heritage Committee. However, the Committee did not support ICOMOS's change of view about the length of the tunnel.

5.7.16 This reaction of the Committee is in stark contrast to their response to development proposals affecting other WHSs in other countries, to which reference was made at the inquiries by objectors. Conservation reports on the pyramids at Giza and the Taj Mahal led to expressions of concern by the Committee. In the case of the proposals for Stonehenge, however, the Committee acknowledged that they had been kept fully informed by the State Party, and they welcomed the proposals put forward.

5.7.17 DCMS has been involved in the Stonehenge project since 1997, when the then Secretary of State pledged to act as a catalyst in finding a solution to the problem of improving Stonehenge. Consultations produced the Stonehenge Master Plan, and there was agreement to action in three areas:

- (i) the early implementation of the A303 improvements, the closure of the A344, the development of a visitor centre at Countess East, the removal of the existing visitor facilities and the re-creation of the landscape;
- (ii) consideration of innovative construction procurement, possibly including the early involvement of contractors in the design process; and
- (iii) the preparation of a management plan for Stonehenge.

5.7.18 The Management Plan was presaged in the Master Plan. It was completed in June 2000 after widespread consultation, and it was the subject of consensus by all the relevant organisations. This identified a number of specific objectives for the future management of the site, and allocated these to lead organisations. The Management Plan translated the vision of the Master Plan into more detailed objectives, with an allocation of responsibility for achievement as set out in the Programme of Action annexed to the Management Plan.

5.7.19 Objective 23 of the Management Plan deals with the comprehensive treatment of road links, and includes the placing of the A303 in a tunnel, closure and removal of the A344 and the related landscape restoration within the Stonehenge "Bowl". DCMS has partially funded the development of proposals for the A303 Stonehenge Improvement Scheme, and would be contributing £70m towards the implementation of the scheme. DCMS believes that this scheme would deliver the objectives of the Management Plan.

- 5.7.20 The CBA analysis of the funding of the published scheme set out in Document CBA/1/1 is incorrect. Whilst there are heritage benefits from the proposals for both the A344 and the A303, from a transport perspective there is no need or benefit in placing the A303 in a tunnel. This part of the scheme meets the objectives of the Stonehenge Management Plan to deliver heritage benefits, and it is not accepted that the tunnel is necessary mitigation for the transport proposals. The published scheme has been conceived with both heritage and highway benefits in mind.
- 5.7.21 The Ministerial decision regarding the length of the tunnel and the method of construction was taken on the basis of the Comparison of Tunnel Options 2002 (Document DD60), together with the views of the World Heritage Committee regarding the acceptability of a 2km cut and cover tunnel, and advice from English Heritage (Documents EH/0/2 and CD/INQ/3).
- 5.7.22 The proposals would deliver one of the main objectives of the Management Plan's Programme of Action to "*implement a scheme for the dualling of the A303 in a tunnel of appropriate length*". Without this scheme in place, a significant number of other key objectives of the Management Plan could not be delivered, particularly the closure of the A344, the restoration of an appropriate landscape setting for the stone circle and immediately related ceremonial monuments in the core area, and open access on foot within the core of the WHS. It would enable English Heritage and the National Trust to improve the setting of the stone circle and to deliver the landscape vision of the Management Plan of an extended core zone of permanent grassland, which would permit access on foot to the stone circle.
- 5.7.23 The overall scheme would fulfil the obligation of the UK under the Convention to protect, conserve, present and transmit to future generations its sites of outstanding universal value. It would have long-term conservation benefits and enable visitors to visualise and understand the significance of Stonehenge in its historic context. DCMS fully supports the published scheme.

## **5.8 Other written submissions in support of the published scheme**

- 5.8.1 In general, the other written representations of support for the published scheme concentrate on the positive effect the proposal would be perceived to have in removing the road block which the present single carriageway is regarded as creating, and on the improvement to the immediate surroundings of Stonehenge which it is considered that the scheme would deliver. There is also support for the relief which the scheme is seen as offering for the village of Winterbourne Stoke. Other supporters speak positively of the attention given to nature conservation and biodiversity in the preparation of the scheme.
- 5.8.2 Salisbury District Council supports the published scheme in principle. The scheme would represent the taking of a crucial step towards realising the objectives of the WHS Management Plan. It conforms with the policies of the Local Plan and the supplementary planning guidance contained in the

WHS Management Plan. There are just two points of detail which the District Council consider should be met by way of amendment to the published scheme, and these points are picked up at paragraph 8.5.30 below.

- 5.8.3 The Regional Tourist Board for the South West considers that the proposal would improve the visitor experience at Stonehenge and the surrounding monuments, as well as alleviating the worst congestion experienced by people travelling further into the South West region. Tourism is a crucial industry for the South West, supporting an estimated 237,000 full time equivalent jobs in the region.
- 5.8.4 The Automobile Association Motoring Trust is particularly supportive of the proposed tunnel, and the Ramblers' Association are delighted that safe crossing points are proposed for all north/south footpaths and bridleways that cross the proposed line of the new A303.
- 5.8.5 Three individual archaeologists offer written support for the published scheme. Professor J C Barrett of the University of Sheffield considers that the proposal represents the best, and indeed only, hope of restoring the monument of Stonehenge to its fuller landscape setting in a way which will enable visitors to appreciate that setting and the landscape history in which it developed. Stonehenge itself is the core from which the landscape is understood, and the scheme put forward by the Highways Agency would remove the A303 from that core. Professor Barrett regards the scheme as a cost effective way of massively enhancing understanding and enjoyment of this unique archaeological landscape. He expresses this view on the basis of thirty years involvement in researching Neolithic and Bronze Age landscapes in southern Britain, which includes the publication of "*Fragments from Antiquity*" (1994), in which he presented the first published discussion of the visual positioning of Stonehenge in relation to The Avenue.
- 5.8.6 Professor B Cunliffe, since 1972 Professor of European Archaeology at the University of Oxford, is a former President of the Society of Antiquaries and of the Council for British Archaeology. He states that while, like many archaeologists, he would prefer to have the A303 hidden in a tunnel for the full width of the WHS, he believes that the proposed 2.1km tunnel is a sensible compromise, delivering most of what is archaeologically desirable at a defensible cost. He considers that it would be a deplorable outcome if, in standing out for a longer tunnel, those who oppose the present proposal cause the road improvement to be further delayed or aborted, a view which he believes to be widely shared among professional archaeologists.
- 5.8.7 That is a view endorsed in terms by Mr J Richards, a professional archaeologist who has been involved with Stonehenge for 24 years, and has just completed a major BBC documentary on the monument. He considers that the heart of the Stonehenge landscape is the natural amphitheatre rimmed by the barrow cemeteries of the King Barrows, the Cursus Barrows and those on Normanton Down. That amphitheatre is precisely what would be restored to comparative tranquillity by the construction of the 2.1km tunnel.

## **6 THE CASES OF THE OBJECTORS**

The material points are:

### **6.1 The National Trust**

- 6.1.1 The National Trust believes that this opportunity to heal the injuries that Stonehenge and its setting have suffered during the last hundred years or so should not be wasted. The option to do nothing is unacceptable, but the Government's task of mending the harm that has been done to the Stonehenge landscape by the intrusion of motorised traffic in the core of the WHS needs care to ensure that further wounds are not inflicted upon that landscape.
- 6.1.2 The National Trust does not criticise the concept of a bored tunnel for the A303 road as it passes through the core of the WHS, nor the alignment chosen for the route. The objection is that the length of tunnel currently proposed would not deliver the declared objectives of the scheme. It would compromise them, unless the proposed tunnel was to be lengthened to at least 2.9km and a tunnel-boring machine used in its construction.
- 6.1.3 These would be modest changes in the scale of the published scheme as a whole. They would add to the cost of the project and the time taken to complete it, but the additional costs would be good value, and justified by the environmental gains that the scheme would achieve. The possible delay in achieving good value for money would be outweighed by the importance of the environment through which the scheme runs. The traffic problems which the scheme seeks to address are not said to be so dire or so urgent as to justify the scheme on their own. Neither the Highways Agency nor DCMS has stated that an immutable limit has been set on the funds the Government would be prepared to devote to the improvement of the Stonehenge landscape.
- 6.1.4 The Highways Agency has determined the length of the tunnel by applying the concept of the MILS for the purpose of removing visible traffic from the core of the WHS. The MILS concept involves the definition of visual horizons from the Stones themselves, and concerns itself with the immediate landscape setting of the Stonehenge monument rather than the wider archaeological landscape, or even the core of the WHS as defined in the Management Plan.
- 6.1.5 The National Trust seeks amendments to the currently proposed scheme in order to ensure that appropriate settings are provided for a number of important scheduled monuments, and that the opportunity is taken to re-unite The Avenue where it is severed by the A303 road. It is not disputed by the Highways Agency that the relocation of the portals of the proposed tunnel away from the Normanton Down Barrow group and away from the barrows on King Barrow Ridge would improve the settings of these monuments. The Avenue is part of the Stonehenge monument, and its re-unification is a worthwhile and important objective.

- 6.1.6 The Stonehenge WHS Management Plan provides a sound policy basis for the changes proposed by the National Trust for the published scheme. These changes would meet the objectives of providing an appropriate setting for the Stones and their immediately related ceremonial monuments in the core (Objective 9) and enhancement where appropriate of degraded archaeological features within the World Heritage Site (Objective 16).
- 6.1.7 The Highways Agency concept of the MILS and the concept of the Stonehenge Core in the Management Plan cannot be equated with each other. The conclusion of applying the MILS concept to the length of the proposed tunnel is that the road would emerge from its portals at either end in the midst of important archaeological sites, and a number of these interests of acknowledged importance within the core of the WHS would be harmed. That harm would be avoided if the length of the proposed tunnel were extended by some 200m at the western end and by some 600m in the east. This would preserve the settings of several scheduled or important barrows and leave other remains intact at the western end of the tunnel, whilst at the eastern end the road would emerge beyond the route of The Avenue and the archaeological sites on King Barrow Ridge.

### ***The Stonehenge landscape***

- 6.1.8 The inscription of Stonehenge and Avebury as a World Heritage Site is set out in paragraph 5.7.10 above. The justification for the inscription of Stonehenge acknowledges that the unique assemblage of prehistoric features creates a "landscape without parallel", an archaeological landscape rather than one which is appreciated in a purely aesthetic way as other landscapes are. In this archaeological landscape, the protection of the setting of the monuments that comprise it is of paramount importance.
- 6.1.9 The summary of the Stonehenge WHS Management Plan describes the Stonehenge part of the WHS as:
- "contain[ing] 196 scheduled monuments, mainly prehistoric burial mounds, and a dense concentration of buried archaeology which combine to create a unique cultural landscape of international importance".*
- Paragraph 2.2.3 of the Management Plan adds that the Stonehenge WHS is not so much a site as a 'cultural landscape', and if inscription were to be sought today, it might well be classed as an outstanding example of a cultural landscape.
- 6.1.10 In its draft document 'Stonehenge Spirit of Place Statement' (Document CD/NT/01), the National Trust analyses five types of value associated with the WHS: archaeological and historical, scientific and research, aesthetic, spiritual and social values. In each case, these values are related to the ancient landscape setting, not purely the individual monuments. This approach is commended by the National Trust, because it is the Government's duty to preserve the unique quality of the Stonehenge landscape.

### ***Planning policies and Government guidance***

- 6.1.11 PPG 16: Archaeology and Planning, 1990, provides guidance on the preservation of archaeological remains and their settings:

Paragraph 3 – *"Archaeological remains are irreplaceable. They are evidence...for prehistoric periods, the only evidence...of the past development of our civilisation."*

Paragraph 6 – *"Archaeological remains should be seen as a finite and non-renewable resource, in many cases highly fragile and vulnerable to damage and destruction. Appropriate management is therefore essential to ensure that they survive in good condition. In particular, care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed."*

Paragraph 8 – *"Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development, there should be a presumption in favour of their physical preservation."*

Paragraph B.18 – *The desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether that monument is scheduled or not."*

- 6.1.12 PPG 15: Planning and the Historic Environment, 1994, provides guidance for the protection of the historic environment and WHSs:

Paragraph 1.1 – *"It is fundamental to the Government's policies for environmental stewardship that there should be effective protection for all aspects of the historic environment. The physical survivals of our past are to be valued and protected for their own sake, as a central part of our cultural heritage and our sense of national identity."*

Paragraph 2.26 – *"In defining planning policies for the countryside, authorities should take account of the historical dimension of the landscape as a whole rather than concentrate on selected parts."*

Paragraph 2.23 – *"Policies should reflect the fact that all these (World Heritage) sites have been designated for their outstanding universal value, and they should place great weight on the need to protect them for the benefit of future generations as well as our own. Development proposals affecting these sites or their setting may be compatible with this objective, but should always be carefully scrutinised for their likely effect on the site or its setting in the longer term."*

- 6.1.13 The Wiltshire Structure Plan 2011 (Document DD147) deals with the WHS in Policy HE1:

*"The World Heritage Site of Stonehenge and Avebury, together with its landscape setting, should be afforded protection from inappropriate development to reflect its outstanding universal value. No development*



*should take place which by reason of its scale, siting and design would prejudice the World Heritage Site and its setting in the landscape."*

Policy HE2 states:

*"Features of archaeological or historic interest and their settings should be protected from inappropriate development... Where nationally important archaeological or historic remains, whether scheduled sites or not, are affected by proposed development, there would be a presumption in favour of their physical preservation 'in situ'."*

- 6.1.14 The adopted Salisbury District Local Plan, 2003 (Document DD149) contains Policy CN20 which provides that:

*"Development that would adversely affect a Scheduled Ancient Monument or other nationally important archaeological features will not be permitted."*

and Policy CN24:

*"Development that would adversely affect the archaeological landscape of the Stonehenge World Heritage Site, or the fabric or setting of its monuments, will not be permitted."*

- 6.1.15 Specific policies and guidance on the management of the WHS are provided in the Management Plan, which has been adopted as Supplementary Planning Guidance to the Salisbury District Local Plan. Accordingly, it has been subject to consultation and considerable weight should be given to its objectives. The Management Plan sets out to apply different management regimes to land in the Stonehenge core and land outside the core.
- 6.1.16 Objective 7 states that " in the management of land in the future, a practical balance between increased permanent grassland and arable farmland should be maintained". The aim is to manage the core zone around the Stones themselves as permanent grassland, within a wider landscape setting of low intensity mixed farming in which the more scattered archaeological monuments would be properly maintained and protected. The Stonehenge Core is one of six management zones in the Management Plan, which have broadly similar characteristics. It is described as "the central part of the WHS which is largely well defined visually by the immediate ridgelines and horizons that surround Stonehenge, and includes many of the archaeological sites and ceremonial area that are most related to the Stones".
- 6.1.17 Whilst it is accepted that The Avenue is not visible beyond King Barrow Ridge and it is not a prominent feature, the Management Plan refers to "many of the archaeological sites and ceremonial area that are most related to the Stones" as an additional element in defining the Stonehenge Core. The Avenue is the archaeological site most related to the Stones, as it forms part of the same scheduled monument, and it is also a ceremonial area in its own right. The Highways Agency's MILS

boundary excludes the part of The Avenue that lies east of King Barrow Ridge.

- 6.1.18 Figure 8 and Table 1 of the Management Plan clearly define the extent of the Stonehenge Core, in that the area washed green is larger than the MILS identified by the Highways Agency, and includes in Figure 8 The Avenue beyond King Barrow Ridge. In addition, Table 1 sets out the "Key Archaeological Sites" within the core as "Stonehenge, The Avenue, the Cursus, King Barrow Group, Normanton Down Barrow Group, the Cursus Barrow Group and Coneybury Hill". Unlike the adjoining Avon Valley management zone, which includes the end part of The Avenue, the Stonehenge Core is not described as including parts of monuments, contrary to the view of the Highways Agency.
- 6.1.19 In addition to the amphitheatre or MILS definition of the core, the "Landscape and Visual Characteristics" of the Stonehenge Core also include the A303/A344 dominant features and "restored grass downland over a large area north of the A303". It is not disputed that the "restored grass downland" extends to the east of King Barrow Ridge, beyond the MILS, and the reference to land in the ownership of West Amesbury Farms must include land to the east of King Barrow Ridge as being outside the MILS but within the Stonehenge Core.
- 6.1.20 Whereas the MILS concept is derived from an analysis of what can be seen from the Stones, the Management Plan eschews the concept of visual horizons as a basis for defining the Stonehenge Core. The Highways Agency assumption that the MILS and the Stonehenge Core are one and the same is wrong, and accordingly, it is concluded that the published scheme is fundamentally misconceived.

### ***The National Trust's objections***

- 6.1.21 The Highways Agency accepts that the published scheme would not be promoted for highway/traffic reasons alone, as the present scheme with a tunnel would have additional environmental/heritage benefits. Consequently, the scheme has to be judged by considering whether those claimed benefits would be outweighed or offset by environmental harm, i.e. whether the scheme is good enough for Stonehenge.
- 6.1.22 The Highways Agency accepted during the inquiries that the National Trust's active involvement in the promotion of the scheme for the improvement of Stonehenge is absolutely crucial. The National Trust cannot and will not participate in the promotion of a project that it regards as unacceptable.
- 6.1.23 The Trust accepts that it has changed its position from one of acceptance of the earlier 2km cut-and-cover tunnel scheme to one of rejection of the 2.1km bored tunnel scheme, but it has done so for good reason. The initial acceptance was based on the understanding that a longer tunnel would require intermediate ventilation shafts, which would rise above the ground and have a clear impact on the landscape of the WHS. In the light of further technological progress on forced longitudinal ventilation of tunnels beyond 2km, the National Trust could no longer support a short

tunnel length, as was indicated to the Secretary of State for Transport in a letter dated 4 October 2002 (Document HA/0/15). The National Trust had already made it clear in a letter of 23/08/02 to the Highways Agency (Document NT/0/1) that it favoured lengthening the proposed tunnel at either end.

- 6.1.24 The Trust contends that the case for the relocation of the eastern tunnel portal 570m further to the east is compelling, and there would be significant archaeological gains if the western tunnel portal were to be sited away from the pinch point of the Normanton Down Barrows. The tunnel should be at least 2.9km long, and of bored construction, in order for the Government to honour its obligations under the World Heritage Convention.

### ***The Longer Tunnels Report***

- 6.1.25 The A303 Stonehenge Improvement Longer Tunnels Scheme Assessment Report (Document HA/0/8), prepared by the Highways Agency, represents the most recent evaluation of longer tunnel options. The assessment has been carried to Stage 3 level of the DMRB, using the same methodology as that which informed the Environmental Statement. Its overall conclusion is that there would be significant environmental advantages in lengthening the proposed tunnel to at least 2.9 km. This is not disputed by the main parties in evidence or cross examination.

### ***Western Tunnel Portal***

- 6.1.26 Under the published scheme, the proposed tunnel would emerge from its western portal within the WHS, in a position where it would have significant adverse impact on three Scheduled Ancient Monuments (Sites 39, 41 and 42) and one unscheduled archaeological site (Site 38), which is a ploughed continuation of a Scheduled Ancient Monument (Site 38A). The Environmental Statement regards the unscheduled site as being "Important", and the three scheduled sites as "Very Important", i.e. nationally important monuments like Stonehenge. Seen from the west, the large scale of the portal cutting would dwarf round barrow Sites 41 and 42, which would lie immediately above the tunnel entrances. The immediate settings of barrows 39, 41 and 42 would be adversely affected because the portal cutting and the highway within it would appear too dominant in relation to these modest scale archaeological features.
- 6.1.27 The Trust considers that the proximity of the proposed tunnel portal to upstanding burial mounds means that there would be a significant risk of unknown buried archaeological features associated with these barrows being damaged by the implementation of the published scheme. Such remains can be varied in form, including unmarked inhumation and cremation burials, as well as pit deposits and post and pit alignments found some distance from upstanding remains. Barrow cemeteries in the Stonehenge landscape can be complex and demonstrate repeated later activity, resembling the type of barrow activity found at Barrow Hills, Radley (Documents CD/NT/11 and HA/13/8 Appendix C), and the barrow cemetery at Allington Avenue, Dorchester (Document HA/13/8 Appendix D) where more than 100 further unanticipated burials were found.

- 6.1.28 The published scheme would have a direct impact on Site 38, a linear archaeological feature of unknown date, extending to about 1.2km. Evidence to the inquiries suggests that this could be a palisade feature of some importance. Siting the tunnel portal some 200m further west would avoid any risk of permanent direct impact.
- 6.1.29 The proposed road would also have an adverse impact upon the visual setting of Sites 39, 41 and 42. Site 39 is a round barrow of the Normanton Down Group, described in the Environmental Statement as one of the "Key Archaeological Monuments" within the Stonehenge Core, and the proposed western portal would have a "Moderate Adverse" impact on the setting of the barrow, as set out in the statement. The long barrow at Site 41 and round barrow at Site 42, both part of the Normanton Down Group, would suffer "Substantial Adverse" and "Slight Adverse" visual impacts to their settings.
- 6.1.30 Although the methodology adopted by the Highways Agency to assess the impacts of the scheme on the settings of monuments offsets these adverse visual impacts by suggesting benefits in traffic noise reduction, in reality the visual settings of these "Very Important" scheduled monuments would be harmed by the proposed siting of the western tunnel portal in the published scheme.
- 6.1.31 If the western tunnel portal were to be placed some 200m further west, these adverse impacts would be avoided. The Longer Tunnels Report indicates that the resultant impacts on the setting of Sites 39, 41 and 42 would be "Minor Beneficial", "Moderate Beneficial" and "Major Beneficial" respectively. Bearing in mind the importance of these monuments, these advantages are well worth having.
- 6.1.32 Although the Highways Agency evidence claims that a westward extension of the tunnel would have a direct impact on archaeological Site 37, it would be possible for an engineering solution to avoid such impact. The Longer Tunnels Report states that:
- "...Site 37, a ploughed out round barrow to the south of the trace, would not be affected by the Western Tunnel Portal location [of the 2.3km/2.9km scheme]; as with the published scheme, the portal cutting would be designed so as to preserve the site in-situ."*
- 6.1.33 Relocating the western tunnel portal some 200m further west would also improve the noise climate for those important monuments, so that they would be given a more tranquil setting. This would meet Objective 9 of the Stonehenge Management Plan, which seeks to achieve an appropriate landscape setting for the Stones and immediately related ceremonial monuments within the core. In assessing the impacts of the proposals on the landscape, the Environmental Statement takes into account the level of tranquillity within the landscape. In assessing the impact on the setting of monuments, the Highways Agency gave equal weight to aural and visual effects.

- 6.1.34 The Highways Agency accepted that, by moving the portal further west, there would be significant amelioration of noise impact at these monuments. A noise climate similar to that presently achieved at the Cursus would be a significant benefit over the published scheme and it would enable Objective 9 of the Management Plan to be met.

### ***Eastern Tunnel Portal***

- 6.1.35 The Highways Agency assessment shows that the location of the eastern tunnel portal in the published scheme would have a "Major Adverse" direct impact on Site 66, an enclosure of possibly Neolithic date and a group of scattered pits which lie on a ridge, considered to be "Moderate Important" in the Environmental Statement. These form part of the King Barrow Ridge, a site where prehistoric activity can be seen to have an intimate and deliberate relationship with the landform, exploiting wide views, with interrelationships between individual and groups of contemporary sites and structures.
- 6.1.36 It is recognised in the Longer Tunnels Report that the relocation of the eastern tunnel portal some 600m further east would completely avoid impact on this site, and it would improve the setting of the sites on the ridge when viewed from the east, e.g. from the line of the Avenue. Moving the tunnel portal further east would also benefit Site 69, a scheduled round barrow monument, regarded as "Very Important" in the Environmental Statement.

### ***Effect on The Avenue***

- 6.1.37 The published scheme would perpetuate the severance of The Avenue, inflicted by the 1960s dual carriageway scheme for the A303. The scheme presents an opportunity to remove the road and reunify The Avenue by moving the tunnel portal some 600m further east. This would bring a very significant advantage over the published scheme.
- 6.1.38 The Avenue is part of the scheduled Stonehenge monument, where it is referred to as being integral with Stonehenge. English Heritage have clarified that those parts of The Avenue under the A303 and Stonehenge Road are not scheduled (Document CD/INQ/4), but this emphasises that the scheduling of the rest of The Avenue makes no distinction between those parts to the west or east of King Barrow Ridge, or between parts of The Avenue that are visible and those that are not.
- 6.1.39 The Avenue is the ceremonial route to Stonehenge from the River Avon. It is described as a fundamental sacred link in Document CD/NT/1, which embraces the two Management Plan landscape zones to the east and west of King Barrow Ridge. It is also considered to be a vital part of Stonehenge's setting, even though it is an unmarked and unseen route that is currently not open to the public to the south of the A303. It is also thought to be part of a special route between Stonehenge, Durrington Walls and Woodhenge.

- 6.1.40 Part Three of the Stonehenge Management Plan refers to the experience of approaching the Stones without views of them from the east side of King Barrow Ridge as one of heightened expectation:

*"The key aspects of the relationship between the archaeological sites and the landscape include:*

- *The nature of most approaches to Stonehenge, whereby the observer first looks down on the Stones but then may descend and climb a number of times before finally approaching uphill to the monument which is visible on the horizon. This type of approach underlies the importance of the sequential and unfolding nature of the visual experience, and suggests that anticipation and expectation in the form of views and movement towards the Stones may have been an important element of historic ceremonies and rituals;"*

- 6.1.41 The Avenue is an important element of the Stonehenge landscape. Objective 9 of the Management Plan seeks an appropriate landscape setting for the Stones and their immediately related ceremonial monuments in the core area. It is evident that The Avenue is a ceremonial monument, a processional route from the Avon, and it is the entire length of The Avenue, not just the visible parts, that performed this ceremonial function.

- 6.1.42 The Management Plan defines the Stonehenge Core as including the eastern part of The Avenue within its boundary, to the point where it enters the Avon Valley management zone. Further to Objective 9, the Management Plan states:

*"Removal of the A303 and the A344 could also restore the integrity of the Avenue – an important ceremonial route currently severed by roads and traffic. Means of enhancing the Avenue could be considered (see Objective 16)".*

- 6.1.43 The aim of Objective 16 is that "Degraded and other archaeological features within the WHS should be enhanced where appropriate". This is further explained in the text as:

*"Enhancing the visibility of key degraded archaeological sites in the wider WHS landscape would help to decrease visitor 'disappointment' and improve the appreciation and understanding of the cultural landscape as a whole. However, opportunities for sensitively enhancing the visibility of selected monuments should be investigated. For example, 'earthworks enhancement' through selective mowing and/or grazing could be used to reinstate the ceremonial route to the Stones of The Avenue, and to emphasise its location on the ground to visitors".*

- 6.1.44 The Highways Agency's view that monuments outside the MILS, such as The Avenue, are only of "interest to the knowledgeable specialist with a cultivated imagination" is not accepted. It is considered that the wider area around Stonehenge should have unrestricted public access to allow

the monument to be viewed and appreciated in its broader context (Document CD/EH/2). Visitors need to be shown how the density of archaeological sites near Stonehenge, particularly The Avenue, relates to the monument itself. Three of the main objectives of the Management Plan (Objectives 3, 20 and 21) seek to increase public awareness and interest in the WHS, and to promote the educational and cultural value of the archaeological landscape as a whole.

6.1.45 In the Environmental Statement, the Highways Agency assesses that the scheme would benefit part of The Avenue, whilst perpetuating the harm accruing to the remaining part of the monument. The assessment arbitrarily divides The Avenue into two sites along King Barrow Ridge: Sites 50 and 70. As both sites are categorised as "Very Important", there is neither a visual nor an archaeological reason for this division. The Avenue to the east of King Barrow Ridge is visible from the air, as evidenced in Document CD/EH/3 Map 2, and it may be visible on the ground next to the River Avon (Document CD/NT/25). In its failure to assess the impact of the published scheme on The Avenue as a whole, the Environmental Statement exaggerates the benefits of the scheme and ignores the harm caused by the continued severance of this ceremonial route.

6.1.46 While the Highways Agency claims that the severance of The Avenue by the A303 would be reversible, if and when the road is decommissioned, the truth is that the severance effect is extremely unlikely to be reversed in the foreseeable future if the chance to remove the highway is not taken now.

### ***Impact on the landscape***

6.1.47 The benefits to the Stonehenge landscape of moving the tunnel portal 600m further east are not disputed. The agricultural downland landscape character type, which is regarded as being of "High Value" in the Environmental Statement, would suffer a "Moderate Adverse" impact from the published scheme, whereas the Longer Tunnels Report states that the effect of moving the eastern tunnel portal 600m further east would be "Minor Beneficial" on the landscape.

6.1.48 It is a medium to long-term objective of the Management Plan and the National Trust Land Use Plan (Document DD68) to remove woodland so as to improve intervisibility between key archaeological sites. However, the removal of trees above King Barrow Ridge and around the southernmost barrow on the ridge at Stonehenge Cottages could not be contemplated whilst they are required for screening the trunk road. By removing the tunnel portal by some 600m further east, the road would be well away from the New King Barrows, so that thinning or removal of the vegetation could take place to return the area to an appropriate setting.

6.1.49 With the tunnel extension in place, the whole of the King Barrow Group and a substantial portion of The Avenue monument would become tranquil in terms of traffic noise. The increased area of tranquillity in the Stonehenge Core would assist in achieving the Management Plan

Objectives 18, 19, 20 and 21, by encouraging free and unhindered dispersal of visitors in the WHS landscape.

- 6.1.50 With regard to the effect of a 600m longer tunnel on Vespasian's Camp (Site 71), this could be reduced to the same level of impact as the published scheme, given the acceptability of earthworks and additional planting. Site 71 does not fall within the Stonehenge Core. Such comparatively minor adverse effects could be readily mitigated, and it can be concluded that positioning the eastern tunnel portal some 600m further east would bring significant advantages to the WHS, in comparison with the published scheme.
- 6.1.51 The extension of the tunnel portal eastwards by some 600m would also benefit the night time landscape. It would place the tunnel portals and their internal illumination at a lower level in views of the Stonehenge core landscape at night. This would preserve the views from light pollution.

### ***Stonehenge Bottom and the use of a tunnel boring machine***

- 6.1.52 The Trust objects to the proposed method of construction of the tunnel using a sprayed concrete lining method. Where the tunnel is to pass through Stonehenge Bottom at a shallow depth, it is proposed that a concrete frame would be introduced to stabilise the ground prior to tunnel construction. This method would require the complete excavation of the area within the trace at Stonehenge Bottom and the consequent loss of archaeological remains or their removal rather than preservation in situ. This would be contrary to Government guidance in PPG16.
- 6.1.53 The Highways Agency has failed properly to assess the risk to buried archaeological remains generally within the trace of the scheme. Comments to this effect from the National Trust were either ignored or inadequately addressed before and after the Environmental Statement was published (Documents NT/0/5 and CD/INQ/2). This is particularly relevant to the possibility of discovering archaeological remains at Stonehenge Bottom. Such remains would be preserved were the construction of the tunnel to be carried out with a tunnel-boring machine.
- 6.1.54 It is accepted by the Highways Agency in the Longer Tunnels Report that it would be feasible to construct a 2.9km tunnel using a tunnel-boring machine. The Longer Tunnels Report accepts (at paragraph 2.4.4.5) that this method would be better for tunnelling and (at paragraphs 2.4.4.5 and 2.5.1.4) that it would be safer. This type of tunnel would be cut more deeply through the chalk to avoid direct impacts upon Stonehenge Bottom, which would be beneficial to the landscape and to the archaeological remains in the area. The Longer Tunnels Report states that the construction of a longer tunnel would generate additional volumes of spoil for disposal either off-site or nearby with adjacent landowners' agreement. However, an earlier briefing paper by the Highways Agency in September 2003 stated that the surplus spoil from a 4.5km long tunnel could be accommodated within the earthworks design of the scheme "in such a way as to be no more or less of an impact on the landscape character and quality than the published scheme" (Document CD/NT/4, paragraph 3.3.5.1). Therefore, the spoil from a



shorter 2.9km tunnel could be accommodated more easily, and no mention was made in the briefing paper about the need to find alternative sites and obtain planning permission for disposal.

- 6.1.55 The bored tunnel method was favoured because it would be an improvement over the earlier proposed cut-and-cover method, in that it would carry significantly less risk for buried remains. The Longer Tunnels Report recognises that the costs of using a tunnel-boring machine to construct a 2.9km tunnel would be similar to that of the proposed sprayed concrete lining method, and that it could be carried out in a similar construction period.

### ***Stonehenge Byway***

- 6.1.56 The National Trust objects to the proposal in the published scheme to create a byway along the route of the A303 for use by non-motorised traffic which is prohibited from using the tunnel, and by motorised traffic allowed under the Byway Regulation Order. That Order would allow access for vehicles, including access to Stonehenge Cottages from Stonehenge Road, emergency vehicles, statutory undertakers' vehicles, "disabled transport vehicles" and "invalid carriages".
- 6.1.57 The objection is to the creation of a byway regulated by a TRO. The Trust seeks the permanent exclusion of motorised traffic from the proposed highway, which could be achieved by the creation of a bridleway along this route. The penetration of the Stonehenge Core area by motorised vehicles would be contrary to Objective 9 of the Management Plan, which seeks the restoration of the appropriate landscape setting of the Stones and the immediately related ceremonial monuments in the core. Whilst the placing of the A303 in a 2.9km tunnel would help to achieve this objective, the creation of a byway with regulated traffic would open the possibility of the byway being used by motorised traffic in the future. This would seriously harm the landscape setting of the Stones and associated monuments within the Stonehenge Core.
- 6.1.58 The byway proposal would also prejudice the achievement of Objective 23 of the Management Plan, which seeks the reduction of traffic movements within the WHS and the enhancement of the historic environment. The text supporting Objective 23 at paragraph 4.6.4 advocates a comprehensive review of access requirements, including access by motorised vehicles on byways within the WHS and the potential for downgrading byways to bridleways within the core. The Stonehenge Byway proposal would run counter to the aims of the Management Plan to downgrade byways to bridleways and to remove traffic from the core area.
- 6.1.59 A private access could be provided to meet the needs of Stonehenge Cottages. Statutory Undertakers and emergency vehicles could be accommodated through wayleaves, and the bridleway made up to the same standards as a byway. Access for the disabled should be part of the currently proposed visitor access scheme with drop-off points to the north or north-east of the Stones, without any need to use the

Stonehenge Byway route. The Packway route to the north would be available for all those who need to cross the area but would not be able to use the tunnel.

***Proposed modifications***

- 6.1.60 The Trust is not proposing an alternative scheme that would be equally or better justified than the published scheme in terms of cost-benefit analysis or on a broader analysis of highway-related benefits. The suggestion that consideration should be given to a 2.9km tunnel is put forward only for the benefits it is claimed to hold for the environment. Therefore, the Trust does not seek to give an overall judgement in relation to the scheme, because it has deliberately not engaged in an overall balancing exercise, taking all material considerations into account. No evidence has been produced by the Trust in relation to the economic or traffic-related considerations of the published scheme or potential alternatives.
- 6.1.61 There is no real divergence of views between the National Trust, Highways Agency and English Heritage about the advantages of lengthening the tunnel by some 800m. The Trust accepts that there is no absolutely perfect solution for Stonehenge, but this is not an excuse for doing nothing at all. The perpetuation of the present situation is not acceptable to the National Trust.
- 6.1.62 The National Trust concludes that there are numerous substantial advantages to be derived from a longer tunnel of not less than 2.9km, constructed using a tunnel-boring machine, by comparison with the published scheme. In summary, the proposed modifications (set out in Document NT/0/7) would improve four important elements of the WHS landscape:
- (i) The extension of the tunnel at the western end would benefit four archaeological sites (Sites 38, 39, 41 and 42), which are "Important" or "Very Important", three of which are scheduled, and it would eliminate the risk of damaging associated buried features;
  - (ii) The extension of the tunnel at the eastern end would benefit the setting of King Barrow Ridge, a highly significant place in the Stonehenge landscape. It would also benefit an "Important" site (Site 66) which lies on the ridge, and an area with a landscape character of "High Value". This eastern extension would also allow the re-unification of The Avenue and deliver benefits to a scheduled group of barrows to its east (Site 69);
  - (iii) Construction using a tunnel-boring machine would avoid the potential of direct impact on archaeological remains at Stonehenge Bottom (Site 48). The extension of the tunnel by 800m would reduce severance within the WHS; and

- (iv) A bridleway along the route of the existing A303, with the road submerged in a 2.9km tunnel, would comply more closely with the objectives of the Stonehenge WHS Management Plan to restore the landscape of the core area.
- 6.1.63 The extent of the proposed modifications to the published scheme is considered to be minor, and could be accommodated without significant delay. As outlined in Document NT/0/7, the Byway Regulation Order would no longer be needed; the Slip Roads Order and the Detrunking Order would not require amendment; the Line Order, the Side Roads Order and the Tunnel Regulation Order would require only minor amendment; only the Compulsory Purchase Order would require amendments which could not be made as modifications to the present Orders, and then only if the landowners concerned were not prepared to agree to the changes.
- 6.1.64 If a scheme with a 2.9km tunnel were to be approved in principle, it would receive the co-operation of all three of the principal parties. The details of the scheme would need to be resolved in further stages of the design process. Any delay to the opening of the new road, which is likely to be caused by the construction of a longer tunnel with the tunnel-boring machine method, has to be viewed in the context of the importance of this WHS and the length of time that the road would be in place.
- 6.1.65 The National Trust is firmly opposed to the current proposals, and it has been unable to align itself with the Highways Agency and English Heritage in promoting the project as three partners. Being responsible for the custodianship of the land around Stonehenge, the Trust's ownership of this land is inalienable. The Special Parliamentary Procedure applies to any attempt to acquire that land compulsorily from the National Trust, and the Trust has an obligation, not just an option, to object to confirmed Compulsory Purchase Orders in Parliament in order to protect its inalienable land against what it sees as objectionable development.
- 6.1.66 The Trust is not in a position, at this stage, to commit itself one way or the other to exercising or refraining from exercising its powers in relation to inalienable land at Stonehenge. However, the Secretaries of State need to bear in mind that the future progress and programming of the published scheme, if approved, would depend on the outcome of the Special Parliamentary Procedure. This procedure would be a relevant factor to the issue of delay to the scheme.

**The response of the Highways Agency to the objection of the National Trust**

***The National Trust has changed its position on the published scheme***

- 6.1.67 Apart from the land on which the Stonehenge monument is situated (which is owned by the Government and managed by English Heritage), all the surrounding land within close proximity to Stonehenge is owned

by the National Trust and held inalienably. Without the initiative and support of both English Heritage and the National Trust, the published scheme would not have been developed. So far as the Trust is concerned, that support was proclaimed by its then Chairman, its Director General and its Chief Archaeologist. All clearly considered that a 2km tunnel was both adequate and acceptable within the WHS in terms of all relevant planning policies, the requirements of the Stonehenge Management Plan, and in terms of the effect on the Trust's own property.

6.1.68 However, despite the close involvement of the National Trust in the working up of the road scheme once it had been included into the Roads Programme, during the course of 2002 the Trust changed its position from one of support for the 2km cut and cover tunnel which it had jointly proposed with English Heritage, to one of support for a tunnel of 4.5km. On the other hand, at the inquiries, the National Trust has argued for a tunnel of at least 2.9km, though it has not put this forward as an Alternative Route. This radically changing position provides no basis for planning a project and taking it forward.

6.1.69 It is difficult to understand the reasons for the Trust's present criticisms of the approach taken to heritage survey and assessment in connection with the published scheme, because the Trust was fully involved in scoping the survey work and in determining the approach to assessing the environmental impact of the scheme. On heritage matters in particular, it was believed that all this work had been carried out with the full agreement of the Trust. It is noted that the witnesses called by the Trust at the inquiries have been professional consultants, rather than the Trust's own expert staff who were involved in the discussions on survey and assessment before the Trust's change of mind regarding the scheme.

6.1.70 The MILS was defined in order to fix accurately the area of visual influence of Stonehenge in the drafting of the Environmental Statement, given the use of a variety of different terms and boundaries in the Stonehenge Management Plan to describe the central area of the WHS. It is clear from the Management Plan that parts of the WHS are considered to merit different treatment from others. The Management Plan states (in paragraph 5.2.5) that the zones it specifies are deliberately broad, and the boundaries should be reviewed where necessary during the implementation of the Plan, as more information about each zone is completed.

6.1.71 The Plan's vision for the future is that:

*"In the long term all farmland in the core zone would be restored to permanent grassland and all inappropriate structures and roads removed or screened to provide an improved landscape setting for the Stones, the protection of archaeology from ploughing, and an area carefully managed for open access on foot for visitors."*

Within the core area, the Management Plan thus accepts screening of a road (for example, by placing it in a cutting) rather than its complete removal.

### ***Western Tunnel Portal***

- 6.1.72 It is not disputed that moving the western tunnel portal 200m further to the west would have a beneficial effect on three scheduled monuments (Sites 39, 41 and 42) and on one unscheduled site (Site 38). The extra cost would be £17m. An assessment of the benefits which would be delivered by that extra expenditure has not been undertaken by the National Trust.
- 6.1.73 In fact, moving the western portal would offer no additional benefits in the views from the monuments to the east. In terms of views from the west, a 200m extension would not remove the A303 from westerly views from the barrows. The benefits in views to the west from the monuments would be restricted to the foreground. Such views would, however, only be attainable by someone driving along the A303 itself, moving along the new byway (where they would in any event be walking close to the highway) or in long views (from a distance of around 1km) from the northernmost barrows in the Winterbourne Stoke group.
- 6.1.74 As regards the risk to buried archaeological features associated with the barrows closest to the western portal, it was because of this very possibility that a range of investigations was undertaken at this location. Several geophysical anomalies were recorded and some subsequently sampled by test trenches. Whilst it is impossible to state that no other feature might come to light at the western portal if the published scheme were to proceed, sufficient assessment has been undertaken to satisfy the Archaeological Working Group (which included the Trust) that it would be unreasonable to object to the scheme merely on the basis that there is a hypothetical possibility that important buried remains might exist there.
- 6.1.75 Taking all relevant factors into account, including noise (as has been done for all other assessments of impact throughout the WHS), the significance of effects of the published scheme on Sites 39 and 41 would be neutral, and the effect on Site 42 would be moderate beneficial.
- 6.1.76 None of the issues raised regarding the extension of the tunnel by 200m to the west comes anywhere near justifying expenditure of an additional £17m.

### ***Eastern Tunnel Portal***

- 6.1.77 As regards the suggestion of the National Trust that the eastern tunnel portal should be moved 600m to the east, there are six benefits claimed for this.
- 6.1.78 In relation to the impact of the portal on views of King Barrow Ridge from the east, such views are only available from a distance of around 4km, and are interrupted by vegetation on Vespasian's Camp.
- 6.1.79 In relation to views of the published scheme from King Barrow Ridge and Bridleway 10, these are very limited unless one climbs on top of the

barrows. The views from the Bridleway are well protected by the vegetation that runs along most of the ridgeline. The suggestion by a witness for the National Trust that at some stage in the future all vegetation along the ridgeline might be removed is a novel one, which is not supported by the Trust's own Land Use Plan (Document DD68). Nor does that Document support the equally novel suggestion that Stonehenge Cottages might be demolished. This is hardly surprising, since the Trust does not own two of them.

- 6.1.80 In relation to Site 66, this area was originally investigated by English Heritage as a potential site for the proposed new visitor centre. As a result, the area has been subject to aerial photographic survey, field walking and geophysical survey. Trial trenches were then dug, but no archaeological remains of significance were found. The Archaeological Working Group agreed, therefore, that it would be unreasonable to object to the scheme merely on the basis that there is a hypothetical possibility that important buried remains might exist.
- 6.1.81 In relation to the impact on Vespasian's Camp, a 2.9km tunnel portal would be closer to Vespasian's Camp than the eastern portal of the published scheme. While the published scheme would be screened by the copse on the corner of Stonehenge Road, the 2.9km portal would be more difficult to screen, increasing the adverse visual effect on Vespasian's Camp.
- 6.1.82 In relation to the noise environment of the WHS, all the 2.9km tunnel would achieve would be to move the relevant noise contour lines back by 200m in the west and 600m in the east if the Trust's proposals were to be implemented.
- 6.1.83 None of these factors, either singly or cumulatively, would justify the additional expenditure of over £50m which would be necessary to extend the tunnel by 600m to the east.

#### ***Effect on The Avenue***

- 6.1.84 In relation to The Avenue, it was the National Trust itself, along with English Heritage, who was responsible for putting forward the original proposal for a 2km tunnel. If they had not done so, the scheme would not have been brought forward into the Roads Programme. But the 2km tunnel commenced west of the crossing of The Avenue by the A303. Moreover, proposals (shown in Document HA/0/14) for a visitor drop off point at King Barrow Ridge designed for the Trust (but now superseded) involved the creation of a new tarmac road running parallel to, but east of, King Barrow Ridge, which would have involved a new crossing of the line of the buried section of The Avenue. At that time (June 2002) the Trust clearly saw no particular disadvantage to adding a fifth road crossing to The Avenue.
- 6.1.85 Concern at the published scheme crossing The Avenue should be viewed in the light of the following facts:

- The A303 currently crosses The Avenue, and the design of the published scheme would ensure that no further damage would be caused to The Avenue at this location.
- When Stonehenge was inscribed, the UK Government made a commitment, at the request of the World Heritage Committee, to find a solution to the problem of the A344 main road crossing The Avenue at Stonehenge. No such commitment was sought in relation to the crossing of The Avenue by the A303.
- The part of The Avenue crossed by the A303 is not scheduled.
- East of King Barrow Ridge, The Avenue is not visible on the ground except in exceptional conditions, and then only as a crop mark.
- The area over which this section of The Avenue used to pass is now in active agricultural use.
- With the exception of one barrow of Site 69, all the barrows which used to lie adjacent to this part of The Avenue have been ploughed out and are also no longer visible.
- Before their proofs of evidence were produced for these inquiries, the National Trust had not expressed an intention to extend public access over this part of The Avenue. The Land Use Plan (Document DD68) does not show such access.
- While the Trust could permit such access over the part of The Avenue which is in its ownership, The Avenue crosses private land on either side of the A303. It also crosses two further roads and passes under a Grade I listed building. The possibility of restoring it as a route from the River Avon to Stonehenge is therefore remote, particularly when none of the various private landowners concerned has expressed interest in selling their land to the Trust, and one of them has counter objected to the Trust's proposal (Document IS/1/2).

### ***Stonehenge Bottom and the use of a tunnel boring machine***

- 6.1.86 While it is accepted that a deeper bored tunnel, constructed using a tunnel boring machine, would require no surface works at Stonehenge Bottom, a substantial extra area of land would have to be acquired near Longbarrow Crossroads to treat and dry the material from the deeper bored tunnel, and further land would be required for a compound at the eastern portal. Additional material of some 130,000 cubic metres would also need to be removed from the site. The archaeological remains in Stonehenge Bottom were assessed as being of minor importance in the Environmental Statement (Volume 2 Part 1 page 55), and there has been no specific challenge to that evidence.
- 6.1.87 It is always necessary, in undertaking any planning evaluation, to balance the positive and negative implications of a development proposal in order to arrive at a net effect. This is the only basis on which a balanced decision or recommendation can be reached, which has fairly considered all aspects of a proposal and given appropriate weight to all the material considerations. The National Trust has not attempted to undertake this balance.

***Objections to the National Trust proposal for a 2.9km tunnel***

6.1.88 Although the National Trust put forward a case for a 2.9km tunnel in its evidence to the inquiries, the proposed tunnel extensions were not submitted as alternative routes in response to the Secretary of State's direction under paragraph 19 of Schedule 1 to the Highways Act 1980. This meant that they were not advertised in the local press. Despite that, there was significant objection to the proposed extension in written submissions made to the inquiries.

6.1.89 There were in fact twelve representations against the proposed 2.9km tunnel, five of them from adjoining landowners, four of whom claim that the farming of their land would be adversely affected by the proposal. The bases of opposition to the extensions to the tunnel suggested by the National Trust include:

- The lack of any consultation with adjoining landowners, leading to the lack of any apparent appreciation of the problems which the proposals would cause.
- The increased land requirement for additional spoil working which would arise.
- The increased cost of the revised scheme.
- The increased indirect impact of the eastern extension on Vespasian's Camp and on one of the Nile Clumps, both scheduled ancient monuments.
- The need which would flow from the proposed eastern extension to use a farm track, part of Vespasian's Camp, as an emergency vehicle access in both directions to and from any incident. This would require the compulsory acquisition, the widening and strengthening of the track, which is only intended for use under licence as access to a DTA under the published scheme.
- Specific impacts on the business of West Amesbury Farms, outlined in detail in Document IS/1/2, which would cause difficulties in the farming of fields both to the north and the south of the revised eastern portal and lead to the need to move farm machinery from time to time through the centre of Amesbury.

6.1.90 There was also one representation from a resident of West Amesbury in support of the National Trust's 2.9km tunnel proposal, on the basis that it would remove the A303 from The Avenue.

***The response to the modifications proposed by the National Trust***

6.1.91 The Highways Agency does not entirely accept the position on modification of the Orders before the inquiries as set out in Document NT/0/7. The Highways Agency's detailed response is contained in Document HA/0/31. The centre line of the National Trust road proposal would deviate from the published scheme, and the Line Order would therefore need to be republished. The Byway Regulation Order would still be needed, because the Secretary of State is required to make



reasonable alternative provision for non-tunnel users, and this includes horse drawn carriages, which would be prohibited from using the tunnel. The Compulsory Purchase Order would clearly need substantial amendment, which could not be achieved as a minor modification. In fact, it is not considered possible to purchase compulsorily any further land for the disposal of the increased quantity of spoil which would be generated by the additional 800m of tunnel. This would either need to be dealt with by negotiation with landowners, with associated planning permission, or by disposal off-site to tip.

## **6.2 ICOMOS - UK**

6.2.1 As a WHS, Stonehenge is acknowledged as being part of the heritage of mankind as a whole. The UK Government has a responsibility to protect this landscape for our children and grandchildren. The pressures of road traffic in 2004 must not be blamed for compromising the integrity of one of the world's most prized sites.

### ***Obligations under the World Heritage Convention***

6.2.2 The UK Government has decided that its obligations under the World Heritage Convention will be discharged within the existing planning system, without the introduction of separate legislation. This does not mean that Stonehenge is to be treated in the same way as if it were not a WHS. Planning decisions should reflect the special status of the site as an international asset as a material consideration.

6.2.3 The World Heritage Convention was adopted by UNESCO in 1972. By signing the Convention, the state pledges to conserve its WHSs "to the utmost of its own resources". ICOMOS - UK does not suggest that funding for WHSs can be limitless, but funds should be spent to the advantage, not to the disadvantage, of the WHS.

6.2.4 WHSs are inscribed on the list for their "outstanding universal value", and protection of the site involves sustaining the outstanding universal value for which a site is inscribed. The crucial aspect of outstanding universal value is that it is a characteristic of the site as a whole and consequently sites have integrity. Integrity in cultural sites is mentioned in the new Operational Guidelines for WHSs. It is no longer considered relevant only to natural WHSs. The Stonehenge WHS is inscribed, not just for its main monument, but also for the overall landscape within the boundaries. The UK Government is thus further committed to:

- Protecting and sustaining the identified outstanding universal value for the WHS.
- Protecting the integrity of the WHS.

6.2.5 Stonehenge has outstanding universal value through its inscription in 1986 as a cultural WHS. The Stonehenge WHS Management Plan sets out the outstanding universal value of the site as:

- Extensive, highly complex and evolving cultural landscape
- Unparalleled dense concentration of archaeological monuments

- Complex spatial layout with strong ceremonial and cosmological associations
- High visual interconnectedness of key landscape features
- Influence of the site on the development of landscape appreciation
- Powerful inspirational visual/aesthetic qualities
- Strong spiritual associations
- Iconic status
- High levels of access and enjoyment

These qualities need to be sustained for the WHS as a whole.

6.2.6 In 1986 the Cultural Landscape category of WHS did not exist, and properties could be put forward as either Cultural Sites or Natural Sites. However, the UK nomination of Stonehenge and Avebury noted that:

*"The landscape surrounding Stonehenge contains many related prehistoric monuments, including the Cursus, Durrington Walls, Woodhenge and a large number of Neolithic and Bronze Age barrows. The fine landscape of the Stonehenge area is justly famous for the range of monuments and their importance in European pre-history".*

6.2.7 The overall justification for the Inscription strongly supported the value of the landscape. Landscape can cover more than topography; the term can be applied to an area of land where the buildings and monuments present a coherent pattern related to the underlying topography. The monuments, their relationships to one another, and their relationships to the underlying topography, all go to make up the overall landscape. It is not acceptable to consider the WHS as monuments with landscape in between in a way that suggests that the landscape is unrelated to the monuments.

6.2.8 From the descriptions, it is clear that Stonehenge was perceived as a widespread landscape when nominated, and not simply an isolated stone temple within a secondary landscape setting. In its evaluation report to the World Heritage Committee, ICOMOS emphasised the broader context of the archaeological sites within an integral landscape setting. The ICOMOS evaluation of the nomination of Stonehenge in 1986 was prepared by Professor Leon Pressouyre. He referred to the wider area included in the nomination as enabling a better understanding of the famous sites by situating them in a broader context. He has recently confirmed that the site was inscribed for the whole landscape, not just for the main monuments, in a letter included at Annex 1 to Document ICOM/1/3.

### ***The outstanding universal value of the WHS***

6.2.9 The outstanding universal value of the WHS is a combination of the cultural qualities that give the site its international value. This does not usually include all the qualities that the site possesses, but those of high value. Consequently, the outstanding universal value does not usually include everything within a site and the cultural qualities that underpin its value are not necessarily equally distributed across the site. At

Stonehenge, the present Visitor Centre and the modern roads do not contribute to the outstanding universal value of the WHS, but the boundary of the WHS is a visible envelope that encompasses the most valuable core of the prehistoric landscape and those qualities that give the site outstanding universal value. The modern farmland within the WHS is not considered to have outstanding universal value, but the space covered by farmed fields and grazed lands is strongly associated with the cultural qualities that go to give the site outstanding universal value, particularly the strong visual interrelationship between the monuments, which reflect prehistoric cultural traditions.

- 6.2.10 It is agreed that the boundaries of the Stonehenge WHS do not accurately include all that is of value in the area. The nomination document acknowledged that the landscape beyond the boundaries was important. WHS boundaries often need re-assessing in light of new research and there is a mechanism to allow minor or major extensions.
- 6.2.11 ICOMOS-UK did not lend support to the Stonehenge Master Plan, but expressed reservations about the relationship between the Master Plan and the Management Plan.
- 6.2.12 When Stonehenge was inscribed as a WHS, it was not necessary to produce a management plan at the time of nomination, as it is now. Management Plans seek to put in place a management approach to sustain the outstanding universal value for which a WHS is inscribed.
- 6.2.13 Although English Heritage claims that the Management Plan for Stonehenge cannot redefine the significance of the site, the Plan is based on the conception that the whole site is of outstanding universal value. In her foreword to the Management Plan, Lady Gass, Chair of the Steering Group, confirmed that "The Stonehenge WHS is internationally recognised as an outstanding archaeological landscape". The Management Plan was agreed by all the stakeholders and it has been adopted as Supplementary Planning Guidance.

***The assessment of the impact of the published scheme***

- 6.2.14 The assessment of the likely impact of the scheme should follow PPG15 guidance, which states that "the impact of the proposed development upon the WHS will be a key material consideration in determining planning applications". There is no planning application, strictly speaking, in this case, but the proposed road needs the authorisation which would be offered by the Line Order, and WHS inscription must be a material consideration for deciding whether to grant this authorisation.
- 6.2.15 The likely impact of change which would arise from the scheme is measured in the Environmental Impact Assessment, which should evaluate this for the whole WHS asset and its cultural qualities, but fails to do so. Instead, the impact of change has been evaluated in terms of artificial layers, such as historic landscape, archaeological landscape, cultural heritage, etc. Consequently, the Environmental Impact Assessment would read almost the same if the site had not been a WHS,

and it does not adequately measure the impact of the proposed scheme on the cultural qualities of the WHS asset.

- 6.2.16 The Environmental Impact Assessment should have considered the relationship between the scheduled monuments and their spatial and visual organisation. It should not just have considered the impact of the road scheme on individual monuments, but on groups and their linkages. Valuing sites and monuments in isolation is inadequate. It ignores their context. Even disturbed sites have value because of their relationship to other sites.
- 6.2.17 ICOMOS - UK believes that the published scheme would have an unacceptable impact on the integrity and outstanding universal value of the overall WHS, in that it would:
- a) diminish the value of the extensive, highly complex and evolving cultural landscape of the WHS;
  - b) impinge on the unparalleled dense concentration of archaeological monuments;
  - c) interfere with the complex spatial layout;
  - d) impinge on the high visual interconnectedness of the landscape;
  - e) compromise the ability to respect the way the site has contributed to the development of landscape appreciation;
  - f) diminish the site's powerful inspirational visual qualities;
  - g) interfere with the site's strong spiritual associations;
  - h) reduce iconic status; and
  - i) compromise access to and enjoyment of the site.
- 6.2.18 The main physical impact of the scheme would be the proposed 2-lane dual carriageway cutting across the WHS. It would have the following negative impacts on the site:
- a) Cutting a 3km swathe through the highly complex archaeological/historical cultural landscape with a subsequent loss of archaeological coherence;
  - b) Damaging considerable archaeological monuments and below ground archaeology;
  - c) Disrupting the complex spatial layout with its strong ceremonial and cosmological associations;
  - d) Severing the visual interconnectedness of the key landscape features;
  - e) Introducing damaging visual and aural intrusions;
  - f) Preventing access which supports understanding of the key qualities of the site;
  - g) Creating a dual-zoned WHS with a protected core and an unprotected outer zone;
  - h) Removing the possibility of delivering a long-term vision for the site, which could: -
    - re-unite all its connected features
    - create a proper wide setting for the main monument linking it to its complex supporting landscape
    - allow understanding of the complex ceremonial and other uses of the prehistoric and later landscapes
    - offer wide-ranging and meaningful access across the whole site

- offer spiritual reflection and quiet enjoyment
- improve the overall visual landscape
- offer understanding and appreciation of this unique overall landscape.

These impacts would severely diminish the cultural qualities of the site and compromise its integrity.

- 6.2.19 The Environmental Impact Assessment should also have assessed the impact of the proposed scheme on the authenticity of the whole WHS and its outstanding universal value. This means the coherence of the whole site - the way it displays authentic remains of a prehistoric landscape with the cultural qualities which permeate the site. ICOMOS - UK considers that the published scheme would impact adversely on the authenticity of the site as a series of interconnected monuments.
- 6.2.20 The eastern end of the WHS provides a salutary lesson for what could happen at the western end if the published scheme proceeds. At the eastern end, the WHS is already severed by the A303 in a cutting. Comparison of the situation at the eastern end today with the layout before the present road was constructed in the 1960s shows how much has been lost in terms of continuity and access across the site and in the capacity to understand the main ceremonial approach to Stonehenge along The Avenue. The integrity of The Avenue has been lost, and the visual links between the barrows on Coneybury Hill and the King Barrows have been lost. The published scheme would cause a similar but more extensive severing between four groups of barrows in the western part of the site (the combined barrow groups of Winterbourne Stoke, Bush Barrows, Normanton Barrows and the Lake Group) and between those barrows as a group and the main monuments.
- 6.2.21 Even if the southern parts of The Avenue are ploughed out at present, the slight traces which remain, combined with the more positive remains further north, together reflect one of the most important prehistoric ceremonial routes known, linking Stonehenge with the River Avon. The published scheme would deny the possibility of improvement or of recapturing what has become invisible.
- 6.2.22 At the moment, it is not possible to cross the dual carriageway safely in the east of the WHS. It is possible to cross the A303 throughout the rest of the WHS with care. If the published scheme is implemented, although the situation would improve in the centre of the WHS, it would greatly worsen at the western end of the WHS, where it would not be possible to cross from north to south for over 1km of dual carriageway, dividing a unique, important and dense group of barrows.
- 6.2.23 While Stonehenge was not inscribed as a cultural landscape, the Environmental Impact Assessment should reflect current best practice in relating sites and their monuments to their surrounding landscape and cultural context. The site is an evolving cultural landscape, with a dense collection of archaeological monuments. The proposed road improvement would diminish these qualities by severing the social and cultural relationships across the site. One of the key qualities of the

landscape is the way that its many sites, routes and features relate to one another in visual and ceremonial terms through being part of designed spatial relationships. This is revealed as visual links between the centre of the site and the surrounding barrows, between The Avenue and the main monument, and from the periphery of the site to the centre. The current scheme would prohibit the reinstatement of ceremonial routes across a considerable part of the site.

- 6.2.24 While the monuments in the Stonehenge WHS date from many different periods, later construction respects earlier developments. The visual relationships between monuments, even though they may be of different dates, are therefore highly relevant as a reflection of an evolving persistent culture.
- 6.2.25 The proposed road would sever the spatial plane and thus make it difficult to walk across the whole site, depriving visitors of the experience of the interconnectedness of monuments throughout the whole site. The construction of 3km of dual carriageway through it would compromise the way that the site could be read and understood, particularly the ceremonial route of The Avenue approach to Stonehenge.
- 6.2.26 The inspirational value of the Stonehenge landscape in terms of its aesthetic qualities and evocation of 'ancient times' would not be compatible with the noise of modern traffic or the structures of modern roads. The dual carriageway would generate more traffic than the existing A303 leading to greater noise levels in the WHS near the above ground sections of road, which would detract from the inspirational value of the site. The landscape is associated with many types of beliefs, particularly through its cosmological significance, and these would be severely compromised in the area of the proposed new road.
- 6.2.27 The scheme would prevent the deliverability of the Management Plan "vision" for the full potential of the site in terms of the visual integrity of the features and accessibility. Stonehenge was inscribed on the World Heritage list as an entity that has integrity. Parts of the site cannot have greater value than others, and the core area is not more valuable than the outer zone. The core is identified as a priority in the Management Plan for management reasons, not because it is of greater value than the surrounding area. The current road scheme would detract from the web of interlinked sites and spaces that make up the most complex prehistoric landscape in Europe. It would compromise the integrity of the site.
- 6.2.28 The whole of the WHS is greater than the sum of its parts. Cutting a 3km slice through the site should be compared with cutting a piece out of a valued painting; as the painting would lose its meaning, coherence, its aesthetic appeal and integrity. It could be compared with the removal of an important part of a Cathedral, which might not be missed from certain angles, but the building would not function well and its overall integrity would be compromised. This is not the first time that a cultural WHS has been threatened by a major road scheme – the Pyramids of Gizah were to have had a road cut through the edge of the WHS, but the project was subsequently abandoned in response to arguments about the overall integrity of the WHS.

6.2.29 In the case of a WHS, it is not sufficient to balance the potential positive and negative impacts of a development proposal affecting the site. The question to be asked is whether the disbenefits are acceptable in their impact on the outstanding universal value of the WHS. The inscription of the site as a WHS is an overriding factor to be taken into account in reaching a decision. This is underlined by the decision in *Coal Contractors Ltd v SSE and Northumberland CC QBD [1993] 68 P&CR 285*, where planning permission for opencast mining near Hadrian's Wall was rejected because of the visual impact the proposal would have on the WHS. The Court held that WHS status was an obvious material consideration. Similarly, in *Bath Society v SSE [1991] 2 PLR 51*, the Court of Appeal held that the special attention which must be given to the desirability of preserving or enhancing the character and appearance of a Conservation Area was of particular importance when that Area was within a WHS. By analogy, Scheduled Ancient Monuments should similarly have enhanced status within a WHS.

### ***Alternatives to the published scheme***

6.2.30 ICOMOS - UK accepts that the current situation at Stonehenge is not sustainable in the longer term, but considers that alternative options must be considered for the improvement of the A303. It is firmly believed that no new major road work should take place within the WHS, and the options that would meet the criteria would include:

- A 4.5km Tunnel:

This would not impact adversely on the qualities and integrity of the WHS. However, it is acknowledged that with this solution road works would encroach on the eastern side of the site and the western boundary, and the cost would be high.

- Northern Surface Route:

This would have advantages if completely outside the north boundary of the WHS. Although such an alternative route would impinge on military facilities and the southern part of the Wiltshire Downs SSSI to the north, the disadvantages would be slight in the WHS context. ICOMOS - UK considers that the North 4 and North 3 Halcrow routes, slightly varied to achieve optimum results, should be further assessed to provide a suitable alternative to the published scheme.

### **The response of the Highways Agency to the objection of ICOMOS - UK**

#### ***The position under the World Heritage Convention***

6.2.31 When Stonehenge was inscribed as a WHS, it was inscribed as a cultural property under the then current 1984 Operational Guidelines, a copy of which is contained in Document DCMS/1/11. The provision for the inscription of cultural landscapes was not introduced until 1994.

6.2.32 Despite acknowledging that Stonehenge was not inscribed as a cultural landscape, ICOMOS - UK argues that this is what was really intended.

Twenty year old recollections of the basis of the recommendation for inscription (Document ICOM/1/3 Annex 1) are in fact totally unsupported by the contemporary ICOMOS recommendation document to the World Heritage Committee, which includes no mention of cultural landscape (Document DCMS/1/4, Appendix 5, second document).

- 6.2.33 The test to be applied to a cultural site is one of authenticity, not integrity. Although further amendments to the Operational Guidelines are currently being considered by the World Heritage Committee, the nature of any possible changes and the timing of implementation are presently unknown, as Documents DCMS/1/7, DCMS/1/11 and DCMS/1/12 make clear. The Operational Guidelines which apply at present are the 2002 version (Document DD66).
- 6.2.34 Even if integrity were the appropriate test to apply to the Stonehenge WHS, the site does not have the wholeness, completeness, unimpaired or uncorrupted condition that would be required. The monuments and their locations genuinely survive from the Neolithic and Bronze Ages, but the area around Stonehenge is not a genuine and authentic Neolithic or early Bronze Age landscape. It has changed many times since the period of the monuments.

***The outstanding universal value of Stonehenge***

- 6.2.35 The criterion for inscription in the World Heritage List is that a monument or site should have outstanding universal value. If Stonehenge were to be a candidate for inscription today, the nomination would include a statement of significance, in which the reasons for the finding of outstanding universal value would have to be set out. At the time of the nomination of Stonehenge, however, this was not the case, and it is therefore necessary to look at the wording of the nomination, and more particularly at the justification in order to find out what was considered to be of outstanding universal value in relation to Stonehenge.
- 6.2.36 It is quite clear from the justification that, in relation to the Stonehenge part of the WHS, it was Stonehenge itself which was the central focus of the nomination.
- 6.2.37 It is Stonehenge and its associated sites and monuments which together provide a landscape without parallel in Britain. The emphasis is on Stonehenge and the other sites and monuments. Use of the word landscape does not mean that the sites and monuments were inscribed as a landscape. It cannot do so, since there was no ability to inscribe cultural landscapes at the time that Stonehenge was inscribed. The inscription has not been changed since that time, nor has there been any attempt to do so. The inscription was a cultural inscription of sites and monuments, not a landscape inscription.
- 6.2.38 At the time that Stonehenge was inscribed, a Management Plan was not prepared prior to inscription. Therefore the outstanding universal value for which the WHS was inscribed is wholly set out in the justification for inscription. To alter the justification, it would be necessary to renominate the WHS. The Management Plan in the case of Stonehenge post dated



the nomination and justification, and cannot of itself alter the justification. Thus, although the Management Plan contains a chapter headed "Description and Significance of the WHS", this has to be read in the context of the justification. To find the elements of outstanding universal value for which the site was inscribed, it is necessary to look to the justification, not the Management Plan.

- 6.2.39 Not everything within the WHS is of outstanding universal value. If this was not so, discussion of the removal of the A344 and part of the A303 from the WHS and proposals to move the Stonehenge Visitor Centre would be inappropriate. What is necessary to assess the scheme properly is to determine a methodology which discriminates between those things which give the WHS its outstanding universal value and those things which are of lesser importance, so that the effect of the scheme on those different values can be properly assessed.
- 6.2.40 This issue has been vastly simplified by the fact that English Heritage has undertaken a detailed survey of the WHS (see Appendix 1 to Document HA/7/4) with the specific purpose of identifying all archaeological remains that are broadly contemporary with the sites on which the WHS inscription was based. This included all monuments for which any phase of their use was, or had potential to be, of Neolithic or Bronze Age date. The usual national thresholds for scheduling were not applied, and all funerary, ceremonial or buried monuments were considered for scheduling where archaeological survival could be demonstrated, irrespective of how well preserved the remains were thought to be. The scheduling exercise extended throughout an area defined by the Monuments Protection Programme, which, in most places, took in a significant additional area beyond the WHS boundary. A review of these scheduling procedures was published by English Heritage which made it clear that it was intended to be used for the purpose of inquiries relating to developments within the WHS. The Highways Agency therefore relied upon this information in determining what is of outstanding universal value within the WHS.
- 6.2.41 In order to draw conclusions regarding the effect of the published scheme on the outstanding universal value within the WHS, the Highways Agency considered both the direct impact on monuments and the potential effect upon their setting. In fact, the published scheme ensures that all direct impact on monuments is avoided. The assessment therefore relates to the indirect effects upon such monuments.
- 6.2.42 The methodology which has been employed to assess the effects of the scheme on the setting of each of the scheduled monuments within the WHS involved a three stage process. First, assessment was made of the importance of the resource; then an assessment was made of both the direct and indirect impact on the resource (the indirect impact being divided into an assessment of visual impacts, noise and context); and lastly, a matrix was applied to determine the significance of the effect. This was not a methodology made up at random by the Highways Agency. The indirect effects of both visual impact and noise were undertaken according to the methodology set down in Volume 11 of the DMRB. The Archaeology Working Group was set up with the specific

purpose of producing a consensus, from a group of eminent archaeologists, as to both the methodology to be employed in the assessment and to reach agreement on the nature and extent of the assessments themselves.

- 6.2.43 The methodology employed was agreed by the Group, and archaeological assessment continued until each member of the Group was satisfied. All criticism of the methodology used by the Highways Agency, or indeed the extent of the assessment needs to be weighed very carefully in the light of this background. No doubt there are many ways in which most issues can be approached, but what has been attempted here is to adopt the most suitable methodology and practice for this WHS, consistent with the requirements of Volume 11 of the DMRB. Because of the sensitivity of the WHS, that process was developed beyond that required by Volume 11, in order to assess the cumulative effects of each type of impact on each monument, and to provide one overall assessment for each monument or site.
- 6.2.44 In fact, it was decided that this high standard of work, designed for the WHS, should also be applied throughout the whole scheme, irrespective of whether it was within or outside the WHS boundary, since the nomination of the Stonehenge WHS includes references to sites outside the WHS.
- 6.2.45 As regards the suggestion that a map should have been produced showing the setting of each monument, that could not usefully be done as part of the visual analysis carried out in accordance with the DMRB Volume 11. It is not possible to place a boundary around a monument which represents its setting. A building on the scale of one of the hangars at Boscombe Down, around 3km from the nearest boundary of the WHS, could have an effect within the WHS, whereas a small item at that distance would have no effect. The effect on the setting depends on what is proposed.
- 6.2.46 As regards the suggestion that the setting of all monuments should be considered together, in relation to the visual aspects of setting all that can sensibly be undertaken is to consider the visual effects of the scheme on each individual monument, including any potential views between monuments, and in this way to ensure that the assessment takes all significant visual effects of the scheme into account. This is the methodology required by the DMRB.
- 6.2.47 As regards the suggestion that the assessment carried out on behalf of the Highways Agency does not acknowledge what ICOMOS - UK called "the palimpsest of layers across the site" (Document ICOM/0/6 paragraph 12.8), in the cross examination of the relevant Highways Agency witnesses not a single relevant omission could be identified which had not been covered under either the landscape or the heritage assessments. The assessment carried out for the Highways Agency covered all the main effects that the published scheme would be likely to have on the WHS, in accordance with Section 105A of the Highways Act 1980.
- 6.2.48 As regards the suggestion that there has been no assessment of the

setting of the whole WHS or consideration of the WHS as a whole, those things that are of outstanding universal value are both inside and outside the WHS. The boundaries of the WHS have been drawn in a somewhat arbitrary way, following existing roads and other easily recognised features such as rivers and field boundaries. They were not drawn on landscape or historical grounds. If the setting of the boundary of the WHS were to be considered, it would be at best uninformative, and at worst misleading, in that it would fail to take account of important features beyond the boundary. The assessment methodology agreed by the Archaeology Working Group was to assess each monument or group of monuments individually. Other than putting forward a general assertion that the setting of the WHS has not been considered, nobody has been able to put forward an alternative working methodology in any detail.

6.2.49 As regards the suggestion that there has been a failure to assess the overall effects of the scheme on the WHS, this is not true. Although each monument and site has been considered individually, as was necessary, the impact on the WHS as a whole has then been considered, for example in section 5.5.4 of Volume 1 of the Environmental Statement (Document DD9), and in section 7.10 of the cultural heritage evidence of the Highways Agency, which runs from page 127 to page 135 of Document HA/7/1 under the specific heading of "Impact on the WHS as a Whole".

6.2.50 It is clear from the wording of paragraphs 2.22 and 2.23 of PPG 15 that neither of those paragraphs is directly applicable to the proposals before the inquiries. They deal with the determination of planning applications and applications for listed building consent and the preparation of development plans. But the Highways Agency does not seek to argue that the inscription of Stonehenge as a WHS is anything other than a key (in the sense of important) material consideration to be taken into account in the decision making process. Likewise, it is accepted that development proposals within a WHS should always be carefully scrutinised for their likely effect on the site or its setting.

***The assessment of the impact of the published scheme***

6.2.51 Turning to specific criticisms which ICOMOS - UK makes of the effects of the published scheme, although the remains of The Avenue to the east of King Barrow Ridge have been assessed in cultural heritage terms in the highest (Very Important) category, the value of this part of The Avenue as a linear route was lost centuries ago, when the space it contained was assimilated into the surrounding farmland. The route to the east of King Barrow Ridge was lost until the 1920s, and its junction with the River Avon is stated in "Stonehenge and its Landscape" (Document DD89) published in 1995 to be still largely unknown. The route is not visible, and it is crossed already by Bridleway Amesbury 10, the existing A303, Stonehenge Road, a private access road and Wilsford Road. It is also affected by workshops next to Stonehenge Road, a wood, gardens and a Grade I listed building and its curtilage. Its restoration would therefore be extremely problematic, and there is no proposal for this in the National Trust Land Use Plan for the area.

- 6.2.52 The published scheme would not interfere with the layout of the monuments which give the WHS its outstanding universal value. On the contrary, it would bring significant benefit to the MILS. It would not impair the intervisibility of monuments. The removal of traffic would afford better visibility of many monuments. The scheme would not diminish the inspirational qualities of the WHS. The removal of the A344 and part of the A303 would increase those qualities. In the same way, the creation of an area free of traffic would enhance the iconic status of the main monument rather than reducing it. The scheme would not compromise access and enjoyment. The existing roads form a barrier to access. The creation of the tunnel and byway would improve access and enjoyment of the site, facilitating the National Trust's plan for open access grassland within the core of the site.
- 6.2.53 ICOMOS - UK suggests that the published scheme would cut across and sever the site, but the site is currently severed by the A303 and the A344. Whilst the scheme would not fully remove roads from the WHS, it would remove considerable parts of the barrier created by the existing roads, and facilitate non motorised access to several important locations within the site.
- 6.2.54 The WHS was considered to have outstanding universal value when it was inscribed. At that time the A303 and the A344 were already in place, and passed, as they still do, close to Stonehenge. Apart from a desire to see the removal of the A344 where it crosses the visible part of The Avenue, those responsible for the inscription did not consider that the roads compromised the outstanding universal value of the site. That outstanding universal value would be sustained by the published scheme.
- 6.2.55 The suggestion that the published scheme would cut a 3km slice through the site gives a false impression of the scale of the change which the scheme would entail. The 1.8km section east of King Barrow Ridge already exists as a dual carriageway. The proposed tunnel would remove a 2.1km section of road from the WHS. The section from Longbarrow Crossroads to the western tunnel portal amounts to some 1.6km.
- 6.2.56 To suggest, as ICOMOS - UK does, that only the damage which it considers the scheme would do to the WHS should be taken into account is to ignore one of the essential issues in this case. The situation is one where roads already exist within the WHS. One of the main reasons for bringing the scheme forward is to enable those roads to be substantially removed in order to bring significant benefit to the WHS.

### **6.3 The Prehistoric Society**

- 6.3.1 The WHS has international significance, even without the presence of Stonehenge, due to the unusual grouping of henges, timber circles, and other prehistoric ceremonial monuments, including the largest known henge enclosure, Durrington Walls, a remarkable density and distribution of well preserved prehistoric burial mounds and the remains of 10,000 year old posts, which form what may be the earliest monument in the world. It not only contains some of the most spectacular monuments of

British prehistory, but also a palimpsest of different periods within prehistory, which is hard to match.

- 6.3.2 Long before the Stonehenge phase, the landscape of the WHS evolved through Neolithic ceremonial and funerary activity, and was subsequently densely inhabited by Bronze Age farmers. It is therefore a reminder of the long-term character of Britain's social institutions, dating from the unrecorded past. Stonehenge is not a monument in isolation, but a component of a larger complex of Neolithic and Bronze Age monuments which extends across the whole WHS.
- 6.3.3 Before Stonehenge, during the second half of the fourth millennium BC (around 3500-3000 BC), the area around where the stone circle now stands was the scene of a major programme of monument building, including 15 Neolithic long barrows, two Cursuses and a causewayed enclosure with multiple entrances. It is thought that these different elements were integrated within a broader concept of an ancestral landscape.
- 6.3.4 The seven long barrows on Wilsford Down, to the south-west of the stone circle, form one of the densest groupings of such monuments anywhere in Europe. Currently, the A303 separates six of these long barrows from the rest of the monument complex, and the published scheme would accentuate the divide, preventing appreciation of their proper relationship to the wider landscape. It is irrelevant whether all of these barrows are upstanding or not.
- 6.3.5 After 3000 BC, the first phase of Stonehenge was built as a circular earthwork and timber posts, and the first stones were erected in the third millennium BC. The raising of the sarsen circle and trilithons at Stonehenge was carried out at about the same time as the construction of the henge enclosure at Durrington Walls and its annexe of Woodhenge, and it now seems likely that these two late Neolithic building programmes were performed around the same time. Stonehenge was merely the stone component of a much larger complex, linked to the River Avon.
- 6.3.6 For over 1500 years, between around 3500 and 2000 BC, the area of the WHS was one of the most sacred places in Britain. It witnessed a major period of monument building, labour mobilisation and engineering both before and after the period in which Stonehenge was erected. It was at times a landscape full of people and a place of pilgrimage. In contrast, the proposed road scheme would restrict the movement of people through this landscape and it would inhibit appreciation of how people lived and used this complex area many thousands of years ago.
- 6.3.7 The MILS concept is a very small part of this much larger prehistoric landscape, and it is inadequate to focus on landscape use in this tiny area alone. Stonehenge should not be related only to what may be seen at a certain distance from it. It should be seen as a monument constructed as the termination of processional routes which link it to areas on the eastern end of the WHS which are not visible from it.

- 6.3.8 The century of the motor vehicle is but a brief moment in the 10,000 year development of the WHS landscape. The road engineering of the 20<sup>th</sup> and 21<sup>st</sup> Centuries has occurred in a fraction of the time taken to build and rebuild Stonehenge over a thousand years or more. A road scheme is needed to preserve and re-establish the setting of the WHS, by undoing the damage done in a few decades of the modern era. The proposed scheme, through its concern with the immediate vicinity of one monument only rather than the full WHS, fails to live up to this challenge. The current proposal would have a profound impact on the site, not just for many generations to come, but for centuries or possibly even millennia. A short-term, limited solution would have long-term consequences that are not easily undone.
- 6.3.9 History shows that all developments within the larger area of Stonehenge have been recognised as mistakes within very few years. For example, custodians' cottages, built in the 1920s about 100m from the Stonehenge monument, were demolished within about ten years, because it was recognised that they had been built far too close to the monument. Similarly, the Stonehenge Café, built about 50m from the monument in the 1920s, was demolished during the 1930s, because by then it was considered to be intrusive and too close to the monument. The present visitor provision at Stonehenge was built in 1968, but had already been condemned by 1984. Since then, there has been a determination to replace these facilities at a greater distance from Stonehenge. Each development has been found to be intrusive in the prehistoric landscape, and has been demolished or, in the case of the Visitor Centre, condemned by English Heritage for removal and replacement at Countess Roundabout. Each has incurred irreversible damage to the archaeology in the footprint of the development.
- 6.3.10 Both English Heritage and the National Trust have widened their concept of the Stonehenge landscape over the years. This can be demonstrated by examining the evolution of the English Heritage Visitor Centre proposals during the 1980s and 1990s, which have moved from their current location via a site at Larkhill, still within the WHS, to the current proposals outside the WHS, at Countess East. English Heritage claims as a benefit on its Stonehenge web site the fact that it now seeks to build the proposed new Visitor Centre outside the WHS.
- 6.3.11 Similarly, the National Trust has widened its estate through the purchase of 172ha of farmland east of King Barrow Ridge in 1999 to make a total of 850ha holdings that completely surround the Stonehenge monument and extend well beyond the 'Stonehenge Bowl'. Recent National Trust additions include Durrington Walls and the Lesser Cursus, outside the WHS. This accords with the Management Plan, and widens the definition of what needs to be protected in the WHS.
- 6.3.12 Thus attitudes continue to move on. What was regarded as an acceptable approach a relatively few years ago is now no longer regarded as appropriate. Land around Stonehenge was bought and vested in the National Trust during the last century in order to protect the land from development. Now, there is an expectation that it will be saved even from agricultural practices which are damaging to archaeology.

- 6.3.13 The concept of a bored tunnel has been welcomed by archaeologists worldwide, but the length of the proposed tunnel is considered unsatisfactory. The new road would have an intrusive impact on the WHS landscape, and the scheme would fail to take this opportunity to reintegrate the prehistoric monuments within their setting. The published scheme would leave deep scars in the landscape, and the road layout would adversely affect the setting of particular elements, notably the groups of burial mounds at Longbarrow Crossroads and King Barrow Ridge. The Avenue would remain divided in two, with little possibility of it ever being re-united, and the western part of the WHS, comprising the landscape of monuments which predate the development of Stonehenge, would be divided by a deep cutting outside the western tunnel portal.
- 6.3.14 At Longbarrow Crossroads lies one of the finest groups of prehistoric burial mounds in Britain. The proposed scheme would impact on this group of barrows, which would be overshadowed by a new grade-separated road junction. The magnitude of impact would be greater than the "Medium Adverse" assessment in the Environmental Statement, and it would be an example of ill-considered modern development adversely affecting Scheduled Ancient Monuments and their settings.
- 6.3.15 There is a known linear archaeological feature in the ground at the position of the proposed western tunnel portal. This north-east to south-west boundary feature takes the form of a timber palisade, known to be of Neolithic date, although the Highways Agency considers that it is probably of the Bronze Age period. It would still comprise an important prehistoric feature, which it would be prudent to avoid removing for the western portal cutting.
- 6.3.16 In a dramatic location, silhouetted along the ridge, the barrows of King Barrow Ridge contain the most important burials of the Bronze Age in Britain. The setting of the southernmost group would be affected by the proximity of the eastern tunnel portal and the depth and width of the road at this point. While the existing road may detract from the appreciation of these burial mounds, the proposed road would overwhelm them.
- 6.3.17 The Stonehenge Avenue is an integral part of the stone circle monument itself. It is already severed by the existing A303 and the published scheme would leave it just as divided by a deep scar in the landscape. The proposed scheme would perpetuate a major breach through The Avenue, exacerbating the current situation with major works that would be irreversible for centuries to come.
- 6.3.18 English Heritage claims that there is no visible trace of The Avenue throughout its length to the east of King Barrow Ridge. Whilst it is true that The Avenue is not an upstanding earthwork in this location, there are visible traces. It was observed from the ground during ploughing to the east of the ridge in 1995 as sharp soil marks of the banks and ditches, and it has been seen near the banks of the River Avon to the south.

- 6.3.19 In any event, as with other buried monuments, it is considered that non-visible remains have settings that deserve to be preserved within the historic landscape, even if this does not fit easily with current planning practice. In the past, English Heritage has supported the idea that the settings of non visible monuments, where their siting appears to have been carefully chosen in relation to the historic landscape, are a material consideration in planning cases. Whilst paragraph 27 of PPG 16 refers to the setting of visible remains, English Heritage gave evidence at a planning inquiry in 1993 (referred to in Document PS/0/2) to the effect that a proposed waste tip would adversely affect the setting of a scheduled Roman villa which was not visible as an earthwork. This approach should equally apply in the case of so important a monument as The Avenue, which forms a ceremonial route associated with Stonehenge.
- 6.3.20 The separation of the Neolithic long barrows on Wilsford Down (Sites 32, 41, 43, 44 etc) from the remainder of the earlier Neolithic ceremonial landscape, notably the two Cursuses and Robin Hood's Ball, would be made worse by the road emerging from the western tunnel portal through a cutting. The reintegration of this part of the landscape could only be achieved by a longer tunnel option or re-routing of the road improvement. It is accepted that the land south of the A303 at the proposed western tunnel portal is presently in private ownership, and therefore not accessible to the public. This need not always be the case in the future, however. The deep cutting west of the tunnel would make a serious and physical north/south barrier, which would be absolute in a way that the present A303 is not.
- 6.3.21 The scheme's adverse effects on the WHS would not be outweighed by benefits achieved within the immediate landscape setting of Stonehenge. Nor would the scheme have the highly beneficial effect upon the cultural heritage resource claimed in the Environmental Statement. The integrity of the WHS would not be adequately restored, because the proposed scheme would entail the irremediable dissection of a formerly intact archaeological landscape.
- 6.3.22 The capital cost of the published scheme is substantial. If that amount were expended on delivering the published scheme, the result would endure for generations. History shows that a short tunnel would be recognised as an error within a few years. The idea that the scheme's adverse effects are outweighed by its benefits cannot be sustained, since no development should be permitted which would have a long term damaging effect on a WHS or its setting. It is not a matter of balancing the good with the bad, but of selecting a scheme which preserves the WHS and its setting.
- 6.3.23 A long bored tunnel would be the only acceptable solution for improving the A303 as it passes through the WHS, but the alternatives have not been adequately explored. A tunnel of approximately 4.5km would minimise the impact and intrusion of the new road within the WHS. Although this solution would require ventilation shafts and prior excavation and removal of any archaeological remains, it is considered to be a worthwhile sacrifice for the long-term benefits. This alternative



solution would be more expensive, but it would do justice to the unique resource of the Stonehenge WHS. Even if it is more expensive and would take longer to complete, it would achieve an ideal solution without compromising our relationship with the past through short-term solutions that would damage the heritage value of the area.

### **The response of the Highways Agency to the objection of the Prehistoric Society**

- 6.3.24 It is incorrect to say that there are seven long barrows on Wilsford Down. There is one visible long barrow. The others continue as far as Normanton Down and beyond. Six of the barrows are separated from the rest of the monument complex by the A303 at present. The creation of the proposed tunnel would allow visitors to pass more easily from some of the long barrows to other Neolithic monuments. The suggestion that the separation of the long barrow on Wilsford Down (Site 32) from Robin Hood's Ball would be more pronounced ignores the fact that Robin Hood's Ball lies outside the WHS, nearly 5km from Wilsford Down on the military training range, and is separated from it at the moment by the A344 and the Packway.
- 6.3.25 The scheme is not just concerned with Stonehenge, but concerns itself with the full WHS, and indeed all the area affected by the scheme.
- 6.3.26 Nor is it correct to say that the WHS was a formerly intact archaeological landscape. Change in the landscape is demonstrable throughout the prehistoric and historic periods.
- 6.3.27 The boundary of the WHS is almost wholly modern, and does not reflect the distribution of Neolithic and Bronze Age monuments in the area. Many important sites lie outside the current boundary. Stonehenge was inscribed as a WHS because of the Stones themselves and their associated monuments.
- 6.3.28 While it is accepted that the scheme would have adverse effects on the barrows at Longbarrow Crossroads, their main educational value would remain, as excellent examples of their type. Greater access would be given to the barrows as a result of the proposed new byway, and traffic using the A303 would be in cutting and further away from the barrows than the existing road. The existing roundabout lies closer to the barrow group than that proposed in the published scheme. The methodology used in assessing the impact of the proposed scheme on the barrows at Longbarrow Crossroads is the same as that used to make all other assessments in the Environmental Statement.
- 6.3.29 The suggestion that the western tunnel portal might affect a Neolithic timber palisade ditch was made for the first time at the inquiries, and acknowledged to be speculative. In response to cross examination, it was agreed that most of the ditch was ploughed out twenty years ago, and that there is evidence that it had a bank. Palisade ditches are not normally associated with banks. Ditches with banks tend to be of the Bronze Age, and Bronze Age ditches are common in this area.

- 6.3.30 The procedure followed for assessing the likelihood of meeting buried archaeology has included document based research, the use of aerial photographs and sampling by way of physical excavation. In an area so rich in its archaeological resource, some uncertainty as to what might be found during construction cannot be avoided.
- 6.3.31 The scheme would not compromise the setting of King Barrow Ridge, but would bring benefit to the setting of the barrows on the Ridge. The scheme would place the eastern tunnel portal some 100m to the east of King Barrow Ridge, beyond Stonehenge Cottages, and would remove the existing dual carriageway and its traffic from a position adjacent to the Ridge. In fact, the Environmental Statement conclusion is that the published scheme would have a major beneficial impact on the King Barrow Group closest to the proposed route.
- 6.3.32 The Avenue would not "remain divided in two". It is currently "divided" by the A344, the A303, Stonehenge Road, Wilsford Road and other tracks. Its course is also lost beneath a wood and beneath West Amesbury House, a Grade I listed building. The published scheme would remove the A344 from the only visible part of the monument, and have no direct effect where the A303 crosses it.
- 6.3.33 In the DMRB Volume 11, section 3, part 2, paragraph 6.1 (extracted in Document HA/0/24), it is indicated that visual intrusion, as an impact on setting, is only relevant for archaeological remains which are clearly visible to the human eye. The assessment in this case has been undertaken in accordance with this guidance. Nevertheless, knowledge of identified below ground remains, and the effects of the published scheme on their relationship with visible monuments, have been taken into account in the assessment of context.
- 6.3.34 The separation of the barrow groups at the western end of the scheme would not be made worse by the published scheme. They are separated now. Intervisibility would not be affected by the scheme. The land to the south of this section of the A303 is in private ownership, and is not accessible by the public in any event, so the situation would not be changed by the creation of a longer tunnel. The tunnel proposed in the published scheme would encompass the main north/south rights of way (via Byway Amesbury 12 and Bridleways Amesbury 11 and 10), and a new Byway would also be provided under the scheme, connecting Longbarrow Crossroads with Byway Amesbury 12 and points further east. This connection would facilitate access between the points described.
- 6.3.35 The Prehistoric Society makes no reasoned evaluation balancing the positive effects of the published scheme against the negative effects. The published scheme would facilitate better appreciation of Stonehenge and its immediately related monuments within the MILS by the millions of visitors to the Stones.
- 6.3.36 The Highways Agency's assessment of the impact of the published scheme, presented in the Environmental Statement, is fully in accordance with the latest methodologies, has advanced those methodologies, and has been undertaken to an exemplary standard. The assessment has

taken a wide view on all aspects, assessing environmental effects throughout the study area for the scheme, which is substantially greater than the immediate area of the Stones.

6.3.37 The Management Plan (Document DD65) has provided the basis for the development of the published scheme. The Plan sets different objectives for different parts of the WHS, and the scheme would facilitate the delivery of many of those objectives, thereby conserving and enhancing the WHS for generations to come.

6.3.38 It is a fact that the scheme would be potentially reversible. Depending on future transport needs, the tunnel could be decommissioned, and the cuttings could be backfilled.

#### **6.4 Council for British Archaeology**

6.4.1 The CBA is an umbrella organisation which seeks to represent the long term public interest in archaeology in Britain. There is a range of opinion amongst the membership about what would best serve the public interest in this case, but the position advanced on behalf of the CBA at the inquiries has been approved by the elected Trustees of the organisation.

6.4.2 Stonehenge, earlier and later associated visible monuments, non-visible sites and surface artefacts are all believed to be closely inter-related remains of Neolithic and Bronze Age activity that are fundamental to the authenticity of the wider WHS, and contribute to its outstanding universal value. The authenticity of the site includes the physical evidence of how prehistoric people achieved the greatest transformation of land use the area ever underwent, and how they used the natural landform, watercourses and the heavens to help them articulate their abstract ideas and beliefs as they moved through the landscape. Against this background, there is no case for splitting landscape unity by distinguishing archaeologically between a core and a periphery of the area. This approach is reflected in Section 2 of the Stonehenge WHS Management Plan, the emerging Draft Archaeological Research Framework (Document CD/EH/3) and the evidence of the promoter of the published scheme and other supporters.

6.4.3 The CBA accepts that the current road situation at Stonehenge is unacceptable, and is not in favour of doing nothing. Most archaeologists want a better arrangement for the WHS. The consistent thread of the consultation processes for the 1995 Planning Conference and the Management Plan is that surface dualling across the WHS is not acceptable, and in terms of providing a tunnel to avoid irreparable heritage impacts whilst delivering lasting benefits, the longer the tunnel the better. There is however the question of cost and affordability in terms of transport and environmental cost-effectiveness, bearing in mind also that there are other possible surface routes.

6.4.4 The UK Government's responsibilities under the World Heritage Convention and the inscription of the site are now enshrined in the Stonehenge Management Plan, PPGs and the development plan rather than in separate legislation.

### ***The value and significance of the World Heritage Site***

6.4.5 The nomination and inscription of the WHS is not focused mainly on Stonehenge itself and only secondarily upon certain key visible monuments, as is suggested by those promoting and supporting the published scheme. This approach distorts the reading of the broad intention of the nomination documents; it fails to recognise the guidance provided by the Management Plan; and it fails to take into account knowledge gained about the site in two decades since inscription, one of the processes envisaged in the Management Plan.

6.4.6 Whilst it is accepted that not everything in the WHS is of equal importance, any analysis of the landscape ought to show how the relationships between remains and the topography of the site cumulatively give it authenticity as an unrivalled prehistoric landscape, not just one iconic monument surrounded by others. This is recognised in the Management Plan.

### ***Adequacy of the heritage assessment***

6.4.7 It is part of the CBA's case that, despite its apparent thoroughness, there are deficiencies in the promoter's assessment and reporting of the effects of the published scheme:

- i. Failure to use standard principles of sampling practice, either to recognise fully the inevitable uncertainty inherent in current archaeological field evaluation techniques, or to predict the consequent likelihood of nationally important archaeology being destroyed;
- ii. The flaws in the approach to assessing impact on setting as an indirect effect arising from using noise as a dominant factor;
- iii. The failure to address fully issues of severance in terms of heritage as well as access;
- iv. The failure to assess the full range of indirect effects, both beneficial and adverse, that the scheme would give rise to, despite their crucial long-term effects on the future of the WHS;
- v. The failure to assess and report key cumulative effects, such as how the scheme affects key attributes of the WHS which contribute to its outstanding universal value, including its setting;
- vi. The failure to report explicitly the degree of compliance with specific heritage tests in PPGs and the Management Plan;
- vii. The failure to use or seek to develop a methodology as a rational basis for determining heritage cost-benefit;
- viii. The failure to give clear and sufficient reasons for rejecting alternatives.

Most of these deficiencies were noted in March 2001 in the CBA comments on the Environmental Statement scoping report (Document CBA/0/2).

6.4.8 None of these comments appears to have been passed on to the curatorial archaeology group advising on assessment methodology. Consequently, these technical and methodological flaws, and lack of

attention to policy guidance and the Management Plan, mean that the benefits of the published scheme have been over-emphasised and its adverse effects under-stated.

***Authenticity, integrity and severance of the archaeological landscape***

- 6.4.9 Both the authenticity and the integrity of the WHS are key criteria for compliance with the World Heritage Convention. It is agreed that the removal of roads in the central area would enhance the setting of the Stones and other nearby monuments. It would also help to restore the physical and perceptual relationships of some key landscape associations across this part of the WHS, and this would help to re-establish its integrity.
- 6.4.10 In terms of authenticity, the removal of the A344 next to the Stones, and the reinstatement of some cuttings would rectify some relatively minor intrusions on the authentic landform of the WHS. Placing the A303 in a tunnel would remove a dominant non-authentic element in the current landscape. However, the proposed dual carriageway in open cuttings across a third of the WHS to the west and east of the proposed tunnel would create an adverse severance of the integrity of the landscape. The physical loss of archaeological remains, the changes to the landform in these sections, and the scale of the new highway would adversely affect the authenticity of the site and more than offset the benefits of the proposed tunnel in the central area. The published scheme would represent the largest earthwork ever constructed within the WHS; a feature that would contribute nothing to the authenticity of the site or the public appreciation of its outstanding universal value.
- 6.4.11 Although the Highways Agency claims that the works would be reversible, and the tunnel could be decommissioned in the longer term, this is a far more remote possibility than many of the desirable changes to vegetation cover, land use and access opportunities through the Countryside Stewardship Project (Document CD/CBA/4), or the re-creation of the line of The Avenue east of King Barrow Ridge, that the Highways Agency dismissed as being too speculative to be considered.

***Potential loss of archaeological remains***

- 6.4.12 The published scheme sets out to avoid disturbance to known, mainly designated, sites of national importance. However, in policy terms the Environmental Impact Assessment process requires the prediction of significant adverse effects and the technical difficulties of doing so, which should take into account the fact that the size and ease of finding sites does not equate to their importance. There are unidentified geophysical anomalies shown to occur within the road 'trace' through the WHS, which the Highways Agency agree could be pits, burials, tree-throw holes or other features of significant archaeological potential.
- 6.4.13 The problems of making statistically valid predictions are acknowledged, and there can be little confidence in the results so far, which predict that no significant archaeological remains would be directly affected by the

road scheme. In failing to predict more clearly the likelihood of losing smaller features of national importance that contribute to the authenticity of the WHS, the Highways Agency has significantly understated the degree to which the published scheme fails to comply with the guidance in PPG 16, which presumes in favour of preserving in situ nationally important archaeology whether it is scheduled or not.

- 6.4.14 It was conceded by the Highways Agency that it might well be necessary to remove top-soil and trowel or hoe the entire subsoil surface of the 'trace' to be sure of not missing a major but insubstantial site such as a Neolithic house. Such a process is not currently part of the draft mitigation strategy (Document HA/0/22).

### **Setting**

- 6.4.15 The Highways Agency's method of assessing the effects of the scheme on the setting of monuments is considered to be unique. Although similar to the usual methods, its definitions are confusing and its rigid scoring methodology means that noise has become the key determinant of the significance of the impact. This approach has obscured the point that the primary attribute of the setting of any heritage asset must be the nature of its physical surroundings.
- 6.4.16 Nor can setting be affected 'indirectly'. The setting of a place or a monument can be 'directly' changed by altering or removing physical attributes of its surroundings, such as archaeology, topography, structures and vegetation, or the introduction of new features. These would change views of the feature, its relative tranquillity and other characteristics which may be 'directly' observed. Any individual monument has a setting, which does not depend on being inter-visible with others.
- 6.4.17 The Highways Agency approach is flawed. A comparison of two cases shows that the removal of the busy A303 from a listed milestone (Site 54), which does not contribute towards the outstanding universal value of the World Heritage Site, is classed as being "major beneficial" due in large part to the reduction of traffic noise, whereas the construction of a major road intersection immediately next to one of Europe's finest group of prehistoric barrows at Longbarrow Crossroads only has a "moderate adverse" impact on their setting. The visual intrusion and landscape impact on the Longbarrow Crossroads site is of such magnitude that the assessment is plainly contrary to common sense and has led to the perverse kind of results predicted in comments on the draft Scoping Report for the Environmental Statement (Document CBA/0/2).
- 6.4.18 It is considered that the combination of this defective method of assessment with an excessive focus on individual sites has misconstrued the whole impact on the settings of major monuments, whose character and siting contribute to the landscape aspects of the outstanding universal value of the WHS. As a result, the Cultural Heritage evidence to the inquiries presents a distorted assessment of how the published scheme meets the key policy test in PPG 16, which presumes against developments that significantly affect the setting of nationally important

monuments.

- 6.4.19 The National Trust is correct to rely more on the Highways Agency's landscape evidence on setting. This approach is more consistent with normal methods of assessing impacts on setting, taking into account topography, physical characteristics, relative scale and intrusion on views as key factors in determining direct visual and landscape effects of the scheme in relation to particular monuments.

***Conflicts with policy***

- 6.4.20 Contrary to the guidance in paragraph 5.2 of PPG 15, the scheme assessment has failed to analyse the long-term effects of the published scheme, especially how it would permanently preclude the complete fulfilment of a number of Stonehenge Management Plan objectives. The provisions of the Management Plan, adopted as Supplementary Planning Guidance, read together with PPGs 15 and 16, are central to assessing whether the proposed scheme complies with policies and objectives.
- 6.4.21 The promoter and the supporters of the scheme have assumed that the Stonehenge Master Plan proposals were transposed into the Management Plan, rather than the Master Plan being superseded by Section 5 of the Management Plan. Consequently it has been submitted that the published scheme would entirely fulfil the Management Plan objectives, whereas it is clear that it would meet them only partially.
- 6.4.22 Instead of testing the published scheme against the Management Plan objective to remove roads from the WHS, the Highways Agency has related this to the central area, defined as the MILS. This concept has no foundation in the Management Plan, and contradicts its objectives 9 and 23. The MILS is a criterion that suits the published scheme, whereas the Management Plan allows for a complete solution to the problems posed by the existing roads across the WHS.
- 6.4.23 The evidence in support of the published scheme does not make clear how far it accords with key policy tests set by the World Heritage Convention, PPGs 15 and 16 and the Management Plan objectives. Consequently, the extent of its failure to comply has not been passed on to decision makers, and evidence of full compliance with policy, the view apparently communicated to the World Heritage Committee in section 2 of Document DCMS/1/4 does not fully reflect the assessment made.

***Special heritage contributions and cost-effectiveness***

- 6.4.24 The tunnel was included in the re-admitted scheme in the Roads Programme in order to avoid the unacceptable effects of surface dualling the A303 across the WHS. The £70m heritage contribution to the total scheme is not earmarked for any separately defined expenditure, nor is it derived from the cost of any element of the published scheme; it simply forms part of the transport and traffic cost-benefit analysis. It is not a cost for specific heritage benefits. However, when measured on transport and traffic cost-benefit analysis alone, the published scheme has a marginal positive net current value.

- 6.4.25 The transport and traffic need for this road scheme is not yet of paramount importance in the national context, and accordingly, the allocation of heritage funding appears to be little more than a subsidy for normal transport costs, designed to get the scheme back into the Roads Programme.
- 6.4.26 It is asserted by the promoter that the cost of longer tunnels could not be justified, because there has been no technical method for assessing heritage cost-benefits as distinct from transport cost-benefits. This applies also to the justification for the £70m heritage contribution. As a result, the views expressed by the promoter and the supporters of the scheme, that the costs of longer tunnel options would not be justified by the heritage benefits gained have no clear basis in fact.
- 6.4.27 This lack of appraisal of heritage benefits does not take into account the need to avoid adverse impacts on the heritage that would trigger a presumption against the development. These adverse effects are measured by the extent to which the scheme would fail to meet the WHS Management Plan objectives, and how it would preclude their fulfilment permanently.
- 6.4.28 The longer timescale for national and international heritage policy should be reflected in the cost-effectiveness of the scheme, as part of the UK's obligation to many future generations, rather than the normal 30-year timescale of transport cost-benefit analysis. It also appears that no consideration has been given to alternative methods of financing the scheme so that the public finance costs could be spread over a longer period.

### ***Alternatives***

- 6.4.29 Alternative road lines and longer tunnels have been considered at different times under different criteria, but not fully evaluated against the published scheme. The CBA is not in a position to promote a particular alternative. In view of the lack of environmental and other data associated with alternative schemes, it cannot be shown that the published scheme has been properly compared in cost effectiveness with the best possible alternative solutions that might remove the A303 and A344 from the WHS, either through an off-line long tunnel or a cheaper surface route outside the WHS. Therefore, it has not been demonstrated that the published scheme is the best solution for both heritage and transport needs, as claimed by the promoter.

### ***Recommendations on possible solutions***

- 6.4.30 It appears to the CBA that there are four options open to the Secretaries of State to pursue: unconditional confirmation of the Orders; outright rejection of the published scheme; rejection in favour of an alternative outside the land required by the existing Orders; or the modification of the Orders in favour of improvements within the existing land requirements.



*1) Unconditional confirmation*

This option is rejected by the CBA, although it is recognised that there would be benefits for the immediate vicinity of the Stones themselves. However, in view of the conflict with planning policy regarding physical intrusion in the setting of monuments and the likelihood of losing nationally important archaeological sites, permanently frustrating the fulfilment of the long-term vision of the Management Plan, the main objection is maintained.

*2) Rejection of the draft Orders*

The CBA is not in favour of outright rejection of the Orders without there being an alternative solution. It is not in favour of a 'do nothing' option.

*3) Rejection of the draft Orders in favour of a different solution*

Although the CBA is not in a position to promote a particular alternative route, a full like-for-like comparison is needed of all heritage, traffic, environmental and cost-benefit issues for the on-line tunnel solutions that have already been examined, compared to other potentially cost-effective off-line solutions that have not yet been analysed to a comparable level of detail. This would include the 1995 'Green Route' concept and surface route alternatives outside the WHS, for which further optimisation of design assessment would be needed.

*4) Modification of the draft Orders*

If a modification of the Draft Orders were to be recommended, the CBA acknowledges that a 2.9km tunnel, as advocated by the National Trust, would be a significant improvement over the published scheme, because it would successfully remove the main adverse impacts on the eastern third of the WHS. This modification would be a compromise however, in that it would still have a major impact in the western part of the area. As with the published scheme, the view remains that it has not been proven that a better scheme is unaffordable.

- 6.4.31 It would also be possible to recommend the staged approach envisaged in the Action Plan section of the Management Plan. In this case, the Orders could be modified to exclude the A303 dualling, while still carrying out the Countess East grade-separated junction, improved traffic management at Longbarrow Crossroads, enabling the closure of the A344 and perhaps including pedestrian underpasses under the A303. This would allow progress of the Visitor Centre and access proposals while fuller consideration is given to an optimum solution for the A303 dualling, subject to new Orders. This approach would delay the much-needed Winterbourne Stoke Bypass element of the scheme.

**Conclusion**

- 6.4.32 The proposals for stopping up the A344 and restricting motorised traffic on byways in the WHS should be strengthened and confirmed. The proposals for dualling the A303 should be subjected to much more

rigorous consideration of their long-term adverse effects on the cultural heritage, possible alternative solutions and relevant issues of need, cost and financing, than has been presented in the documents supporting the proposals. Without these considerations, it is difficult to fulfil the requirement of the Environmental Impact Assessment Directive to assess and give reasons for the rejection of alternatives.

- 6.4.33 In order to make progress with a new visitor centre and access scheme, it is recommended that the draft Orders are modified to exclude the A303 dual carriageway elements, allowing the A344 to be closed along with the Countess East improvements, and traffic management at Longbarrow Crossroads. This should be linked to a very strong recommendation for an urgent review and development of off-line alternative routes for comparison with the on-line tunnel schemes in seeking a comprehensive, cost-effective and long-term solution to the dualling of the A303.
- 6.4.34 There are two conflicting interests in this trunk road improvement scheme. A difficult exercise requires that the problems of weighing relatively short-term national and local transport and traffic issues against very long term international and national heritage issues be resolved. The real world situation may require compromises, but the area is a WHS, which requires a very high standard of conservation, where ill-judged compromises may well be regretted at international level.
- 6.4.35 The ultimate goal must be to remove much more of the A303 from the WHS than the published scheme would allow. This is crucial in order to provide the great heritage, landscape and ecological benefits that would truly fulfil the UK's obligation to the world community for many generations to come.

### **The response of the Highways Agency to the objection of the Council for British Archaeology**

#### ***The value and significance of the WHS***

- 6.4.36 Stonehenge itself was the primary focus of the Stonehenge part of the WHS nomination. The Stonehenge Management Plan also differentiates between a core and peripheral zones. Objective 9 of the Management Plan provides that

*"The appropriate landscape setting for the Stones and immediately related ceremonial monuments in the core should be restored."*

while Objective 10 indicates that

*"The immediate setting of visible monuments in the wider landscape of the WHS beyond the core zone should be maintained and improved."*

Objective 11 states that

*"Where opportunities arise, the character of the wider WHS landscape should be improved through the removal or screening of existing*

*inappropriate structures.”*

There is thus a clear differentiation made between “restoration”, required within the core under Objective 9, and “removal or screening” within the wider WHS landscape.

- 6.4.37 The Management Plan specifically envisages that putting the A303 in tunnel may inevitably have detrimental consequences on the WHS. At paragraph 4.6.4, the Plan expressly states that such adverse consequences need to be properly balanced against the major benefits that removal of the A303 over the tunnel section would bring to the WHS.

#### ***The adequacy of the heritage assessment***

- 6.4.38 The cultural heritage assessment of the effects of the road proposal has been undertaken in accordance with the standards set out in the DMRB. On the precise process followed, there was considerable consultation to obtain the best consensus view, even if this could not fully accommodate every suggestion. The minutes of some of those meetings are contained in Appendix A to Document HA/13/11. They show that the final Scoping Report did not bring adverse comment or identify any technical deficiencies such as those suggested by the CBA.
- 6.4.39 The landscape around Stonehenge is no longer an authentic Neolithic or Bronze Age landscape. While the visible monuments are in their authentic topographical positions, many contemporaneous components of the landscape have probably been lost as a result of centuries of ploughing. But, as a cultural site, it is the test of authenticity rather than integrity that the site must meet.
- 6.4.40 As regards severance, currently the A303 and the A344 cross the central part of the WHS for some 5.5km and form effective barriers to movement. With the published scheme, however, 2.1km of the A303 would be removed into tunnel, and the A344 would be stopped up from Stonehenge Bottom to the current Visitor Centre. The scheme would enable the National Trust to open up its land over the entire area of the tunnel, and to achieve its policy for an open access grassland core area. The proposed new byway would permit non motorised traffic to cross the WHS from Longbarrow Crossroads to beyond the King Barrows, and the proposed A360 junction would allow safer crossing of the A303. These measures would greatly reduce rather than increase severance.

#### ***Potential loss of archaeological remains***

- 6.4.41 It is inevitable that some uncertainty remains about the impact of the published scheme on unknown archaeological remains, because assessment has been based on sampling techniques which are not infallible. Certainty about the location and full significance of all archaeological remains that lie within the trace of the published scheme could only be reached if the entire area was stripped and every archaeological feature excavated. Such an approach would be totally unacceptable when the objective is to identify remains which merit preservation. The risk posed by the possible presence of unknown

archaeological remains has been appropriately assessed. Because the mitigation strategy would provide for archaeological supervision of all topsoil stripping, even unforeseen remains would be catered for. The proposed comprehensive archaeological supervision and recording reflects the WHS status of the area, but would in fact be applied even outside the WHS.

### ***Setting***

- 6.4.42 The Environmental Statement has assessed the effects which the scheme would have on the setting of each of the sites which give the WHS its outstanding universal value. The boundary of the WHS, however, has no historical significance, and therefore has no setting.
- 6.4.43 Because buried remains are not visible on a site, they do not have a setting. They contribute, however, to the context of a place. Direct impacts on buried archaeological remains have been assessed for each location where they have been identified.

### ***Alleged conflicts with policy***

- 6.4.44 Guidance in PPG 15 has been followed in assessing the proposed scheme. The long term effects on the outstanding universal values of the WHS have been taken into account within the design of the scheme. Great weight has been placed on the protection of the WHS, for which considerable overall benefits would be delivered by the scheme.
- 6.4.45 Similarly, guidance in PPG 16 has also been followed. Great diligence has been exercised to ensure that remains would not be needlessly or thoughtlessly destroyed. Extensive surveys have been undertaken to locate archaeological remains, so that they can be assessed on their merits and taken into account in the design of the scheme. Where any archaeological remains would be destroyed by the published scheme, appropriate provision would be made for their recording both before and during construction. The present draft mitigation strategy (Document HA/0/22) would be refined through a series of written schemes of investigation, which would be agreed before construction commenced. These written schemes would address the objectives of the WHS Research Framework to ensure that resources would be focussed on the most appropriate areas to increase understanding of the past land use in the WHS and the area around it.
- 6.4.46 As to the concept of the MILS, the WHS Management Plan uses a number of words to describe the central area of the WHS. There are references to the core, the amphitheatre and the bowl, amongst others. The core is used in different senses in different places. The concept of the MILS was developed to avoid confusion for the purposes of preparing the Environmental Statement.
- 6.4.47 The additional benefits which would be secured by a 4.5km tunnel over those provided by a 2.1km tunnel would be relatively small compared with the substantial additional cost of such a tunnel. English Heritage confirms that a 2.1km tunnel would meet the objectives of the WHS

Management Plan. Longer tunnels would also meet those objectives, but the large additional investment which would be required cannot be justified. There is no prescribed method for assigning monetary values to environmental resources or to the effects on such resources. Decisions on whether environmental benefits justify investment costs are therefore a matter of judgement.

- 6.4.48 The CBA suggest that the scheme, if carried out, would be likely to become widely regretted in a relatively few years. This takes no account of the fact that the roads have been in place for more than 240 years, and the millions of users of them probably do not regret that they exist. In fact, they would probably prefer that they were improved, as would the millions of visitors to the Stonehenge WHS who would enjoy the benefits of the scheme.

## **6.5 Wiltshire Archaeological and Natural History Society**

- 6.5.1 The Society was founded in 1853, and currently has 1,150 members. The position taken by the Society on the published scheme has been agreed by the Society's members in general meeting.
- 6.5.2 The published scheme was announced as an "exceptional environmental scheme" in the Government White Paper, "A New Deal for Trunk Roads in England", DETR, July 1998 (Document DD33), and it includes a financial contribution from a non-transport Government source towards this end. The Society applauds the aims of the scheme to reduce the A303 severance of the northern and southern parts of the WHS, as this would have significant benefits in enabling visitors to appreciate the relationships between Stonehenge and the monuments in its immediate vicinity. However, the scheme would have very serious adverse effects on other parts of the WHS, which far outweigh these potential benefits.
- 6.5.3 The Stonehenge landscape continues to provide an expression of the development, knowledge and view of the world of local prehistoric communities. The inter-connectedness of visible and buried monuments is important, and they remain as the long-term fixed points of reference of a mobile prehistoric farming community. They display direct views and access between the monuments within a revered ancestral landscape.

### ***The World Heritage Site Management Plan***

- 6.5.4 The Society participated in discussions leading to the production of the Management Plan, which has been described by the Highways Agency as the overarching strategy document for the WHS. However, the full scope of the Management Plan has been constrained by the existence of the earlier Master Plan, which built on the Government's 1998 announced improvement scheme of the A303, involving a 2km cut and cover tunnel in the Stonehenge area.
- 6.5.5 Work started on the preparation of the Management Plan in November 1998, some six months after the Government's formal announcement of the road scheme that was embodied in the Master Plan. The Government's announcement of its preferred route in June 1999

preceded completion of the Management Plan, which was intended to form a framework within which specific road schemes could be proposed and assessed. Requests by the Society during 1999 to have various elements of the Master Plan reviewed within the framework of the emerging Management Plan were refused.

6.5.6 It is clearly the case that, whilst the Management Plan was conceived as being concerned with the outstanding universal value of the cultural assets of the WHS, the Master Plan was limited to improving the immediate setting of Stonehenge. As the published scheme, the subject of these inquiries, represents a modified version of the 1998 scheme, it could not possibly meet any of the principal objectives of the later Management Plan, other than quite fortuitously.

6.5.7 It is recognised that the published scheme would bring about some localised benefits: it would re-establish direct access between Stonehenge itself and the major prehistoric cemeteries in the southern part of the WHS; it would re-unite The Avenue adjacent to Stonehenge; noisy traffic on the A303 and A344 would be removed and the monument would have a more tranquil setting; to the east there would be improved access between the barrows on King Barrow Ridge and around Coneybury Ridge. However, the surrounding landscape has value in its own right, and is described in the Management Plan as "*an archaeological landscape rather than a series of individual monuments*". The adverse impacts on the wider Stonehenge landscape have been demonstrated already by the Prehistoric Society.

### ***The Environmental Statement***

6.5.8 The Environmental Statement is considered to have limitations. The Highways Agency's assessment of the likely impact of the scheme relies solely on a magnetic technique for the geophysical survey, which limits the scope of the archaeological features that could be detected. As a result the assessment itself is considered to be deficient. Likely impacts on sites are measured in isolation rather than from a holistic perspective of their consequence for the historic environment so as to understand the full impact of the scheme on the WHS landscape.

### ***Impact on the landscape***

6.5.9 The Highways Agency has taken a consistently minimalist approach to the assessment of impact. The Agency did not begin by consulting those prehistorians who could have explained the latest thinking about the likely inter movement connections within the WHS. As a result, the importance of buried archaeological evidence is undervalued and the consequences for the spatial relationships between monuments and movement between them in the western part of the "Stonehenge Bowl" are not apparent. This section of the WHS is framed by internationally important monuments at Winterbourne Stoke Crossroads, Normanton Down and Lake cemeteries. It contains the highest concentration of Neolithic burial mounds known in England.

- 6.5.10 The proposed western tunnel portal and associated road cuttings would have the following unacceptable impacts:
- i. Irreversible dissection of the landscape and permanent severance of ancient pathways between important monument groups and the destruction of the landscape setting around this western arm of the Stonehenge Bottom dry valley;
  - ii. The proposed interchange with a deep cutting at Longbarrow Crossroads would further destroy the setting of this famous prehistoric cemetery;
  - iii. The western portal of the 2.1km tunnel would intrude unacceptably on the setting of the Normanton Neolithic burial mounds, closest to Stonehenge;
  - iv. The scheme would introduce a physical barrier to public freedom of movement and understanding of the prehistoric landscape of the western part of the WHS, similar to that which already exists on the eastern section of the A303.
- 6.5.11 Light Detection and Ranging (LIDAR) analysis of the landscape (Document WANS/1/3) shows the planned linear layout of barrow groups on prominent ridgelines, particularly at Winterbourne Stoke and Normanton Down. Bush Barrow sits on a prominent hill at the end of the Normanton Group, and has a visual relationship with the Winterbourne Stoke Group and Stonehenge. The digital terrain mapping technique allows the removal of surface features, such as trees and the existing roads, and the superimposition of the published scheme dual carriageway, cuttings and tunnel portals. The removal of trees returns the landscape to its appearance at the end of the 19<sup>th</sup> century. The analysis shows that in views across to the Winterbourne Stoke Group from Bush Barrow, the proposed road cutting would be a visible feature across the intervening ground.
- 6.5.12 In the eastern part of the WHS, the published scheme would not bring any increased physical impacts on the eastern part of The Avenue where it is crossed by the present line of the A303, but it would perpetuate the severance which already exists. It would miss the opportunity to reunite the two parts of The Avenue at this point, so enhancing the one monument in the WHS which is directly linked to Stonehenge.

***The extent to which the scheme meets objectives of the WHS Management Plan***

- 6.5.13 The Highways Agency has identified Objectives 9, 19 and 23 of the Plan as being those relevant to the construction of the published scheme.
- 6.5.14 Objective 9 relates to the restoration of an *"appropriate landscape setting for the Stones and the immediately related ceremonial monuments in the core of the WHS"*. This is expanded in the accompanying text, which refers to the restoration of *"a core area of permanent grassland, surrounded by a mixed agricultural landscape farmed in an*

*environmentally sensitive manner” and “the removal of the A303 from the landscape”, though it does not specify over which distance this should be done.*

- 6.5.15 Objective 19 relates to *“arrangements for managed access on foot within the core WHS zone”*. The accompanying text refers to open access on foot to all grass downland within the core zone of the WHS, and cites *“the tunnelling of the A303 and closure of the A344”* as being critical to the achievement of this Objective.
- 6.5.16 The “core” or “core zone” referred to in these Objectives is defined in Table 1 of the Management Plan as *“a well defined amphitheatre created by horizons along King Barrow Ridge in the east, Normanton Down in the south, Winterbourne Stoke Down and Fargo Plantation in the west and the woodland screening Larkhill in the north”*.
- 6.5.17 It is Objective 23, however, which refers most specifically to the treatment of the A303 within the WHS. This Objective relates to measures which should be identified so as to *“provide comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety and enhance the historic environment”*. There is no mention here of a “core” or a “core zone”. Instead, the text accompanying this Objective states that *“A strategy to achieve the above includes placing the A303(T) in a tunnel, closure of the A344 and related landscape restoration schemes within the Stonehenge Bowl, including the removal of the A344 in the longer term”*.
- 6.5.18 The Stonehenge Bowl referred to here was defined during the 1995 A303 Planning Conference, and it is mapped out in Appendix C to the Management Plan (Document DD65). It extends well beyond the core (mapped in Figure 8 of the Plan), particularly in the west, where it extends all the way to the western boundary of the WHS.
- 6.5.19 Thus, the published scheme would meet the grassland restoration and public access requirements of Objectives 9 and 19, but it falls short of the much more specifically roads related Objective 23, because the proposed tunnel would end more than 1km short of the western edge of the Stonehenge Bowl.
- 6.5.20 The scheme would also fail to deliver Objective 20, which states that *“Access and circulation to other key archaeological sites within the WHS landscape should be improved to reduce pressure on the Stones and increase public awareness”*. In fact the scheme would have the opposite effect. In the western part of the WHS, it is proposed that the A303 should run in a long cutting. This cutting would be around 7m deep where it passes the prehistoric cemetery at Longbarrow Crossroads. This would create a new severance within the site, contrary to the aims of Objective 20.
- 6.5.21 Accordingly, the published scheme would not fulfil the State Party’s responsibilities under Article 4 of the World Heritage Convention to conserve the historic environment, and the view is taken that the scheme



is not exceptional in positive environmental terms, and therefore the Orders should not be confirmed.

***Alternative or modified proposal***

- 6.5.22 The Society rules out any scheme that would involve new or extended roads at surface level because it would cause intrusion and physical damage to the area. Off-line alternative schemes are also ruled out because other local roads would be unable to absorb the extra traffic caused by the closure of the A303 and A344.
- 6.5.23 It is noted that the Longer Tunnels Assessment Report (Document HA/0/8) confirms that the longer the tunnel, the greater the conservation benefits within the WHS. For this reason, the 2.9km bored tunnel suggested by the National Trust is also considered unacceptable with regard to its impact on the western part of the WHS. The logical outcome of the evidence presented to the inquiries is to favour Alternative Route No 5, which is in line with the Society's consistent support for a 4.5km on-line tunnel scheme.

**The response of the Highways Agency to the objection of the Wiltshire Archaeological and Natural History Society**

- 6.5.24 The importance of the inter connectedness of monuments is recognised. The published scheme would not introduce any new obstruction in terms of line of sight between monuments. In fact, the lowering of the A303 into tunnel or cutting would reduce the visual impact of the A303. The scheme would also improve physical access between monuments across the roof of the proposed tunnel and because of the new byway. This would not always be straight line access, but it is not certain that access was originally along a straight line. Access along The Avenue between the River Avon and Stonehenge was not originally along a straight line. West of the tunnel to Longbarrow Crossroads, where the road would be in cutting, direct access could not be taken in any event because of land ownership restrictions on the south side of the road. Lengthening the tunnel would not increase the area over which direct access would become available.

***The WHS Management Plan***

- 6.5.25 The Stonehenge Improvement scheme was included in the Roads Programme specifically to address the heritage issues at Stonehenge. The published scheme is promoted to contribute to the objectives of the Management Plan. In fact the Management Plan views the Master Plan as "*a mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered*" (Document DD65, paragraph 1.5.11). While the stone circle remains the focus of international designation and visitor attraction, all cultural heritage sites throughout the scheme have been assessed using the same approach, as set out in the Environmental Statement.
- 6.5.26 Geophysical survey was just one of the techniques used to gather information on the cultural heritage resource of the proposed route. The

assessment approach and its results were agreed by the Archaeology Working Group.

- 6.5.27 The A303 and the A344 currently form physical barriers across the WHS and between groups of Neolithic monuments. The scheme would remove these barriers from the central part of the WHS. There is currently no public access to the Neolithic long barrow on Wilsford Down (Site 32) or to the no longer visible barrows at Sites 33, 35 and 36. All of these are situated in the middle of a privately owned arable field.
- 6.5.28 At Longbarrow Crossroads, the published scheme would not impact directly on any scheduled monument. It displaces the main carriageway to the south, making use of low lying ground which does not appear to have contained prehistoric burial mounds, and reuses the existing A303 as slip roads in order to reduce land take. The northern roundabout of Longbarrow Crossroads would be 30m further away from the long barrow (Site 26A) than the existing roundabout.
- 6.5.29 The published scheme would not bring any increased impact to the eastern part of The Avenue where it is crossed by the existing A303. As previously noted, the chance of restoring The Avenue from the River Avon to Stonehenge is remote.
- 6.5.30 Paragraph 1.5.11 of the WHS Management Plan speaks of the Master Plan providing an action plan for the implementation of a proposed tunnel for the A303. This makes it clear that the 2km tunnel spoken of in the Master Plan was regarded as acceptable.
- 6.5.31 In relation to roads, the Management Plan is primarily concerned with removing or screening them to provide an improved landscape setting for the Stones. This would be achieved by removing the impact of the roads from the MILS. Elsewhere, the sections of road in cutting would offer some screening of traffic from the WHS.
- 6.5.32 As regards Objective 20, the published scheme would facilitate better use of both rights of way and permissive paths by removing the A303 and A344 and by the creation of a new byway. Far from failing to deliver Objective 20, the scheme would make a major contribution to its achievement.
- 6.5.33 As regards a possible longer tunnel, tunnelling is a very expensive activity. The A303 scheme has to be the subject of rigorous assessment to determine the optimum length of tunnel in the context of the scheme objective of removing roads and traffic from the landscape setting to Stonehenge. The cost of the tunnel proposed in the published scheme is justified by the considerable benefits which it would bring to the Stonehenge MILS. The scheme is unique in having a financial contribution from heritage funds of the Government. This contribution arises from the special status and value of Stonehenge. Without Stonehenge, DCMS would not be making a contribution to the scheme, and the 2.1km tunnel would not be a component of the published scheme.

- 6.5.34 There would only be a case for additional public investment in a longer tunnel if the scale of additional benefits were of a similar order to those accruing from the 2.1km tunnel. Given that English Heritage has advised that the 2.1km tunnel would meet the objectives of the WHS Management Plan, and that longer tunnels would start to produce only relatively marginal increases in benefit, the case for the investment of additional public funds in a longer tunnel has not been made.

## **6.6 Stonehenge Alliance**

- 6.6.1 The Stonehenge Alliance is a grouping of individuals and organisations who are opposed to the published scheme. The organisations include the CPRE, the Ancient Sacred Landscape Network, the national body Friends of the Earth, the Pagan Federation, RESCUE: The British Archaeological Trust, Transport 2000 (national and Salisbury Groups) and the UK Rivers Network. The opposition of all of these bodies to the scheme has been authorised by the appropriate processes of each organisation.
- 6.6.2 The A303 scheme is considered to be a compromise, dictated by financial considerations, in that the proposals fall short of appropriate protection and rehabilitation of the whole WHS. The scheme would preclude more flexible and suitable choices for visitor management and full understanding and enjoyment of the qualities of the landscape.

### ***Evolution of the A303 scheme***

- 6.6.3 A consensus between heritage and amenity bodies arose from Planning Conferences in 1994 and 1995 to the effect that a long bored tunnel would be the right solution for the improvement of the A303. It was felt that such a tunnel should be long enough to support the aim of English Heritage and the National Trust to restore the WHS downland in the area of the A303 which is not already severed by dual carriageway, i.e. the Stonehenge "Bowl". This would also ensure maximum possible protection for archaeological sites in the WHS on the route of any road improvement.
- 6.6.4 At the Highways Agency's 1995 A303 Planning Conference, English Heritage and the National Trust pointed out the need for a cost benefit analysis for a tunnel solution that would take into account the proper conservation and presentation of Stonehenge. However, despite the efforts of English Heritage and the National Trust to seek the funding for a long (4km) bored tunnel, the scheme was rejected and abandoned by the Government in 1996 as being too expensive.
- 6.6.5 Without further public consultation, the A303 Improvement Scheme, including a 2km cut-and-cover tunnel, was announced in 1998. This scheme was supported by the Stonehenge Master Plan, which was not fully consulted upon, and a Ministerial statement that the Government "*would ensure that archaeological sites would not be destroyed in the process*", which cannot be guaranteed in reality. There is no evidence as to whether funding for a long bored tunnel was sought outside Government sources, although this would have been appropriate under Article 4 of the World Heritage Convention. The 2km tunnel scheme for

the A303 reflected what could be afforded rather than what would be the best solution.

- 6.6.6 Possible methods for assessing the heritage value of road and tunnel options at Stonehenge have been commissioned as advice to the Government, but appear to have been disregarded. The POST Report (Document SA/2/8 within Document SA/2/3) by the Parliamentary Office of Science and Technology 1997 looked at public concerns over the impact of road and rail schemes, the possible advantages of tunnelling and the potential environmental cost benefits of using tunnels in sensitive locations. The Centre for Social and Economic Research on the Global Environment (CSERGE) Report (Document SA/2/9 within SA/2/3, revised 1998) studied the heritage benefits of different road options for the A303 through the WHS, and attempted to value how much individuals would be prepared to pay in tax to secure various options, not including a 4.5km tunnel option.

#### ***The Stonehenge Master Plan***

- 6.6.7 The July 1998 road scheme announcement was rapidly supported by the Master Plan for Stonehenge (Document SA/0/9), published in September 1998. Consultations on the Stonehenge WHS Management Plan began later, in December 1998, with the first Stonehenge WHS Management Group meeting, but the group was precluded from consideration of the Stonehenge Master Plan in this context.
- 6.6.8 The primary emphasis of the Management Plan is on the conservation of the outstanding universal value of the WHS as a whole, while the Master Plan concentrates on the setting of Stonehenge at its core. The Master Plan A303 road scheme was pushed ahead, even though Objective 23 of the Management Plan requires that a long tunnel for the A303 should extend across the Stonehenge Bowl. The Management Plan is therefore in conflict with the Master Plan, but Lord McIntosh, giving a Parliamentary answer in the House of Lords on behalf of the Government on 11 November 1999 (Appendix to Document SA/1/1), stated that the Management Plan overarches the Master Plan, and in these circumstances it therefore takes precedence over it. The decision in December 2002 to pursue a scheme with a 2.1km bored tunnel, instead of a cut and cover tunnel, was again governed by financial considerations rather than the need to protect the whole of the WHS.

#### ***The Stonehenge WHS Management Plan***

- 6.6.9 Unlike the Master Plan, the Management Plan was the subject of wide consultation. It has been accepted by the Government and English Heritage as providing objectives for management of the WHS landscape and the archaeological sites and monuments within it, so that the outstanding universal value of the place is conserved and improved. Given that the Management Plan (unlike the Master Plan) has been adopted by Salisbury District Council as supplementary planning guidance, it therefore also has to be regarded as a material consideration.

- 6.6.10 But the published scheme ignores or meets only partially many of the Management Plan's objectives, and would compromise the achievement of certain others. In particular, it would not comply with Objective 9 of the Plan, because it would not restore the appropriate landscape setting for the Stones and immediately related ceremonial monuments in the core of the WHS; and it would fail to place the A303 in a tunnel within the Stonehenge Bowl, as required by Objective 23. The Highways Agency's MILS, which extends over the proposed 2.1km tunnel area, is not mentioned in the Management Plan, and does not correspond to either the core or the bowl.
- 6.6.11 The Highways Agency argues that the Master Plan is compatible with the Management Plan, pointing to the statement in Paragraph 1.5.11 of the Management Plan that the Master Plan is a mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered. Earlier drafts of this section of the Management Plan, however, (contained in Document SA/2/19) demonstrate that distancing the Master Plan from the overarching Management Plan was intentional.
- 6.6.12 English Heritage's advice to Ministers in October 2002 (Document CD/INQ/3) was to the effect that any of the bored tunnel options (2.1km or longer) would meet the requirements of the Management Plan, but that advice is not correct. It is also the case that the World Heritage Committee has not been informed of the areas from which traffic should be removed under Objectives 9 and 23 in the reports submitted to it (Appendix 2 to Document DCMS/1/3).

***International and UK legal requirements***

- 6.6.13 The proposed scheme, with a 2.1km tunnel that would protect and conserve only part of the WHS, and would not meet the UK Government's international obligations under Articles 4 and 5 of the UNESCO World Heritage Convention 1972 (Document DD100) to protect the WHS to the utmost of its resources. The World Heritage Convention demands that the whole WHS should be protected and conserved for future generations. The boundary of the WHS is shown on Document HA/0/23. The Highways Agency accepts that the scheme would have some adverse impact on the WHS. Under the World Heritage Convention development within a WHS should not have any adverse impact upon it. The nomination document mentions the Stonehenge landscape as an integral part of the site, and that landscape should also be protected.
- 6.6.14 It is believed that the WHS designation constitutes the creation of an 'archaeological reserve' as set out in the European Convention on the Protection of the Archaeological Heritage (Revised) 1992 (Document DD101 - The Valletta Convention). Under this Convention each State Party undertakes to protect the archaeological heritage, making provision for "the acquisition or protection by other appropriate means by public authorities of areas intended to constitute archaeological reserves" (Article 4), and to ensure that the opening of such sites to the public does not adversely affect the archaeological and scientific character of the sites and their surroundings (Article 5).

- 6.6.15 The legal framework for protecting WHSs in Australia is set out in the Burra Charter, which has international influence due to its emphasis on the importance of defining the value of sites and then managing to protect that value. In three Australian legal cases concerning WHSs (Document SA/0/4, Appendix 2), the State Party was successful in protecting sites against inappropriate developments, particularly two cases in Tasmania, involving the construction of a large dam on the Gordon River and deforestation adjacent to the Tasmanian Wilderness.
- 6.6.16 The Stonehenge WHS is internationally important as a landscape of ancient features, interrelated visually and physically. It is an extensive archaeological, historical and cultural landscape. The dense concentration of archaeological features is in a complex spatial layout, with ceremonial and cosmological associations and visual relationships. The WHS has spiritual associations and inspirational qualities. The presumption for this special place must be that the individual components of the landscape, whether visible or not, and their physical and visual relationships should be protected and enhanced.
- 6.6.17 The Environmental Statement produced to assist decision making in this case is inadequate, and does not take account of significant aspects of the WHS. It is an "off the peg" document, inappropriate to a WHS. The major deficiencies are:
- It is based on the assumption that a road must be built.
  - It is based on methods of assessment devised for road schemes, and has not developed new techniques to recognise the importance of the WHS designation.
  - It fails to give proper weighting to the landscape quality of the WHS.
  - It does not adequately address the interrelationship of the monuments within the WHS.
  - It does not respect the integrity of the WHS.
  - It fails to recognise the landscape as a receptor in its own right.
  - It does not assess the effects of the scheme on all the qualities of the WHS set out in the statement of significance in the WHS Management Plan.
- 6.6.18 The European Environmental Impact Assessment Directive (97/11/EEC) requires that an environmental assessment must provide "an outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects". The Alliance does not accept that the promoter of the scheme has met these requirements. The Environmental Statement contains little more than an account of the process of considering different road options, and it appears that the choice of the published scheme was based on financial considerations rather than environmental effects. There appears to have been no consideration of any alternative to road building to address the issues.
- 6.6.19 Also under European Directives, Regulation 48 of the Conservation (Natural Habitats etc) Regulations 1994 (SI 1994 No 2716) requires that an 'appropriate assessment' is made of the environmental effects of a

project on a cSAC. The proposed A303 road scheme and associated developments, such as the proposed new Visitor Centre, need to be assessed for their individual and cumulative effect upon the River Avon cSAC near Amesbury.

- 6.6.20 The Draft Statement to Inform the Appropriate Assessment (Document DD132) is said to be the appropriate assessment for the A303 scheme, but it states at paragraph 4.2 that:

*"Salisbury District Council is currently undertaking an assessment of the various projects occurring around the River Avon cSAC that could result in an adverse impact on the cSAC and that might interact with any effects of the published scheme if mitigation measures were not implemented."*

The District Council's appropriate assessment should have been made available for consideration by the inquiries, so that the effects of the A303 and various projects on the cSAC could be taken into account.

### **Planning policy**

- 6.6.21 Although these inquiries are not dealing with a planning or listed building consent application for new development, it is contended that Government guidance in PPGs and development plan policies are material considerations in decisions regarding these Highways Orders.
- 6.6.22 Paragraph 32 of PPG1 states that it is fundamental to the Government's policies for environmental stewardship that there should be effective protection for the historic environment. That point is carried through to succeeding, more specifically focussed PPGs, whether they are dealing with the countryside (PPG7), nature conservation (PPG9), regional guidance (PPG11), transport (PPG13) or noise (PPG24).
- 6.6.23 PPG15 deals with development affecting WHSs. Paragraph 2.22 highlights the outstanding international importance of a WHS as not just a material consideration, but a key material consideration, in the determination of development proposals falling within a WHS. This should prompt an exceptional method of assessment. The proposals are contrary to PPG15 because:
- Although the outstanding universal value of the WHS is a key material consideration, this is not properly taken into account in the Environmental Statement.
  - The WHS Management Plan has been adopted as supplementary planning guidance, but the road proposals ignore its key objective of conserving, preserving and enhancing the archaeological sites and monuments and their landscape setting.
  - The road proposals treat parts of the WHS as if they were of lesser importance.
- 6.6.24 PPG16 deals with archaeology and planning. Paragraph 6 indicates that archaeological remains should be seen as a finite and non renewable resource. Paragraph 8 provides that, where nationally important

archaeological remains, whether scheduled or not, and their settings are affected by proposed development, there should be a presumption in favour of their physical preservation. At paragraph 27, it is stated that the case for the preservation of archaeological remains must be assessed on the individual merits of each case, taking into account the archaeological policies in detailed development plans together with all other relevant policies and material considerations, including the intrinsic importance of the remains, and weighing these against the need for the proposed development. The proposals are contrary to PPG16 because:

- They would cause significant damage to the integrity of the WHS.
- They would cause serious damage to sites not at present readily apparent, removing the possibility of investigation and interpretation in the future.
- They would severely limit opportunities to interpret the WHS as a whole, reducing its value for education, leisure and tourism.
- The presumption in favour of physical preservation of archaeological remains, whether scheduled or not, and their settings has been ignored.
- Conservation has only been considered to be important over part of the WHS.
- Sites have not been earmarked for preservation, but instead have been considered to see whether they are expendable.

6.6.25 Regional planning guidance (Document DD146) carries forward the general principles in the PPGs, underlining the importance of securing protection for the region's historic and archaeological areas of international, national and regional importance in development plans. There is specific reference to the Stonehenge improvement scheme in section 8 of the document, which deals with transport in the region. Both the Wiltshire County Structure Plan (Document DD147) and the Salisbury District Local Plan (Document DD149) contain policies for the protection of archaeological sites and areas, similar to the guidance contained in PPG16. The relevant policies are set out in paragraphs 6.1.13 and 6.1.14 above.

6.6.26 Planning decisions in the Avebury half of the WHS have respected the principle of the protection and long-term interests of the site (Document SA/2/18 – correspondence). In addition, the judgement in the case of *Coal Contractors Limited v SSE and Northumberland County Council QBD* (1993) 68 P&CR 285 concerning a temporary opencast coal mining proposal affecting the setting of Hadrian's Wall WHS (Document SA/0/4/B) has direct relevance to the road proposals at Stonehenge. The Secretary of State's rejection of a development which would be visually intrusive in a WHS was upheld by the Court, even though the intrusion would only have been temporary. At Stonehenge, the proposals would have temporary impact during the construction of the scheme (which would last for up to four years), but, beyond that, the alien and visually intrusive proposal to have a road in deep cutting through part of the WHS would have permanent, direct and indirect effects on settings.



### ***Archaeological impacts***

- 6.6.27 As the designated WHS covers an extensive landscape of visible interrelated monuments and invisible below ground archaeological remains rather than just the Stonehenge core of the site, in accordance with guidance in PPG15 it is not acceptable in policy terms to remove traffic from the environs of the henge monument but to cause harm to the wider setting and features of the WHS. The published scheme would bring about the complete removal of any archaeological remains along the length of the proposed new construction, including Stonehenge Bottom, close to the Stones.
- 6.6.28 The direct and indirect impacts of the proposed road scheme, in terms of noise, access and setting, would be particularly severe in relation to the Winterbourne Stoke barrow cemetery at Longbarrow Crossroads, the northern part of the Normanton Down barrows, Stonehenge Bottom, King Barrow Ridge barrows and The Avenue east of King Barrow Ridge. At Longbarrow Crossroads next to the western tunnel portal, and at King Barrow Ridge next to the eastern portal, important barrow groups would be adversely affected by noise and visual impacts that would be particularly noticeable to visitors to these locations.
- 6.6.29 The proposed dual carriageway would be largely in a cutting from Longbarrow roundabout to the western portal of the tunnel, varying between 25m and 44m in width. It is considered that this would comprise an alien and visually intrusive feature damaging to the WHS. Running parallel with the new road on its northern side, the proposed 'Stonehenge Byway' would be a 12m wide track. At its widest the track and proposed dual carriageway together would be some 79m wide, whereas the width of the existing A303 is about 12.16 metres. The proposed grade-separated junction at Longbarrow would have a north-south aligned dumb-bell roundabout arrangement with the centres of these about 152m apart, located on the very edge of the WHS. At this point, the new intersection would be some 190m wide, measured at its extremities from north to south, compared to the existing Longbarrow roundabout, which is about 73m diameter in total, and the Stonehenge circle, about 100m diameter.
- 6.6.30 The proposed road tunnel works would break the surface for some distance at Stonehenge Bottom and an impervious layer would be installed. This could lead to permanent scarring of the land surface and the creation of a further inappropriate feature at the heart of the WHS. The residual scar of the existing A303 over the tunnel area, the dual carriageways at each end and the creation of a new 'Stonehenge Byway' would result in the A303 becoming a very much larger feature in the landscape in archaeological terms than it is today.
- 6.6.31 The emergence of the tunnel just east of King Barrow Ridge would affect the setting of New King Barrows and The Avenue. Pedestrians close to the A303 at these locations would find their experience of the WHS considerably interrupted by the sight and sound of traffic approaching and leaving the tunnel. The Management Plan Objective 16 to restore

the ancient route of The Avenue, where it is breached by roads, would be frustrated, as it would be made impossible to walk along it.

***Landscape and visual impacts***

- 6.6.32 Landscape impacts of the published scheme are not correctly assessed in the Environmental Statement, either in terms of the method outlined in the Statement or of the great importance of the WHS designation, which requires a greater level of assessment, taking into account the Management Plan's statement of significance. The impacts are more severe and significant than is acknowledged.
- 6.6.33 Although the Environmental Statement says that the landscape is a receptor whether or not it can be seen, that is not how it is treated in the assessment. Settings of the WHS and individual monuments should have been considered whether or not the public has access to them. This has not been done. Nor have long term aims for possible wider public access to the WHS been properly considered.
- 6.6.34 The proposed cuttings for the road east and west of the tunnel portals would be new and dominant features in the WHS landscape, and they would in effect cut the WHS in two over some two-thirds of its width. This severance would impact upon the integrity of spatial and topographical relationships between sites, so that they would be difficult for people to understand on the ground.
- 6.6.35 The overall landscape impact of the published scheme on the WHS would be a major adverse one, because it is at considerable variance to the landscape, significantly degrades its integrity, and cannot be fully mitigated. Placing the road in deep cuttings would result in major adverse landscape impacts over 63% of the width of the WHS. These adverse impacts cannot be offset by the 37% of the width of the WHS over which there would be some beneficial effect.
- 6.6.36 Nor have visual impacts been properly assessed. No attempt has been made to consider the visual linkages between groups of monuments around and overlapping the Stonehenge Bowl which are affected by the proposals. Visual impacts have not been properly assessed, for example, at Longbarrow Crossroads, the Winterbourne Stoke Group barrows and the long barrow at Site 41. The visual impacts are more severe and significant than acknowledged.
- 6.6.37 The overall assessment produced for the published scheme by the Highways Agency concludes, however, that the scheme would be moderately beneficial. This overall conclusion is arrived at by subdividing the WHS, nominating the central area as the MILS (within which impacts are almost entirely beneficial, because this is the area where the road is removed from the landscape by tunnelling), and by then balancing the positive impacts of the tunnel against the negative ones elsewhere in the WHS and outside it.
- 6.6.38 This is not a correct approach. The Government's published guidance on the methodology for multi modal studies (GOMMMS - Document DD53),

as supplemented in Document SA/5/6, cautions against the cancelling out of beneficial and adverse impacts against each other. The later document states that, in general, the most adverse category should be the one recorded; that impacts should only be balanced out where one resource is substitutable for another; and that

*"In particular, balancing should be restricted to slight or, exceptionally, moderate impacts. It is very unlikely that adequate compensatory effects can be identified to justify any balancing of large adverse or very large adverse impacts."*

- 6.6.39 The effect on the iconic status of Stonehenge itself of removing it entirely from the view of travellers on the A303 has not been properly taken into account.
- 6.6.40 The published scheme for the A303 would severely and irreversibly damage parts of the WHS contrary to the duties set out in the World Heritage Convention and the vision and objectives of the Stonehenge WHS Management Plan. The proposals would make it impossible for visitors to access significant areas of the site without the accompanying sight or sound of roads and traffic, and it would be difficult to achieve a satisfactory visitor transit system that would not require further scarring of the landscape and damage to its integrity.

#### ***Hydrogeological impacts***

- 6.6.41 While the Environmental Statement appears to be a thorough and well prepared report in its treatment of geological and hydrogeological conditions, there is some concern about a number of issues which may affect groundwater conditions detrimentally.
- 6.6.42 Further work is required to assess the impact of the barrier which the tunnel would create in the aquifer. The tunnel could interrupt supplies of water to existing boreholes. A frequently encountered effect on shallow groundwater systems occurs when large diameter pipelines (such as cross country high pressure gas pipelines) are constructed. Changes in groundwater flow patterns adjacent to springs, seepages and shallow abstraction wells sometimes take place, caused by the redirection of groundwater flow along the pipeline route as a result of disturbance caused in the excavation zone. In many cases, replacement water supplies for both stock and private water abstractions need to be found, often from mains water supplies.
- 6.6.43 There is also a need for further work on the impact on the tunnel of elevated groundwater heads in high water level conditions, the potential environmental impact of a major pollution incident in the tunnel, and the contingency planning for the response to such an incident.
- 6.6.44 A major pollution incident (caused, say, by an accident to a tanker carrying hazardous liquid) could of course occur on the surface at present; but, in the proposed tunnel, the spillage could take place at or below the groundwater table. A major irretrievable aquifer contamination incident could therefore occur in the saturated zone or below the

operational water table level. Contingency planning for such an incident appears to have been considered only to the extent of being identified in Document HA/0/46 as a matter yet to be agreed between the Highways Agency, the Environment Agency and English Nature.

- 6.6.45 The tunnel construction method proposed involves the creation of horizontal drains across the top of the tunnel to allow water to pass over the tunnel below the surface of the ground when the water table is high. There is concern that the horizontal drains provided could clog up over time with calcrete build up and the general accumulation of fines.

***Transport policy and its implications for the published scheme***

- 6.6.46 The Government's White Paper on Transport (Document DD32) makes it clear that building new roads should no longer be the first option. Paragraph 4.199 of that document indicates that:

*"Because of the environmental impacts of major new construction, it is important that alternatives to new construction are considered at the earliest stages of planning. Alternatives include making better use of existing infrastructure and managing demand for it and the use of other forms of transport."*

The White Paper also states that:

*"Since new roads can lead to more traffic, adding to the problem not reducing it, all plausible options need to be considered before a new road is built."*

It emphasises the special protection afforded to environmentally sensitive areas or sites. Paragraph 4.201 states that in such locations *"there will be a strong presumption against new or expanded transport infrastructure"*, while paragraph 4.202 provides that in sensitive areas:

*"Such schemes should not go ahead unless it is clear that the net benefits ... clearly override the environmental disbenefits, there is no better option and all reasonable steps have been taken to mitigate the impacts."*

- 6.6.47 The Environmental Statement points only to the consideration of dual two lane road building solutions to improve the situation on the A303 in the area of Stonehenge since 1991. It states that *"the upgrading proposed via the published scheme is consistent"* with the SWARMMS conclusions that the A303 should be dualled. However, SWARMMS accepted dualling of the A303 as a given, and did not give proper consideration to improvements to this corridor which do not require road dualling schemes.

- 6.6.48 The SWARMMS report conceded that, even with capacity on the A303 expanded to accommodate average flows, in 2016 there would still be congestion at summer weekends. The average journey time savings, on which the cost benefit analysis relies, thus present a flawed picture of the conditions which drivers might expect to encounter in future. The actual

benefits may be quite insignificant in real life, and accrue mainly to those travelling a little faster at times when they would not have expected the route to be congested anyway.

- 6.6.49 In fact, unless demand is managed, traffic will grow faster than any road building programme can accommodate. The published scheme depends on high traffic growth for its economic justification, but traffic growth year on year on an improved A303 would lead to traffic slowing down, and erosion of time savings. In due course, the short bored tunnel would create a new and irremediable bottleneck.
- 6.6.50 In reality, the traffic and economic appraisal for the scheme is not robust. Notwithstanding the ruling that no further sensitivity testing of the appraisal need be carried out (paragraph 3.10 above), it was agreed at the inquiries that it is uncertain whether the traffic and economic benefits would be sufficient to justify the costs of the published scheme. The Highways Agency agreed that, if the published scheme were a conventional road scheme, with the sort of economic return it would deliver, it would not be in the road programme.
- 6.6.51 This does not mean, however, that the traffic appraisal may be ignored, because the more uncertain its economic return would be, the higher or more certain the environmental benefits should be to justify the scheme. In fact, no attempt has been made to quantify those environmental benefits in economic terms; but a qualitative value judgement has clearly been made that the environmental benefits perceived to be achieved are large enough to justify the scheme, and this against an economic assessment which at low growth would result in a negative net present value of £35.1m.
- 6.6.52 The Highways Agency concluded that the impact of induced traffic - the additional traffic which would be encouraged by the existence of the improvement itself - would be small in this case. The Agency therefore carried out its appraisal on a fixed trip matrix - the assumption that there would be no change in the patterns of origins and destinations chosen by those who would use the scheme, or the time of day of their trips, or the method of transport used.
- 6.6.53 The Highways Agency agreed, however, that when traffic is operating in conditions of congestion, a fairly small difference in traffic volume can make a more than proportionate difference to the level of congestion, and that this fairly small difference in traffic can potentially make a bigger proportionate difference to the overall economic balance of costs and benefits.
- 6.6.54 The Highways Agency has made a judgement that the small level of induced traffic anticipated would not have a material effect. The Agency therefore accepts that there is some additional headroom for environmental benefits to outweigh a greater loss in economic value than £35.1m.
- 6.6.55 The Stonehenge Alliance contend, however, on the basis of the evidence of their expert witness Professor Goodwin, that induced traffic could add

as much as 20% to the Highways Agency's traffic forecasts (see Document SA/8/1) in the context of the upgrading of the whole A303 corridor, rather than viewing the published scheme as a stand alone project. A fixed trip matrix cannot take into account either the impact of induced traffic or the effects on traffic volume of the cumulative effect of upgrading the whole of the A303.

- 6.6.56 While the National Road Traffic Forecast of 1997 might be the basis on which the scheme falls to be assessed, it is undoubtedly the case that the core central assumptions on which that forecast is based have become the subject of doubt or challenge in the intervening seven years. There have been major policy changes, significant changes to the forecast inputs, further research leading to substantial changes to the approach used in 1997, and the formulation of a new forecasting method. This must cast doubt on the validity of the traffic and economic assessment of the published scheme.
- 6.6.57 The Department for Transport discussion paper "Managing our Roads" (Document SA/0/1) looks at the challenge of increasing demand for road space over the next 20 to 30 years. It acknowledges the need to consider in future the balance between the pressure on our roads, the provision of further capacity and the extent to which road pricing might be used to dampen demand. Present day decisions on roads planning should therefore take into account the possible impact of road user charging. Road pricing on the A303 could have a long term effect on travel patterns, both long distance holiday traffic and local commuting. With road pricing in the pipeline, the need for improvements to the A303 on transport grounds could be reassessed.
- 6.6.58 In the meantime, the Stonehenge Alliance would prefer a "do minimum" approach, which might comprise the closure of the A344, the resurfacing of the A303 with quieter materials, small scale safety measures, and a package of demand management measures for the local area and along the A303. This would allow breathing space in which to consider removing the A303 from the WHS.
- 6.6.59 New options to achieve that might emerge in time, such as a route to the north of Stonehenge following the possible closure of the Army camp at Larkhill or the building of a longer bored tunnel financed by a toll. The Queen Elizabeth II Bridge at Dartford provides an example of a major infrastructure project financed by the private sector in return for toll revenue. The Highways Agency dismissal of this suggestion on the ground that it would cause diversion on to less suitable local routes is inconsistent with its claimed intention to introduce demand management at some future date, since this would also cause diversion.
- 6.6.60 Until the Highways Agency models, using a variable trip matrix, a long bored tunnel with a toll set at varying levels, accompanied by solutions such as area wide, non pricing demand management measures, it is not in a position to rule out this option on diversion grounds.
- 6.6.61 The commitment made by the UK Government to the World Heritage Committee when Stonehenge was inscribed as a WHS related in any

event only to the closure of the A344. There was no promise to address the problems of the A303. That is not to say that the Stonehenge Alliance advocates the closure of the A344 as a stand alone scheme. It should be undertaken with a range of complementary measures, outlined below, to improve safety and manage demand on the A303 in the short term.

- 6.6.62 The predictable nature of the congestion associated with peak hour commuter and weekend holiday traffic on the A303 at Stonehenge is a strong indicator that demand management could do much to reduce traffic levels and their impacts on the WHS. There is a need for an origins and destinations survey to establish the journey purposes for which the A303 is currently used. This could then inform a package of measures specifically developed to reduce car use in the area.
- 6.6.63 Given its national and international importance and popularity, public access to Stonehenge is poor. A visitor travel plan is needed to reduce car trips and to offer reasonable access to the site for those without a car. Easy public transport access to the site is of high importance to overseas visitors in particular, and there is scope for developing dedicated shuttle bus services from reopened railway stations at Wilton and Porton, with a light railway scheme from Salisbury. These could be backed up with stiff parking charges for those accessing the site by private car, and a marketing campaign to inform the public that arriving without a car is an easy and attractive option.
- 6.6.64 The accident rate for the A303 is close to the national average for the class of road. The closure of the A344 would eliminate one source of accidents. Targeted speed reductions at other accident locations would further reduce accidents. Variable speed limits could reduce the likelihood of incidents and make the best use of existing capacity on the road. Speed management should also be considered as a method of dealing with the problem of queuing at peak times. Journey time penalties would be small, while benefits in casualty reduction would be potentially large.
- 6.6.65 The coming decades will see the adoption of technologies which adapt the car to the environment, rather than the reverse. New communication technologies may change working, shopping, leisure and travel patterns, with a consequent reduction in the need to travel in road traffic. The concept of multiple lane roads may come to be regarded as outdated. The impact of the internal combustion engine could not have been foreseen only a century ago, but that is a very small period of time in the history of Stonehenge.
- 6.6.66 The Stonehenge WHS is a landscape which bears witness to 5,000 years of ritual use. An archaeologist visiting it a few centuries hence would be surprised to find that by far the largest single human intervention within it would be a utilitarian structure dating from the relatively short lived fossil fuel age.

### ***The outstanding universal value of the WHS***

- 6.6.67 Five of the nine qualities of outstanding universal value identified in the statement of significance in the WHS Management Plan are not considered at all in the Environmental Statement. Two others are only partially considered. No attempt has been made to assess impacts on spiritual, ceremonial, cosmological or inspirational aspects of the site, and the importance of the integrity of the site has been ignored. No proper attempt has been made to consider the interrelationships between monuments, and there has been no proper assessment of impacts of the scheme on the iconic status of Stonehenge itself.
- 6.6.68 Earlier, better options for improvement of the A303 in heritage terms have been rejected on grounds of cost. But if the Highways Agency accepts that a greater potential negative net present value than £35.1m could be accepted in relation to the scheme, an alternative scheme, which cost more to achieve but delivered greater environmental benefit (such as a longer tunnel scheme) could still be regarded as justified. The balancing exercise for the WHS carried out in relation to the published scheme has been formulated incorrectly: more weight should have been given to heritage and environmental considerations than to economic considerations.
- 6.6.69 It is important to get things right at Stonehenge. If it is too expensive to do that now, we must wait until the money is available, or raise the money now from other sources. The sort of short term decision which has been taken in relation to developments at Stonehenge in recent years (for example, the present provision made for visitors) should not be repeated in relation to the road scheme.

### **The response of the Highways Agency to the objection of the Stonehenge Alliance**

- 6.6.70 The best heritage solution for the WHS would be the complete removal of roads and traffic. Because it has not proved possible to find a satisfactory surface route for the A303 outside the WHS, solutions have naturally been sought by way of a tunnel. This rationale underpinned the conclusion that emerged from the 1995 Planning Conference. There were, however, no funds in the Government's transport budget to meet the costs of such a solution, so the scheme was dropped from the national roads programme.

### ***The evolution of the A303 scheme***

- 6.6.71 If there were limitless funds, a utopian solution could be embraced; but costs and benefits must be carefully weighed in the investment of public funds. Since the UK has one of the richest economies of the world, it is unrealistic to expect substantial overseas funding to assist in meeting the costs of improving the A303 at Stonehenge. A willingness on the part of the Government to invest heritage funds in a solution which was acceptable at the time to both English Heritage and the National Trust led to the promotion of an exceptional environmental scheme for the A303 at Stonehenge, and therefore to the published scheme being prepared.



6.6.72 The change of views of English Heritage and the National Trust in championing in 1997 a 2km tunnel, rather than the 4km tunnel they had supported following the Planning Conference is entirely understandable. They had exercised their judgement responsibly about the relative merits of tunnels of different lengths. The exercise of such judgement is not necessarily either straightforward or transparent, because subjective evaluations are involved. The heritage and other environmental benefits can be assessed and described in qualitative terms, but there is no basis for assigning fixed quantitative or monetary values to assist the comparison of relative benefits against the costs of investment. All that can be done is to ensure that the effects, positive and negative, are identified and assessed, so that they can be weighed in the balance and measured against costs. The POST and CSERGE reports merely underline the difficulties which arise in attempting to quantify environmental benefits.

***The Master Plan and the Management Plan***

6.6.73 The foreword to the Management Plan makes it clear that the plan is not intended to be prescriptive. It provides a framework for action within which future decisions about the WHS can be made. The common leadership of DCMS and English Heritage across the Master Plan and the Management Plan make it clear that the published scheme is intended to be an action under the framework of the Management Plan, which will lead to the delivery of many of the Plan's objectives. The pursuit of the published scheme under the umbrella of the Management Plan is entirely in accordance with the expectations raised with the publications of the Master Plan and the Management Plan, as applauded by ICOMOS and the World Heritage Committee, and with the continued support of the World Heritage Committee, notwithstanding the change of heart by ICOMOS.

6.6.74 Reference to the wording of the Parliamentary answer given by Lord McIntosh (Appendix 1 to Document SA/1/1) will reveal that he did not say that the Management Plan takes precedence over the Master Plan, but that the Government is satisfied that the two plans are fully compatible.

6.6.75 It must be recognised that the WHS is currently bisected by the A303, and that a major purpose of the published scheme is to obtain the heritage benefit of removing this road from the heart of the WHS. Taken overall, the published scheme would obtain substantial heritage benefits for the WHS. The Management Plan itself envisages (at paragraph 4.6.4) that the introduction of a tunnel may have inevitable detrimental effects on existing archaeology along the route corridor, but that this has to be balanced against the major benefits which would arise.

6.6.76 The Stonehenge MILS is the term used to describe the immediate landscape setting of Stonehenge, bounded by the horizons occupied by large groups of barrows. It seeks to define accurately the area of visual influence of Stonehenge, avoiding the uncertainty of the variety of alternative terms used in the Management Plan to indicate the immediate area of Stonehenge.

6.6.77 It is not the case that everything within the boundary of a WHS is of outstanding universal value. This is not suggested either by the World Heritage Convention (Document DD100) or by the Operational Guidelines (Document DD66). In fact, the boundary of the Stonehenge WHS has no historical or landscape significance, being based on easily identifiable features such as roads, field boundaries and rivers. Both the inscription of the site (Document DD61) and the Management Plan (Document DD65) clearly attach different levels of importance to different parts of the WHS.

6.6.78 The inscription reads:

*"Stonehenge and Avebury are the two most important and characteristic prehistoric monuments in Britain. They represent the henge monuments par excellence, as the largest, most evolved and best preserved prehistoric temples of a type unique to Britain. Together with the associated sites and monuments **they** provide a landscape without parallel in Britain or elsewhere and provide an unrivalled demonstration of human achievement in prehistoric times."*

The Highways Agency contends that it is clear from the use of the word "they" (which the Agency emphasises in that quotation), that it is Stonehenge and the associated sites and monuments which comprise the landscape. The landscape itself, described in the National Trust's Spirit of Place (Document CD/NT/1) at paragraph 2.4.12 as "*a beautiful, but nevertheless ordinary Wiltshire landscape*", could not provide an unrivalled demonstration of human achievement. The inscription thus relates to the archaeological aspects of the WHS, not to the landscape itself. That landscape is not recognised even as of national importance, because it was not included in the area of outstanding natural beauty which has been designated further to the north. Similarly, the Management Plan refers to the landscape of the WHS at paragraph 2.2.26 as "undistinguished".

6.6.79 The Management Plan differentiates its aims for the core of the WHS, where Objective 9 states that "*The appropriate landscape setting for the Stones and immediately related ceremonial monuments*" should be restored, and for "*the wider WHS landscape*", which Objective 11 suggests should be improved through the removal or screening of existing inappropriate structures.

6.6.80 The whole of the WHS has been recognised, but there is no obligation on the Government to protect everything within the boundary. What is required is that the development proposal should be fully assessed, and the balance of benefits and disbenefits reviewed. That is what has been done in the Environmental Statement. It is not the case that the published scheme is based on the premise that transport benefits outweigh damage to the WHS, as the Stonehenge Alliance claims. The assessment concludes that the published scheme would offer an overall substantial benefit to the WHS in environmental terms, accepting that there are negative environmental effects, but balancing these against the benefits, without any consideration of the transport benefits.

### ***International and UK legal requirements***

- 6.6.81 The UK ratified the Valletta Convention in 2001. It is not, however, incorporated into UK domestic law. The interpretation and implementation of the UK's obligations under the Convention are matters for the State Parties and the Committee of Ministers of the Council of Europe. In the UK, the obligations relating to the creation of archaeological reserves are fulfilled through legislation which permits the designation of sites containing archaeological remains as scheduled monuments or protected wrecks, or within the planning system by the imposition of planning conditions. Within the Stonehenge WHS, various historic assets are protected by statutory designation as scheduled monuments, and the fact that the area is a WHS means that it is given particular importance within the planning system. There is nothing which gives the WHS as a whole, however, the status of an archaeological reserve.
- 6.6.82 The World Heritage Convention operates differently in Australia, because that State Party has enacted special domestic legislation to support the Convention obligations. That is not the case in UK.
- 6.6.83 The scope of the Environmental Statement is in part guided by European Directives which the Highways Agency is obliged to follow, and in part by the requirements of the DMRB volume 11 (Document DD48). The scope of the Statement was the subject of very broad and prolonged consultation, and the Statement was formulated taking full account of the fact that the scheme would pass through a WHS.
- 6.6.84 The Statement is not based on the assumption that a road must be built. The A303 and the A344 have already been built. They are no longer regarded as acceptable in their current form within the WHS, and the need to deal with the A303 and to remove the A344 is therefore set out in the Management Plan.
- 6.6.85 The Statement is naturally based on methods of assessment derived for road schemes, because the scheme which is being assessed is a road improvement. The method of assessment has, however, developed new techniques which recognise the importance of the WHS, in that the cultural heritage assessment has developed an approach which combines the magnitude of both direct and indirect effects, taking full account of the enhancement of statutory protection for all those sites within the WHS boundary identified by English Heritage as being associated with Stonehenge.
- 6.6.86 The methods used to assess landscape quality are those required by the DMRB. To have used a different method of assessment derived specifically for this project would have invited the criticism that the method of evaluation had been invented to deliver the desired result.
- 6.6.87 The spatial inter relationship between monuments is shown in Figure 5.1 of the Environmental Statement (Document DD10). The visual

relationship between monuments is included in both the cultural heritage and the landscape assessments.

- 6.6.88 The current Operational Guidelines for the implementation of the World Heritage Convention (Document DD66) provide that the appropriate test for a cultural site such as Stonehenge is authenticity rather than integrity. The Environmental Statement has identified and assessed all sites which are authentic in terms of the justification for inscription.
- 6.6.89 As regards the landscape as a receptor, in the Environmental Statement the landscape has been broken down into units of landscape quality, and the effects of the scheme have been assessed on each unit individually before conclusions have been drawn about the overall effect. This demonstrates a more transparent assessment, as it makes clear which features would be affected in the landscape and how.
- 6.6.90 In relation to the final criticism levelled at the Environmental Statement, neither the inscription nor the Management Plan contains a statement of significance. The justification within the inscription is the sole guide to what is considered to be of outstanding universal value within the site. This focuses on Stonehenge and its associated sites and monuments.
- 6.6.91 An outline of the main alternatives studied by the Secretary of State and an indication of the main reasons for his choice, taking into account the environmental effects, is given in Chapter 17 of Volume 1 of the Environmental Statement (Document DD9). This is fully compliant with the European Environmental Impact Assessment Directive. Nothing in the Directive precludes the Secretary of State from including financial considerations as a relevant issue.
- 6.6.92 The Appropriate Assessment for the published scheme under the Habitat Regulations will be undertaken by the Secretary of State for Transport as the competent authority for the scheme. The Secretary of State will use the Statement to Inform the Appropriate Assessment (Document DD132), agreed by English Nature, as the basis for undertaking the Appropriate Assessment. The role of Salisbury District Council as planning authority is to undertake a cumulative assessment on the River Avon cSAC arising from proposed developments in the area. The Environmental Statement indicates, however, that the published scheme would not affect the integrity of the River Avon cSAC, and this is accepted by English Nature in Document HA/0/45. There is therefore nothing arising from this scheme for the District Council to assess along with other proposed developments.

### ***Planning policy***

- 6.6.93 Neither paragraph 2.22 nor paragraph 2.23 of PPG 15 is in fact directly applicable to the proposals before the inquiries, but the Highways Agency accepts that the inscription of Stonehenge as a WHS is an important material consideration to be properly taken into account in the decision making process on the published scheme. PPG 15 also provides in paragraph 1.3, however, that "*the historic environment of England is all*

*pervasive, and it cannot in practice be preserved unchanged.” Paragraph 27 of PPG 16 states that:*

*“The case for the preservation of archaeological remains must however be assessed on the individual merits of each case, taking into account ... the intrinsic importance of the remains and weighing these against the need for the proposed development.”*

6.6.94 The Regional Planning Guidance (Document DD146) also includes Policies TRAN 2 and TRAN 4, which establish the A303 improvement at Stonehenge as being within the first priority five year time horizon. The scheme is seen as being necessary to support inter regional movement to aid economic growth and regeneration, and to reduce the effect of the peripherality of the South West Region. Similarly, the SWARMMS study refers to existing problems of community severance, noise, higher accident rates and long delays during peak holiday periods on existing single carriageway sections of the A303.

6.6.95 The Wiltshire Structure Plan contains a statement at paragraph 26.26 that the A303 Stonehenge scheme is fully supported by the County Council in accordance with Policy HE1. Like the County Council, Salisbury District Council is a supporter of the published scheme (subject only to two points of detail, which do not affect compliance with Local Plan policy). The District Council must therefore be satisfied that the scheme complies with the Local Plan, and with the relevant provisions of the Management Plan, which the District Council has adopted as supplementary planning guidance.

6.6.96 In the case of *Coal Contractors Limited v SSE and Northumberland CC*, the Secretary of State took the view that the impact of the proposed development on the setting of Hadrian’s Wall and its WHS was unacceptable. It is accepted that the same issue arises in this case. It will fall to be decided on its merits, after all the evidence produced in the case has been evaluated. The approach of the Secretary of State which was upheld in the Coal Contractors case included the following:

*“The Secretary of State agrees with the Inspector that there is no complete embargo on any particular form of development within a WHS. The Secretary of State takes the view that the designation as a WHS is not of itself an instrument of planning control and does not carry any specific additional restriction or control, but it signals the particular importance of the site as a material factor to be taken into account in the planning application.”*

At page 291 of the judgement in the Coal Contractors case, it is also noteworthy that the Secretary of State considered it necessary to weigh any positive benefits of that particular scheme against any adverse effects before coming to his decision.

6.6.97 At the time that Stonehenge was inscribed as a WHS, the justification contained within the nomination provided the only description of the outstanding universal value of the site. The reference in the justification is to Stonehenge and to its associated sites and monuments. There is no

reference in the nomination of Stonehenge to invisible below ground archaeological remains. The way in which the DMRB asks for invisible below ground remains to be assessed is dealt with in paragraph 6.3.33 above.

### ***Archaeological impacts***

- 6.6.98 The impacts of the published scheme on all identified cultural heritage sites have been assessed in the Environmental Statement. It is the case that, as a result of direct impacts in certain areas, the scheme would lead to the complete removal of any archaeological remains found in those areas. Such remains have, however, been assessed, and do not fulfil the criteria for national importance. They would be recorded by archaeological investigation in advance of construction.
- 6.6.99 While the scheme would result in adverse effects on the settings of some sites including Site 26 at Longbarrow Crossroads, none would be particularly severe. While the effects on Site 26 would be classed as moderate adverse, the effects would be major beneficial on Site 59, moderate beneficial on Site 42, and neutral on Sites 41 and 70.
- 6.6.100 The spatial relationship of the monuments in the area of the western tunnel portal and Longbarrow Crossroads would remain unaltered, and the limits of the cutting in this area would be obvious. The cutting would only be visible from limited areas within the WHS landscape, and could not be confused with the natural topography. Placing the A303 in cutting would also serve to conceal the traffic on it from much of the WHS.
- 6.6.101 The reinstatement of the proposed work in Stonehenge Bottom is designed to avoid any adverse effect on subsequent vegetation. The ground would be reinstated and reploughed or cultivated along with the adjoining arable land, so that any vegetation would be indistinguishable from that at either side of the tunnel. The proposed byway has been added to provide the benefit of access to the WHS for non motorised visitors.
- 6.6.102 It is accepted that walkers close to the A303 at the tunnel portals would find their experience of the WHS very considerably interrupted, but walkers in a similar position today suffer from the proximity of traffic on the A303. The scheme would result in a far better experience for those who use public rights of way such as Bridleway Amesbury 10 beside the King Barrows, who would no longer see the A303.
- 6.6.103 The scheme has not sought to reunite The Avenue. It is split by the A303 at present, and physical restoration of its route does not appear to be achievable south of the A303. Before the inquiries, it had not been identified as a priority in either the Management Plan or the National Trust's Land Use Plan.

### ***Landscape and visual impacts***

- 6.6.104 Stonehenge was not inscribed as a WHS for its landscape quality. Nor was it inscribed as a cultural landscape. Indeed, the existing landscape

- has little historical integrity. The inscription is firmly focussed on archaeological monuments.
- 6.6.105 In areas such as the Stonehenge MILS, the landscape character is dominated by the monuments and their cultural resonance, which contribute to the very high value landscape character. The remainder of the WHS does not, however, necessarily share that value in landscape terms. There are some corners of it, for example next to the sewage works south of Larkhill, where its landscape value is much lower. Taking the whole WHS and giving it a very high landscape quality ranking on the grounds that it is a WHS, when this designation is on archaeological grounds, would be illogical.
- 6.6.106 The effects of the published scheme would similarly not be made clear if a single assessment of major adverse was applied throughout the WHS. The Stonehenge Alliance fails to attribute sufficient weight to the very considerable benefits resulting from the removal of the A303 and its traffic from the MILS. The individual areas are assessed separately so that all adverse and beneficial effects are fully identified before an overall conclusion is reached.
- 6.6.107 All the assessments carried out for the Highways Agency are based on a comparison between the existing situation and the published scheme. Between The Avenue and Countess Roundabout, the scheme differs only slightly from the existing dual carriageway, and at Countess Roundabout itself the A303 is very enclosed in a corridor which is entirely dominated by the existing junction. Assessments cannot be made for the published scheme without any consideration for what exists at present.
- 6.6.108 The cuttings in which parts of the proposed road would be located would not interrupt the line of sight between monuments, and it is not accepted that most intelligent viewers would not be able to appreciate the relationships between the sites because the road would be in cutting between two monuments. The road in cutting would remove the interruption of the traffic which would be located between two views in a situation where the A303 runs on the surface at the present time.
- 6.6.109 There is no evidence that walking in a direct line between monuments, in particular between barrows, was important in prehistoric times. The Avenue, for example, does not run in a straight line, and cuts across lines of barrows on its route between Stonehenge and the River Avon.
- 6.6.110 It is accepted that the published scheme would be visually intrusive to a greater degree than the existing A303 at a limited number of monuments. This is, however, greatly outweighed by the benefits of removing the A303 and its traffic from the site of Stonehenge and from the space between many of the principal monuments in the WHS.
- 6.6.111 The Appraisal Summary Table for the published scheme was provided to the Stonehenge Alliance at the start of the inquiries (Document HA/0/28). The negative and positive effects of the published scheme are fully presented in the Environmental Statement. The balance of effects is heavily positive, a view which is supported by DCMS and English

Heritage. The Appraisal Summary Table has been prepared in accordance with the methodology prescribed in the Transport Analysis Guidance corresponding to the development stage of the published scheme. The methodology requires a summary assessment score to be entered on the Appraisal Summary Table for various environmental sub objectives. This scheme is not part of a Multi Modal Study.

- 6.6.112 It is correct to say that drivers would lose the view of Stonehenge and much of the WHS if the tunnel were to be constructed. This is, however, a consequence of a stronger priority, as expressed in the Management Plan, for visitors to the WHS to lose the view of vehicles and the roads along which they travel. Once they have left their cars, drivers would be better able to appreciate the WHS without the view and sound of vehicles. The Stonehenge Alliance suggests that Stonehenge owes much of its iconic status to the views that generations of people have seen from the A344 and the A303. In fact, the iconic status of Stonehenge clearly pre dates the arrival of the motor car by several hundred years. The view from the road forms, however, a separate part of the DMRB methodology, which is dealt with at chapter 13 of volume 1 of the Environmental Statement.
- 6.6.113 It is certainly the case that the published scheme would make it impossible for visitors to access parts of the site without being affected by the sight or sound of traffic. The sight and sound of traffic would, however, be removed from the MILS. All available north-south rights of way would be connected over the top of the proposed tunnel.

### ***Hydrogeological impacts***

- 6.6.114 It is accepted that in certain circumstances the building of new pipelines can create new pathways for shallow groundwater flow. That is certainly an issue in relation to gas pipelines, which are normally placed in trenches with a gravel backfill. Gravel would be of greater permeability than the adjacent natural strata, and so would provide a preferential pathway for shallow groundwater flow. The tunnel proposed here, however, is to be constructed by excavated bore at depth. Shallow groundwater flow diversion would therefore not arise. The method of construction would impose only limited stress on the rock fabric, and so the potential to enlarge existing or to create new fractures would be limited. Reference to the local hydrogeology shows that, even if tunnelling did increase fracturing in the adjacent chalk, there would be no significant change to the existing groundwater flow regime.
- 6.6.115 In any event, no groundwater source would be affected. There is only one source in the Stonehenge Bottom groundwater catchment, a disused well at Springbottom Farm, about 2km south of the A303. This is licensed for abstractions, but it is not used, and the residents at the Farm state that they have no plan to use it. Its distance from the A303 would make it highly unlikely that its yield would be affected in any event if any groundwater redirection were caused by the tunnel.
- 6.6.116 In relation to the possible spillage of hazardous liquids in the tunnel, the tunnel would comprise three liners - outer shotcrete, a waterproof PVC



membrane, and an inner concrete lining. The risk of a spillage within the tunnel migrating out into the chalk aquifer is therefore considered to be insignificant. Spillage in the tunnel would be collected by kerb drains, linked to sealed carrier drains, leading to a sump at the low point near the centre of the tunnel. Contaminated spillage would be pumped to a waste tank near the Eastern Tunnel Control Building, and then removed for disposal at an appropriate facility.

- 6.6.117 The 2.1km tunnel would replace an equivalent length of existing road at ground surface level, from which drainage is currently directed to unsealed ditches. There is therefore a greater existing risk for a spillage to cause aquifer contamination at present. The tunnel section (and the remainder of the scheme's drainage system) would in fact reduce the risk of contamination to the aquifer.
- 6.6.118 As regards the suggestion that the proposed drainage pipes across the top of the tunnel might clog up over time with calcrete build up and the general accumulation of fines, the intended pipe size and spacings would more than deal with the expected peak flows that would be generated from the groundwater catchment up gradient of the tunnel. It is not considered that any maintenance of these arrangements would be required.
- 6.6.119 The Environment Agency has considered the proposals involved in the construction of the published scheme. The Agency has accepted the proposals and withdrawn its objection to the published scheme. Similarly, English Nature has also accepted that the scheme would have no significant adverse consequences, either for the hydrological regimes in the Till and Avon Valleys, or for water quality throughout the route corridor.

***Transport policy and its implications for the published scheme***

- 6.6.120 It is accepted that Government policy recognises that a range of initiatives needs to be pursued to deliver an effective transport programme. This certainly includes achieving a reduction in traffic growth through measures such as demand management. But those policies work in parallel with road building, which is another essential component of the overall strategy to reduce congestion. At the same time as the issue of the Transport White Paper in July 1998, the Government also published "A New Deal for Trunk Roads in England" (Document DD33). This was one of the supporting documents to the Transport White Paper, and it made it clear that trunk roads would continue to be an integral part of the nation's transport system. It introduced a carefully targeted programme of large scale improvements, one of which was the present scheme. Similarly, Transport 2010: The Ten Year Plan (Document DD34, produced in 2000) indicates in paragraph 7.2 that "*the vast majority of travel will continue to be by road*", and that "*by 2005, we expect to see ..... a growing number of new bypasses and other major road improvement schemes coming on stream or under construction*".

- 6.6.121 The causes of the transport problems in the area of Stonehenge have been studied over many years. A wide variety of solutions has been considered. This has culminated in the promotion of the published scheme, which the Highways Agency regard as the optimum solution. A two lane dual carriageway is justified by the traffic figures for the area.
- 6.6.122 The Stonehenge improvement scheme came back into the roads programme only because of the initiative of English Heritage and the National Trust bringing forward the tunnel solution which they suggested. Thereafter, because the scheme was already included in the roads programme as an exceptional environmental scheme, it was not remitted to SWARMMS. It was already being pursued as a priority because of the heritage benefits it would bring to the WHS. If the scheme had not already been in the roads programme, it would no doubt have been included in SWARMMS.
- 6.6.123 The published scheme is not dependent on high traffic growth for its justification. The transport benefits which would be derived from it are substantial with high or low traffic growth. It is the cost of the tunnel which starts to erode the net value of those transport benefits, but that is justified by the heritage benefits it would bring to Stonehenge and its immediately related sites and monuments.
- 6.6.124 The scheme benefits have been assessed under all traffic conditions, and do not concentrate on congested conditions. The traffic model represents traffic flows on an average day. The assumption of balanced flows on a daily basis is a reasonable one for traffic on an average day. Peak hour analyses of traffic have been based on factors that vary by direction, and the variation of traffic flow at different times is taken account of in the economic assessment within the COBA and QUADRO computer models.
- 6.6.125 The traffic and economics forecasts used in the appraisal of the published scheme have been prepared in strict accordance with the provisions of DMRB, volume 12 (Document DD/49). This has included the use of data from both the Department for Transport's TEMPRO programme (Document DD85), which provides local growth for cars, and the National Road Traffic Forecasts for other vehicles. Clearly, work is proceeding to update the National Road Traffic Forecasts, and various policy initiatives to address transport developments are constantly under discussion. The basis upon which schemes are to be appraised, however, has not been changed by the Government. No definitive advice on the subject of, for example, road pricing strategies for inter urban routes has yet been issued by the Government.
- 6.6.126 The effects of induced traffic have been properly assessed and taken into account in the design of the published scheme. The level of induced traffic amounts to around 1,000 vehicles per day in the opening year of the scheme. Even if that were to be doubled to 2,000 vehicles per day, in the context of existing flows along the A303 this would not be significant. Those current traffic flows vary between 22,000 and 33,000 vehicles per day. The two lane dual carriageway proposed in the published scheme could readily carry flows of 70,000 to 80,000 vehicles per day. Such a flow level may never be reached on the A303. Certainly

the amount of induced traffic calculated as a result of the published scheme itself and as a result of further improvements on the A303 could be accommodated comfortably by the new dual carriageway proposed without having material impact on speed for decades to come.

- 6.6.127 The traffic and economic assessment of the Stonehenge scheme as a stand alone scheme is relatively simple and straight forward. The assessment can be undertaken robustly and adequately using a fixed trip matrix model. There is no justification for introducing the complexities of a variable trip matrix model to what is such a straightforward scheme in terms of traffic assessment.
- 6.6.128 The economic assessment does not seek to take into account the cumulative traffic effect of upgrading the remainder of the A303. There is no need to do so. The published scheme can cope operationally with future traffic levels. The assessment has, however, taken into account local development envisaged in the adopted development plan.
- 6.6.129 The suggestion made by the Stonehenge Alliance that, in the short term, a "Do Minimum" approach, comprising the closure of the A344, resurfacing of the A303 with quieter materials and small scale safety measures should be followed is not a realistic one.
- 6.6.130 The closure of the A344, without additional action to address the problems in the area, would have adverse traffic impacts. There would be additional congestion on the A303, principally on the sections either side of Longbarrow Crossroads. Queuing would be common place, and delays would be extensive at peak times. There would be diversion of traffic on to less suitable local roads with implications for the links and the junctions in terms of safety and operation. Access to Stonehenge from the A303 would also become much more inconvenient.
- 6.6.131 The responsibility for managing and maintaining the A344 lies with Wiltshire County Council, as the highway authority for that road. The County Council has considered the proposal, and agreed that it would not exercise the powers available to it to promote the closure of the A344 should the A303 Stonehenge improvement not go ahead (Document WCC/1/17, minute 65 (ii)).
- 6.6.132 If the published scheme did not proceed, the existing A303 would have to be resurfaced at some point in the future, and this would be carried out with low noise surfacing material, but its impact on traffic noise at the Stones would not be substantial. As regards other small scale safety measures, a number of these (extra signing, anti skid surfacing and white lining) have already been introduced following a study carried out in 2000. It is difficult to see what else could reasonably be done to manage the traffic flows any further within the constraints of the existing layout.
- 6.6.133 In terms of demand management measures such as road user charging, these could supplement the scheme in the future, depending upon the direction in which Government policy moves. Many of the measures suggested by the Stonehenge Alliance would, however, have a limited impact on the traffic problems on the A303. The majority of the journeys

(amounting to an estimated 84%) on this section of the A303 have origins and destinations outside the local study area, and therefore local measures would have a limited impact on the flows along the road.

- 6.6.134 It is hardly the case that a hasty decision is in prospect in relation to the published scheme. It has evolved from many years of study of a wide variety of alternative potential solutions. It is available only because of the heritage contribution being offered to support the tunnel element of the scheme. That contribution is available now. If the present scheme is not pursued, it could be a substantial time before anything happens to address the problems at Stonehenge.

***Outstanding universal value***

- 6.6.135 The possibility of an assessment of the impact of the published scheme on spiritual and ceremonial aspects of the WHS was carefully considered, but rejected because it has not proved possible to reach agreement about such matters, and neither is there any specific methodology provided in volume 11 of the DMRB. It was suggested at the inquiries that advice should have been sought from suitably informed Pagans. Yet Pagans have been invited to all the Public Community Liaison Group meetings during the design of the scheme, and no such suggestion has previously been put forward.

- 6.6.136 It is not considered that roads are more important than a WHS. It is a fact, however, that busy roads already exist within the WHS. This exceptional environmental scheme is challenged with finding the solution to the needs of both road transport and cultural heritage. The published scheme would not directly affect any nationally important monument, and the outstanding universal values of the WHS would not be diminished. The scheme would provide substantial heritage benefits, and also provide a solution to traffic congestion.

**6.7 Friends of the Earth (Wiltshire)**

- 6.7.1 Wiltshire Friends of the Earth (Wiltshire FOE) is a member of the Stonehenge Alliance. Wiltshire FOE has, however, separate and additional grounds for objecting to the published scheme.

- 6.7.2 Wiltshire FOE was a participant in the Stonehenge Planning Conference of 1995. This was a constructive and productive non statutory procedure, which brought together all those interested in the proposals with a view to seeking a consensus.

- 6.7.3 Wiltshire FOE did not agree with all the resolutions which came out of the Planning Conference, but four resolutions had the potential to satisfy Wiltshire FOE and many other participants. These were:

*"This Conference:*

*5. Supports the development of facilities for visitors to Stonehenge in the context of a sustainable development plan and visitors' transport choices.*

*8. Notes that if, following the current debate on national transport policy, it is decided to restrict road building in order to restrain traffic growth, growth of traffic on the A303 would be less if those sections which are not already improved remained a single 7.3m carriageway. Any review of the A303 as a strategic route should be in the context of the recommendations of the SACTRA Report.*

*12. Supports in principle the proposal by English Heritage and the National Trust for a long tunnel under the Stonehenge site, but recommends further investigations are carried out to establish a portal west of the A360 to link with the Winterbourne Stoke bypass.*

*15. Recommends that in the interim, traffic management measures are considered to reduce congestion and improve safety on this section of the A303 and the A344, but that the earliest opportunity should be taken to resite the Visitor Centre and to green the A344."*

- 6.7.4 Although the Planning Conference took place nine years ago, that does not diminish its significance. In fact, however, the resolutions set out above have been betrayed.
- 6.7.5 There is no sustainable development plan for visitors in the published scheme, nor does it contain proposals for managing demand. Resolution 5 is therefore not fulfilled by the published scheme.
- 6.7.6 The Government did accept the SACTRA Report, but efforts to restrain traffic growth do not form a major part of this allegedly exceptional environmental scheme. Resolution 8 is therefore not fulfilled by the published scheme.
- 6.7.7 The 4km tunnel does not form part of the Highways Agency's proposals. Resolution 12 is therefore not fulfilled by the published scheme.
- 6.7.8 The only interim traffic management measures which have been undertaken are speed restrictions at Winterbourne Stoke. Resolution 15 is therefore not fulfilled by the published scheme.
- 6.7.9 The stretch of the A303 affected by the published scheme is a pinch point, but the Highways Agency agrees that dualling it on transport grounds is not a priority. Speed control can maintain a flow, and increase the capacity of a road. As shown in the Transport Statistics Bulletin, "Vehicle Speeds in Great Britain 2002" (Document FOEW/0/8) dual carriageways encourage unlawful speeding, where 50% of traffic breaks the speed limit. On non built up single carriageway roads, only 8% of traffic exceeds the 60mph limit.
- 6.7.10 Noise increases significantly according to speed (amongst other factors). A likely 4-5dB difference between 40mph and 70mph will occur, with increases throughout the day. Residents at Winterbourne Stoke will no longer have a 40mph trunk road going through the village, but instead

there will be very high noise levels along the original road, whilst less than 500m away is a high speed dual carriageway with thundering traffic that will supposedly improve noise levels. This seems improbable. The base line noise assessment designed for comparison was taken when the traffic levels were likely to have been relatively high.

- 6.7.11 A single carriageway bypass for Winterbourne Stoke would have much merit in improving the quality of life for local residents. It would help to keep the whole corridor below capacity, and keep traffic noise to existing levels, achieving long term better value.
- 6.7.12 The Highways Agency should have explored and consulted on the affordability and feasibility of a long bored tunnel option, assisted by road tolling. This could have been investigated for this particular scheme. It is not necessary to await Government decisions on tolling for the road network as a whole before considering the issue in relation to this proposal.
- 6.7.13 The Highways Agency did not produce an Appraisal Summary Table for this scheme until requested to do so by the Stonehenge Alliance. It is remarkable that a document which lies at the heart of the Government's "New Approach to Appraisal" should only be produced upon request in this way. There is a reference to the latest Government methodology in the Environmental Assessment Scoping Report (Document DD58), but there seems little evidence that this methodology has been used in assessing this scheme. There are significant differences between the overall assessment against individual sub headings in the Appraisal Summary Table drawn from the Stage 2 Assessment and produced before the opening of the inquiries (Document FOEW/0/4) and the assessments contained in the Summary of Tunnel Comparisons (Document DD60). Some of these have changed again in the Appraisal Summary Table now produced (Document HA/0/28). The Highways Agency explain that the latest document is a Stage 3 Assessment, but it is hard to understand how significantly different scores can be arrived at even accepting this point. The earlier appraisals were both issued to the public, and, in the case of Document DD60, formed part of the Government decision making process, being used as a basis to determine how to spend hundreds of millions of pounds of Government money.
- 6.7.14 The Stage 2 appraisal appears to have formed a most unreliable way of assessing the different options in this case. This is unfortunate, in that it was the basis of the decision taken by the Government on tunnel options in December 2002.
- 6.7.15 The whole appraisal process seems to be susceptible to manipulation in order to achieve the appraisal scores required to support whatever might be the current favoured option.
- 6.7.16 Wiltshire FOE believe that the published scheme should be rejected, and that the 1995 Planning Conference should be reconvened, focused this time far more on sustainable transport and real heritage outcomes.

### **The response of the Highways Agency to the objection of Friends of the Earth (Wiltshire)**

- 6.7.17 The 1995 Planning Conference was held to provide the public and other interested organisations with an opportunity to explore and debate possible ways of overcoming the problems which existed on the Stonehenge stretch of the A303. It was not part of any formal statutory procedure. The resolutions arising from the Planning Conference had no formal basis, and were not binding.
- 6.7.18 The aim of Resolution 5 of the Planning Conference was to leave open the opportunity for introducing different modes of transport for people wishing to visit the WHS via the existing or the proposed Visitor Centre. The published scheme would not hinder this objective in any way, and would provide the opportunity for users other than those in motor vehicles to enjoy a much improved rights of way network. Public transport is currently not an easy option for visitors to the Stones, but many visitors use coaches and buses provided by tour operators. This would not change as a result of the published scheme, but access would be improved at peak times because of a reduction in congestion.
- 6.7.19 The existing A303 through Winterbourne Stoke and past Stonehenge is overloaded at certain times. Providing a wide single two lane carriageway road would not address that overloading adequately. The predicted flows in the opening year (2008) would exceed the capacity by 16%. The adoption of a dual carriageway standard for the Winterbourne Stoke Bypass is supported by the SWARMMS recommendations for dualling most of the remaining single carriageway sections of the A303. Resolution 8 of the Planning Conference has therefore been taken into account in the preparation of the published scheme.
- 6.7.20 It was the unaffordability of the long tunnel proposal contained in Resolution 12 of the Planning Conference that resulted in the scheme being dropped from the Roads Programme. In the preparation for these inquiries, at the request of the National Trust, a further detailed study has been undertaken of various tunnel lengths, and the result of this study has been presented to the inquiries as Document HA/0/8. The long tunnel alternative being considered at these inquiries is, however, different from the line of the longer tunnel which was the subject of Resolution 12. The 1995 long tunnel option has not been proposed by anybody as an alternative to the published scheme at these inquiries.
- 6.7.21 As regards Resolution 15 of the Conference, interim safety improvements have been carried out at Winterbourne Stoke with the installation of extra signing and a speed camera. It is difficult to see what more could sensibly be done pending the provision of a bypass.
- 6.7.22 The issue of road tolling is a matter for the Government. The principle of tolling could apply equally to a 2.1km tunnel as it could to a 4.5km tunnel. The issue does not bear on which tunnel length would provide the optimum, best value for money solution. Tolling would simply provide a source of revenue, and a potential means of managing traffic demand.

## **6.8 Salisbury Green Party**

- 6.8.1 Salisbury Green Party has around 50 members. Its objection to the published scheme has been authorised by local meetings open to all of those members.

### ***The Resolutions of 1995 Planning Conference***

- 6.8.2 The Salisbury Green Party does not support the ambition to dual the A303. However, the Party believes there is merit in maintaining the consensus which was the product of a well organised Planning Conference in 1995, at which the issues were thoroughly and openly debated by interest groups who were prepared to compromise in pursuit of an agreed way forward.
- 6.8.3 The published scheme would have been very quickly rejected by the Planning Conference.
- 6.8.4 The published scheme would have an adverse effect on the WHS. It would not restore the integrity and tranquillity of the Stonehenge landscape. This is visually degraded by the tarmac of the present A303 and A344, the car park and the Visitor Centre. Its tranquillity is affected by noise from four main sources – road traffic, flights from Boscombe Down airbase, the Army's noisiest big guns, which are fired into the Larkhill ranges from about 2km north of Stonehenge, and by substantial local military helicopter traffic. Thus, whilst it is the road proposals that are crucial to the visual restoration of the landscape, restoring that landscape to tranquillity also depends on substantial changes to the training activities of the armed forces.
- 6.8.5 The key demand of the Planning Conference was to seek the restoration of the Stonehenge monument to its landscape through the closure and restoration to downland of the A303 between Stonehenge Cottages and Longbarrow Crossroads, the closure of A344 between Stonehenge Bottom and Airman's Corner, and the resiting of the present visitor facilities. The published scheme would achieve the closure of the A344 between Stonehenge Bottom and Stonehenge (though not as far as Airman's Corner) and the replacement of the A303 by a new downland byway. The benefits of those measures would, however, be entirely negated by the proposal to build a new trunk road. Far from restoring the A303 to downland between Stonehenge Bottom and Longbarrow Crossroads, the published scheme would convert a large area of downland into the A303. Although the proposed tunnel would mean that the length of A303 crossing the WHS would be 2km less than at present, the scale of the new road and its associated earthworks would mean that the land take and the consequent zone of disruption would be considerably greater than at present. The published scheme would replace a road following the contours, which is less than 10 metres wide, with a road in a deep cutting, severing the downland and with a width of more than 50m. The A303 cutting would become the most prominent monument within the WHS – a 21<sup>st</sup> century monument to the car.



- 6.8.6 Any new road scheme in the vicinity of Stonehenge needs to comply with resolution 9 of the Planning Conference, which required any route for the diverted A303 to avoid the Stonehenge Bowl. The idea that the Stonehenge Bowl forms the core of the WHS was a consensus opinion supported by disparate parties. The boundary of the Stonehenge Bowl was considered to extend westwards as far as Longbarrow Crossroads, indicating that the whole area between New King Barrow Ridge and Longbarrow needed to be avoided by any new road. This would not be achieved by the published scheme.
- 6.8.7 It is accepted that the WHS boundaries are themselves arbitrary, following the lines of modern features like the A360, rather than being determined on archaeological or landscape grounds. There is scope for argument about what should have been the boundary of the WHS, but it should be mandatory for the proposed road to avoid the core area of Stonehenge. At Longbarrow, the arbitrary WHS boundary and the landscape boundary of the Stonehenge Bowl coincide.
- 6.8.8 The only way that the published scheme could be amended to comply with the required objectives is by tunnelling under the entire length of the WHS.
- 6.8.9 In the meantime, there is no reason why the A344 should not be closed. This has been repeatedly called for over many years, including by the 1995 Planning Conference. The Highways Agency acknowledges that there would be a heritage benefit as well as a road safety benefit from closing the junction at Stonehenge Bottom. The Agency argues that work would be needed at Airman's Corner, but if this is correct, then it applies equally to the published scheme or any alternative that involves closure of the A344.
- 6.8.10 The only substantive objection to the closure of the A344 is that it would be disadvantageous to traffic between Stonehenge Bottom and Longbarrow. That is so, but, to accept it as an argument against closure, is to put the highways interest ahead of the heritage interest. That would seem to be contrary to the whole basis on which the question of the A303 and Stonehenge has been brought before the inquiries.
- 6.8.11 The draft Side Roads Order would allow the Secretary of State to close the A344 from its junction with the A303 to the Stonehenge car park, and, if the Secretary of State wishes to protect and enhance the environment and cultural heritage of Stonehenge, he should close the A344 immediately.

***Tunnel safety***

- 6.8.12 The safety of any tunnel would be of the highest importance. Although road tunnels in Britain seem generally to have a good safety record, the public perception has been influenced by a number of serious fires in tunnels overseas. Any tunnel scheme should therefore have the maximum available protection in the form of smoke extraction, fire suppression and measures to isolate affected areas of the tunnel. This applies equally to the published scheme and to any alternative longer

tunnel.

### ***Winterbourne Stoke***

- 6.8.13 The Green Party does not support the idea of a bypass for Winterbourne Stoke, but if there is to be one, it should be built as a separate scheme, with a single carriageway to cater for existing traffic levels. In the meantime there should be a comprehensive programme of traffic calming. The environmental impact of a Winterbourne Stoke bypass on the Till Valley should be assessed and considered.

### ***Countess Flyover and the proposed Visitor Centre***

- 6.8.14 Although the A303 proposals and the Visitor Centre proposals are being progressed as separate schemes, they are clearly closely linked. The flyover at Countess was not proposed at the 1999 public consultation. At that time, it was proposed to run the A303 across the middle of the roundabout at grade, with traffic signals. The flyover was added to the scheme later, in the light of objections to the traffic problems that might arise at Countess from English Heritage's new preferred site for the Visitor Centre at Countess East.
- 6.8.15 The Countess flyover would cause disbenefits to Amesbury in terms of noise, visual intrusion and pollution. The flyover would become a dominant and unwelcome feature for residents and visitors in that part of the town. On the other hand, the existing roundabout provides a proper transition between the continuous dual carriageway to the east and the mix of single and dual carriageway to the west. Limited roadworks at Countess could, however, improve the safe operation of the roundabout. There should be better provision for pedestrians and cyclists, and traffic signals with pedestrian phases so that people can cross the road in this location safely on the level.
- 6.8.16 The proposed new Visitor Centre does not have planning consent, and given the high level of opposition to it, there is no guarantee that it will obtain such consent. It should be noted, however, that the heritage benefits which are claimed to justify the published scheme cannot be achieved by the scheme alone. The restoration of the landscape in the MILS depends crucially on the successful removal of the Stonehenge Visitor Centre and car park. It is therefore recommended that, in the event of the published scheme (or any alternative to it) being approved, its construction should not go ahead until the relocation of the Visitor Centre is assured.

### ***Wider highways issues***

- 6.8.17 At the 1995 Planning Conference, it was pointed out that, west of Amesbury, the A303/A30 was largely single carriageway, and this is still the case. In the intervening years, the 22km Honiton to Exeter section of the A30 has been replaced by a dual carriageway, but that still leaves 66km of single carriageway on the A303 between Amesbury and Honiton. At that rate, it would take another thirty years to dual the whole route.

- 6.8.18 Stonehenge is the only section currently programmed, and thus, if all the objections were to be dismissed and the published scheme were to be implemented, the A303 could have another 11km of dual carriageway within about five years. That would still leave, however, 55km of single carriageway. As there is no policy of bringing the whole road network up to current road building standards, the road will always have varying standards along different lengths.
- 6.8.19 Design standards are put in place primarily to enable traffic to move safely at a given speed. If sections of the A303 are substandard for a speed limit of 60mph, the immediate remedy is to lower the speed limit. On the A303, congestion is largely caused and endured by people making optional leisure trips of questionable economic value. It is inappropriate to spend a vast amount of money on a dual carriageway that would do untold damage to the landscape of the WHS, just so that weekenders from London can get to their country cottages a few minutes more quickly.

### ***Overall submissions***

- 6.8.20 Salisbury Green Party consider that the published scheme would have a massive and adverse impact on the Stonehenge Bowl and the WHS. It should therefore be rejected.
- 6.8.21 Closing the A344 at its junction with the A303 would improve road safety at Stonehenge Bottom and comply in part with the Government's international obligations.
- 6.8.22 A single carriageway Winterbourne Stoke bypass should be reconsidered as an independent scheme, with the implementation immediately of further measures for speed restraint and safety in the village.
- 6.8.23 No scheme to improve the A303 in the area of Stonehenge should be allowed to commence until it is clear that it will be possible to move the existing Visitor Centre car park from its present location.
- 6.8.24 Salisbury Green Party is also the promoter of the long bored tunnel alternative (AR5). This aspect of the case is dealt with at section 7.6 below.

### **The response of the Highways Agency to the objection of the Salisbury Green Party**

#### ***The Resolutions of the 1995 Planning Conference***

- 6.8.25 The 1995 Planning Conference was held to give the public and other interested organisations an opportunity to explore and debate the possible ways of overcoming the problems on the Stonehenge section of the A303. Neither the Conference nor its resolutions, however, have any particular status. The situation has moved on in the nine years since the Planning Conference took place.
- 6.8.26 The published scheme would remove the main source of persistent noise

from Stonehenge. It is accepted that there would be a significant land take (of agricultural farmland rather than downland) between the western tunnel portal and Longbarrow Crossroads. However, as well as accommodating the entry to the tunnel, the cutting, as it proceeded through the wider reaches of the western part of the WHS, would serve to screen views of traffic from many parts of the WHS.

6.8.27 It is acknowledged that the cutting would disturb the pattern of the landscape along the corridor of the existing road. This would, however, be a localised effect within what is a relatively ordinary landscape in pure landscape terms. It is the heritage component which makes this landscape special, and, within this area of the WHS, from the proposed location of the western tunnel portal to Longbarrow Crossroads, there is little of heritage significance, apart from Site 37, which is not upstanding.

6.8.28 The WHS Management Plan (DD65) refers to areas within the WHS described as "Bowl" "Core" and "Amphitheatre". This document has been produced since the 1995 Planning Conference to provide a framework guiding future decision making for the WHS. It anticipates the delivery of a 2km tunnel through the central, most important area of the WHS.

6.8.29 In removing the A303 and part of the A344 from the landscape setting of Stonehenge, the published scheme would be in accordance with the objectives of the Management Plan. In particular, it would comply with Objective 9 in that it would "restore" the appropriate landscape setting for the Stones within the core. Outside the core, the scheme would comply with Objective 11, in that the A303 would largely be placed in cutting, serving to screen views of traffic from the wider reaches of the Stonehenge Bowl. The scheme would also facilitate arrangements for open access on foot within the core zone, as sought by Objective 19.

6.8.30 Objective 23 of the Management Plan provides that:

*"Measures should be identified which will provide comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve road safety and enhance the historic environment"*

The supporting paragraph 4.6.4 of the Management Plan sets out a strategy to achieve Objective 23 which includes placing the A303 in a tunnel, closing the A344 and carrying out related landscape schemes within the Stonehenge Bowl.

6.8.31 The published scheme would deliver the first two of those points, and would assist the third by the restoration of the A303 to grassland and byway, and the restoration of the closed portion of the A344 to grassland and footpath.

### ***Tunnel safety***

6.8.32 It is accepted that appropriate measures must be part of any tunnel construction to ensure the safe operation of the tunnel. The Highways Agency has agreed safety measures for the published scheme with the

Tunnel Design and Safety Consultation Group, which is attended by all the emergency services, over a series of meetings since 2002.

- 6.8.33 Closure of the A344 could not take place independently of the improvement of the A303. The closure of the A344/A303 junction at Stonehenge Bottom would need to be accompanied by dualling of the A303 in order to avoid congestion on the A303 and rat running along local roads. If the closure of the A344 were to be carried out as a stand alone scheme, there would be large economic disbenefits arising from the additional congestion that would result from the consequent more extensive and more frequent queues and delays. The predictability of the journey time for emergency service access between Shrewton and Amesbury would be affected, giving rise to safety concerns. Both local and longer distance traffic, which would otherwise have used the A303 trunk road, would be attracted to inappropriate local roads such as Countess Road and the Packway. Until any removal of the existing Visitor Centre and car park has taken place, the A344 would need to remain open to vehicles between Airman's Corner and the Visitor Centre in any event to provide continuing access.
- 6.8.34 The A344 is not a trunk road, and it is therefore part of the responsibility of the local highway authority, Wiltshire County Council. The County Council has made it clear that it would not be prepared to exercise its powers to promote the closure of the A344 at the Stonehenge Bottom junction if the A303 Stonehenge Improvement were not to go ahead. This is shown by minute 65 (ii) of the County Council Cabinet meeting of 26<sup>th</sup> March 2004 (Document WCC/1/17).

### ***Winterbourne Stoke***

- 6.8.35 A single carriageway bypass for Winterbourne Stoke would be inadequate. Document DD42 (Volume 5 of the DMRB) describes the method used to establish a carriageway standard that is economically and operationally acceptable to suit traffic flow and local conditions. A normal single carriageway road has an economic flow range of 13,000 average annual daily traffic ("AADT"). The forecast low growth opening day traffic flow on the Winterbourne Stoke Bypass would be 21,200 AADT, which is well beyond the maximum figure for a normal single carriageway road, and beyond the upper range of acceptability (21,000 AADT) for a wide single carriageway road (one with a width of 10m, rather than the normal carriageway width of 7.3m). A wide single carriageway road would be particularly unsatisfactory to the east of Longbarrow Crossroads, where the forecast low growth opening day traffic flow is 32,900 AADT. Changes between dual carriageway sections and a wide single carriageway would also introduce potential safety problems.
- 6.8.36 In considering appropriate measures within Winterbourne Stoke, an optimum balance has to be struck which safeguards the local community and maintains the safe operation of the A303. There is little more that can sensibly be achieved through the village without a bypass, and the bypass must be designed in such a way as to remove safety concerns rather than adding new ones.

### ***Countess Flyover and the proposed Visitor Centre***

- 6.8.37 The public consultation on the proposed scheme which took place in January 1999 had before it options for Countess Roundabout which included both grade separation and an at grade solution involving traffic signals. No less than 71% of respondents supported grade separation. In the light of that, the Highways Agency announced in 2000 its intention to pursue grade separation at Countess Roundabout. The proposed design would cater for the estimated traffic flows resulting from the relocation of the Visitor Centre to Countess East without the need to allow for any increased capacity. The published scheme does not, however, prejudice the ability to pursue other reasonable locations for the Visitor Centre if the present proposal for its relocation is rejected.
- 6.8.38 An at grade traffic signal controlled roundabout would not secure sufficient capacity for the A303 in the longer term, and congestion would occur. In addition, if the roundabout were to be maintained at grade, vulnerable local road users such as cyclists and motor cyclists would continue to have to negotiate a heavily trafficked roundabout when travelling between Amesbury and Countess Road North. As well as congestion increasing, the severance effect for local north/south movements would increase across the predominant flow of trunk road traffic. Only grade separation could achieve a safe and effective layout enabling local traffic to negotiate a lightly trafficked roundabout, free of through flows.

### ***Wider highways issues***

- 6.8.39 The improvement to the A303 between Amesbury and Berwick Down is being driven by the need to remove roads and traffic from the landscape setting to Stonehenge and the need to provide a bypass of Winterbourne Stoke. The exceptional circumstances created by the proximity of the A303 to Stonehenge justify the pursuit of this scheme as a stand alone proposal, regardless of other proposals that may be pursued elsewhere along the A303.
- 6.8.40 It is accepted that the busiest times on the A303 are at weekends, and that this situation becomes even worse at holiday times, with the attractiveness of the South West as a holiday destination. That does not mean, however, that all the journeys causing congestion are of "questionable economic value". People travelling to and from work, commercial traffic serving both long distance and local community needs, as well as leisure and local traffic, use the A303 route for a great number of purposes. The journeys themselves may be of no economic worth, but, at their destination, they certainly contribute substantially to the local economy. The economy of the South West depends to a very large degree on visitors from elsewhere to support its tourism industry. In order to sustain the region, there is an obvious need to sustain efficient transport links. The A303 is part of that network.

## **6.9 The Association of Council Taxpayers, South Wiltshire**

6.9.1 The Association of Council Taxpayers, South Wiltshire ("ACT") began life in 1969 as the Salisbury Ratepayers' Association, with a remit to monitor rates levied and spent by Salisbury Council. ACT currently has over 450 members. It is independent of any political party. It has no affiliation with any other organisation. Its objection to the published scheme and the alternative route which it promotes (Alternative Route 4) have been duly authorised by ACT.

### ***The objections to the published scheme***

6.9.2 The crossing of the WHS with a new road with excavated cuttings and a tunnel is contrary to the objectives of the UNESCO World Heritage Convention which the British Government signed in 1984. It is also contrary to the spirit of the Stonehenge Management Plan.

6.9.3 Section 8 of that plan, in Objectives 7 to 12, calls for the enhancement, restoration and extension of the grassland landscape around Stonehenge and the removal and screening of inappropriate structures. The screening of structures is virtually impossible in peripheral areas, where villages, housing, farms and military establishments, including a major, difficult to resite explosive storage area, exist. However, across the width of the present line of the A303, and for hundreds of metres to each side, total restoration is possible, without a road in sight.

6.9.4 Improving the A303 on line can only be achieved by extensive excavation in an archaeologically sensitive and internationally protected area with high capital and long term operational costs. There would be lengthy and frustrating disruption of traffic during construction over many months, extending into periods of peak holiday traffic, which eases for only a few winter months each year. That traffic would find alternative routes along other roads in the area, causing added discomfort in many local villages. The same situation could occur at any time if the published scheme were to be constructed, in the event of accidents in the tunnels or of any major road and tunnel maintenance.

6.9.5 The proposed tunnel is an expensive, damaging and unnecessary expedient to hide traffic. At 2.1km, it needs a deep cutting 1.5km long to hide road movement westwards to Longbarrow Crossroads. This cutting would maintain the separation of the land to either side of the existing road, losing the opportunity for reunification of the land in that area. The tunnel solution, probably the longest in the country, would still be too short to meet its objectives fully, forcing people to travel underground for purely cosmetic reasons.

6.9.6 Noise and headlight pollution would still be discernable in the core area around Stonehenge. At the Solstices and at other times of gatherings at Stonehenge, those effects would be objectionable.

6.9.7 The proposed tunnel would give rise to serious ground water problems, and the descent below ground, especially at the western end of the tunnel, would be gradual and close to the surface for some distance,

producing a potential for damage to existing or undetected archaeology.

- 6.9.8 Maintenance demands not associated with the open roads would require regular traffic diversion at extra cost. There would also be additional operating costs for a tunnel because of the need for lighting, closed circuit television surveillance, public address systems, a fire suppression sprinkler system and specially staffed control rooms.
- 6.9.9 With the inexorable advance of traffic growth, the time would no doubt come when the A303 would require a third lane in each direction. An extra lane cannot be accommodated in a tunnel without massive expense in reconstruction.
- 6.9.10 Accidents in tunnels may be no more likely than on an open road, but their consequences are much more difficult to deal with. Risk assessments of all anticipated potential problems should be carried out. The risk of explosion or terrorist attack must be the greatest one. Innocuously loaded vehicles attract little attention and are not routinely checked, but an explosion could be massively destructive when confined to a tunnel.
- 6.9.11 The present line of the A303 cuts through the boundary of the town of Amesbury, separating a significant area of housing at Countess Road and several large villages from the shopping area of the town. The published scheme would sustain that separation. In addition, the proposed Countess Roundabout flyover would raise east/west traffic on the A303 to rooftop height, increasing the distribution of noise and pollution.
- 6.9.12 The provision of a bypass for the village of Winterbourne Stoke is unquestionably necessary, but to take that road out into the broad open space of the Till Valley on a visually dominating embankment, with a 200m viaduct is detrimental to the environmental protection given to the valley.
- 6.9.13 It is those considerations which led ACT to prepare an alternative scheme, Alternative Route 4, dealt with in section 7.5 below.

**The response of the Highways Agency to the objection of the Association of Council Taxpayers, South Wiltshire**

- 6.9.14 The WHS Management Plan envisages the core area of the WHS being dealt with in a way different from the approach in the wider area. The published scheme would facilitate this by removing roads and traffic within the core (MILS) area. Objectives 10 and 11 of the Management Plan, which refer to the wider landscape, would not, it is recognised, receive the same benefits with the published scheme as they would from a route which avoids the WHS completely; however, Objective 12, which deals with nature conservation, would receive benefits from the published scheme.
- 6.9.15 The risk of damage to archaeological remains in the WHS is fully addressed in the Environmental Statement. There would be no direct impact upon any Scheduled Monument from the published scheme.



- Other known archaeological remains have been fully assessed, and the significance of the impact has been identified. Unknown archaeological remains have also been considered, and a mitigation strategy devised which would ensure that all remains can be detected, recorded and rescued before construction proceeds.
- 6.9.16 Two way traffic flow along the A303 would be maintained throughout the construction period of the published scheme.
- 6.9.17 It is not clear what reunification of land to either side of the A303 between the proposed western tunnel portal and Longbarrow Crossroads ACT seeks. Apart from a length of approximately 250m immediately adjacent to the tunnel portal, which is in National Trust ownership, the majority of the land to the south of the existing A303 in that area is in private ownership, and not open to the public.
- 6.9.18 The expense of the proposed tunnel is justified by the benefits it would bring to the WHS.
- 6.9.19 The tunnel would not be the longest in the country. It would be shorter than the Mersey Queensway Tunnel (3.2km, opened in 1934) and the Mersey Kingsway Tunnel (2.4km, opened in 1971). A 2.1km tunnel would, however, certainly be amongst the longest in the country, and would be a considerable investment for the Government to make in securing its objective of removing roads and traffic from the landscape setting of Stonehenge. The proposed length of 2.1km is the optimum length for securing that fundamental objective for the scheme. The area would not be a WHS without Stonehenge, and there would be no tunnel without Stonehenge.
- 6.9.20 Stonehenge would undoubtedly benefit from a major reduction in traffic noise as a result of the published scheme. On completion of the scheme, headlight pollution would also be removed, because there would be no direct line of sight to vehicles from Stonehenge. There would therefore be no direct glare from vehicle headlights at the Stones.
- 6.9.21 Ground water would be encountered during tunnelling operations, but any problems which it would give rise to have been identified and addressed in the proposals for the published scheme.
- 6.9.22 The cost of tunnel maintenance and all the operating costs associated with the tunnel have been taken into account in the economic assessment of the published scheme.
- 6.9.23 There is no evidence to suggest that the use of a modern road tunnel attracts a greater risk of accidents than travel on an open road. Road tunnels provide a well lit, dry and frost free environment, within which there are no road junctions and a high degree of surveillance, which may be expected to influence driver behaviour. Emergency services currently need to reach the sites of accidents which occur on the single carriageway section of the A303 between Winterbourne Stoke and Stonehenge Bottom, where access is constrained. The ability of emergency services to reach the site of any incident would be improved

considerably with a dual carriageway compared with that which exists on the existing single carriageway A303. Emergency access within the proposed tunnel would be greatly assisted by the ability to close the tunnel rapidly and to reach the position of any incident via the cross passages and the non incident bore. Emergency scenarios within the proposed tunnel have already been fully considered in great detail. There are many road tunnels in the UK and overseas, so there is no operational safety or emergency scenario that is not already well understood and capable of being satisfactorily addressed.

- 6.9.24 As regards the future capacity of the A303, two lanes in each direction would provide an adequate and satisfactory capacity for the Stonehenge Tunnel, even with high traffic growth.
- 6.9.25 As regards the Countess Roundabout flyover, it is acknowledged that some properties along Countess Road would generally experience a minimal increase in noise levels. This is of an order of increase, however, that would not normally be discernable. As regards air quality, no relevant air quality threshold would be exceeded with the published scheme, at Countess Road, or elsewhere. Any changes in air quality would be negligible. At Countess Road air quality levels would actually improve slightly with the published scheme in place.
- 6.9.26 The Highways Agency acknowledges in the Environmental Statement that the proposed viaduct across the Till Valley would have a major adverse effect on the landscape. Acceptable routes for a Winterbourne Stoke Bypass have, however, only been identified to the north of the village. Any route to the south would pass through a landscape to which greater damage would be caused, and would also be likely to have an impact on the village Conservation Area. Winterbourne Stoke Parish Council supports the published scheme, and has raised no concern as to the appearance of the proposed viaduct.

## **6.10 Dr C Gillham**

### ***Compliance with Government policy***

- 6.10.1 The normal line has been taken at these inquiries that matters of Government policy are not open to challenge and debate. That does not avoid the need to argue about what is Government policy. The 1998 Transport White Paper (Document DD32) indicated that a policy of "predict and provide" was to be a thing of the past, and that road building in future would be a response of last resort. That is not the approach demonstrated by the published scheme. It fails all the tests upon which the policy contained in the White Paper is supposed to be based.
- 6.10.2 The published scheme fails the test of sustainability in that it would cause an increasing consumption of resources and would compromise the mechanisms that hold our environment in equilibrium.
- 6.10.3 It fails the test of environment, in that building roads has never provided a net environmental benefit. Every extra piece of road capacity means

more traffic – more and longer trips, trips not confined to trunk roads, but which start and end elsewhere on the road network. Thus, other junctions congest; other streets are polluted; and other communities pay the cost.

- 6.10.4 The published scheme fails the test of social inclusion, because private motoring, being heavily subsidised, is available only to people who are better off. People in society without cars contribute to taxation supporting private motoring without benefiting from the flowback in subsidy; but their facilities (such as shopping) become less accessible and more expensive, as they become more dispersed on the road network, rather than remaining compactly within towns and villages. The published scheme would encourage the greater use of cars. It therefore increases the burden those without cars have to bear.
- 6.10.5 The published scheme fails the test of integration. It shows no consideration of alternatives to road building, which in this case has been the option of first and only resort.

***Value for money***

- 6.10.6 The fundamental approach to assessing the cost and benefit of a highways scheme is flawed. Motor traffic is a highly subsidised activity, and therefore represents a drain on the economy of the nation. If an activity costs more than the benefits it provides, encouraging more of it cannot deliver an overall benefit.
- 6.10.7 Every road scheme, including the published scheme, will result in increases in traffic that would not have taken place otherwise. Every scheme, including this one, is therefore contributing to economic disbenefit. Logically, it would seem that extra traffic would give rise to extra accidents, and this therefore calls into question the benefit claimed for new road building arising from accident reduction.
- 6.10.8 The only valid reason for building a new road, at Stonehenge or anywhere else, is if it offers some environmental or social gain to offset the enormous capital and resources cost. In addition, any specific local environmental gain must also be able to offset all the environmental costs, both locally and elsewhere.
- 6.10.9 The Highways Agency claims that the published scheme, together with other planned improvements to the A303, would help to reduce peripherality, and to increase the economic competitiveness of the South West region. It is by no means clear, however, that road building achieves positive economic outturns for peripheral regions such as the South West. The full report of the Standing Advisory Committee on Trunk Road Appraisal reported (Document CG/1/3/1) that the results of road building do not offer convincing evidence of the size, nature or direction of local economic impacts. A paper by John Whitelegg, "Roads, Jobs and the Economy" (part of Document CG/1/3/1) also argues that there is no evidence that road investment stimulates economic development. He suggests that achieving economic development is a much more complex process, involving issues such as regional assistance

and the comparative growth and decline in regional economies. A further part of Document CG/1/3/1 is a report by Silvestrini from a southern European perspective, suggesting that for peripheral regions, transport policies should encourage the possibility of a self centred development, and that connections with more central areas should preferably be improved using sea or rail transport. A study by EURES in 2000 (Document CG/1/3/2) goes further, contending that better accessibility in terms of time and costs to the centre can have adverse effects on local development in a peripheral area.

- 6.10.10 The published scheme is said to be too expensive to warrant priority solely on its transport benefits. The Highways Agency says that it should be judged by its heritage and environmental benefits. An expenditure of £200m, of which some £70m is to come from heritage sources, would be used to make the immediate environment of Stonehenge more pleasant for today's generation, at the expense of costs to tomorrow's generations. There are many other calls which could be made on heritage funding of this scale. Around 650 miles of the coastline of England and Wales has been saved by the National Trust, for example, at an outlay of around £35m.

***Core objection***

- 6.10.11 The scheme is fundamentally misconceived, in that it performs neither a valid transport nor a valid environmental purpose. The scheme is frequently described as an "exceptional environmental scheme" as though that were the reason for its promotion. The reality is that the scheme would facilitate the completion of a shadow M4 road. It would serve a transitory and fundamentally mistaken transport purpose, providing tourist benefit at the cost of permanent damage to a great archaeological and spiritual or imaginative landscape. The purpose is transitory, because the future of motorised transport, based on any current estimate of fossil fuel reserves, or of likely technological advances, or of the limitations brought about by climate change predictions, is measured in decades, whereas Stonehenge spans 10,000 years. The perceived benefits are selfish, in that they do not look to the importance of Stonehenge to future generations, but rather to the narrow gratification of tourism today. A road underneath Stonehenge, though invisible to the eye, would be present to the imagination and the spirit. It would alter the place and the feel of the place.
- 6.10.12 The scheme would have the result of increasing capacity on the A303. It would therefore increase the corridor traffic along the A303 and into the regions it feeds. It would bring pressure to bear on the A303 in Somerset, and threaten the Blackdown Hills. It would generate new traffic into north/south corridors, such as the A350 and the A36, thereby increasing pressures on areas already threatened by road schemes.
- 6.10.13 The Highways Agency claims benefits to the village of Winterbourne Stoke and to the immediate area of Stonehenge, without computing the consequent costs to the wider environment and all the communities and landscapes which would be affected by the traffic generative effect of the published scheme. It would lead to increased greenhouse gas emission,

contrary to international commitments and encourage modal transfer from public transport.

- 6.10.14 The scheme claims advantages which could be secured by other means and at much less cost. The removal of the A344 could be achieved easily and cheaply, and would probably achieve most of the presumed accident benefit of the published scheme. The displacement of the Stonehenge Visitor Centre to a more distant location could also be achieved without the completion of the published scheme.
- 6.10.15 No real analysis of the transport need for the scheme has been carried out. Nor have alternative policies been investigated which might achieve the same or better transport ends. There is no argument to show that this is a development of last resort as required by Government policy, and there is no evidence at all that alternative modes of transport have been considered.
- 6.10.16 The scheme justification calls erroneously on the SWARMMS study, when in fact SWARMMS took the Stonehenge development as a given. It is incorrect to allege that, if the published scheme is not approved, the A303 in the area of Stonehenge will be the only part of that road which would not be in dual carriageway. The Secretary of State has not confirmed the SWARMMS study's recommendations to dual all the A303, since no decision has been taken regarding the section through the Blackdown Hills. In fact, the decision on this scheme could be a determinant of the fate of such places.
- 6.10.17 The Highways Agency cannot be trusted to carry out a highways scheme in a sensitive landscape with due regard to environmental issues. At Twyford Down, the Highways Agency misrepresented the landscape effects of the scheme, because the Twyford cutting turned out to be 35% wider than the predictive photomontage issued to the public. The Agency also predicted a noise benefit from the scheme which has not been realised. They claimed that traffic in central Winchester would reduce as a result of the scheme, whereas it has not. They promised to take care during construction to translocate the Dongas turf to another part of Twyford Down, but this was done so ineffectively that, ten years later the turf which was moved is still not of the quality of that which was on the original Dongas site. A promise to maintain the water flow along the route of the Itchen Navigation Canal was not kept, and a promise to take care to avoid polluting the course of the River Itchen was also ignored. The former A33 bypass was restored to downland meadow as a landscape amenity for the Winchester area as promised, but, ten years later, that amenity is being ripped up to be turned into a car park.
- 6.10.18 Despite the fact that the UK is committed to a significant reduction in greenhouse gases, the 4% rise in local emissions of greenhouse gases which it is estimated would take place as a result of the published scheme is characterised as "negligible" by the Highways Agency.
- 6.10.19 In any civilised society, road traffic would not be allowed within miles of Stonehenge. The answer to the present problem at Stonehenge is not to engineer the landscape to hide the worst abuses, at the cost of making

things worse everywhere else. The answer is to work towards a sustainable future that does not consume finite, irreplaceable resources in pursuit of a temporary and ultimately illusory notion of economic growth. The proposed scheme would destroy several kilometres of archaeological landscape for ever, for a supposed gain that can only be temporary. Within two years, English Heritage and the National Trust moved from supporting a cut and cover scheme to deploring it. The decision taken in this case needs to have regard to the view which history will take of it in twenty, fifty or one hundred years from now.

### **The response of the Highways Agency to the objection of Dr C Gillham**

#### ***Compliance with Government policy***

- 6.10.20 Dr Gillham takes issue with the Government's interpretation of its own policies, and its decision to include the A303 Stonehenge Improvement in its Targeted Programme of Improvements. The Government's policies do not rule out further road building, but envisage a programme of construction, targeted towards set objectives. The Stonehenge scheme is an "exceptional environmental scheme", for which the objectives are much broader than those defined within a pure transport context.

#### ***Value for money***

- 6.10.21 Benefits would be secured for the landscape setting of Stonehenge by the removal of roads and traffic. That is a primary objective of the published scheme, supported by a contribution of £70m from the DCMS. The scheme would also, however, produce substantial transport benefits through reduced accidents and congestion (calculated following the prescribed methodology). The high investment costs associated with the proposed 2.1km tunnel begin to erode the net value of those transport benefits. The heritage benefits secured for Stonehenge provide additional justification for the costs of the tunnel. There is no set methodology for allocating prescribed values for different environmental features, but, as an undisputed icon of this country, it is difficult to think of any more deserving environmental cause than Stonehenge.

- 6.10.22 Economic benefits for the peripheral area ultimately served by the A303/A30 are not central to the Highways Agency case for the promotion of the published scheme in relation to the A303 in the area of Stonehenge. At the same time, the M3/A303/A30 is an existing main transport link from London to the South West, and is in fact part of the Trans European Road Network. The focus of the published scheme is, however, Stonehenge and the improvement of the existing A303, not the "completion of a shadow M4 road".

#### ***Response to Dr Gillham's core objections***

- 6.10.23 The view that placing the A303 in a tunnel some 200m to the south of the Stones would impinge upon the imagination and spirit of Stonehenge does not appear to be shared by those who have appeared at the inquiries on behalf of various Druid organisations or by the CBA, the

Prehistoric Society or the WANHS. Those groups would generally prefer a longer tunnel, though the British Druid Order and the Druid Network have indicated that they would prefer the 2.1km tunnel to be constructed rather than no tunnel at all. The placing of the A303 in a tunnel would most certainly alter the place and the feel of the place – hugely for the better. That is what DCMS and English Heritage want to achieve, and it would meet the objectives of the WHS Management Plan.

- 6.10.24 The potential induced traffic has been calculated as around 2.7% of average daily trips along the A303 in 2023, assuming high growth during the 15 years after the projected scheme's opening in 2008. As the traffic generative effect of the scheme would be so marginal, there is no significant consequent cost to the wider environment and communities to be taken into account which has not already been taken into consideration in the Environmental Statement.
- 6.10.25 The pressures that exist along other sections of the A303 further to the west and along intersecting north/south corridors would be little affected by the improvement of the section of the A303 between Amesbury and Berwick Down. Traffic has been growing along the A303, and will continue to grow in the future, whether or not the proposed improvement is carried out. Without that improvement, conditions would only worsen.
- 6.10.26 Greenhouse gas emissions from induced traffic would be insignificant considering the small amount of such traffic. The 4% increase in carbon dioxide emissions which would be attributable to the published scheme applies to the area covered by the local traffic model. It is negligible both in the context of existing overall emissions and in the context of the potential increase in the future, with or without the published scheme.
- 6.10.27 For reasons outlined above in response to other objectors, the closure of the A344 without implementing the proposed improvement of the A303 would be neither defensible nor achievable.
- 6.10.28 The justification for the published scheme does not call on the SWARMMS study. The scheme stands by itself because of the unique context created by its proximity to Stonehenge. The recommendations of the SWARMMS study for dualling most of the remaining single carriageway sections of the A303 have been accepted by the Secretary of State. Those recommendations emerged from a multi modal study that considered the transport problems along the main corridors in the South West, and assessed a range of possible solutions across all modes of transport, before concluding what should be done in terms of dualling the A303. The improvement proposals for the A303 past Stonehenge can therefore be seen to be consistent with what the Government is proposing elsewhere on the A303 as part of its overall investment proposals for an efficient integrated transport network in the South West.
- 6.10.29 As regards the photomontage of the Twyford cutting, photogrammetric comparisons can be difficult. What is true, however, is that the scheme drawings published for that scheme correctly showed the constructed cutting width. The outturn impact of the scheme on noise and traffic is subjective, and it is not possible to comment specifically on those matters

without an extensive noise survey comparing actual and predicted noise levels. In relation to the Dongas at Twyford Down, any assessment now on the effectiveness of the translocation of the turf should have regard to the conditions under which it was undertaken, and would require knowledge of the condition of the turf prior to and post translocation. The scheme proposals at Twyford Down did not in themselves provide for a full reinstatement of the Itchen Navigation Canal, but simply made accommodation for that to be carried out should the Itchen Navigation ever again become a navigable canal. The Orders for the M3 made specific provision for this. As regards the restoration of the old A33 as a landscape amenity, this was carried out as promised. The changes to that area now taking place are as a result of an initiative by Winchester City Council. The Highways Agency is not involved in this work.

6.10.30 In this case, the Highways Agency is working in close partnership with others who have excellent environmental credentials. This includes English Heritage, English Nature, the Environment Agency and the National Trust.

6.10.31 The published scheme for Stonehenge seeks to address the problems of today, and to provide a long term solution, looking forward as far as is reasonably possible in projecting the trends of modern society. In the even longer term, depending on the transport demands and the functioning of future society, it would be possible to decommission the proposed tunnel and the scheme, so that any "permanent damage" for future generations to the area of Stonehenge would, in that event, be limited.

## **6.11 Mr R Harvey**

6.11.1 The immense material and human resources required to complete the published scheme are not relevant to the present threat of world ecological collapse, and could be better employed in averting it. The lifestyles of the developed world are, with over consumption and mismanagement, destroying the inanimate, animate and vegetable power pyramid, the product of many years of evolution. Scientists are beginning to realise that, within the next two or three decades, 25% of the existing plant and animal species will be extinct, that substantial low lying land areas will be over topped by rising sea levels, that storms and droughts will further degrade agricultural land, leading to famine, while at the same time the human population will increase by 20%.

6.11.2 Unless action is taken to address these changes, which are being brought about principally by the massive discharge of carbon dioxide into the atmosphere, but also by the release of newly discovered unbiodegradable toxic compounds, which have entered the air, the soil, the seas and hence the bodies and tissues of most life forms, human kind is doomed. Long before the end of its designed life period, the A303 and its expensive tunnel will be redundant.

6.11.3 The resources available to carry out the published scheme should be redirected to a more necessary activity, such as improving sea defences and tidal and flood barrier construction.



### **The response of the Highways Agency to the objection of Mr R Harvey**

- 6.11.4 There are problems on the A303 past Stonehenge and through Winterbourne Stoke which need to be addressed.
- 6.11.5 The Government is aware of environmental sustainability issues, and resources are allocated to different projects taking such considerations into account. The tunnel past Stonehenge proposed in the published scheme and the improvement of the A303 are part of the Government's sustainable planning proposals for the future, which include the allocation of resources to other activities such as sea defences. The Government is taking a balanced approach, and the resources directed towards the published scheme are justified by the problems and policies which are being addressed.

### **6.12 Mr T Mayer**

- 6.12.1 The construction of a tunnel is costly and unnecessary. It would deprive all those people who drive along the A303 of the thrilling sight of Stonehenge as they approach from either direction. Many people who do not stop at their first sight of Stonehenge return as visitors at a future date. If the tunnel is built, drivers passing the site will not see Stonehenge, and visitor numbers will decline.
- 6.12.2 The A303 is merely a road. It takes nothing away from the glory of the Stonehenge monument. If the A303 were built with a surface level dual carriageway and the A344 were closed, there would be much less to distract the passing motorist who would enjoy a more relaxed view of the Stones.
- 6.12.3 The civil engineering works associated with the tunnel would damage barrows and tumuli of genuine historic interest. Stonehenge does not need to be reunited with its historic setting. It has not been divorced from it. The site is merely bisected by a road. The two parts of the site could be linked by pedestrian tunnels.
- 6.12.4 At Avebury, it is possible to wander among the stones without restriction. At Stonehenge, that is not possible because of the fencing which has been erected. This causes far more detriment to the landscape generally than the A303.
- 6.12.5 The resources proposed to be directed to the published scheme should be used to improve secondary roads, rural roads and byways which are in decay.
- 6.12.6 There should be greater public consultation about the published scheme. There would be a large majority against it if the views of ordinary local people were taken into account.

### **The response of the Highways Agency to the objection of Mr T Mayer**

- 6.12.7 The loss of a view of Stonehenge to drivers passing the monument on the A303 is an unavoidable effect of the removal of the sight and sound of traffic from Stonehenge.
- 6.12.8 The effect of the published scheme on archaeological remains has been fully taken into account in the Environmental Statement. The public consultation on the proposals for Stonehenge has been extensive. It has not been limited to academics and interest groups. Reports on the public exhibition and consultation which took place in January 1999 are included in the inquiry library (Documents DD57/1 and DD57/2). The scheme was amended in the area of Countess Roundabout as a result of that consultation.
- 6.12.9 The viability of a surface level route for an improved A303 will be considered when Alternative Route 1 and Alternative Route 9 are discussed.

### **6.13 Mr P Corp**

- 6.13.1 The published scheme would carry significant environmental and operational risk. It represents poor value for money in relation to the transport infrastructure needs of South Wiltshire.
- 6.13.2 The scheme would potentially damage archaeological sites (known and unknown). It would have an uncertain effect on the water table. It would disrupt local and through traffic during construction.
- 6.13.3 Despite the measures included and budgeted for in the design of the scheme, there remains a risk of collision and/or fire within the tunnel, with resultant difficulties of access by emergency services and difficulties in achieving the timely evacuation of large numbers of passengers, including children, elderly people and disabled people. The idea of a lower speed limit in the tunnel and on its approaches than that which applies on the open road to the east and the west would lead to the bunching of traffic, which would exacerbate the problems. Such problems would be even greater while contraflows were in operation during maintenance periods.
- 6.13.4 Other long tunnels have been built to take roads under features such as rivers or mountains. The risk of a tunnel on a major route in this case, however, is being considered for purely cosmetic reasons.
- 6.13.5 However unlikely a significant tunnel accident might be in statistical terms, it would only have to happen once for holiday travellers at least to be dissuaded from using the tunnel.
- 6.13.6 On those bases, Mr Corp supports Alternative Route 4, which is discussed below.

### **The response of the Highways Agency to the objection of Mr P Corp**

- 6.13.7 Extensive research has been undertaken and advice obtained to avoid damage to archaeological sites (known and unknown) associated with the carrying out (if it is authorised) of the construction of the published scheme. Expert advice has also been obtained on the effect of the proposed works on the water table. Evidence has been given to the inquiries on all of these matters, and has been tested by cross examination.
- 6.13.8 Disruption to local and through traffic during construction is unavoidable, but would be minimised by the extent to which the scheme would be built alongside or beneath the existing road corridor.
- 6.13.9 Road tunnels in the United Kingdom have an exceptionally good safety record, and all appropriate expert advice has been taken in this case in connection with the incorporation of safety features in the design of the proposed tunnel.

### **6.14 Mr P Matthews**

- 6.14.1 The proposed tunnel included in the published scheme would be constructed at very great cost, and not because it is essential to the scheme, but purely for cosmetic reasons.
- 6.14.2 A tunnel at the depth proposed would have consequences for the underground waterflow in the area. The experts say that this will not be a problem, but, as somebody who lived at Springbottom Farm for six years, and in the Woodford Valley for thirty two years, local knowledge leads Mr Matthews to believe that there would be possible problems with the underground waterflow if the scheme were to go ahead as planned.
- 6.14.3 When Mr and Mrs Chubb gave Stonehenge to the nation in 1918, one of the requirements of the deed by which the gift was made (Document ACTP/0/5) was that the public should have free access to the monument on payment of a reasonable sum, not exceeding one shilling. That condition was broken many years ago, and would continue to be broken by the proposals now put forward. It is also the case that the condition providing that no building apart from a pay box should be erected on the site has been broken.
- 6.14.4 What remains, is the opportunity for everybody who passes along the A303 at least to see the Stonehenge monument free of charge. The published scheme would take away even that opportunity.

### **The response of the Highways Agency to the objection of Mr P Matthews**

- 6.14.5 The way in which the ground water regime in the area would function in the future if the proposed tunnel were built is not complicated. The topography and the way in which the catchment area lies within the area mean that there is no real risk of any adverse effect from the building of

the tunnel as proposed.

- 6.14.6 As regards the deed of gift, the DCMS have provided information that the covenants contained in that deed are no longer enforceable. They were given as personal covenants to the donors and not for the benefit of their heirs or successors in title. The background to this is explained in Document DCMS/1/8. The position as outlined in that document has been confirmed in a case determined in the Court of Appeal in 1991 (*R v HBMCE ex parte George Firsoff*).

## **6.15 Dr J R Moon and Mrs J Moon**

### ***Impact of the Highways Agency's proposals***

- 6.15.1 The amazing landscape of Stonehenge deserves much better treatment that it would receive under the scheme proposed by the Highways Agency.
- 6.15.2 The proposed interchange at Longbarrow would make a particularly damaging impact on the WHS in that area. In that vicinity, there is the Neolithic long barrow from which the junction takes its name, and the large Winterbourne Stoke group of early Bronze Age barrows situated just to the north east of the present roundabout, on a slight ridge which extends north east and looks down upon both the A303 to the south and the A360 to the west.
- 6.15.3 The Winterbourne Stoke barrow group is spectacular and very important. It is located at the high point between the Till and Stonehenge Bottom valleys, with the barrows, typically for this area, placed prominently and deliberately on the ridge line. These barrows are visible from other ridge lines on which barrows are placed in the landscape, for example Normanton Down. The later Bronze Age barrows are aligned behind the Neolithic Longbarrow. There are many different forms of Bronze Age barrows in this group. They form a gateway to the Stonehenge landscape and must have done so for thousands of years for people approaching on the trackways which are now major roads.
- 6.15.4 The setting of this group of monuments is already compromised by the proximity of the current A303; but it would be made much worse, visually and aurally, by the proximity of the proposed dual carriageway A303 and the complex of roundabouts and slip roads associated with the planned Longbarrow interchange.
- 6.15.5 The visual impact would be enormous. From the ridge, one would be able to look down on to a massive interchange and on to the new, widened, dualled section of the A303 between the western tunnel portal and the bridge under the A360. The evening and night time setting would also be severely affected by the complex of lights needed to illuminate the planned double roundabout junction and the slip roads.
- 6.15.6 Noise levels could be expected to increase owing to the considerable increases in traffic volume forecast for both the A360 and for this section of the A303, and also as a result of the considerably increased traffic

speed on the A303, from which the slowing effect of the roundabout would have been removed. The ambiance and setting of the Winterbourne Stoke barrow group, a key feature within the WHS, would largely be ruined by the published scheme.

- 6.15.7 The potential for destroying significant remains within and outside the WHS in the vicinity of the current roundabout should also be considered. The very high density of scheduled monuments in the vicinity of Longbarrow means that there would be a correspondingly high potential for encountering and destroying significant remains which have not yet been discovered. The chance of this taking place is clearly proportional to the area destroyed by the construction work, and this would be large. The A303 itself, the slip roads and the subsidiary roundabouts associated with the Longbarrow junction would occupy an area of 15ha, and the total destroyed area would be almost double that, when the extent of the construction zone to either side of the actual roads is taken into account.

***The lack of real need for an interchange with the A360***

- 6.15.8 Yet there is no real need for an interchange between the A303 and the A360. The A360 runs between Salisbury and Devizes, and passes through the villages of Potterne, Littleton Panell, West Lavington, Tilshead and Shrewton, all of which lie north of the A303. Traffic from either Devizes or Salisbury which wishes to travel either east or west on the A303 already has viable alternatives to the A360 to provide access to the A303. In most cases traffic originating from or destined for the five villages also has viable alternative routes to reach the A303. The details of these alternatives are set out between pages 4 and 8 of Document JM/1/1. Almost all of them involve reduced distances. They are already widely used by local traffic during the summer to avoid the traffic queues in the area of Stonehenge.
- 6.15.9 Particularly when the Stonehenge Visitor Centre is relocated, the interchange at Longbarrow will be largely unnecessary. Any inconvenience caused to local residents by its removal would be considerably outweighed by the financial and environmental benefits of not providing it. It is accepted that there is legitimate concern about traffic on alternative routes out of Shrewton, but this could be addressed by a constructive dialogue between the Highways Agency and Wiltshire County Council. This issue is further pursued below as part of Alternative Route 8, of which Dr and Mrs Moon are the promoters.

***Traffic noise assessments***

- 6.15.10 Although never having worked on road noise, Dr Moon has had extensive experience in interpreting underwater sound data, and has been the author of a computer programme for predicting sound propagation in the sea. He therefore claims general familiarity with the concepts of sound propagation.
- 6.15.11 The Highways Agency has made a number of unrealistic assumptions about traffic speeds and volumes on the A303 following implementation of the proposed scheme.

- 6.15.12 The principal component of high speed traffic noise is tyre noise, and this is strongly dependent on speed. The Highways Agency's projections for the average traffic speed on the proposed new section of the A303 are between 96 kph and 98 kph. This is unreasonably low. An average traffic speed of 120kph is the more likely figure on a dual carriageway with no roundabouts or right turns to slow the flow. As regards the volume of traffic, this has been assumed by the Highways Agency to be unaffected by whether the published scheme proceeds or not. Evidence from the opening of the new dual carriageway on the A417/A419 (Gloucester to Cricklade) and from the more recent dualling of the A30 east of Exeter suggests that, when a known bottleneck has congestion removed from it, traffic along the route grows by 25%. This would be likely to be replicated as a minimum on any improved A303 in the area of Stonehenge because of the greater notoriety of that section of the A303 as a traffic bottleneck.
- 6.15.13 The Highways Agency's projections regarding noise are based on the Department for Transport's Calculation of Road Traffic Noise ("CRTN") (Document DD92), which were published in 1988. These were in fact based on roadside measurements of noise levels made at some unspecified time prior to 1972. Since that time, mechanical noise from vehicles has decreased, but tyre noise had increased, and tyre noise dominates at all but the lowest speeds.
- 6.15.14 The Highways Agency's assumptions about noise from the proposed scheme are therefore based on a speed some 20kph below that which is likely to be the average speed on any new dual carriageway; they underestimate the likely traffic volume by around 25%; and they underestimate the noise generated by tyres, which have become progressively wider and therefore noisier in the thirty years since the measurements upon which Document DD92 were made.
- 6.15.15 The Highways Agency has also over estimated the noise levels likely to arise from the existing road configuration. The traffic speed assumptions used for the A303 in the vicinity of the Countess Roundabout, for example, are virtually identical to those assumed after completion of the published scheme. But that is not credible, given that at the present time traffic needs to slow to negotiate the roundabout, whereas, if the published scheme were to be carried out, there would be no roundabout and therefore no need to slow down. Similarly at Longbarrow Crossroads, the small increase in predicted noise level of around 1dB is not credible when one compares the speed and volume of traffic which would be moving through the published scheme compared with that needing to negotiate the existing roundabout.
- 6.15.16 As a result, the difference in mean noise levels as between the existing road and that which would apply should the published scheme be constructed have been underestimated by between 5dB and 7dB, depending on location.
- 6.15.17 Nor has the Highways Agency taken into account the variability of traffic noise depending on wet or dry road conditions, the varying condition of

the road surface, and refraction effects caused by wind and temperature inversions. The variation in noise levels perceived by an observer close to the ground can be dramatic. Despite this, the Highways Agency makes the claim at paragraph 2.6.5 of Document HA/13/8 that the proposed scheme "*would unlock major benefits for public access and amenity to large areas of landscape from which traffic noise and visual intrusion would be entirely removed*". In fact, it cannot be said that in all conditions and circumstances there would be no traffic noise audible at the Stonehenge monument.

- 6.15.18 The Highways Agency appears to have a history of underestimating the traffic noise associated with major new road schemes. Annex D to Document JM/1/3 comprises an extract from the May 2003 edition of "Noise Management", which details seventeen major new roads built since 1988 where noise levels have turned out to be higher than those predicted at the preceding public inquiry, in several cases by more than 5dB.

### **The response of the Highways Agency to the objection of Dr J R Moon and Mrs J Moon**

#### ***The impact of the published scheme***

- 6.15.19 Although it is at the western boundary of the WHS, it is accepted that Longbarrow Crossroads is an area dominated by burial mounds, which have been placed so as to make good use of the natural topography in the area. All of these sites are very important, and the design of the published scheme has succeeded in avoiding direct impact on any scheduled monument. It has also limited the land take in the area so far as possible. The scheme displaces the main carriageway of the A303 to the south, making use of low lying ground which appears never to have contained prehistoric burial mounds. It also reuses the existing A303 as slip roads in order to reduce the land take for the highway.
- 6.15.20 In the proposals brought to the inquiries by the Highways Agency, the roundabouts at Longbarrow Crossroads were to be lit for safety reasons. As indicated at paragraphs 5.1.42 and 5.1.43 above, however, it is not now proposed to install lighting at that location, but to seek to achieve the necessary safety provision by other means.
- 6.15.21 As regards the impact of noise at Longbarrow Crossroads, the design of the published scheme would move the traffic using the A303 further away from Site 26A. It would remove the immediate view of A303 traffic as a result of the cutting, and would increase the distance of the northerly roundabout from the monument.
- 6.15.22 Every attempt has been made to avoid direct impact upon known archaeological remains in the design of the published scheme. The northern roundabout proposed for Longbarrow Crossroads would be much smaller than the existing roundabout, and would make use of land that is already in highway use. Similarly, the use of the existing A303 west of Longbarrow Crossroads to serve as the eastbound off slip road for the published scheme would reduce the area in which unknown remains

might be encountered.

***Assessment of the removal of a link between the A303 and the A360***

- 6.15.23 The alternative routes for traffic proposed by Dr and Mrs Moon if the A360/A303 junction were removed from the scheme would either be longer in distance or in time than the routes which exist at present or than those which would be provided by the published scheme. Traffic which would be affected by the closure of the existing junction would probably make its way to the A303 using local routes rather than diverting to other routes which would extend the journey. The absence of a junction at Longbarrow Crossroads would therefore significantly inconvenience local traffic and local communities.

***Traffic noise assessments***

- 6.15.24 The CRTN (Document DD92) prescribes mean traffic speeds to be used in the calculation of traffic noise. These are to be used unless available data indicate a traffic speed significantly different from the prescribed speed for the class of road being evaluated. The speed used is taken as a mean value applied to the total traffic flow used in the calculation, and represents the mean values of the different vehicle speeds on different parts of the link being assessed. Dr and Mrs Moon suggest that it would be more realistic to assume an average traffic speed of 120 kph. This is, however, above the national legal speed limit for dual carriageway roads, and it therefore unlikely to represent a mean value.
- 6.15.25 The Highways Agency has carried out a detailed assessment of the amount of additional traffic that might be attracted to the published scheme as a result of savings in travel time if the scheme were constructed. This concluded that, at peak times, the increase in traffic would be some 3.5%, but that, at other times, it would be as low as 2%. The reason why this change is likely to be so small is because the time savings contributed by the scheme would represent only a small proportion of the total journey time for the majority of traffic using this section of the A303.
- 6.15.26 Dr and Mrs Moon refer to more substantial increases which have followed highway improvements on other trunk roads in the immediate area. For both the A417/A419 and the A30, however, there are reasons for the increase in traffic flow on those roads that are specific to those roads, and would not apply to this section of the A303. The improvements on the A417/A419 coincided with the completion of several other increases to dual carriageway sections, including a bypass around the town of Cirencester, which released suppressed traffic demand and encouraged a degree of reassignment from parallel route corridors. The A30 improvement coincided with the opening of new slip roads on the M5, which accommodated additional traffic movements on the A30 which were not previously possible.
- 6.15.27 Dr and Mrs Moon contend that the CRTN model is based on old data, but this remains the prescribed method for calculation of traffic noise levels



in environmental assessments. No alternative method of calculation is permitted by the DMRB in the assessment of road proposals. Notwithstanding its age, there is an assumption inherent in the model that tyre noise is dominant at speeds above 75 kph.

- 6.15.28 Different climatic conditions can have an effect on the traffic noise, but this is taken into consideration by the CRTN model, which produces a methodology that provides an average noise level within a range of possible conditions. Increased levels of tyre noise would in any event affect both the Do Minimum and Do Something scenarios, and are therefore immaterial to the comparison.
- 6.15.29 The Highways Agency accepts that its response to the National Trust should not be read to imply that traffic noise would be removed entirely from Stonehenge in all climatic conditions.
- 6.15.30 As regards the change in traffic noise observed at various schemes which have been completed, the results of the assessment work indicate the different surface noise level correction values for different sections of trunk roads built with concrete surfaces since 1988. What the assessment work does not indicate is the correction value that should have been applied to the various road surfaces that would have remained in place without the schemes being built. The results therefore do not indicate whether the noise differences between the Do Minimum and Do Something scenarios are greater or less than those which had been predicted.
- 6.15.31 For the A303 Stonehenge scheme, the road would be improved using a low noise, thin wearing course surface. The appropriate noise level correction value has been built into the CRTN calculations for the scheme. No beneficial effect has been presumed, however, because the same correction value has been applied for the calculation of the Do Minimum noise levels. That approach has been followed on the assumption that, if the scheme does not proceed, the existing road would be resurfaced in any event with a low noise, thin wearing course when maintenance works are carried out.
- 6.15.32 The traffic noise predictions for the published scheme have thus been carried out on a robust, conservative basis to assess the noise differences that would result from the proposed improved road.

## **6.16 East Amesbury Residents**

- 6.16.1 East Amesbury Residents ("EAR") is an informal residents' group, representing the interests of people who live in about 700 houses in East Amesbury. Although it does not have a formal constitution, it has a Managing Committee, made up of people who are particularly active in the group. The Committee meets regularly, and has formally endorsed both the objection of EAR to the Orders and the specific terms in which that objection is put to the inquiries.

### ***Value objection***

- 6.16.2 The scheme does not provide best value for the investment proposed to be made.
- 6.16.3 The calculation method makes a comparison of the construction costs against the projected benefits of the scheme accruing over 30 years, but does not appear to take into account the running costs of the proposed scheme over the same 30 year period. These amount to £1.3m per year. Those high running costs reflect the extra energy costs for the operation of the tunnel (including the CCTV system), the regular maintenance costs, the permanent provision of two tunnel control rooms, one of them staffed, and the permanent provision of a staffed and equipped "rapid response service". The costs of these factors would not be incurred in alternative proposals which do not involve the provision of a tunnel, and they should therefore be included in the assessment of the published scheme in order to provide a fair comparison. If that is done, it would lead to an even more negative economic return.

### ***Heritage objection***

- 6.16.4 The proposed scheme would have catastrophic effects on the setting and archaeology of the Stonehenge area. The Stonehenge WHS Management Plan puts forward twenty six objectives aimed at achieving future benefit for the site. Objective 9 discusses the use of the tunnel, but seeks a solution which would "restore the integrity of The Avenue". The published scheme would, however, leave the A303 still cutting through the route of The Avenue.
- 6.16.5 The published scheme would also involve the construction of an additional surface road alongside the existing A303 between the two tunnel portals. This would be used for some three years by heavy plant during the construction period. It would therefore need to be of substantial construction, and would clearly damage the surface of this 2.1km stretch of the WHS.
- 6.16.6 It is recognised that none of the scheduled monuments within the WHS would be directly affected by the proposed scheme, but many barrow groups and monuments would suffer adverse effects. Examples are the Winterbourne Stoke Barrow Group and the Wilsford Down Long Barrow.

### ***Noise objection***

- 6.16.7 The proposed elevation of the A303 over the Countess Roundabout would cause noise pollution to affect a wider area of Amesbury than that affected by the present road arrangements. To achieve a grade separated junction at Countess Roundabout, an extended flyover would be constructed along the A303, extending to a total of 1km, and with a maximum height of 6m. As it is not proposed to box in the flyover, the high speed of through traffic would allow significant noise to spread over a wider area of Amesbury than that affected by the present road arrangements. The Highways Agency has confirmed that properties expected to experience an increase in noise following the construction of

the published scheme would amount to some 15% of Amesbury homes. Increased noise would also have an impact on The Lords Walk, the Amesbury Conservation Area, Amesbury Abbey Park and the listed buildings at Countess Farm.

- 6.16.8 In 1996, when the scheme was withdrawn from the Government Roads Programme, the then Secretary of State announced that all the northern routes around Stonehenge had been rejected because of their unacceptable impact on nearby communities. The proposed flyover now put forward by the Highways Agency would have an unacceptable impact on a community significantly larger than those to the north of Stonehenge. This part of the scheme should therefore similarly be rejected.
- 6.16.9 A better and cheaper solution would be to allow a short single lane A345 bridge over a ground level A303.

### **The response of the Highways Agency to the objection of East Amesbury Residents**

#### ***Value objection***

- 6.16.10 The A303 improvement scheme was included in the roads programme by the Government as an "exceptional environmental scheme" with the aim of securing both heritage and transport benefits. Accordingly, the value of this unique scheme is assessed more widely than by reference to the transport benefits alone, with much of the anticipated value relating to the environmental benefits that would be achieved by the scheme.
- 6.16.11 The published scheme economics included in the cost benefit analysis for the scheme fully reflect future running costs anticipated for the published scheme. In particular, they include the estimated £1.3m per year cost of all the activities needed to operate the proposed tunnel safely.

#### ***Heritage objection***

- 6.16.12 A comprehensive survey was undertaken to identify archaeological sites that would be affected by the published scheme. Each of these is described in the Environmental Statement volume 2 part 1 (Document DD11).
- 6.16.13 While there would be adverse effects, especially on the setting of the barrows at Longbarrow Crossroads and the western tunnel portal, these are relatively slight impacts in comparison with the major benefits which the scheme would achieve within the Stonehenge MILS.
- 6.16.14 The existing A303 crosses The Avenue east of King Barrow Ridge. The published scheme has been designed to have no further impact upon The Avenue at this point, but it is accepted that it does not restore The Avenue where it is currently crossed by the A303. When the WHS was inscribed in 1986, the process was wholly focused on the removal of the A344 from The Avenue, an objective which the scheme achieves fully.

- 6.16.15 It is correct that the published scheme would require a haul road between the tunnel portals. That would be necessary to gain access to the works in Stonehenge Bottom, and also to allow site traffic to travel from one end of the scheme to the other. The haul road would be constructed from chalk placed on top of the existing ground surface on a permeable geotextile membrane. The thickness of the chalk would be designed to spread the load from the site traffic that uses it. Additionally, the haul road would be paved with a macadam surfacing to minimise the generation of airborne dust when the haul road was being used. It would be maintained and regularly cleaned throughout its period of use. It would have no impact upon buried archaeological remains, and would be removed fully once the construction work was complete. The land would be restored so that it was not possible to detect that a haul road had existed.
- 6.16.16 It is accepted that there would be adverse indirect effects upon the settings of the monuments at Longbarrow Crossroads. There would be a moderate adverse effect on the Winterbourne Stoke Barrows (Site 26) and on the Wilsford Down Long Barrow (Site 32). The junction would, however, be physically further away from the Long Barrow itself (Site 26A) than is the existing roundabout, and the main traffic flow along the A303 would be placed in cutting.

### ***Noise objection***

- 6.16.17 Traffic noise levels at properties in the vicinity of Countess Roundabout would increase by a minimal extent of around 2dB in the planned opening year of the scheme. The elevation of traffic over the flyover would, to some extent, be offset by the increased distance of the traffic from the properties concerned brought about by the realignment of the main carriageway across the centre of the roundabout. The rejection of the northern alternative routes in 1996 arose from a variety of causes, not just from the noise which they would have generated.
- 6.16.18 There is street lighting at Countess Roundabout at ground level at present, and this would continue to be the case. The published scheme would, however, bring about an improvement in light spill, by replacing the existing orange low pressure sodium lights by soft white high pressure sodium full cut off lanterns around the roundabouts. On the flyover itself, there would be no street lighting, and headlights of vehicles on the flyover would be at a level below the lanterns lighting the roundabout beneath.
- 6.16.19 A solution involving a short single lane A345 bridge over a ground level A303 is not feasible, and the Alternative originally put forward by another objector on that basis has been withdrawn.

### **6.17 Countess Road Residents' Group**

- 6.17.1 Countess Road Residents' Group ("CRRG") is an unincorporated association of the residents of Countess Road, Amesbury. It was formed in the late 1990s, with a view to ensuring that the interests of the residents of Countess Road were taken into account in connection with

the proposals for the improvement of the A303 and the moving of the Stonehenge Visitor Centre from its current site at Stonehenge. CRRG has a formal constitution and a Managing Committee. Its objections to the published scheme were authorised and endorsed by the residents of 82 of the 126 houses on Countess Road to the north of Countess Roundabout. Only four residents were unwilling to support the objection.

- 6.17.2 CRRG accepts that the A303 between Countess Roundabout and the dual carriageway west of Winterbourne Stoke requires improvement. The Group objects to the method of achieving that improvement which would be followed if the published scheme were implemented.

### ***Disruption***

- 6.17.3 All road schemes cause disruption during construction. The effect of the published scheme on residents of Countess Road would, however, be immense, and would continue after the construction phase was completed.
- 6.17.4 Although the original proposal of the Highways Agency to route traffic along Countess Road while tunnel maintenance was carried out has now been dropped, that would still be the diversion route used in the event of any accident in the tunnel. Countess Road would also be the route for any high vehicles. This is inappropriate for a road which is already at or near its maximum capacity.
- 6.17.5 The proposed flyover at Countess Roundabout would lead to faster moving and therefore noisier traffic. This would be a particular problem for houses close to the Roundabout, where some would face an increase of up to 3.9dB, when 3dB represents a doubling in noise intensity. Air pollution in the area would also rise between 2003 and 2023. According to the Highways Agency's own figures, the rise would be 36.8% without the scheme but 42.5% with the scheme in place.

### ***Environmental damage***

- 6.17.6 The construction of the tunnel would produce millions of tons of spoil. While some of this would be used in the scheme, an enormous amount would be left (estimated at 411,258 cu m), and this would need to be disposed of.
- 6.17.7 At Stonehenge Bottom, because of the level of the water table, the tunnel would have to be constructed by the cut and cover method, which would cause a great deal of environmental damage and would put at risk any archaeological remains.
- 6.17.8 There would also be adverse effects on the subterranean water flow in the area.

### ***Objection to the use of a tunnel***

- 6.17.9 Tunnels are more dangerous to construct than surface roads. They bring with them increased risks, when used by fast moving traffic. They should

only be used when absolutely necessary, for example, to pass through a mountain or under a river. In this case, a tunnel is proposed for the purely cosmetic reason of removing the road from the sight and earshot of Stonehenge. The high cost of this proposal is not justified. For the same cost, a surface road could take vehicles away from Stonehenge, and at the same time solve some of the other traffic problems facing South Wiltshire. These alternatives should be fully evaluated.

### ***Wider objections***

- 6.17.10 A representative of CRRG was involved with other residents of Amesbury in seeking a wider expression of public opinion regarding the published scheme in January 2004. Over two days, opinions were sought from some 873 local residents. Only 7 people supported the published scheme, and 866 were opposed to it.

### **The response of the Highways Agency to the objection of CRRG**

#### ***Disruption***

- 6.17.11 The frequency with which a vehicle breakdown or road traffic incident would give rise to the closure of a tunnel bore would be less than the frequency of such incidents causing disruption on the existing A303, because the new road would be a dual carriageway, providing more space for broken down vehicles and minor accidents to be passed without the need for traffic to be diverted. A major incident on one carriageway, should the published scheme be completed, would not necessarily mean that traffic travelling in the opposite direction would be affected. Within the tunnel, most incidents would be dealt with by means of a single lane closure, with traffic continuing to flow in the other lane, avoiding congestion and the need for traffic to be diverted.
- 6.17.12 Countess Road North is not planned to be used as a high load route in place of the section of the A303 which would be affected by the published scheme. In any event, the number of high load vehicles passing along the A303 is very small, with only four recorded in the past ten years.
- 6.17.13 With maximum growth factors applying to Countess Road North (high growth and the relocation of the Visitor Centre to Countess East) the flow of traffic along the road is estimated at 19,400 vehicles by 2023. The capacity of Countess Road North is in excess of 19,400 vehicles. Irrespective of where the Visitor Centre is relocated, therefore, the road would be able to accommodate the resulting traffic flow.

#### ***Environmental damage***

- 6.17.14 In the existing situation, dwellings along Countess Road North are exposed to traffic noise from the A345 as well as from the A303 in its existing form. The noise level increases of 3.9dB referred to by CRRG include increases due to traffic growth which would occur in any event. The increased noise arising from the published scheme would not be more than 2.5dB. It is generally accepted that a change of 3dB or less is barely perceptible under normal circumstances. An increase of 10dB in

sound pressure level is generally what would be perceived as a doubling of noise level. The noise levels given in the evidence of the Highways Agency are not noise intensity levels, but the 90<sup>th</sup> percentile of the hourly predicted traffic sound pressure levels averaged over the eighteen hour period between 06.00 and 24.00. Changes in noise levels at houses on Countess Road North as a result of the published scheme would result in a barely perceptible change for residents.

- 6.17.15 By raising much of the traffic on to a flyover, the centre line of the plume of pollutants would be raised. The concentrations at ground level would be lower than if the source were itself at ground level. The predicted pollutant levels if the scheme is carried out would be well below the accepted air quality thresholds. In fact, air quality levels immediately around the Countess Roundabout would slightly improve with the published scheme in place.
- 6.17.16 As regards spoil from tunnel construction, approximately 500,000 cu m of material would be excavated from a proposed 2.1km tunnel. This material would be used as essential landscape mitigation for the Winterbourne Stoke bypass, as well as for the construction of the Countess Roundabout flyover. Far from creating environmental damage, the reuse of this material would be beneficial in mitigating the effects of the proposed scheme.
- 6.17.17 It is not the case that tunnel construction at Stonehenge Bottom would be by the cut and cover method. A concrete cover slab would be constructed in Stonehenge Bottom to allow the tunnel to be bored beneath Stonehenge Bottom without the ground collapsing during the boring operation.
- 6.17.18 The potential effects on ground water in the area of the tunnel construction are fully considered in the Environmental Statement Volume 2, part 4, Appendix B. With mitigation measures as planned, there would be no adverse impact on the ground water flow regime. The Environment Agency has considered the analysis and is content with the results, as is indicated by the withdrawal of the Agency's objection to the published scheme.

### ***Tunnel construction***

- 6.17.19 The Highways Agency accepts that tunnels attract construction risks that are more difficult to manage than those for equivalent open roads. It does not follow, however, that a tunnel need be more dangerous to construct, provided the risks are properly understood and managed. The JV will take all necessary measures to ensure safety during construction. There is no evidence to support the contention that tunnels experience a higher rate of accidents than the open road. Tunnels in the UK have an excellent safety record, and it may even be the case that, with the relatively unusual surroundings of a tunnel causing drivers to be vigilant, safety levels may be higher in a tunnel.
- 6.17.20 Alternative schemes put forward in response to the published scheme have been compared with the published scheme as part of the process of

the inquiries.

## **6.18 The Avebury Society**

6.18.1 The Avebury Society was formed in 1994, and has a membership of 70. It has a formal constitution and is run by a Management Committee, which has approved both the objection to the published scheme and the evidence given to the inquiries.

6.18.2 The Avebury Society takes a close interest in what is planned for Stonehenge, since the management of Avebury and Stonehenge is partly in the same hands, and decisions for one half of the WHS may reflect on or affect those for the other. Like Stonehenge, Avebury suffers from road traffic passing through the centre of the WHS. The proposals for the A303 at Stonehenge therefore ring alarm bells for Avebury, since the treatment of the A303 proposed for Stonehenge would protect only the core of the WHS.

### ***Planning decisions at Avebury***

6.18.3 Three decisions made by Secretaries of State on development proposals at Avebury provide precedents for this decision affecting Stonehenge, the other half of the WHS.

6.18.4 In September 1988, there was a public inquiry into proposals for a hotel and hostel on the site of a transport café on the visually prominent Overton Hill at the south eastern corner of the WHS, some 2.5km distant, but not visible from, the henge at Avebury. Objectors, including English Heritage, the National Trust and ICOMOS - UK, were concerned about the visual impact of the proposed development on the WHS. In his refusal of the planning application (reference SW/P/547/21/67), the Secretary of State did not specifically mention the WHS, but accepted the Inspector's recommendation, which did mention it. The Inspector had placed a very high value on the setting of the archaeological landscape of the WHS, noting that "the wider surroundings are all part of the archaeological scene". He considered that these objections might be regarded as decisive in their own right, but they were also supported by planning policy affecting the designated Area of Outstanding Natural Beauty ("AONB") within which the appeal site was situated. The decision underlines the fact that the whole archaeological landscape of the WHS was recognised as worthy of protection from inappropriate development in just one part of it; the designation was a significant factor in the recommendation of refusal made by the Inspector. The decision of the Secretary of State in this case is at AVS/4 within document AVS/1/3, and the relevant extract from the report of the Inspector is at AVS/5, also within AVS/1/3.

6.18.5 A public inquiry was held in August 1989 into an outline planning application for a hotel and other visitor facilities at West Kennet Farm. The application had the qualified support of the local planning authority, and the granting of Scheduled Monument Consent was supported by English Heritage. The National Trust and ICOMOS - UK, however, objected to the proposals, as did a number of archaeological bodies, all of



whom raised the issue of WHS status. In his decision letter of 19 December 1990 (reference SW/P/5407/21/74, appendix AVS/7 within Document AVS/1/3), the Secretary of State recognised the importance of the WHS designation, but felt that this and the AONB designation were not alone sufficient to refuse the development, since it would not be visually prominent in the landscape. Conservation Area and listed building considerations were the main reasons for refusal of both planning and listed building consents. Scheduled Monument Consent was refused, however, because of the international importance of the monument (West Kennet Avenue) and its location within the WHS. The Secretary of State also noted the concern about the possibility of undiscovered remains being present which would be of significance for the understanding of the monument and its relation to the WHS as a whole. He did not accept that an archaeological watching brief over the proposed works would adequately protect any remains; his preference was for the physical preservation of any remains where they lie, as opposed to preservation by record.

- 6.18.6 In the third case at Avebury, which concerned appeals against enforcement notices and listed building enforcement notices in relation to a theme park at Avebury Manor, the Secretary of State referred in dismissing the majority of the appeals to the Conservation Area, AONB, Area of Special Archaeological Significance and WHS designations (APP/E3905/F89/4&5, appendix AVS/8 within Document AVS/1/3).

***Planning decisions at other World Heritage Sites***

- 6.18.7 The importance attached by the Secretary of State to the protection of WHSs from inappropriate development is also shown by planning decisions in the areas of the Ironbridge Gorge WHS and the Hadrian's Wall Military Zone WHS.
- 6.18.8 At Ironbridge Gorge, the Secretary of State refused planning consent for the development of a new bridge and approach roads which would have created an adverse visual impact on the WHS (reference WMR/P/5072/223/6, appendix AVS/9 within Document AVS/1/3).
- 6.18.9 In the first case at Hadrian's Wall (reference M42/R2900/01, AVS/11 within AVS/1/3), the Secretary of State agreed with the Inspector that the need to consider the possible impact of the development on the setting of a WHS was the main issue in the case. He considered that the proposed development (an exploratory oil well, some 400m south of Hadrian's Wall) would have a considerable discordant visual effect when seen from a distance, and that it would dominate the wider archaeological landscape. In refusing the development, the Secretary of State noted that, even taking into account the relatively short duration of the works, their impact on the setting of the WHS would not be acceptable.
- 6.18.10 In the second Hadrian's Wall case, an application for open cast coal extraction about half a kilometre north of Hadrian's Wall, the Secretary of State again refused the application, despite the relative short duration (eighteen months) of the proposed development. He regarded the

proposals as an alien and visually intrusive feature damaging to the setting of Hadrian's Wall and the WHS. The decision can be found at AVS/13 within Document AVS/1/3.

- 6.18.11 The decisions at Ironbridge Gorge and Hadrian's Wall, together with those at Avebury, support the view that WHSs should be given the necessary protection in their entirety by the Secretary of State.

***Key issues raised by the published scheme***

- 6.18.12 The Management Plan for Stonehenge has the status of supplementary planning guidance. The Stonehenge Project or Master Plan, of which the A303 scheme is a part, was, however, produced in advance of the Management Plan, and fails to acknowledge the overriding primary emphasis on conservation and management of the whole WHS and its archaeology as a cultural landscape. Paragraph 1.1.2 of the Management Plan shows that that Plan is intended *"to provide objectives for the management of the WHS landscape and archaeological sites and monuments within it, so that the outstanding universal value of the place is conserved and improved"*. No hierarchy of value is indicated here for archaeological sites below ground and/or undiscovered, or upstanding monuments or whether monuments are scheduled or not. All are of significance in the conservation and improvement of the outstanding universal value of the WHS.
- 6.18.13 The current A303 scheme would damage the archaeology and settings of sites known and unknown, and it would leave substantial parts of the WHS with increased surface dual carriageways and cuttings. Grade separated junctions would be needed at the western and eastern extremities of the WHS, and the western junction would be particularly intrusive, close to the significant Winterbourne Stoke barrow cemetery. There can be no doubt that the road improvement proposed would impact adversely on the setting of the WHS, both within and without its boundary, notwithstanding that a part of the highway in the core area of the WHS would be hidden from sight.
- 6.18.14 The primary emphasis of the Stonehenge Management Plan includes *"improving the interpretation and understanding of the whole WHS as a cultural landscape to visitors"*. This would be very difficult to achieve if the A303 road scheme were to proceed. The WHS would be physically divided into two over a substantial part of its area, and the dominant impact of the modern road on the landscape, where it would be both seen and heard, would make it difficult to explain effectively to visitors the interrelationships of monuments and sites in a WHS that has been designated for its outstanding universal value as a prehistoric cultural landscape. The experience of visiting and exploring the WHS and having it interpreted would be badly compromised, even though the area in the immediate vicinity of the henge might be freed of the sight of the main A303 traffic.
- 6.18.15 It is accepted that the present situation with the roads at Stonehenge is unsatisfactory, and that a bypass is needed for Winterbourne Stoke; but that does not mean that a permanently damaging road improvement

scheme should be either considered or undertaken. There should be no compromise in a WHS, and, if a better road solution cannot be implemented on the grounds of cost, the proposal to improve the A303 should be abandoned for the time being until the necessary finance can be secured.

- 6.18.16 The choice of the current scheme appears to have been made on grounds of what could be afforded rather than on the ground of what would be most suitable for the WHS. Less damaging options for the A303 improvement could and should be identified. Attention should be given to alternatives which would take the A303 completely outside the WHS, and if this would require additional funding, the world wide objection to the present scheme indicates that there could be world wide support for the funding of a more acceptable alternative.
- 6.18.17 The World Heritage Convention includes the responsibility to conserve WHSs for future generations. Road improvements may provide a temporary solution to contemporary problems, but they cannot be considered as anything other than short term measures, since it is not certain what future road traffic needs might be. There should be regard paid to the long term in dealing with a WHS. Road traffic solutions to present problems should not compromise the permanent protection and improvement of the integrity and environs of the WHS as a whole.
- 6.18.18 The decisions made by Secretaries of State on development proposals in the WHS at Avebury, Ironbridge Gorge and Hadrian's Wall were welcomed as upholding the outstanding universal values of the sites as a whole. Unusually, at Stonehenge, it is the Secretary of State who is the developer. The Secretary of State might therefore be regarded as having an interest in the decision. No less attention should be given in this case to the need to protect the outstanding universal value of the Stonehenge WHS.

#### **The response of the Highways Agency to the objection of the Avebury Society**

- 6.18.19 Whilst it is fully acknowledged that Avebury forms part of the same WHS as Stonehenge, the latter area is covered by a different Management Plan and is administered differently. The published scheme would have no physical impact, direct or indirect, on the Avebury part of the WHS.

#### ***Planning decisions at Avebury***

- 6.18.20 There are significant differences between the planning applications referred to at Avebury and the proposed published scheme. The three developments at Avebury were all private commercial developments, with limited direct contribution to improving the environment within the WHS. None related to the route of a trunk road. By comparison, the published scheme is being promoted in the public interest. It offers considerable environmental gain to the public in their use of a WHS at Stonehenge, as well as for motorists using the A303.
- 6.18.21 The application for a hotel on Overton Hill was refused on the basis of

conflict with plans and policies, road safety and scale. The reasons for refusing the proposal for West Kennet Farm took into account the location within an AONB, WHS and area of Special Archaeological Significance, but this alone would not have justified refusal without the effects on listed buildings and the surrounding Conservation Area. The reasons for refusing the appeal at Avebury Manor included the fact that the development would conflict with the policies of the approved Structure Plan on tourism and employment in villages.

### ***Planning decisions at other WHSs***

- 6.18.22 The decision at Ironbridge was based on there being an alternative; the site was not the only suitable location for a replacement bridge. The Hadrian's Wall applications were refused because, for the first development, the impact of the proposed works on the setting of the WHS would not be acceptable, and the second development was considered to represent an alien and visually intrusive feature, damaging to the setting of Hadrian's Wall and the WHS. It would therefore not be in accordance with the policies of the approved Northumberland Structure Plan.
- 6.18.23 In all of those cases, therefore, there were particular conflicts with approved plans and policies. On the other hand, the published scheme is being put forward within the context of international, national, regional, county and local plans and policies, and the relevant authorities have not recorded any concern in this respect.

### ***Issues raised by the published scheme***

- 6.18.24 Whilst it is the case that the Master Plan was produced in advance of the Management Plan, the two Plans are interwoven, and are considered to be in agreement. Their relationship is set out in paragraph 1.5.11 of the Management Plan, which states that:

*"The Stonehenge Master Plan announced by English Heritage and the National Trust in April 1999 runs in parallel to but independently of the WHS Management Plan. The Master Plan is a mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered. The Master Plan sets out the Government's commitment to improving the Stonehenge landscape and provides an action plan for the implementation of a proposed tunnel for the A303, closure of the A344 and the removal of the existing visitor facilities and car park at the Stones, and the creation of a new Visitor Centre."*

- 6.18.25 The provision of a bored tunnel through the central area of the WHS would improve the setting of the Stones within the Stonehenge MILS, avoid all direct impact on scheduled monuments, provide an opportunity for the enhancement of biodiversity, and remove traffic from the central area of the WHS. This would greatly improve the opportunity for interpretation and understanding of the WHS, a view supported by English Heritage in its evidence to the inquiries.

- 6.18.26 It is not considered that all archaeological components of the landscape should be regarded as having the same importance for the outstanding universal value of the WHS. That is why a careful assessment of each site has been made. The WHS inscription clearly sets Stonehenge and its associated sites and monuments apart from the rest of the WHS.
- 6.18.27 As regards the proximity of the Longbarrow Crossroads junction to the Winterbourne Stoke Barrows, the effects of the published scheme on these barrows have been assessed to be moderate adverse in cultural heritage terms. Because the design of this junction is part of a wider scheme, these adverse effects must be weighed against the substantial benefits which would accrue from other parts of the scheme, not least those provided at great cost in the heart of the WHS.
- 6.18.28 The Management Plan's vision clearly includes the provision of a 2km tunnel. The Plan's vision for the future includes amongst its aspirations that all inappropriate structures and roads should be removed or screened to provide an improved landscape setting for the Stones. The Highways Agency does not agree that the Management Plan argues for a tunnel under that part of the A303 that is not already dualled within the WHS. English Heritage in its evidence to the inquiries also states that in its view the 2.1km tunnel would achieve the objectives of the Management Plan.
- 6.18.29 Nor does the Highways Agency agree that there would be any difficulty in achieving improved interpretation and understanding of the whole WHS if the scheme were to proceed. This suggestion of the Avebury Society ignores the fact that the existing roads have been in place for more than 200 years, and, despite the traffic upon them, interpretation and understanding have proceeded. The provision of a tunnel and a new east-west byway would open up much of the area, and thereby provide much greater access for interpretation and understanding.
- 6.18.30 Various alternative routes have been identified and considered at the inquiries. There is therefore the opportunity to evaluate them against the published scheme.
- 6.18.31 Given the fact that the UK is one of the richest economies in the world, it is hard to believe that other countries would see a need to contribute to a more expensive scheme than that put forward at the inquiries to address the impact on Stonehenge of the A303.
- 6.18.32 Whilst the draft Orders for the published scheme are being promoted in the name of the Secretary of State for Transport, the report in this case will be submitted to the First Secretary of State, as well as the Secretary of State for Transport. There would be no prejudicial conflict of interest.

## **6.19 The Amesbury Link Road Action Group**

- 6.19.1 The Amesbury Link Road Action Group ("AAG") is a loose and informal group of friends and local residents. It does not have a constitution or a Management Committee. It works with other groups such as the East

Amesbury Residents. The objection made on behalf of the AAG was authorised by representatives of the East Amesbury Residents' Group, the Beverley Hills Park Residents' Association, and four other people who are members of AAG.

- 6.19.2 It is accepted that there is a need to maintain and increase the capacity of the A303 in order to support its role as part of the Trans European Road Network. This need not be achieved by way of a tunnel, however, or even within the existing A303 road corridor.

***Problems associated with the published scheme***

- 6.19.3 The published scheme would damage parts of the WHS. It would have a substantial or moderate adverse visual effect on nine barrows. It would perpetuate the intersection of The Avenue by the A303. It would also adversely affect Countess Farm, and the elevation of traffic over Countess Roundabout would deliver sound, light and environmental pollution to a much wider area of Amesbury than the existing road arrangements.
- 6.19.4 There are outstanding uncertainties associated with the published scheme at its present stage of development. The Highways Agency evidence was to the effect that analysis of the effects of the scheme on water courses would only take place later, during the detailed design stage, when the precise extent of the works would be known. Similarly, the impact of the proposed tunnel on groundwater flows would be assessed in detail at a later stage.
- 6.19.5 The building of the flyover at Countess Roundabout would remove the safe pedestrian access between Countess Road north and Countess Road south. Traffic signals would permit crossing, but introduce a new obstacle to traffic flows. The current separation of pedestrians from motorised traffic would be lost when the existing subway was removed.
- 6.19.6 In relation to the use of a tunnel to remove the sight of traffic from Stonehenge, the concept of self rescue suggested by the Highways Agency following a crash causing a fire within the tunnel seems to be flawed. It would imply a need for special survival training for users of the tunnel, which would not be feasible for each driver. This is a particular concern because the nearest fire station at Amesbury relies on retained fire fighters over the weekends.
- 6.19.7 The proposed tunnel would do nothing to improve the transport network of South Wiltshire. Its capacity would be limited, and any expansion needed in the future would require a similar level of effort if it were to be achieved.
- 6.19.8 The decision whether the published scheme represents value for money has not been the subject of any effective comparison with the possible alternatives. DETR guidance exists on the use of Multi Criteria Decision Analysis in a manual published by the DETR in December 2000. There is no evidence that this approach has been used in seeking a robust decision on the improvement of the A303.

### ***Alternative approaches***

- 6.19.9 Other alternatives are available, such as the South Surface Screened Road, which would remove traffic pollution from Stonehenge and provide a bypass for Winterbourne Stoke, but at the same time provide a bypass for fifteen other villages along the A338 and the A36, at the same time as preserving local barrows and offering the opportunity to restore The Avenue.

### ***The Amesbury Link Road***

- 6.19.10 Salisbury District Council has proposed that the A345 becomes the preferred route north between Salisbury and the A303, replacing the A338 in that role. A new link road between the A345 and the A303 Solstice Park junction would then be constructed. In the future, therefore, through traffic would include the tourist traffic to and from Salisbury Cathedral, and the extra weight of coach and car traffic would not be welcome or appropriate for the roads through residential areas of Amesbury, damaging the amenity of these areas.
- 6.19.11 The interplay of the A303 proposals and the link road proposal do not appear to have been considered together. The repercussions of Stonehenge tourist traffic using the link road and the new junction would be very substantial for the residents of East Amesbury. The establishment of a strategic waste transfer site at Ratfyn is also likely to increase southerly traffic through Amesbury, which would have a further adverse impact on amenity.

### ***The response of the Highways Agency to the objection of the Amesbury Link Road Action Group***

- 6.19.12 Placing the A303 in a tunnel past Stonehenge would secure the same benefits for the landscape setting to the Stones as would be secured by the complete physical relocation of the road.
- 6.19.13 Paragraph 4.6.4 of the Stonehenge Management Plan recognises that a strategy of placing the A303 in a tunnel and closing the A344 would inevitably have some detrimental effect on existing archaeology along the corridor of the A303, but the Management Plan indicates that these detrimental effects should be balanced against the major benefits that would result for the WHS. In overall terms, the published scheme would clearly bring major benefits to the WHS.

### ***Response regarding alleged problems with the published scheme***

- 6.19.14 There is nothing in the published scheme proposals to inhibit the National Trust from pursuing any plans it may have for The Avenue on land within its ownership. Elsewhere along the line of The Avenue, however, there are practical difficulties which stand in the way of The Avenue being reunited, whether or not it is cut by the A303. Such difficulties, and the limited benefits which would otherwise be achieved by removing the

intersection of the A303 with The Avenue, could not justify the investment of an additional £50m of public funds to extend the tunnel by the 600m eastwards which would be necessary to enable it to pass beneath The Avenue.

- 6.19.15 The reference to analysis of the impact of the scheme on water courses taking place during the detailed designed stage concerns only the possible effects on the flood flow regime of the River Till arising from a temporary haul road and bridge crossing of the river channel. The purpose of further analysing the effects during detailed design would be to determine whether mitigation, such as piped culverts beneath the haul road, would be needed. If needed, such works would be provided.
- 6.19.16 As regards the proposed tunnel acting as a partial barrier to ground water flowing south beneath Stonehenge Bottom, the mitigation measures which have been designed have been accepted by the Environment Agency, to the extent that they have withdrawn their objection to the published scheme.
- 6.19.17 The evidence clearly indicates that the change in traffic noise brought about by the published scheme would be minimal for properties in the Amesbury area, both north and south of the A303.
- 6.19.18 With regard to potential light pollution, vehicle headlights on the proposed Countess flyover would be no higher above existing ground level than the existing roundabout lighting. The existing low pressure sodium lanterns on the A345 on the roundabout approaches would be replaced by high pressure sodium full cut off lanterns, which would cause less light spillage.
- 6.19.19 In terms of air pollution, the published scheme would not cause any air quality issues in the Amesbury area.
- 6.19.20 As regards the pedestrian crossing at Countess Roundabout, the substantial reduction in traffic flow on Countess Roundabout itself, caused by the introduction of the flyover, would permit the installation of a safe at grade signalised crossing for pedestrians and for other non-motorised users. The crossing proposed would be typical of what exists throughout the country as a means of allowing pedestrians to cross roads in safety. Even if an underpass were to be retained, it could be anticipated that most pedestrians would prefer to use the safe, surface route rather than the below ground route. With relatively few people using an underpass, that would make its use even less desirable by those who would feel more secure in the presence of others. There is therefore no justification for incurring the cost of retaining and maintaining an underpass.
- 6.19.21 The anticipated frequency of accidents giving rise to a complete closure of the proposed tunnel would be less than the frequency of incidents requiring a complete closure of the existing A303, because incidents arising within the tunnel would in most cases be capable of being dealt with by means of a single lane closure, with traffic continuing to flow in the other lane. By comparison, any incident on the existing single



carriageway section of the A303 may be expected to lead to significant delay and more frequent diversion of traffic.

- 6.19.22 As regards tunnel safety, the track record of fire safety in modern uni-directional tunnels similar to that proposed for Stonehenge is extremely good. Recent serious tunnel incidents abroad, involving loss of life, have taken place in tunnels of a very different design from that proposed at Stonehenge, in which there were few points of escape, and no means of driving smoke away from stationary vehicles.
- 6.19.23 In the unlikely event of a serious tunnel fire, drivers would escape to safety by way of the regularly spaced emergency cross passages. A tunnel user would not have to walk more than around 150m to gain the safety of a cross passage, which would provide refuge from any smoke and heat. A range of facilities would be installed in the tunnel to assist and encourage tunnel users to make their way as quickly as possible to a place of safety. In the event of a serious tunnel fire, there would be time and opportunity for drivers and their passengers to take advantage of the escape routes and to gain a place of safety before conditions of heat and smoke within the affected tunnel bore became untenable, and before the arrival of emergency services at the scene of any incident. This is the only form of self help that the Highways Agency envisages may need to be exercised by tunnel users, although fire extinguishers and hose reels would be provided at each emergency point along the length of the tunnel, and could readily be used to extinguish small fires. The concept is no different from what might be expected of any occupier of a building when a fire alarm sounds.
- 6.19.24 Nevertheless, it is accepted that a proportion of tunnel users might not heed the warnings, or take advantage of the escape measures provided, and might elect to remain in their vehicles in spite of (or perhaps unaware of) the potential danger that may be posed by a serious tunnel fire. The proposed tunnel ventilation system would help in such circumstances. It would be capable of blowing smoke from a serious tunnel fire away from any stopped vehicles, and would be brought into operation as appropriate.
- 6.19.25 In addition, the initial Fire Brigade response from Amesbury would be capable of arrival at the eastern tunnel portal within ten to twelve minutes. It is currently proposed that the initial response to all incidents by the emergency services would be by way of Stonehenge Road. This means that it would not be necessary for the emergency services to negotiate stationary traffic on the A303. In the event of a major incident in the tunnel necessitating a tunnel bore being closed from the east, the emergency services would be able to reach the western end of the tunnel very speedily by travelling through the non-incident bore of the tunnel, which would have been closed to traffic. In this way, it would not be necessary for the initial response to rely on emergency services travelling to the tunnel from destinations to the west. In the event of a major incident requiring the attendance of additional emergency service resource not available from Amesbury, units from other centres would be capable of providing an appropriate additional response within thirty minutes.

- 6.19.26 Wiltshire Fire Brigade are, along with the other emergency services, part of the Tunnel Design and Safety Consultation Group. They have withdrawn their objection to the published scheme. The Highways Agency has undertaken to continue discussing with the Fire Brigade the question whether a fire suppression system should be installed in the tunnel. The ultimate decision on that would be informed by further research, which would add to the knowledge and understanding of what might best be done in these circumstances.
- 6.19.27 The capacity of a uni-directional twin bored tunnel, with two lanes in each direction, is needed to accommodate the safe and efficient operation of the tunnel. The capacity provided would be capable of accommodating the forecast traffic flows in 2023 (the design year) and beyond, even assuming high traffic growth in the future. At the same time, the Government is investigating options for traffic management and demand management which, if introduced and if successful, would ensure that the tunnel would have sufficient capacity for an indefinite period into the future.
- 6.19.28 The economic appraisal of the published scheme has been carried out in accordance with the requirements of the DMRB and the Government's New Approach to Appraisal. It includes the estimated annual running costs of the tunnel and the energy requirements for the proposed tunnel are included as part of those annual running costs.

***Alternative approaches and the Amesbury Link Road***

- 6.19.29 The "South Surface Screened Road" has not been promoted as an alternative at the inquiries. The Highways Agency has no details which would enable it to understand the alternative, to develop the design, or to comment on the supposed benefits of such a scheme.
- 6.19.30 The proposed Amesbury Link Road appears to be related to planned development on the east side of Amesbury. The published scheme would commence to the west of the junction improvement with the A303 associated with that scheme, which is currently being carried out. The published scheme would not prejudice development or highway planning on the east side of Amesbury.
- 6.19.31 Other issues such as the relative status of the A338 and the A345 routes north from Salisbury and the establishment of a strategic waste transfer site at Ratfyn are the responsibility of the local highway and planning authorities. They are not impacted upon by the published scheme.

**6.20 Mrs J Robertson**

- 6.20.1 Mrs Robertson works as a tourist guide, both in the area of Stonehenge and also throughout the UK, but her objection is a personal one.
- 6.20.2 The A303 runs along the site of the Bronze Age trade route which connected Salisbury Plain to South Wales, and, from there, to Ireland. The blue stones of Stonehenge were brought from the Preseli Mountains

to Salisbury Plain. There are four henges in the same area, but the blue stones were used to decorate the henge closest to the road, because the builders wished them to be clearly visible from the road.

***A tunnel is not the solution***

- 6.20.3 Whilst it is accepted that the bottleneck which the single carriageway section of the A303 alongside Stonehenge represents has got to be resolved, placing the road in a tunnel is not an appropriate solution. With a tunnel, people would not be able to see Stonehenge as they drive past. Many people who see Stonehenge for the first time as they drive past on the road to the South West later return as tourists to visit both Stonehenge and the surrounding area. The average visit by an organised tourist party to Stonehenge lasts for around one hour, and is linked with visits to other sites of interest in the immediate area, such as Salisbury Cathedral, the Andover Iron Age Museum or Winchester. What the average tourist visiting Stonehenge needs is three things – a distant view of the Stonehenge within its landscape; an opportunity to appreciate the relationship of the barrows on their ridge lines, grouped around the central monument; and a visit to the monument of Stonehenge itself.
- 6.20.4 If the road were placed in a tunnel, tourists who did not have time to spend half a day at Stonehenge would drive through Wiltshire and never see Stonehenge or any of the other attractions of the immediate area.
- 6.20.5 Some people find it difficult to travel through tunnels. Accidents within a tunnel are more difficult to deal with than accidents on a surface road, and there is concern about the ventilation system proposed for the tunnel coping with stationary traffic in the event of an accident or blockage.
- 6.20.6 There is also concern about the impact of the proposed tunnel on the water table in the immediate area. In particular, neither the Highways Agency nor the Environment Agency appears to have considered the potential for the pollution of aquifers by sewage from villages such as Shrewton, Tilshead, Orcheston and Chitterne. There is no main drainage in, for example, Chitterne, and therefore clear potential for pollution of aquifers if the water table rises. The Highways Agency has not advised the Environment Agency of the lack of public sanitation in these villages.
- 6.20.7 The cost of the published scheme, including a tunnel, is exorbitant and unnecessary. All that is needed is a dual carriageway along the whole of the route of the published scheme at surface level. This would be able to cope with the increased traffic experienced on the A303 without the need for tunnel building. The view of Stonehenge would be preserved for passing travellers.
- 6.20.8 It is not the case that accidents happen in the area of Stonehenge because the sight of Stonehenge distracts drivers. The main cause of the accidents in the area is the reduction from dual carriageway to single carriageway. The Yarnbury Iron Age Fort to the west of Stonehenge is a massive construction, seven times wider than Stonehenge and nearer to the road, but there is scarcely any accident on the road approaching that site, because that part of the road comprises a dual carriageway.

- 6.20.9 Mrs Robertson promoted Alternative Route 9, which is dealt with in Section 7.9 below.

**The response of the Highways Agency to the objection of Mrs J Robertson**

- 6.20.10 The evidence for a through route on the precise line of the existing A303 in prehistoric times is uncertain, and it would be speculation to suppose that the location of Stonehenge has any special relationship to the line of the existing A303. Nevertheless, the published scheme would reinstate a byway on the line of the existing A303, which would be more representative of the appearance of any track which might have existed there in prehistoric times than a busy dual carriageway.
- 6.20.11 A surface route through the WHS would, it is acknowledged, be considerably cheaper to construct than the published scheme; but it would not achieve the principal objectives of the WHS Management Plan, which requires a tunnel to improve the setting of the Stones and the core area of the WHS.
- 6.20.12 The loss of a view of Stonehenge to drivers passing the monument on the A303 is an unavoidable effect of the removal of the sight and sound of traffic from Stonehenge.
- 6.20.13 The proposed tunnel has been designed in full consultation with representatives of the emergency services, and incorporates all necessary safety requirements. Tunnels have a good safety record in the UK.
- 6.20.14 The villages of Shrewton, Tilshead, Orcheston and Chitterne sit in different ground water and river catchments from the tunnel at Stonehenge Bottom. This means that, even without any mitigation measures in place at the tunnel, the presence of the tunnel would not impact on ground water levels in those villages. The mitigation measures proposed as part of the published scheme would deal with the problem of an increase in the water table in the area of Stonehenge Bottom. The Environment Agency has indicated its satisfaction with the arrangements for dealing with groundwater as part of the published scheme. The Agency has withdrawn its objection to the Orders. It has also dealt with the very specific concerns of Mrs Robertson in relation to the effect of the published scheme on Chitterne in a series of letters (Documents JR/0/1, JR/0/2 and JR/0/7).

**6.21 Mr G V Cowmeadow**

- 6.21.1 The improvement to the A303 should take place at surface level, so that drivers and their passengers passing Stonehenge can continue to see the Stones. This is the view of the vast majority of local people.
- 6.21.2 The proposed tunnel would cost considerably more than the cost of a surface level solution. It would be difficult for emergency services to reach the scene of accidents which took place in the tunnel. People who

are reluctant to use tunnels would divert on to local roads.

- 6.21.3 The A344 from Airman's Corner to Stonehenge should be retained as an access road to Stonehenge.

**The response of the Highways Agency to the objection of Mr G V Cowmeadow**

- 6.21.4 It is recognised that the loss of views of Stonehenge for the traveller on the A303 and the A344 is a substantial drawback to the published scheme in the minds of many, though there is no evidence to support the suggestion that this is the view of the majority of local people. The loss of the immediate view of Stonehenge for travellers is, however, the other side of the coin, made inevitable by the removal of views of traffic from Stonehenge. The ability to appreciate the depth and complexity of this prehistoric landscape, free from 20<sup>th</sup> Century clutter is embodied in the objectives of the WHS Management Plan (Document DD65), and would be a benefit for the hundreds of thousands of people who make a special journey to see Stonehenge. This greatly outweighs the loss of passing views.
- 6.21.5 The Highways Agency has carried out a careful analysis of a large number of possible incident scenarios, and in each case has identified, with the help of the Tunnel Design and Safety Consultation Group, the appropriate response. All the emergency services are represented on that Group.

**6.22 Amesbury Town Council**

- 6.22.1 The Town Council supports the proposal to make the A303 a dual carriageway from Countess Roundabout to Berwick Down. The Council objects, however, to the placing of any part of that section of highway in a tunnel; to the proposed closure of the current pedestrian underpass at Countess Roundabout and to the installation of traffic lights; and to the exemption of certain vehicles from restrictions on using the proposed Stonehenge Byway.

***Objection to a tunnel***

- 6.22.2 A tunnel could only be created at substantial and disproportionate cost. It would result in the loss of the view of Stonehenge for passing drivers and their passengers.

***Objection to the closure of the Countess Road Underpass***

- 6.22.3 The underpass provides a well used and safe passage connecting the town centre of Amesbury with the residential area to the north of the town. It is used not only by residents of Countess Road, but also by pedestrians from both Durrington and Larkhill. Children use the tunnel on a daily basis to go to and from school and to other activities in the town of Amesbury. Customers using the residential facilities at the Countess Service Area also use this underpass to find refreshments in the nearby town centre. Whilst the numbers using the underpass on an

hourly basis may not meet similar figures for pedestrian underpasses in larger towns or cities, the route serves a valuable purpose for the town of Amesbury.

- 6.22.4 The Highways Agency states that the underpass will remain in use during the construction of the flyover at Countess Roundabout, and it is understood that the filling in and decommissioning of the underpass is one of the final parts of the construction of the entire scheme for the improvement of the A303. It is therefore clear that the retention of the underpass would not interfere in any way with the major part of the construction of the flyover or the associated slip roads.
- 6.22.5 The pedestrian underpass would be replaced by pedestrian crossings on both the east and west bound slip roads, controlled by traffic lights. The Town Council is very concerned that pedestrians trying to cross these slip roads would ignore the lights, and try to cross the slip roads without reference to the sequence of the traffic lights.
- 6.22.6 When the current dual carriageway and pedestrian underpass were built, the traffic flow both known and predicted was a fraction of that which applies today. The Town Council considers that the predicted traffic numbers using the slip roads would be in excess of total traffic numbers when the pedestrian underpass was built. If that is so, it should remain.
- 6.22.7 It is also feared that including traffic lights on the roundabout would cause long delays for traffic travelling both north and south. For many years, residents of Amesbury have had to endure long delays when crossing the A303 between south and north almost every weekend, and the proposal to create a flyover is welcomed by the Town Council. Including traffic lights on the roundabout would, however, reinstate potential delays.

***Objection to the exemption of certain vehicles from restrictions on using the proposed Stonehenge Byway***

- 6.22.8 The exemption of "invalid carriages and disabled transport vehicles designed specifically to carry up to 8 disabled or less able bodied persons and driven by a designated representative from English Heritage or the National Trust" is considered to be a discriminatory measure, designed to aid English Heritage and the National Trust rather than the wider community of people with disabilities. The exemption should be made available to all types of transport for people with disabilities, with no restriction on drivers or operators.

**The response of the Highways Agency to the objection of Amesbury Town Council**

***The case for a tunnel solution***

- 6.22.9 The placing of a section of the A303 in a tunnel is essential if the sight and sound of traffic is to be removed from the Stonehenge MILS. The loss of the view of Stonehenge by drivers and their passengers is the price which must be paid for the removal of the impact of traffic on the

central area of the Stonehenge WHS.

***The case for closing the Countess Road Underpass***

- 6.22.10 The retention of the existing underpass at Countess Roundabout is not a viable option with the published scheme. At the very least, the existing underpass would have to be extended, strengthened and refurbished in order to extend across the width of the new junction, and to secure a satisfactory maintenance regime and design life for the structure. There are only about fifty movements each day through the underpass, and it would cost £500,000 to refurbish and upgrade the underpass. The number of movements through the improved structure might well reduce from fifty to around fifteen, because, with a great proportion of traffic being taken off Countess Roundabout and the flows on the slip roads being relatively light, there would be little incentive for pedestrians to use the underpass, since they would be able to cross the slip roads at grade in safety.

***Restrictions on the Stonehenge Byway***

- 6.22.11 The limited exemption for vehicular traffic on the proposed Stonehenge Byway is intended to restrict vehicular use of that Byway to a very limited class of vehicles associated with organised access for people with access related disabilities to Stonehenge.

**6.23 Councillor A J Brown-Hovelt**

- 6.23.1 Councillor Brown-Hovelt is a Salisbury District Councillor for Wilton, but his objection is a personal one.
- 6.23.2 Much of the actual Stonehenge monument was rebuilt in the early 20<sup>th</sup> Century. It is only when the monument is viewed in the context of its relationship with the surrounding Neolithic and other remains that Stonehenge is seen in its proper setting. The barrows that ring the area all have a direct relationship with the Stonehenge monument, and it is the whole landscape, the whole of the WHS, which should be protected and preserved.
- 6.23.3 A tunnel would intrude into the landscape. The published scheme would have portals within the WHS, and even a longer tunnel would intrude on the landscape of the WHS because of the need to provide ventilation shafts within the WHS.
- 6.23.4 It is not clear how spoil disposal from the proposed tunnel would be achieved. There is also concern about the potential effects of the tunnel on the chalk aquifer, and the impact on ground water flows within the Avon, the Till and the Wylde river systems.
- 6.23.5 The adopted Local Plan concentrates on the protection of the WHS in its entirety, rather than simply the Stonehenge monument, which puts the Local Plan in conflict with the published scheme proposals.
- 6.23.6 For all of those reasons, Councillor Brown-Hovelt objects to the published

scheme, and supports a solution which would take the A303 away from the WHS. He believes that further consideration should be given to Alternative Route 4.

### **The response of the Highways Agency to the objection of Councillor A J Brown-Hovelt**

- 6.23.7 The published scheme is being promoted as an "exceptional environmental scheme". Its prime objective is to remove roads and traffic from the setting of Stonehenge in recognition of its status as a WHS. English Heritage, as custodians of the WHS and the Stonehenge Management Plan, supports the scheme in the belief that it provides the right solution for the Stones. The scheme could not be delivered through the WHS without the proposed tunnel. It is the tunnel solution that offers the heritage and environmental benefits required by the Stonehenge Management Plan.
- 6.23.8 The disposal of material from the tunnel and cuttings would be used as part of a package of essential landscaping to blend the proposed highway into the existing landform. This would reduce the visual intrusion of the published scheme so that it would have overall benefits in both landscape and visual terms.
- 6.23.9 The Highways Agency has demonstrated to the satisfaction of the Environment Agency and English Nature that the tunnel would not have an adverse impact on the chalk aquifer, and that it would not affect the viability of any of the river systems within the area.
- 6.23.10 The published scheme would achieve considerable compliance with policies contained in both statutory and non statutory plans from international through to local level.

### **6.24 The Trail Riders Fellowship**

- 6.24.1 The Trail Riders Fellowship ("TRF") was formed in 1970 to record, protect and use public greenways and tracks. It has a written constitution, and a national membership (as at September 2003) of 3,217. The TRF objection (which has been authorised by the Fellowship) is to the Byway Regulation Order. The additional objection originally made to the Side Roads Order is withdrawn.
- 6.24.2 The Tunnel Regulation Order would prohibit pedestrians, cyclists, animals (ridden, led or driven by a person), vehicles drawn by animals, motorcycles (whose engine cylinder capacity is less than 50 cc) and invalid carriages from using the proposed tunnel. All of those classes of traffic, with the exception of motorcycles with an engine capacity of less than 50 cc, would be able to use the Stonehenge Byway. Motorcycles (whatever their engine capacity) would not be able to use the Byway.
- 6.24.3 At present, the A303 to the south of Stonehenge is joined from the south by a right of way shown on the current Definitive Map as Bridleway Amesbury 11. Following consideration of a Definitive Map Modification Order made under Section 53 (2) (b) of the Wildlife and Countryside Act



1981 at a public inquiry held on 24 and 25 February 2004 (reference FPS/K3930/7/27, Document TRF/0/2), this right of way has recently been reclassified as a Byway Open to All Traffic. It is therefore open to use by motorcycles, along with other vehicular traffic.

- 6.24.4 Some 400 m to the west of the junction of what is now Byway Amesbury 11, the A303 is joined from the north by Byway Amesbury 12.
- 6.24.5 At present, users of Byway Amesbury 11 and Byway Amesbury 12 can move between the two Byways using the A303. If the published scheme were carried out, the A303 in the section between Byway Amesbury 11 and Byway Amesbury 12 would be in tunnel. If the restrictions contained in the Byway Regulation Order were to apply, this would mean that users of motorcycles and other motor vehicles would not be able to move between Byway Amesbury 11 and Byway Amesbury 12 along the proposed Stonehenge Byway. Byway Amesbury 11 would thus become a dead end for those classes of user. (Byway Amesbury 12 would not, because it continues as Byway Wilsford cum Lake 1 to the south of the A303.)
- 6.24.6 To address this issue, the TRF seeks an exemption from the restriction of vehicular traffic on the 400m length of the Stonehenge Byway between the points at which it is joined by Byway Amesbury 11 and Byway Amesbury 12.
- 6.24.7 There is no objection from the TRF to the proposals contained in the Byway Regulation Order for the balance of the proposed Stonehenge Byway.
- 6.24.8 Should the published scheme be approved, Wiltshire County Council as the local highway authority would need to carry out a comprehensive review of the public rights of way within the Stonehenge area, and that is when the issue of the use of the Stonehenge Byway should be determined. This should be done in consultation with all appropriate user groups. There was no such consultation before the present draft Byway Regulation Order was published. The need for this comprehensive review is recognised in the Stonehenge Management Plan at paragraph 4.6.4, and in the Stonehenge Estate Land Use Plan (Document DD68) in management policy ACP1.
- 6.24.9 The Statement of Reasons produced by the Highways Agency for the making of the Byway Regulation Order referred to the preservation and improvement of the amenities of the area through which the Byway would run; the prevention of the use of the Byway by vehicles which are considered unsuitable having regard to the intended character of the road and the adjoining landscape; and the conservation and enhancement of the flora, fauna and beauty of the area.
- 6.24.10 Prohibiting those motor vehicles which would be affected by the Byway Regulation Order from the 400m between Byway Amesbury 11 and Byway Amesbury 12 would not improve the amenities of the area; that improvement would be achieved by placing the A303 in a tunnel. Vehicles of the type used by members of the TRF are not unsuitable,

having regard to the intended character of the road, a Byway replacing a trunk road which forms part of the ancient landscape. The Order would not conserve and enhance the flora, fauna and beauty of the area, because no flora or fauna exist on the surface of the A303 nor are any likely to colonise the surface of the Byway. The beauty of the area would not be affected by members of the TRF, whose sporadic and transient use already takes place in areas of beautiful countryside without any adverse effect.

6.24.11 The trail motor cycles used by members of the TRF are road legal, fuel efficient, quiet, unobtrusive and have a significantly lower impact on the surface and amenities of a route than agricultural vehicles, statutory undertakers' vehicles, transport vehicles for people with disabilities and emergency vehicles.

6.24.12 As presently drafted, the Byway Regulation Order would mean that motorised traffic (apart from those classes covered by the existing exemptions in the Order) would need to turn round at the northerly end of Byway Amesbury 11 and find an alternative route, probably using normal public roads, before being able to rejoin the byway network.

#### **The response of the Highways Agency to the objection of the Trail Riders Fellowship**

6.24.13 The Highways Agency would provide reasonable alternative routes for those users who would be banned from using the proposed tunnel. All but the 50 cc motorcycles would be permitted to use the Stonehenge Byway. In line with the WHS Management Plan aim that motorised traffic should be removed from the vicinity of the Stones, the Highways Agency considers, however, that it should not promote the use of the Byway between Byway Amesbury 12 and Byway Amesbury 11 by motor vehicles or motorcycles.

6.24.14 The Highways Agency consulted those it was required to consult under the relevant Regulations regarding the draft Byway Regulation Order.

6.24.15 The Order is being promoted to restrict vehicles from the immediate area of the Stonehenge monument from the outset because of the importance attached by the WHS Management Plan to removing vehicular traffic from that area. It is not premature to take this line now, leaving the comprehensive review of access requirements envisaged by the Management Plan and the Land Use Plan to be carried out by English Heritage and the National Trust in consultation with the relevant bodies when a decision has been taken on the Orders before these inquiries.

6.24.16 To allow vehicles along the 400m between Byways 11 and 12 (which comes within about 250m of Stonehenge itself) beyond those covered by existing exemptions would have an adverse effect upon precisely those amenities of the area which would be improved by placing the A303 in the proposed tunnel.

## **6.25 The Byways and Bridleways Trust**

- 6.25.1 The Byways and Bridleways Trust ("BBT") is managed by 7 Trustees. It was created to protect the heritage of public rights over roads, bridleways and byways. The objection to the Orders in this case has been approved by the Trustees.
- 6.25.2 The BBT accepts that traffic flow along the A303 needs to be improved. This should not be achieved, however, at the expense of damage to the rights of way network in the area.

### ***The status of the public rights of way affected by the Side Roads Order***

- 6.25.3 During the consultation period on these Orders, the BBT has consistently highlighted the existence of carriageway rights over a number of public rights of way which join with or cross the A303. These routes are, however, not recorded on the Definitive Map for the area as Byways Open to All Traffic subject to vehicular rights, as the BBT considers they should be on the available evidence. They are shown on the Definitive Map instead as Bridleways or Footpaths, and the Highways Agency has referred to them with that status in the Side Roads Order. The Highways Agency should have resolved the status of these rights of way before producing the draft Orders, and shown them in those Orders at their true status.
- 6.25.4 Until 1 January 2026, public rights continue to exist, whether they are shown on the Definitive Map or not. The relevant highway authority has a duty under Section 130 of the Highways Act 1980 to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority. The Highways Agency is the highway authority for the A303, and they should take that duty seriously.
- 6.25.5 Belatedly, the Highways Agency has introduced an amendment to Article 1 (1) (b) and to Article 1 (3) of the draft Side Roads Order (shown in Document HA/0/13) which would address in practical terms the issue raised by the BBT. It would provide for the automatic recognition of any higher status subsequently found to apply to the rights of way concerned; but it is unreasonable to deal with this important matter, which has consistently been raised with the Highways Agency over many months, at this late stage.
- 6.25.6 The BBT ask that the draft Orders be amended so as to take account of the true nature of the rights of way concerned, as created by Act of Parliament, where they are affected by the A303 improvements, so as not to prejudice the rights of those who rely on the status of Byway Open to All Traffic for their recreation.

### ***Ultra vires purchase of land***

- 6.25.7 The proposed revised line of the A303 is superimposed in places over highways which were created by Act of Parliament. The failure of the local highway authority to record accurately these old carriageways does

not alter the fact that they are, in law, publicly maintainable highways. If the Highways Agency is buying those areas of land which currently form the A303 or the B3083 where coincident with the published scheme, it should not be expending public money on the compulsory acquisition of ancient lanes which are also existing highways. Payment for existing highway land goes beyond the powers available in the Highways Act 1980.

***Traffic regulation on the proposed Stonehenge Byway***

- 6.25.8 The Highways Agency should have undertaken early consultation with appropriate user groups on the proposals contained in the Byway Regulation Order.
- 6.25.9 The BBT objects to the prohibition of any vehicle using the section of the proposed Stonehenge Byway which links Byway Amesbury 11 and Byway Amesbury 12. These routes are pivotal to the byway network in this area. Whilst there may be legitimate amenity issues which militate against certain traffic traversing the entire length of the proposed new Byway, there is no benefit or reason to preclude traffic between Amesbury 11 and Amesbury 12. There is no nearby alternative recorded byway route which would provide a north/south connection in the rights of way network. The user of the byway network with a motorcycle or motor vehicle would need to find a link either 4km west or 5km east for any north/south journey.

**The response of the Highways Agency to the objection of the Byways and Bridleways Trust**

***The status of public rights of way affected by the Side Roads Order***

- 6.25.10 The modifications to the Side Roads Order which the Highways Agency has sought in Document HA/0/13 meet the objection raised by the BBT in connection with the contested status of public rights of way which join with or cross the existing A303. The highway authority for these public rights of way is Wiltshire County Council. It is not the Highways Agency. The Highways Agency considered that it could not take into account the alleged status of each of these rights of way when it was not the highway authority for them, and when no modification Order seeking amendment to the Definitive Map for the area had been proposed. It would have been wrong for the Highways Agency to prejudge the issue of the status of these rights of way before any application to change that status had been made and before a decision had been arrived at on such an application.
- 6.25.11 The Highways Agency followed what had been recorded as to the status of these rights of way on the Definitive Map.
- 6.25.12 Given that applications have now been made to amend that status, the modifications requested to the draft Side Roads Order provide for the automatic recognition of higher rights over the public rights of way concerned if these are shown to exist.

### ***Powers for the purchase of land***

- 6.25.13 As regards the purchase by a highway authority of land already owned by the same or another highway authority, generally there are two types of land included in any road improvement scheme. The first is freehold land held by the Crown or the relevant local highway authority or some other landowner. The second is highway land vested in the Crown or in the local highway authority, but where the sub soil is vested in the adjoining landowner or landowners.
- 6.25.14 In this case, the route of the present A303 is owned by the Crown. Such parts of that route as would no longer be required for highway purposes (for the new route or for mitigation) would be offered to the former owners of the land. Where land which is held freehold is required for the route or for mitigation and is shown as being held by the Crown, it would remain in the ownership of the Crown. All parcels of land required for the new route and for essential mitigation are included in the draft Compulsory Purchase Order, however, even if already owned by the Crown. This ensures that, in the event that it is found that the Crown only owns the top soil, this ownership can be made complete to include the sub soil.
- 6.25.15 Powers to purchase land compulsorily are only used in the last resort. The Highways Agency would not purchase any land presently used or shown as a right of way unless the sub soil was not owned. In some instances, however, the line of the new trunk road would cross the line of public rights of way, in which case those rights would be stopped up by the Orders. At that point, the land would revert to the previous owner, and it would then be purchased by the Crown for the new right of way (the new trunk road) with the re provided original right of way along a new alignment.
- 6.25.16 The Highways Agency consulted those it was required to consult on the proposal to restrict traffic along the Stonehenge Byway.

### ***Traffic regulation on the proposed Stonehenge Byway***

- 6.25.17 As indicated in paragraph 6.24.13 above, reasonable alternative routes would be provided by the scheme for those users who would be banned from using the proposed tunnel.

## **6.26 Mr R Wort**

- 6.26.1 Mr Wort was brought up in the area of Stonehenge and has many longstanding family connections with the area. In the past, he was one of the partners running Countess Farm. His objection is a personal objection.
- 6.26.2 Stonehenge was given to the nation in 1918. In 1927, there was a national appeal "to restore and preserve the open surroundings of Stonehenge", and the Stonehenge Protection Committee, set up at that time, established suitable policies for the Stonehenge landscape. They

said that, *"The solitude of Stonehenge should be restored and precautions taken to ensure that our posterity will see it against the sky in the lonely majesty before which our ancestors have stood in awe throughout all recorded history .... Further building will be prevented, and the valuable archaeological remains of the site permanently protected from the plough ....."*.

- 6.26.3 The Stonehenge Protection Committee considered that Salisbury Plain was our greatest archaeological site, and that Stonehenge was the heart of the Plain. Over the years, however, Governments and various bodies responsible for managing Stonehenge and the area immediately around it have not respected the aims established by the Protection Committee.
- 6.26.4 The National Trust has never understood the role of the natural horizon at Stonehenge. The designers of Stonehenge were interested in celestial divination. They wished to look at the sky in order to foretell future events. They were interested in checking the calendar, and observing the shifts in the rising and setting position of stars. They wished to observe the horizon. In recent years, however, two thirds of the natural horizon has been covered by trees. The Fargo Plantation should be removed, and there should be no trees on the King Barrow Ridge. Until recently, there were no trees between Stonehenge and the Packway. The sheep of Countess Farm grazed up to the Packway. The landscape of today, predominantly arable, but with numerous coppice woodlands and plantations, gives a distorted view of what the area was like when the monuments were built.
- 6.26.5 Trunk roads should not cross the land between Larkhill 2.5km to the north of Stonehenge and Rox Hill, 3.5km south of the monument. They could be routed to the south of Boscombe Down Airfield, between Rox Hill and Little Durnford, much closer to Salisbury.
- 6.26.6 The A303 has been allowed to become a much more important road than it should have been. The Salisbury and Bulford Land Utilisation Map of 1935 does not show the A303. The road to the south of Stonehenge at that time was surrounded by downland. The longstanding error of developing the importance of the A303 in the transport infrastructure of the area should be corrected now by the removal of the A303 from the WHS.
- 6.26.7 The Highways Agency's A303 improvement scheme does not in any event appear to offer a long term solution to the traffic problems of the area. There is no evidence that a dual 2 lane carriageway will be adequate after 2033. In 2003, the AADT flow on the A303 to the west of the Countess Roundabout was 33,000 vehicles. Between 1992 and 2002 the average growth rate on the A303 had been 4.1% per year. Assuming such a growth rate were to continue between 2003 and 2013, the AADT flow on the A303 to the west of the Countess Roundabout would be 49,319 in 2013.
- 6.26.8 There is limited evidence for the prediction of traffic growth after 2013, but it is unlikely that the growth rate on the A303 will be lower than 2.4% per year. Assuming such a growth rate, the AADT flow on the

A303 to the west of Countess Roundabout would be 62,520 vehicles in 2023 and 79,270 vehicles in 2033.

- 6.26.9 In 2002, the AADT flow on the A303 section between the A34 and the B3048 was 49,200 vehicles. It is likely that the AADT flow will exceed 73,500 vehicles in 2012 and 93,200 vehicles in 2022. After 2022, the only acceptable option for the A303 in Hampshire will be the construction of a dual 3 lane carriageway, and a similar scale of road will be required in Wiltshire after 2033.
- 6.26.10 The Highways Agency's proposals for the A303 would therefore prove to be inadequate within a relatively short period of time, but the carrying out of those proposals within the WHS would restrict the ability to meet future transport needs. This limitation could be avoided if the improvements to capacity to the A303 were carried out outside the WHS.
- 6.26.11 Mr Wort's objection also raises issues concerning the proposed relocation of the Stonehenge Visitor Centre and the rerouting of the A345 in the vicinity of Durrington Walls, which are outside the scope of these inquiries.

#### **The response of the Highways Agency to the objection of Mr R Wort**

- 6.26.12 Much has changed since the 1927 Committee set out what they regarded as appropriate policies for the Stonehenge landscape. The A303 has been recognised as a trunk road. There has been significant growth in the traffic using it. Stonehenge and its associated monuments have been inscribed as a WHS. The WHS Management Plan has been adopted, with specific objectives for the enhancement of the area. The Highways Agency does not disagree that the Stonehenge monument is at the heart of the Plain. It is the desire to restore the setting of Stonehenge which provides the rationale for the promotion of the published scheme as an "exceptional environmental scheme". This aim, which is reflected in Objectives 9 and 23 of the WHS Management Plan, seeks to address the desire to restore and preserve the open surroundings of Stonehenge, which was the basis of the national appeal in 1927.

### **6.27 Stapleford Parish Council**

- 6.27.1 Stapleford Parish Council objects to the published scheme because the Council considers that it represents a missed opportunity to solve traffic problems in the Wylve Valley at the same time as improving the A303.
- 6.27.2 The only option put forward in the Salisbury Transport Plan to relieve the traffic situation in the Wylve Valley was to reroute traffic along the A303/A360. That option has now been removed, and Wiltshire County Council has applied to central Government for funding to construct a Wylve Valley Relief Road. This would run through unspoilt agricultural land. It would relieve only two villages of traffic at an estimated cost of £34m.
- 6.27.3 Instead of that, there should be a truly integrated solution to the traffic

problems of the A303/A36 corridors. The issues on the A303 at Stonehenge should not be considered in isolation.

- 6.27.4 Only 9% of the traffic on the A303 at present comprises HGVs. On the single carriageway A36 passing through Stapleford, 17% of vehicle movements are of HGVs. There is a case for rerouting HGVs east bound from the A36 on to the A303, and west bound from Southampton along the M3/A34/A303. Traffic should be signed away from the A36 and along the A303 from the junction at Deptford.

### **The response of the Highways Agency to the objection of Stapleford Parish Council**

- 6.27.5 The reasons for not pursuing the A303/A360 route to relieve traffic in the Wylde Valley are provided at paragraph 14 of the first appendix to the Parish Council's own Document SPC/1/2. Improvements to the A303 and the A360 would not be sufficient in themselves to remove through traffic from the A36, because the alternative route would be so much longer than the existing route. It would not be practicable to introduce sufficient delays on the existing route to make the longer route attractive to through traffic. Physical closure of the existing A36 would not be practicable because of the needs of local traffic. The outcome of the Salisbury Transport Study, commissioned by the Government Office for the South West in the aftermath of the Government's dropping of the A36 Salisbury Bypass in 1997, was a recommendation for a Wylde Valley Relief Road, having considered and rejected the A303/A360 option.
- 6.27.6 There is therefore no basis for the A303/A360 option forming part of the planning for the A303 Stonehenge improvement. In providing a bypass for Winterbourne Stoke and improving the junction at Longbarrow Crossroads, however, the published scheme would facilitate rather than hinder the A303/A360 option. There would be sufficient capacity to accommodate a proportion of traffic diverted away from the A36.
- 6.27.7 The rerouting of HGVs from the A36 to the A303 would not cause any difficulty for the capacity of the A303 with the published scheme.

## **6.28 Written Objections**

- 6.28.1 Written objections, which were principally made to the scheme generally rather than to specific Orders, came from the length and breadth of the United Kingdom. There were also 221 written objections from a total of 25 other countries.
- 6.28.2 Some 93 of the letters classed as written objections simply asked that the **decisions on the Orders should not be taken without a public inquiry** being held. That, of course, has now taken place. These letters included the objections received from the **Town Council of Devizes and the Parish Councils of Bulford and Cherhill**.
- 6.28.3 One representation argued specifically for the holding of a public inquiry on the basis of what was seen by the objector as the inadequacy of the consultation process and the limited availability to the public of the



Environmental Statement and the draft Orders. The lowest price for which a copy of the Environmental Statement could be obtained was £20 for the CD version. The cost to obtain a hard copy or to travel to a location at which the Environmental Statement was on display was potentially much higher. When the subject matter concerned a WHS, the objector believed that documents should have been put on display at locations throughout the United Kingdom. Similarly, the draft Orders should have been available much more widely when they concerned a site of recognised world importance. The objector considered, however, that the holding of a public inquiry would go some way to satisfying all concerned that the proposals had been subject to proper scrutiny. The Highways Agency made the point that statutory requirements concerning the availability of documents had been met, and that the charge made for providing copies of documents had simply covered the cost of producing those copies.

- 6.28.4 There were four groups of objections received in more or less standard form.
- 6.28.5 There were 597 letters from supporters of the **Stonehenge Alliance**, raising matters dealt with in detail in the Alliance objection at the inquiries. There were 48 letters of objection from residents of Countess Road, Amesbury, whose objection was put in detail at the inquiries through the appearance of the **Countess Road Residents' Group**.
- 6.28.6 A total of 40 letters of objection was received from residents of the **Beverley Hills Mobile Home Park**. These objections were made on the basis that the published scheme is too costly; that a tunnel is not justified; that the proposed flyover at Countess Road would cause unacceptable levels of noise and pollution; and that Alternative Route 4 (which had been widely publicised for some time before alternatives were formally advertised) would represent a more acceptable means of dealing with the traffic problems on the A303.
- 6.28.7 There were also 448 letters of objection using a standard form published on the **internet site** [www.dianacooper.com](http://www.dianacooper.com). These objections raised issues regarding the spiritual importance of Stonehenge; the architectural and environmental damage which it was alleged the published scheme would cause to the WHS; and the need to give consideration to alternative proposals. These issues and those raised by the Beverley Hills objectors were considered at the inquiries, having been raised by various objectors who appeared at the inquiries.
- 6.28.8 **Barford St Martin Parish Council** made a written representation supporting the idea of a dual carriageway A303, but opposing the proposed tunnel on grounds of cost. The Parish Council considers that this expenditure would make it less likely that funds would be available to repair and improve other roads in Wiltshire. The village of Barford St Martin is situated on the junction of the A30 and the B3089. The B3089 is already used as a short cut by motorists who exit the A303 at Willoughby Hedge, particularly when there is an accident on the A303. The B3089 is not designed for that volume or weight of traffic. The Parish Council is concerned that the B3089 would be used even more extensively while the

tunnel system at Stonehenge was under construction.

- 6.28.9 The Highways Agency responds that the published scheme could not be delivered through the WHS without the tunnel solution. Traffic management would aim to keep disruption during the construction period to a minimum. The existing A303 would remain open while the tunnel was being constructed.
- 6.28.10 **South Newton Parish Council** is concerned that, in the event of the proposed tunnel being closed for repair or maintenance or as a result of an accident, the A36 route through the villages from Wilton to Wylve would be used as a diversion route. The Highways Agency responds that any necessary repair and maintenance to the tunnel would be carried out at night time, using a contra flow system, and that no programmed or emergency closure of the tunnel should have an effect on the A36.
- 6.28.11 **Mere Parish Council** considers that the tunnel proposal represents a waste of money. It would cause irreparable damage to important archaeological sites, and it would deprive local residents of the sight of Stonehenge when they are driving in the area. The Highways Agency responds that the road scheme provides value for money on account of improved road safety, reduced congestion, the environmental benefits which would be felt in Winterbourne Stoke and the environmental and heritage benefits which the WHS would enjoy. While the published scheme would have an indirect effect on the setting of some monuments remote from the Stones, and there is always the potential to disturb as yet undiscovered archaeology, there would be no direct effect on any Scheduled Ancient Monument.
- 6.28.12 **Little Cheverell Parish Council** objects, on the other hand, that the proposed tunnel is not long enough to take traffic away from the Stonehenge site. Two thirds of the WHS would still be divided by roads and cuttings, and traffic noise would still be heard at Stonehenge. The tunnel would emerge at barrow cemetery locations both east and west of Stonehenge, and numerous archaeological sites and their settings could be damaged. The same points are raised by **Whiteparish Parish Council** and **Bishopstone Parish Council**. The Highways Agency responds that longer tunnel alternatives were considered at the inquiries.
- 6.28.13 Not surprisingly, most of the points raised in the written objections were fully covered in the objections made by various parties who appeared at the inquiries. I therefore do not reiterate those points here. There were, however, some particular points raised in written objections which would not otherwise be covered in this report, and these are detailed below.
- 6.28.14 **Shell UK Ltd** objects to the published scheme on the ground that the proposals would seriously undermine and compromise the viability of their service station business at Countess Roundabout. The Highways Agency respond to this objection by providing details regarding their extensive signing proposals of the service station from the A303 and the A345 if the published scheme were carried out.
- 6.28.15 **Mr C R Vince** of the **Stonehenge Filling Station** objects to the road

scheme because of the impact he considers it would have on his filling station, which lies on the A303 at Winterbourne Stoke. He has been in business at that location for the past 33 years. More than 95% of his trade is passing trade from the A303. Moving the A303 to a new position would doom his business. It would be uneconomical to continue trading, and there would be a substantial cost involved in decommissioning the site. He understands, however, that no compensation would be available as a result of the moving of the road away from his site. The Highways Agency confirms that it does not have a responsibility to ensure the provision of passing trade to a business, and therefore cannot offer compensation to Mr Vince should the published scheme proceed. Notwithstanding the fact that the A303 is part of the Trans European Road Network, the Highways Agency is not aware of any compensation available from the European Union should the published scheme proceed.

- 6.28.16 **The Wiltshire Wildlife Trust** supports in principle the removal of intrusive roads and the restoration of the downland landscape around Stonehenge. It objects to the published scheme, however, on a number of points of detail.
- 6.28.17 It considers that a scheme of this kind requires the carrying out of an Appropriate Assessment in respect of the River Avon cSAC.
- 6.28.18 It considers that further assurances are required in relation to the potential impact of the proposed tunnel on ground water flows. In particular, assurances are needed that during construction the dewatering process will not affect ground water flow to the River Avon, a SSSI and a cSAC; that if dewatering were to occur during extremely high ground water levels the chalk would be able to cope with the discharge; and that, once operational, the tunnel would not cause a significant barrier to ground water flow.
- 6.28.19 The Wiltshire Wildlife Trust accepts that the A303 must be dualled throughout the length of the tunnel, but the Trust objects to the proposal to dual the new road from Berwick Down to the western tunnel entrance. The case for doing so has not been justified in the light of the environmental impact it would inevitably have. The new dualled road would pass extremely close to the Parsonage Down NNR. The dualling of this section of the A303 would also inevitably lead to greater pressure to dual sections of the road further to the west, with knock on effects on other sensitive landscapes.
- 6.28.20 The published scheme provides no details about how future access to the Stonehenge monument would be provided. The existing Visitor Centre at Stonehenge is intended to be moved. When it is, there will be cumulative impacts on the A303 which should form part of the appraisal of the scheme now.
- 6.28.21 The Highways Agency states that the details of the Construction Environmental Management Plan would be complete before any start was made on construction. That is not sufficient, however, and details of the CEMP should be available before a decision is taken on the Orders.

- 6.28.22 The Trust has concerns over the long term maintenance of the DTAs proposed as part of the scheme. There should be a clear strategy for the long term maintenance of the DTAs, with clear responsibility assigned to the appropriate body to carry out that maintenance.
- 6.28.23 The Trust also believes that more could be done to avoid the predicted increase in road casualties of barn owls. Scrub planting could be undertaken at predicted collision black spots to encourage foraging owls to fly higher over the road. As regards the creation of chalk grassland on verges and elsewhere, the Trust endorses the habitat creation proposals for the collection of seed and translocation of turf prior to construction work, as this would ensure local provenance. There should be no seed used other than that collected from the site. In relation to the mitigation proposed for arable weeds discovered within the site footprint, more work could be done to safeguard the receptor site chosen for the sowing of any seed collected – for example, a Countryside Stewardship application could be submitted.
- 6.28.24 The Highways Agency responds that, so far as the Appropriate Assessment is concerned, the Agency has completed a Statement to Inform the Appropriate Assessment under the Habitat Regulations. This document was compiled in consultation with English Nature, which was the formal recipient. English Nature has withdrawn its objection to the published scheme in the light of that document, and confirmed that it *"is a comprehensive and objective document that covers the required issues"*.
- 6.28.25 As regards ground water, further work has been undertaken on assessing the impact of the proposed tunnel on ground water flows in preparation for the inquiries. This work has been carried out as a result of concerns expressed by the Environment Agency which were similar to the concerns of the Trust. As a result of that further work, the Environment Agency has withdrawn its objection to the scheme.
- 6.28.26 As regards Parsonage Down NNR, English Nature has agreed that significant effects as a result of the published scheme are not likely. The evidence produced by the Highways Agency to the inquiries clearly indicates that the provision of a single carriageway A303 along any part of the published scheme would not be acceptable for the predicted traffic flows.
- 6.28.27 The published scheme would be able to accommodate the predicted traffic movements associated with the Stonehenge Visitor Centre at its current location or at a proposed new location in Amesbury. The published scheme is independent of any proposal for a new Visitor Centre. With regard to cumulative impacts, English Nature are content that these would be covered by the Appropriate Assessment carried out in connection with the published scheme.
- 6.28.28 As regards the timing of the production of the CEMP, scheme construction methods have not been finalised to a level of detail which would permit a full version of the CEMP to be produced at this early stage.

- 6.28.29 In relation to the DTAs, it is acknowledged that the use of vegetative systems for the treatment of highway surface runoff is a relatively new science and is subject to review and development. As described in the Environmental Statement, volume 2, part 4, Appendix D, paragraph 4.7.1, a "live" maintenance manual would be created, and would be updated whenever changes to the maintenance strategy and regime take place.
- 6.28.30 In relation to barn owls, proposed offsite ecological mitigation and enhancement measures such as those suggested by the Wiltshire Wildlife Trust are being discussed with landowners. Agreement has been obtained for the placing of owl boxes as one such measure. It is confirmed that the Highways Agency plans to harvest suitable local seed to use in the creation of chalk grassland on verges and elsewhere. As regards arable weeds, six arable field margins, within a search area extending roughly 500m to either side of the published scheme route alignment, have been found to support important arable weed communities.
- 6.28.31 Three written representations raise particular points about **the energy field of Stonehenge**. The first states that Stonehenge is one of the major dimensional energy portals of our planet, and has many ley lines running through it. To disrupt this energy flow would be very detrimental to the planet as a whole, and this could happen if a road were to be built within the energy field of Stonehenge. The second representation states that any tunnelling in the area would interfere with the energy field complex. The spiritual energy of Stonehenge would be lowered, which would reduce the Earth's wellbeing. On that account, the third representation argues for an alternative route to be found, which would take the A303 as far away from Stonehenge as possible. This objector contends that the Stonehenge Ley passes through what would be the line of the proposed tunnel. The ley line passing through Stonehenge would therefore be weakened, and Stonehenge's spiritual power would be undermined if the tunnel were developed.

## **6.29 Objections to the Compulsory Purchase Order**

- 6.29.1 There were fourteen objections to the Compulsory Purchase Order which remained outstanding at the close of the inquiries. Eight of them were objections of principle from individuals or organisations which did not have interests in property affected by the Compulsory Purchase Order. Of that number, six objections were from organisations which had been represented at the inquiries - the CPRE, WANHS, the Stonehenge Alliance, FOE Wiltshire, the Amesbury Society and the Pagan Federation. Six objections from persons or organisations with an interest in land affected by the Compulsory Purchase Order remained outstanding at the close of the inquiries. One of these was the objection from the National Trust, which was represented at the inquiries. The remaining objections from individuals or companies with land interests affected by the Compulsory Purchase Order are outlined below.
- 6.29.2 **Berwick Down Ltd** is the owner of a number of plots affected by the Compulsory Purchase Order. Amongst them are plots 1/4a, 1/6c, 2/2

and 2/3b. Together, those listed plots amount to approximately 7.02ha. A number of the Company's original points of objection to the Compulsory Purchase Order has been resolved, but the Company sustains its objection to the compulsory acquisition of the plots listed above. They are included in the Compulsory Purchase Order to provide land for earthworks mitigation, partly to the north, but principally for infilling the valley to the south of the proposed route of the western end of the published scheme. The objector argues that the plots are not required to support the new road, but rather to dispose of spoil from the scheme. The area to be acquired compulsorily under the Order could be significantly reduced, and the present proposed landtake is unreasonable.

- 6.29.3 The Highways Agency responds that the land included within these plots is required for essential earthworks to provide mitigation of the adverse effects which the existence and use of the proposed new highway would have on the surroundings of that highway. The land therefore falls within the class of land which can be acquired compulsorily under section 246 of the Highways Act 1980.
- 6.29.4 The entire length of the published scheme runs through landscape designated a Special Landscape Area by Wiltshire County Council. The landform is the strongest feature of the chalk downland landscapes, with complex systems of dry valleys leading down to the river valleys. Ancient roads and tracks are a feature of many landscapes. They are an integral part of the scenery, and valuable in visual, recreational and ecological terms. Apart from where centuries of use have formed holloways, these tracks follow the landform, and their routes have been determined by it. Roads have adverse effects on the landscape character when they are enlarged and "improved" in engineering terms. They start to lose their contact with the landform, as geometric standards are applied. Detailed design may fit the road into the topography to some extent, but the only sure way to mitigate this adverse effect is to match the landform to the road, since it is no longer possible to do the reverse.
- 6.29.5 The DMRB states in paragraph 1.2 of section 1, part 1, chapter 1 that *"integration with the existing landform can best be achieved by grading out cuttings and embankments to slopes which reflect the surrounding topography."* Paragraph 1.4 emphasises that use should be made of the compulsory powers of acquisition of land for mitigation. Areas required for grading out earthworks should be included in the draft Compulsory Purchase Order for the scheme, but can be returned to the owner after the works have been completed.
- 6.29.6 In a landscape where the topography is the dominant feature, it is particularly important that mitigation earthworks should reflect the surrounding topography, and should be adequately feathered out to avoid a visible change of slope. The published scheme uses the minimum area necessary to mitigate the adverse effects of roadwork construction. The design also has the benefit of returning a greater area of land to productive agricultural use, and the landowner would be compensated for the time during which the land concerned was out of production.
- 6.29.7 **R J Moore & Sons** are landowners affected by the Compulsory Purchase

Order. They do not object to the principle of the published scheme, and many of their original detailed concerns have been resolved by agreement. They also object, however, to the extent of their land which has been included in the Compulsory Purchase Order in order to provide land for earthworks mitigation. They object to the inclusion in the Order of plots 2/6a, 2/6b, 2/6d, 2/6g, 2/6h, 2/6j, 3/1a, 3/1c and 3/1e. Together these plots amount to approximately 7.49ha.

- 6.29.8 The objectors contend that the new landform proposed by the Highways Agency to the north and south of the Winterbourne Stoke Bypass element of the published scheme does not need to be feathered out over such an extensive area as is proposed. Although the vast majority of the land within the plots listed above is intended to be returned eventually to the owners to be used again for agriculture, it is impossible to recreate fully a soil structure appropriate for the best possible agricultural production. The retention of as much as possible of the existing landform in its current agricultural use is therefore essential.
- 6.29.9 It is the workability of the soil, rather than the soil quality which is most seriously affected by its temporary loss to agriculture in the way proposed in the published scheme. The objectors have experience of this process in connection with the small area of their land which was affected by the A36 (T) Improvement Scheme in 1982. The land was raised by only 1m in connection with that scheme, but it has still not returned to full agricultural productivity, even after more than twenty years. The land restoration in that case was carried out by Wiltshire County Council to what was considered to be current best practice. Over the intervening years, Mr Moore has tried to address the remaining problems by sub soiling and by using differing forms of cultivation. He still finds, however, that during the autumn the ground is less workable and the seedbed is not as good as that in the adjacent undisturbed ground. During the spring of each year, the crop looks similar to that growing on the adjoining land, but later in the growing season (June to August) the crop tends to die off prematurely, and there is a noticeable yield differential when combining the crop takes place.
- 6.29.10 These objectors also contend that the need for the extensive area of land proposed to be acquired by the Highways Agency is dictated by the need to dispose of spoil from the proposed tunnel, rather than being justified in its own right for landscaping purposes.
- 6.29.11 The Highways Agency repeats the response it has made to the similar objection from Berwick Down Ltd.
- 6.29.12 As regards the area of land affected by the A36 scheme, practice in relation to soil restoration has moved on substantially over the last twenty years. There is considerably more attention to detail now. Where stripping takes place, the topsoil would be stripped separately from the subsoil, and would be reinstated separately. Thereafter, there would be a period of up to five years managed "aftercare", during which time the management of the land would be dictated by the needs of the soils in order to re-establish the appropriate structure. The Highways Agency would ensure that the restoration work would be undertaken in

accordance with current best practice as set out in the "Good Practice Guide for Handling Soils", published by the former Ministry of Agriculture, Fisheries and Food, and as set out in the soil movement and restoration specification appended to the Environmental Statement as Appendix 2 to Part 9. In their response to consultation on this subject, DEFRA expressed the opinion that the matter of the sustainable use of the soil resource had been addressed thoroughly in the Environmental Statement, "*with which we are content*". (Appendix B to Document HA/11/14).

- 6.29.13 The work would be monitored by a professional soil scientist. Such a methodology was adopted during the construction of the Channel Tunnel Rail Link, and has produced some of the finest agricultural restoration in the country.
- 6.29.14 If a scheme for the improvement of the A303 which did not involve a tunnel were to be proposed, the Highways Agency's plans for earthwork mitigation of the Winterbourne Stoke Bypass would be exactly the same. Material would then need to be imported from elsewhere to supplement the available cut material from the site. As indicated in the Highways Agency response to the longer tunnel proposal, Alternative Route 5, the additional spoil arising from such a tunnel would need to be removed to tip off site unless arrangements could be made by agreement for disposal of it locally (Document HA/13/30, paragraph 4.11.1).
- 6.29.15 **Mrs M J Turner** is another agricultural landowner affected by the Draft Compulsory Purchase Order. Again, she has no objection in principle to the published scheme, and a number of specific issues concerning the impact of the proposals on her land has been resolved by agreement with the Highways Agency. Mrs Turner's objection is maintained, however, to the acquisition under the Compulsory Purchase Order of plots 3/2a, 3/2b, 3/2d, 3/2f and 3/2h. Together, these plots amount to some 4.78ha, and again the land concerned is required for earthworks mitigation. The basis of Mrs Turner's objection to the compulsory acquisition of the plots listed above, and the response of the Highways Agency to that objection mirror the arguments set out above in connection with the other landowners whose land is sought to be acquired for earthworks mitigation.
- 6.29.16 The same considerations apply to plots 3/4, 3/5r, 3/5s, 3/5v, 4/1a and 4/1b, which are owned by **Mr and Mrs R L Turner**. Together, these cover an area of approximately 23.65ha to the north and south of the Winterbourne Stoke Bypass element of the published scheme.
- 6.29.17 **The Druid's Lodge Partnership** owns various plots of land which are included in the Compulsory Purchase Order. Like the other owners listed above, the Partnership supports the published scheme, and has resolved by agreement with the Highways Agency a number of detailed issues regarding land which would be affected by the scheme. The Partnership's objection to the Compulsory Purchase Order is sustained in relation to just one plot within the draft Compulsory Purchase Order, plot 4/3b, which extends to approximately 16.61ha. This land is sought by the Highways Agency to provide a site for the contractor's compound.



- 6.29.18 The Druid's Lodge Partnership contends that the normal practice with a project such as this is not to include the compound within the Compulsory Purchase Order, but to leave it to the contractor to find a suitable site by negotiation with local landowners. The objector contends that the inclusion of a site for the contractor's compound goes beyond the powers of the authorising legislation.
- 6.29.19 The Highways Agency responds that the inclusion of the land for the compound in the Compulsory Purchase Order is one of the results of early contractor involvement in this particular scheme. The contractor's requirements are sufficiently well defined at this stage to enable the inclusion of the necessary land in the Compulsory Purchase Order. Section 240 (2) (a) of the Highways Act 1980 gives express power for the acquisition of land for use in connection with the execution of highway works. That would include the necessary land for the contractor's compound for this scheme.
- 6.29.20 The compound would comprise offices, stores, plant maintenance facilities, the materials testing laboratory, a concrete batching plant, car parking provision for people working on the scheme, and an earth bunded spoil storage area. The areas which would be devoted to these uses are shown on Figure CON 2.5 within Document HA4/3, which shows how the overall site area would be used.
- 6.29.21 The site has been selected as the best location for the contractor's compound because it is outside the WHS, and could be accommodated without affecting the archaeological resource. It is not close to any residential property. It has good A road access for the delivery of materials. It is centrally located within the scheme, and there would be direct access on to the site from the compound without the need to use the public highway. There is no other potential location where all of these points can be similarly met, whilst avoiding archaeological remains and not introducing conflict between A303 traffic and material transportation along the site.

### **6.30 Objections made to other specific Orders**

- 6.30.1 At the close of the inquiries, there remained 16 objections to the Slip Roads Order; 16 objections to the Detrunking Order; 14 objections to the Side Roads Order; 5 objections to the Tunnel Regulation Order and 5 objections to the Byway Regulation Order. Apart from the National Trust's objection to the Byway Regulation Order (dealt with at paragraphs 6.1.56 to 6.1.59 above), the Amesbury Town Council objection to the same Order (paragraph 6.22.8), the objections of TRF and the BBT again to the same Order (paragraphs 6.24.2 to 6.24.12 and 6.25.8 to 6.25.9), and the BBT objection to the Side Roads Order (dealt with at paragraphs 6.25.3 to 6.25.6), I consider all of them to be objections of principle to the published scheme and its Orders. They do not raise specific points of objection to the individual Orders.

## **7 THE CASES FOR THE ALTERNATIVE ROUTES PROPOSED**

The material points are:

- 7.1 In this section of the report, I deal first with eight of the nine alternative routes submitted and advertised in pursuance of the Secretary of State's direction referred to in paragraph 1.20 and 1.21 above. The remaining alternative, Alternative Route 6, was withdrawn during the inquiries by the objector who had been promoting it at the same time as the related objection was withdrawn. I deal next with two alternatives submitted during the course of the inquiries which I considered could, with benefit, be the subject of detailed assessment without prejudicing either the promoter of the Orders or people whose interests might be affected by the proposals. Then I deal with alternatives put forward during the inquiries which I did not believe it proper to subject to detailed examination. Finally, I deal with alternatives put forward in written letters of objection to the Orders but which those suggesting them did not pursue further

### **7.2 Alternative Route 1 – The Amesbury Society**

- 7.2.1 The Amesbury Society is a Civic Society, affiliated to the Civic Trust. It has existed for 28 years, and its current membership is between 80 and 100. The Society has an Executive Committee, and that Committee has authorised the submission of the Alternative Route proposal.

#### ***Description of Alternative Route 1***

- 7.2.2 Alternative Route 1 would provide a new dual carriageway road, at or below existing ground level, making use of the existing road where feasible, but without the provision of a tunnel in the area of Stonehenge. In effect, the existing A303 would be widened by the provision of a second, two lane carriageway on its south side. The western part of the route up to and including Longbarrow Crossroads, and from east of The Avenue to the eastern end of the scheme would be as proposed in the published scheme. The Amesbury Society would wish the new road to be realigned slightly further to the south in the immediate area of Stonehenge.
- 7.2.3 Stonehenge Road from Amesbury would be extended over the new dual carriageway A303 on a bridge, to provide access to Stonehenge Cottages. An underpass would be provided for Byway Amesbury 12 to pass beneath the dual carriageway and to link, via a new byway to be provided parallel to the A303, to what is now Byway Amesbury 11 on the south side of the A303. A bridleway would be provided parallel to the north side of the new A303, east of Stonehenge, to link the footpath replacing the A344 with Bridleway Amesbury 10 at King Barrow Ridge, and the new Stonehenge Road overbridge would link these bridleways to the town of Amesbury.
- 7.2.4 The junction of the A303 and the A344 would be removed, and the A344 between this junction and the present Stonehenge Visitor Centre would be closed and replaced by a footpath. This alternative would provide

views of Stonehenge from the road, with the provision of laybys on both carriageways to the west of King Barrow Ridge for this specific purpose.

### ***Justification of Alternative Route 1***

- 7.2.5 It cannot be disputed that an upgrade of the A303 is required, but the cost of the proposed tunnel would be a prohibitive waste of taxpayers' money. It would not only be expensive to provide, but also expensive to operate and to maintain, compared with a conventional ground level road. In the event of an accident or breakdown, a tunnel would present many more problems than a normal dual carriageway. Levels of air pollution would be high both within and immediately outside the tunnel; oil and water collected into sumps would be a hazard; and the tunnel portals would be an eyesore from outside the site. The eastern portal would impinge on the setting of the Nile Clumps (referred to in paragraph 2.16 above), which, although they have not been fully maintained, represent a unique memorial to an important event in modern history.
- 7.2.6 Stonehenge was given in trust to the Nation, and the joint owners who pass the property should have the chance to see what they own. Seeing Stonehenge itself is all that most visitors wish to do. They have no desire or intention to spend half a day on a visit to the site.
- 7.2.7 During construction of the tunnel, there would be many hundreds of thousands of tonnes of spoil to be disposed of and many more tonnes of material to be brought in. This would add unnecessarily to traffic congestion.
- 7.2.8 The cost of a properly aligned surface route would be a fraction of the cost of any tunnelled road. It would be completed more quickly, and it would cause the minimum of delays to traffic during the construction period. With the savings which would accrue, more money could be spent on screening the road if that were to be required.
- 7.2.9 The new road over the brow at King Barrow Ridge, if routed into a cutting aligning the road towards the south, would move the road further from the Stones, reducing traffic noise at the Stones.
- 7.2.10 In the 21<sup>st</sup> Century, motor transport is a fact of everyday life. It is not surprising to people that they see traffic during their visits to Stonehenge. So long as they are safely isolated, and the traffic noise and distraction is minimal, most people are able to ignore the noise and sight of traffic and still to enjoy the beauty and mystery of Stonehenge and its surroundings. Even if the sight of traffic were removed, there would still remain the clearly visible hangars of Boscombe Down Airfield and the row of electricity pylons across the Downs above Coneybury, not to mention the belts of alien species of trees planted to screen the military establishment at Larkhill.

### ***Support for Alternative Route 1***

- 7.2.11 **Mr G Randall** appeared at the inquiries to support Alternative Route 1. He echoes the arguments of the Amesbury Society, making the additional

point that the screening of all contemporary noise from Stonehenge is an impossible task, since there is a busy airfield at Thruxton, about 8km to the east, a military airfield with high performance jet aircraft and a Test Pilots School some 3km to the south, parachute dropping zones to the west and north west, and an Artillery School at Larkhill, 1.6km north of Stonehenge.

7.2.12 **Colonel S J D Bush** also appeared at the inquiries to support Alternative Route 1. He emphasises the importance of retaining the view of Stonehenge for people passing the site, particularly for children on their way to or from a holiday in the South West. He is also concerned to ensure that those who wish to visit Stonehenge should be able to do so within a reasonable timespan. He considers that the vast majority of visitors to Stonehenge are interested only in the monument, and not in the barrows and other archaeological features. To remove Stonehenge from the view of passing drivers and their passengers and to deny people the opportunity to stop to make a short visit to the monument would be to take away the major benefit of Stonehenge to the vast majority of the people to whom it was given.

7.2.13 There were 19 written representations of support for Alternative Route 1, including support from Idmiston Parish Council and Durrington Parish Council. In addition, 13 written objections to the overall published scheme mentioned their support for an online ground level solution.

#### ***The response of the Highways Agency to Alternative Route 1***

7.2.14 Alternative Route 1 would present approximately 40,000 sq m more carriageway surface to be drained of rain water than the published scheme. This would produce increased storm run off, which would require treatment in either enlarged or extra DTAs.

7.2.15 The laybys proposed west of King Barrow Ridge would present safety concerns. Vehicles decelerating and accelerating to enter and leave the laybys would be in conflict with fast moving traffic. Although this is a regular occurrence on dual carriageways, large numbers of vehicles could be expected to make such manoeuvres at this location. Congestion within the laybys, potentially exacerbated by vehicles parked in the laybys by people walking to Stonehenge, could lead to accidents on the approaches to, within and on the exits from the laybys.

7.2.16 The widening to dual carriageway of the existing A303 across the centre of the WHS at ground level would be in direct conflict with the provisions of the Development Plan relating to the A303, with the Regional Planning Guidance, and with a number of the fundamental objectives of the WHS Management Plan. It would deliver neither Objective 9 (the restoration of the appropriate landscape setting for the Stones) nor Objective 23 (the reduction of traffic movements within the WHS and the enhancing of the historic environment). A total of 17 cultural heritage sites would suffer a worse effect with Alternative Route 1 than with the published scheme. Most importantly, Stonehenge and its associated sites in the heart of the WHS would all be significantly adversely affected.

- 7.2.17 The removal of the tunnel and the placing of the road at ground level would mean that key landscape gains offered by the published scheme would not be achieved. These include the provision of views from Stonehenge and within the MILS of a landscape largely free from the visual impact of traffic and its associated noise, the expansion of areas of chalk grassland above the tunnel and the opportunity for open access to be provided without fears for the safety of walkers.
- 7.2.18 Alternative Route 1 would also deny beneficial effects with respect to nature conservation and biodiversity that would flow from the published scheme. These opportunities arise from the expansion of habitat in place of the existing A303, without the intrusion of vehicle noise and pollution. In relation to rights of way, the presence of the new road at ground level as proposed by Alternative Route 1 would continue to limit the amenity value of existing paths and tracks and would affect the proposed enhancements included within the published scheme.
- 7.2.19 In relation to air quality, there would be no significant difference between Alternative Route 1 and the published scheme, save for the issue of dust during construction. Alternative Route 1 would take one year less to construct, but during the construction period dust impact at the Stonehenge monument would potentially be greater, with a greater risk of significant adverse effect on the lichen on the Stones.
- 7.2.20 There would be benefits in terms of the reduced costs of Alternative Route 1 (£70m, as compared with £192m). A COBA analysis of Alternative Route 1 would show a net present value with low growth of £102.24m, and £222.5m with high growth. Alternative Route 1 would therefore present very good value for money in comparison with the published scheme, but this would only be achieved by sacrificing the essential components of a scheme which would comply with the policies contained in the Development Plan for the area and supplementary planning guidance.
- 7.2.21 Alternative Route 1 would also maintain views of Stonehenge for drivers, and would reduce driver stress as a result of the dualling of the A303 without the need to drive through a tunnel.
- 7.2.22 Alternative Route 1 would result in the loss of some 8.5ha more agricultural land, 5.6ha of which would be within the classification of the best and most versatile land.
- 7.2.23 While Alternative Route 1 would take about 12 months less time to construct than the published scheme, the need for revised draft Orders and a new Environmental Statement would, in effect, mean that opening of Alternative Route 1 would take place two and a half years later than the estimated opening date of the published scheme. The Alternative Route would also affect inalienable land of the National Trust. Given that the Trust has objected to the published scheme with a 2.1km tunnel, it would seem unlikely that it would readily agree to cooperate in the delivery of this alternative. English Heritage has also objected to the Alternative, so it is clear that there will be very little chance of this Alternative Route being acceptable or deliverable.

- 7.2.24 Without an acceptable road scheme, the other two limbs of the Stonehenge Project would not be deliverable – the financing of the replacement of the Visitor Centre and the ability of the National Trust to put into effect their proposals for open access to the scheme.

### ***Objections to Alternative Route 1***

- 7.2.25 There are 11 written objections to Alternative Route 1. They include an objection from Wiltshire Constabulary, which the Police indicate that they would be prepared to withdraw if the viewing laybys were to be omitted from the scheme. (In the light of this and of the criticism of the laybys by the Highways Agency, the Amesbury Society reluctantly agreed to drop the laybys from their Alternative).
- 7.2.26 The major points of objection of Wiltshire County Council concern what the Council regards as the adverse impact on the rights of way network which the scheme would cause through increased severance as a result of the dualling of the A303. In ecological terms, the scheme would provide none of the benefits of the published scheme in terms of the removal of a significant barrier and the consequent enhancement of large areas of chalk downland. The County Council makes the point that it is the tunnel in the published scheme which provides 500,000 cu m of fill needed for the western section of the proposed route. Replacing that material from elsewhere could involve around 50,000 lorry movements, significantly increasing costs and disruption during construction.
- 7.2.27 The County Council considers that Alternative Route 1 would be in conflict with the adopted Structure Plan Policy HE1, which requires a high level of protection to be accorded to the WHS.
- 7.2.28 English Heritage considers that the proposal would not provide a solution to any of the traffic impacts on the WHS, and therefore that it would not be addressing the WHS Management Plan objectives.

## **7.3 Alternative Route 2 – South and West Transport Action Group**

- 7.3.1 The South and West Transport Action Group (“SAWTAG”) is an unincorporated association with a formal constitution and a current membership of around seventy five. It concerns itself with public transport issues in the South West region. A majority of the members of SAWTAG has approved the making of an objection to the Orders before the inquiries by way of the submission of Alternative Route 2.

### ***Description of Alternative Route 2***

- 7.3.2 Alternative Route 2 would provide a new dual carriageway road eastward from a junction with the A36 just west of Stapleford village. It would require substantial modification of the A303/A36 interchange at Deptford in order to direct traffic along the A36 and downgrade the A303 to a minor road to the east. Using the existing road layout and structures as much as possible in that area, the scheme would still need 1.5km of new dual carriageway, additional link roads and roundabouts and three

additional bridges. The main dual carriageway link from the A303 west section on to the A36 east of the junction would cross paddocks and orchards in the frontage of Deptford Farm, which is an attractive listed historic farmhouse with barns.

- 7.3.3 The A36 would be upgraded to dual carriageway along its existing line, with a grade separated junction access to Steeple Langford and other villages. It would require the demolition of two buildings at Southington Farm or the construction of the new road over part of the River Wylve through an existing pinch point. The route would diverge from the A36 just west of Stapleford, bypassing to the south of the village across the Wylve valley on a 700m long viaduct, between 4.5m and 10m high.
- 7.3.4 The proposed route would then head east across a number of dry valleys on a series of embankments and cuttings to reach the relatively flat, high ground on the watershed between the Wylve and Avon Valleys. A grade separated junction would be required where the route crosses the A360. From there, the new road would descend at a gradient of 6% into the Avon Valley, passing within 100m of the northern part of Upper Woodford. It would cross the River Avon to the south of Great Durnford, outside the boundary of the WHS.
- 7.3.5 Originally, SAWTAG put this forward as a "mini barrage crossing" for both a road and railway, incorporating turbines, sluices and locks, with the integrated road and railway emerging from tunnels on both sides of the River Avon. Following adverse comments on its likely environmental impact, however, the barrage concept was amended to a bridge crossing with embankments, and the tunnel on the western approach was deleted. The route would pass through a 300m section of twin tunnels on the eastern approach to help to screen the road from Great Durnford.
- 7.3.6 A grade separated dumb bell roundabout junction with the A345 would be needed at the southern end of the main runway of Boscombe Down Airfield. From that, Alternative Route 2 would progress along the main runway, which it is presumed would be closed. The new road would dive under the second runway in a wide underbridge. The route would then continue north east, rising gently on a series of low embankments and shallow cuttings to join the existing A303 at Beacon Hill, south east of Bulford Camp.
- 7.3.7 SAWTAG refer to Alternative Route 2 as "the Jackson Alternative". This is not because it was promoted at the inquiries by Mr John Jackson, the Chairman of SAWTAG, but in honour of Sir John Jackson an early 20<sup>th</sup> Century Civil Engineer who, amongst other things, built a military railway in 1914 from Amesbury via Larkhill to the then Stonehenge Airfield.
- 7.3.8 Although it is not shown on the drawings of Alternative Route 2, the Jackson Alternative advocates returning to rail use the Countess to Larkhill section of this military railway, and extending it underground to Stonehenge itself (Document SAWT/0/4). In addition, savings arising from the cheaper cost of Alternative Route 2 as compared with the published scheme could be used to create a circular train service to connect Boscombe Down Airfield with Salisbury and the Wylve Valley line,

using existing closed stations, and 24km of new railway providing railway access to Stonehenge, with new stations for Strangways, Stonehenge, Winterbourne Stoke, Berwick St James and Stapleford. This is outlined in detail in Document SAWT/2/2. The new railway would significantly reduce road tourist traffic in the north Salisbury area, and facilitate the closure of the A344 between its junctions with the A360 and the A303.

### ***Justification of Alternative Route 2***

- 7.3.9 The estimated cost of the road construction and land acquisition elements of Alternative Route 2 is £41m less than the published scheme. That is because it uses 3.2km of the Boscombe Down runway as free infrastructure. One runway (the shorter north west/south east one) could continue in aviation use. In an emergency, if the longer runway were needed for aircraft, one of the taxi ways could be used for road traffic. This would achieve integration of road and air traffic, a Government policy aim.
- 7.3.10 The use of the cost savings against the published scheme to finance the rail proposals of SAWTAG would achieve further valuable integration.
- 7.3.11 Alternative Route 2 would take the A303 completely outside the WHS. The road would barely be visible from the WHS.
- 7.3.12 The published scheme should be rejected because it does not deliver the absolute reduction in traffic which paragraph 1.35 of the "A New Deal for Transport; Better for Everyone" (Document DD32) said was the Government's aim. The tunnel would reduce visible traffic at Stonehenge, but at each side of the tunnel, east and west, traffic would greatly increase.
- 7.3.13 Paragraph 4.165 of Document DD32 indicates that Development Plans should give better protection to those sites and routes (both existing and potential) which could be critical in developing infrastructure to widen transport choices. The existing Development Plan for this area fails to carry out that task, because it does not protect existing and potential railway sites and routes, in particular the old Amesbury branch line which passes Boscombe Down and the Sir John Jackson military railway line. The report of these inquiries should draw that matter to the attention of the Secretary of State.

### ***Support for Alternative Route 2***

- 7.3.14 One letter of support for Alternative Route 2 was received following the advertising of the alternative in local newspapers. The letter of support does not provide any basis for the expression of support other than that the writer is opposed to any type of tunnel scheme.

### ***The response of the Highways Agency to Alternative Route 2***

- 7.3.15 Alternative Route 2 would run along the main runway of Boscombe Down Airfield, and would cause the Airfield to close. Boscombe Down is a MOD facility, and the Ministry has no plan to close the Airfield.



- 7.3.16 The Alternative Route would involve the construction of 21.7km of new road, with 17.2km of this across open countryside and the remaining 4.5km an on line widening of the A36. In addition, approximately 15km of existing A303 would have to remain open for local access, from the A36 Interchange at Deptford to Longbarrow Crossroads and from Countess Roundabout to Beacon Hill. By comparison, the published scheme would be 12.4km long, with 4km of the existing A303 de-trunked between west of Winterbourne Stoke and Longbarrow Crossroads remaining open for local traffic. Alternative Route 2 would increase the journey length of A303 traffic by approximately 1.5km compared with the published scheme.
- 7.3.17 Long distance trunk road traffic travelling along the A303 with origins and destinations outside the immediate study area is the dominant flow of traffic on this section of the A303. The additional travel length would bring disbenefits in economic terms due to additional time and operating costs as well as additional accident costs. These contribute to assessed net present values for Alternative Route 2 of minus £60.55m with low traffic growth and plus £11.84m with high traffic growth. By comparison with the published scheme, the Alternative would provide poorer value for money, therefore, even though the route is significantly cheaper to construct. The main difference lies with local traffic having to divert to less convenient routes as well as the additional travel time and associated costs for A303 through traffic using the trunk road.
- 7.3.18 In terms of cultural heritage, Alternative Route 2 would remove most motorised traffic from all parts of the A303 and the A344 within the WHS. These additional benefits to the WHS are significant. They would, however, impact on that part of the WHS away from Stonehenge itself.
- 7.3.19 On the other hand, the value of the rich archaeological resource of this area does not stop at the WHS boundary. Alternative Route 2, with its 17km crossing of mainly open countryside, would be proportionately more damaging to archaeology than the equivalent 5km length of new and improved road around Winterbourne Stoke with the published scheme. Alternative Route 2 would adversely affect many more known sites (64 in total, compared with 21 for the published scheme), having a direct effect on 20 sites (including partial destruction of the Scheduled Ancient Monument at Beacon Hill), and indirectly affecting 38 sites and 34 listed buildings. The Alternative could have, in addition, a potential visual effect on 6 Conservation Areas at Wylde, Steeple Langford, Hanging Langford, Stapleford, Great Wishford and Durnford.
- 7.3.20 Except for avoiding the effects of temporary works associated with tunnel construction, Alternative Route 2 would have exactly the same effect as the published scheme in the Stonehenge MILS by the removal of roads and traffic. In the outer areas of the WHS, removal of the A303 and traffic from Longbarrow Crossroads to Countess Roundabout would deliver additional visual and landscape benefits as compared with the published scheme. Alternative Route 2 would also avoid effects on properties and sites north of Winterbourne Stoke which would be affected by the published scheme. Against that must be set the adverse visual

effects which Alternative Route 2 would have on a much higher number of residential properties and on sites and monuments outside the WHS. These would result both from its greater length and from the substantial increases in traffic on a number of local roads. There would be adverse visual effects on some 170 properties along the route of Alternative Route 2 and on 300 other properties along other roads where traffic would increase. These figures compare with 61 properties adversely affected by the published scheme.

- 7.3.21 The western part of the Alternative Route would lie within the Cranborne Chase and West Wiltshire Downs AONB. The 700m long viaduct crossing of the River Wylde south of Stapleford would have a major adverse impact on this designated area. It would be virtually impossible to mitigate adequately.
- 7.3.22 Alternative Route 2 would result in some benefit to the noise environment of the Yarnbury Castle SSSI and to the Parsonage Down SSSI. Against that, however, it would result in direct habitat loss at the southern extremity of the Steeple Langford Down SSSI. The Alternative would increase traffic volumes and speeds within 100m of Steeple Langford Gravel Pits SNCI and the Langford Lakes Wiltshire Wildlife Nature Trust Reserve. This would significantly increase the noise disturbance to birds over more than 50% of this County value site. With over 70 necessary field boundary crossings, many through substantial woody vegetation, Alternative Route 2 would almost certainly cross a number of important bat flight corridors. It could have a very extensive effect on badgers, and it would have adverse impacts on both existing stone curlew nesting areas and the ecological potential of large areas identified by the Royal Society for the Protection of Birds as target areas for stone curlew recolonisation. For other birds, the overall disturbance effects of noise from Alternative Route 2 would be that of new dual carriageway largely through tranquil countryside, with over 50% of the route lying more than 500m from an existing major road.
- 7.3.23 Alternative Route 2 would cross the River Wylde on a 700m long viaduct, completely spanning the flood plain, and crossing the river channel twice. Given the length of this structure, the double crossing of the Wylde channel and the perennial nature of the river at the crossing points, the potential hazards to the Wylde are considerably greater than those that would arise from the crossing of the small winterbourne section of the River Till under the published scheme.
- 7.3.24 By removing roads and traffic from the WHS, Alternative Route 2 would secure significant reductions in noise levels of 20dB or more, and would do much to restore a peaceful and quiet setting to the Stonehenge monument. On the other hand, the alternative would give rise to a moderate to major increase in noise (13dB to 26dB) for a small number of properties which presently lie in rural locations along the line of the Alternative Route. There would also be properties close to the A36 where the Alternative Route joins the existing alignment, in Larkhill close to the Packway and in Amesbury close to Countess Road North, which would experience a minimal to moderate (2dB to 8dB) rise in noise. The Alternative would provide benefits for Winterbourne Stoke, where there

would be a moderate to substantial reduction in noise levels.

- 7.3.25 Alternative Route 2 would lead to the loss of views of Stonehenge for bypassing motorists in just the same way as would occur with the published scheme. The Alternative would provide pleasant views of countryside throughout most of its route. Driver stress would therefore be reduced to low throughout the Alternative Route, avoiding the increase in driver stress levels through the tunnel proposed as part of the published scheme.
- 7.3.26 Alternative Route 2 would result in a loss of almost 76ha of agricultural land. The majority of that land would be higher quality land. This loss of agricultural land would be substantially more than that which would occur with the published scheme.
- 7.3.27 The Alternative would be less disruptive to users of the A303 than the published scheme during construction, because the route would be constructed for the most part a considerable distance from the existing road. However, the Alternative is a longer route, with substantial structures. It would involve an additional river crossing, and it would disrupt a much larger number of side roads and other rights of way than the published route. It would also involve works alongside the A36, and would involve a significant reconfiguration of the existing A36/A303 interchange. Overall, therefore, Alternative Route 2 would be significantly more disruptive during construction than the published scheme.
- 7.3.28 As regards the issue raised concerning paragraph 1.35 of Document DD32, the achievement of an absolute reduction in road traffic is a high level policy objective of the Government in those places where the damage caused by road traffic growth is greatest. It does not apply to each and every road in the country, taken individually. The Government has made it clear that traffic is expected to continue to grow overall in future years.

### ***Objections to Alternative Route 2***

- 7.3.29 **Mrs S Parrett** appeared at the inquiries as an objector to Alternative Route 2. Her case is that the Woodford Valley is an area of simple, unspoilt natural beauty and diversity. It is a very quiet area, with little traffic, particularly at the Upper Woodford end. A dual carriageway and viaduct such as those proposed in Alternative Route 2 would destroy the natural beauty of the area and bring noise and disturbance together with pollution from exhaust gases. Since the ecclesiastical Parish of the Woodford Valley was created in 1972, when all the villages of the valley were brought together, a strong community spirit has become established. All residents of the area identify with belonging to the Woodford Valley. It is noteworthy that those objecting to Alternative Route 2 include people from the far north of the valley, for example from Wilsford and West Amesbury, as well as from Upper Woodford, which would be the part most immediately affected. The development of Alternative Route 2 would effectively cut the Woodford Valley community in half.

- 7.3.30 These inquiries are about protecting Stonehenge as part of our heritage, but it is right that the idyllic and tranquil Woodford Valley and its community should be similarly protected.
- 7.3.31 There were 57 written objections to Alternative Route 2. For the most part, they covered points raised by the Highways Agency or by Mrs Parrett. Two additional matters referred to, however, are the potential loss of a significant number of jobs in the area if Boscombe Down Airfield were to close, and the substantial adverse impact on the 65ha business development currently taking place at Solstice Park, east of Amesbury, which would flow from Alternative Route 2 effectively removing Solstice Park from the trunk road network.
- 7.3.32 The objectors include Wiltshire County Council, the Parish Councils of Stapleford, Woodford, Idmiston and Durrington and the Parish Meeting of Wilsford cum Lake.
- 7.3.33 The MOD confirms that any alternative route for the A303 which is proposed to pass through the Ministry's establishment at Boscombe Down would be strongly contested. The airfield has unique capabilities for the testing and evaluation of aircraft and other systems. Its replacement in the UK would be both costly and difficult. Test operations cannot be carried out in conjunction with operational use. The continued safe operation of both the two main runways at Boscombe Down is of paramount importance.
- 7.3.34 Wiltshire Fire Brigade objects to Alternative Route 2 because the closure of the existing A303 between Longbarrow Crossroads and Countess Roundabout would adversely affect emergency response times to Berwick St James, Winterbourne Stoke, Shrewton and the surrounding areas. Wiltshire Constabulary similarly considers that the greater distances involved by the removal of the A303 would have an adverse impact on the ability to meet expected response times. In addition, the Alternative would greatly increase rat running by local traffic.

#### **7.4 Alternative Route 3 – Mrs M P Stephenson**

- 7.4.1 Mrs M Stephenson is an individual objector. She put forward Alternative Route 3, which was first proposed by the then Royal Fine Art Commission in 1994, because she thought it merited further investigation. Mrs Stephenson was not able to attend the inquiries to put forward the case for her Alternative Route, but the route was nevertheless advertised and considered at the inquiries, with a full response from the Highways Agency.

##### ***Description of Alternative Route 3***

- 7.4.2 Alternative Route 3 follows the line of the "Purple Variant Route" identified at the 1995 Planning Conference in the form of a northern bypass route. It proposes a new dual carriageway road, which would diverge from the A303 at the same point as the published scheme for the Winterbourne Stoke Bypass.

- 7.4.3 Skirting Winterbourne Stoke to the north, Alternative Route 3 would cross over the B3083 and pass approximately 400m south of the Coniger site. Continuing in a north easterly direction, the route would cross two bridleways and the Till Valley on a 200m long viaduct, some 5m high. It would pass within 400m of the Foredown Enclosure, and within 100m of the Roman settlement of Foredown, before entering an 8m deep cutting, forming a new grade separated junction with the A360 to the east of Shrewton. Moving eastwards to pass under the B3086, the Alternative Route would enter the WHS and pass to the north of Fargo Plantation.
- 7.4.4 The route would pass to the north of Airman's Corner, to run east between the Cursus and Larkhill. Having cleared the eastern end of the Cursus, the route would cut through the King Barrow Ridge between Strangways and the eastern end of the Cursus, turning south eastwards to rejoin the existing A303 just west of Countess Roundabout. From that point, it would continue on the same alignment as the published scheme.
- 7.4.5 Alternative Route 3 would permit the closure of the existing A303 between Longbarrow Crossroads and Vespasian's Camp. A new byway would be created along this route. The A344 would be closed to traffic and converted into a footpath.

### ***Justification of Alternative Route 3***

- 7.4.6 Alternative Route 3 would avoid key archaeological sites and the National Trust land. It would also avoid the need to create the ultra modern interchange with twin roundabouts which the published scheme would provide at Longbarrow Crossroads, very close to the Winterbourne Stoke barrows.

### ***Support for Alternative Route 3***

- 7.4.7 One written representation of support for Alternative Route 3 was received on the basis that this route would be the most sensible and least costly.

### ***The response of the Highways Agency to Alternative Route 3***

- 7.4.8 This route was rejected in 1995 because of its unacceptable impact on nearby local communities. That would remain a problem now. The route would be open to view from some 60 properties in Larkhill, which would suffer substantial adverse visual effects. The same impact would apply to 9 properties at Strangways, and there would be moderate adverse visual effects at 15 properties on Fargo Road east of Stangways. It would result in major increases in noise levels in the highly populated areas of Larkhill, Durrington and Strangways, with more than 150 properties suffering significantly greater adverse noise effects. It would worsen air quality for around 60 residential properties in the Fargo Road area and around 50 residential properties in the Strangways area, though overall air quality levels would remain acceptable. The route would separate an area of housing from Strangways and from the County Primary School and local shops at Larkhill. There would be considerable disruption to

residents along Fargo Road and at Strangways during construction as a result of the close proximity of the construction work. This would last for approximately thirty months.

- 7.4.9 Alternative Route 3 would not require a tunnel, but three additional road bridges would be needed together with at least three additional structures to carry the route over public rights of way. Given that the scheme would be in cutting for approximately 70% of its length, however, it would still generate approximately the correct amount of material to provide the essential earthworks mitigation to reduce the visibility of the Winterbourne Stoke Bypass section of the route. Consequently, a net earthworks balance could be achieved for Alternative Route 3 in a similar way to that which applies in relation to the published scheme.
- 7.4.10 As regards cultural heritage impact, some 6.4km of the route would lie within the WHS. The route would, however, bring additional benefits within the WHS as compared with the published scheme, because it would take the A303 away from a greater proportion of the WHS, removing direct impacts which the published scheme would have on Sites 8, 9, 17, 19, 23, 30, 38, 47, 48 and 66. On the other hand, Alternative Route 3 would have a severe adverse direct impact on four Scheduled Monuments and a similar direct impact on two other sites classed as very important. There would be direct impacts on a further eight sites (four major adverse effects and four moderate effects), and indirect impacts on thirty two Scheduled Monuments (eleven of them major adverse impacts). Alternative Route 3 would divide Stonehenge and the Cursus from other major monuments to the north such as Robin Hood's Ball, Durrington Walls and Woodhenge. The WHS Management Plan has as one of its objectives the enhancement of the Stonehenge landscape and the reuniting of the monuments. Alternative Route 3 would thus be in direct contravention of this objective.
- 7.4.11 Alternative Route 3 would have greater benefits than the published scheme in the outer parts of the WHS along the existing A303. There would be a substantial beneficial visual effect on the barrows at Stonehenge Down and the westernmost barrow in the Normanton Down group, with a moderate beneficial effect for the northerly barrows in the Winterbourne Stoke group, a long barrow at Site 32, and the northernmost barrows in the Lake group. There would also be a slight beneficial visual effect on the Longbarrow Crossroads, where the existing roundabout would remain, minus its eastern arm.
- 7.4.12 Alternative Route 3 would result in the loss of 60.5ha of agricultural land, some 10.4ha more than the published scheme. The impact on the farm holdings affected would be greater, however. Manor Farm, Durrington Down Farm and the National Trust estate would all suffer greater adverse severance, and alternative means of access would need to be provided.
- 7.4.13 Journeys between Winterbourne Stoke and Amesbury by means of Alternative Route 3 would be increased in length by approximately 1.6km compared with the published scheme. In addition, journey lengths would be slightly increased between Amesbury and Shrewton. Driver stress

along Alternative Route 3 would be low along the entire section, although there is some concern that the sound of gunfire from the Royal School of Artillery could potentially increase driver stress levels.

- 7.4.14 The route would require the acquisition of approximately 7ha of land designated as Military Garrison in the Local Plan. This land is currently in active use by the MOD. Until such time as the MOD decides that the land is surplus to requirements, it would not be possible to acquire it for development.
- 7.4.15 Alternative Route 3 would be considerably cheaper to construct than the published scheme (by approximately £112m). The net present value of the Alternative would be £61.3m with low traffic growth and £161.8m with high traffic growth. The alternative would therefore represent very good value for money as compared with the published scheme. If it were recommended for further consideration, however, this would give rise to significant delays to the currently envisaged programme. A new procurement process would be necessary to identify suitable consultants and contractors. There would need to be new draft Orders published. It would therefore be unlikely that construction could start before 2008 for completion in 2011, and even this assessment would assume that compulsory acquisition of land from the MOD and the National Trust could proceed, even though each of those organisations has expressed opposition to the route.

### ***Objections to Alternative Route 3***

- 7.4.16 There were 25 written objections to Alternative Route 3. In the main, they raise points covered by the Highways Agency response. The objectors included the MOD, Wiltshire County Council, the Parish Councils of Woodford, Idmiston and Durrington and the Parish Meeting of Wilsford cum Lake.
- 7.4.17 Wiltshire Fire Brigade states that emergency response times to Shrewton and the surrounding area would increase with Alternative Route 3, and questions how emergency vehicle access to Stonehenge Cottages would be obtained.

### **7.5 Alternative Route 4 – The Association of Council Tax Payers (South Wiltshire)**

- 7.5.1 The author of the Alternative Route promoted by ACT is Lt Col G W Parker, who served in the British Army for 43 years, specialising in transportation.
- 7.5.2 Alternative Route 4 differs from the other alternatives promoted at the inquiries in two respects. The first is that it has not simply been advertised in connection with the inquiries. It has been publicised over a number of years, and attempts have been made to persuade various local authorities, community groups and representatives of the good sense of the proposal. It has therefore had much wider publicity over a much longer period than any of the other alternatives before the inquiries. The second difference is that, as feedback on the proposal has

been received by ACT, it has in some cases responded by changing the line of the proposal to meet the issues raised, and in other cases ACT has produced alternative lines. By the time Alternative Route 4 was promoted at the inquiries, ACT was putting the route forward as a concept rather than as a defined line on a map. The version of Alternative Route 4 shown on Document HA/0/32 represents the originally submitted idea for the route, but the variations actually put before the inquiries are shown at Appendix 1 of Document ACTP/2/3.

#### ***Description of Alternative Route 4***

- 7.5.3 Alternative Route 4 would provide a dual carriageway, diverging south from the existing A303 dual carriageway to the west of Winterbourne Stoke. It would follow the line of a dry valley to pass under the B3083 and cross the River Till between the villages of Winterbourne Stoke and Berwick St James through a 7m deep cutting. The proposed route would cross the Till Valley on a 200m long viaduct, approximately 6m above the valley floor.
- 7.5.4 The route would climb at a gradient of 6% on the east side of the Till before heading into a 2m to 3m deep cutting, and then turn to head south on a ridge of high ground, almost parallel with the A360 towards Salisbury. Embankments would be needed to accommodate two minor dry valleys, and the route would rise to the south through a 6m deep cutting crossed by Monarch's Way at grade. At the high point of this ridge, the road would need to pass through a 6m deep cutting between Newton Barrow and some radio communications masts. Curving east to meet the A360, the road would be on a 7m high embankment to form a grade separated junction near Little Durnford.
- 7.5.5 The road would then proceed south through a cutting up to 13m deep and 1km long, and drop down eastwards along the line of a secondary valley, to cross the River Avon on a 400m long viaduct between 13m and 18m above the valley floor between Little Durnford and Old Sarum. East of the viaduct, the route would proceed through North Hill Down in a deep cutting, which would be up to 16m deep at the western end, gradually decreasing over its 1km length heading east. After passing within 1km of the prehistoric site of Old Sarum on a 1m high embankment with screen banking, the route would meet the A345. The A345 junction would be a grade separated interchange, with a new dual carriageway bypass on the east side of Salisbury, to link with the A36, south east of the City.
- 7.5.6 From the A345 junction, Alternative Route 4 would rise for 3.5km as it heads north east along high ground between the Bourne and Avon Valleys. At the high point, the road would run through a 6m deep cutting, passing between an archaeological enclosure to the west and Downton West Farm to the east. The route would cross a dry valley on a 10m high embankment with extensive ground modelling to minimise its impact. Once across the high ground, the route would drop down to skirt around the end of the secondary runway of Boscombe Down Airfield.
- 7.5.7 The steep ground between the runway and the settlements of Idmiston



and Porton would require two deep cuttings of about 10m either side of an 8m high embankment. In addition, two semi detached houses would need to be demolished to achieve a suitable alignment. Turning north to rejoin the existing A303, the route would run parallel to the perimeter of the airfield, and rise on a 6m embankment to cross above the Allington Track. It would then rise through a 6m cutting to cross the level area of Beacon Hill Farm on an embankment up to 6m high. Finally, the route would tie in to the existing A303 dual carriageway at a new grade separated junction south east of Bulford Camp.

7.5.8 Part of this scheme would involve the closure of the A303 between Longbarrow Crossroads and Countess Roundabout, and the closure of the A344 adjacent to Stonehenge. The Alternative would involve the construction of 25.7km of dual carriageway.

7.5.9 Additions to Alternative Route 4 were proposed by ACT after the Alternative had been advertised. These involved traffic calming along the Packway and a western through link, involving the widening of the A360 from Airman's Corner in a southerly direction, and then the provision of a new link from the A360 to a new junction with Alternative Route 4 near Druid's Lodge.

7.5.10 At a later stage, further variations to Alternative Route 4 were proposed by ACT, and these are shown on Appendix 1 to Document ACTP/2/3. They comprise:

- A1 – from east of Stapleford, this Variant would depart from Alternative Route 4 to pass south of Berwick St James and continue to rejoin the existing A303 just east of the A36/A303 interchange at Deptford.
- D1 – between the grade separated interchange where Alternative Route 4 crosses the A345, just to the north of Salisbury, and the Boscombe Down Airfield, this Variant would run closer to the A345 and pass beneath the Airfield's reserve runway in a tunnel.
- D3 – this Variant would be the same as D1, except that it would pass around the end of the Boscombe Down reserve runway rather than beneath it.

The plan of the route contained in Appendix 1 to Document ACTP/2/3 shows only approximately half the length of the Alternative Route on a definite line. The responsibility for promoting and funding the Eastern Link section of Alternative Route 4, from the junction of the Alternative Route with the A345 to the junction with the A36 to the south east of Salisbury, would rest with the local highway authority, Wiltshire County Council.

#### ***Justification of Alternative Route 4***

7.5.11 The aim of Alternative Route 4 is the full protection of the WHS at Stonehenge and its archaeology forever. At the same time, it looks to the possibility of incorporating other local road schemes into the plan to

improve traffic movement in the area as a whole.

- 7.5.12 Alternative Route 4 would completely remove the problem of the destruction of and damage to archaeological sites within the WHS. It would support the A303/A30 corridor as a strategic route to the South West, and be consistent with plans and policies at national, regional and local level.
- 7.5.13 At the same time, it would provide a long awaited bypass for the City of Salisbury. This would provide benefits to the City, and would support policy objectives to enhance the accessibility and attractiveness of Salisbury as a place in which to live, shop, work and to visit. It would bring an important road close to the City of Salisbury, thereby enhancing the opportunity for business to prosper. It would reduce the operating costs of those businesses in the Salisbury area that need quick access to the major east/west road system. At the same time, it would provide a more cost effective road link to the south for new businesses operating on the planned Solstice Park business development.
- 7.5.14 Alternative Route 4 would be consistent with relevant Local Plan policies to encourage conservation of the built environment, encourage tourism and promote the vitality and viability of local communities. It would reduce traffic on Castle Road, Salisbury. Instead of negotiating this inner ring road as at present, traffic would be able to use the Eastern Link road around Laverstock. It would provide better safety for children at the schools in Laverstock by removing rat running traffic from the school road. It would reduce the pollution on the Salisbury inner ring road and the heavily polluted area in Wilton. It would provide excellent access to the park and ride schemes on the north and west of Salisbury.
- 7.5.15 Salisbury District Council has a statutory duty under the Environment Act 1995 to review and assess air quality. On the basis of the monitoring work it has carried out, the District Council has expressed itself satisfied that most of the UK air quality standards are being or will be achieved in its area. But this is because monitoring has taken place at sites which do not give the worst results. If a site on the A36 Salisbury ring road at a point where traffic approaching the A36/A30 junction has to slow and then accelerate had been monitored, more worrying results would have been obtained. Traffic flows along the A36 ring road are estimated by the Highways Agency to increase from the present 43,000 vehicles per day to 56,500 vehicles per day by 2011. This represents a particular danger of adverse health outcomes for people living within 200m of the ring road, of which there are many, because of the amount of residential property adjacent to the ring road.
- 7.5.16 Alternative Route 4 would assist in alleviating this problem by reducing the amount of traffic travelling through Salisbury on the A36.
- 7.5.17 Alternative Route 4 would allow a series of walks to be established all the way around the outside of the core area of Stonehenge, giving visitors an opportunity to see and understand the historic landscape from areas and angles that would not be easily achievable with a tunnel system with portals dividing up the eastern and western areas. It would avoid

potential serious water problems that could occur at Stonehenge Bottom. It would remove the Winterbourne Stoke Bypass from the north of the current A303 to the south of the village, removing the need for the proposed viaduct which does not sit easily in the landscape. It would relieve residents in Amesbury from having a bypass running through a residential area. It could be constructed without major disturbance to the existing road layout, unlike the published scheme which would inevitably cause difficult problems during a large part of its construction period.

- 7.5.18 It would save the cost of approximately £32m which is needed to produce a Wylve Valley Relief Road, as Alternative Route 4 would effectively serve this function. It would also save any future costs of funding a Salisbury Bypass.
- 7.5.19 It is accepted that Alternative Route 4 would cause motorists on the new A303 to drive a further distance, thus increasing their costs. It should be remembered, however, that the vast majority of motorists on the A303 are travelling long distances, in the context of which the increased distance of Alternative Route 4 as compared with the published scheme would not be significant.
- 7.5.20 It is also accepted that an additional 11km of road would need to be laid in the area of South Wiltshire down the western side of the Bourne Valley. The road would follow as closely as possible the corridor of the existing A345 after crossing the top of the Bourne Valley. This would reduce the intrusive effect of the road in that area. There are long standing road problems in that area, which were discussed at the Structure Plan examination in public in 1983.
- 7.5.21 It would not be possible to ensure that every house along the route of Alternative Route 4 was well clear of the line of the road, but, with today's excellent techniques for landscaping, it is possible to achieve very effective mitigation of the impact of a new highway.
- 7.5.22 It would not be possible to cross the Woodford Valley except by a bridge. This would be located at the southern edge of the Valley to restrict the environmental impact. The environmental cost of accepting this bridge offers the balancing benefit of providing full protection to the WHS by avoiding the construction of the proposed tunnels within the WHS.
- 7.5.23 It is accepted that Alternative Route 4 would be close to and would be seen from some parts, but not all, of the ancient monument at Old Sarum.
- 7.5.24 ACT does not find it possible to place confidence in the traffic and economic assessment of Alternative Route 4 produced by the Highways Agency. The Association considers that the cost estimates for the road scheme are excessive, and that reliance can not be placed on the traffic data on which the COBA is based.
- 7.5.25 The works cost for Alternative Route 4 has been calculated by the Highways Agency at £5.7m per km. ACT is aware of lower comparative

costs for other recent highway schemes such as

- A96 Blackburn to Kintor Bypass – 1998- £2m per km
- A50 Doveridge Bypass – 1998 - £2.85m per km
- A46 Newark to Lincoln Improvement – 2003 - £2.15m per km
- A6 Alvaston Bypass – 2003 - £4.2m per km
- A50 Derby Southern Bypass – 1997 - £5.18m per km

While relatively high figures are produced by the last two examples, the A6 Bypass only ran for a short distance (2.5km), and the A50 Derby Bypass was partly two lane and partly three lane. Neither, in any event, produced a figure per km as high as that estimated for Alternative Route 4. If a relatively high figure of £5.1m per km is applied to Alternative Route 4, its total cost would be £150m. That is £84m less than the cost of the published scheme plus the Wylve Valley Road, which would no longer be required.

- 7.5.26 In relation to the traffic data, accurate figures are essential to produce traffic forecasting information for decision making and for the construction of a COBA analysis. The 1997 National Road Traffic Forecasts provide the basic guidance on growth factors, subject to local interpretation. In fact, Wiltshire County Council has for more than 10 years produced a report containing assessment levels of local road traffic and a forecast of traffic growth, based on data collected from 100 sites throughout the County. The "Travel Report, Wiltshire 2000" suggests that, at Shrewton, the target rate for traffic growth up to the year 2011 will be an average of 0.69% per year. The Do Minimum growth rate is forecast to be an average of 1.2% per year. These figures compare with the National Road Traffic Forecasts figure of 1.9% per year to 2016. However, the traffic growth figures used by the Highways Agency for the purpose of the COBA assessment of Alternative Route 4 appear to be 9.2% per year to 2008 and 6.2% per year to 2023. Thus traffic growth in the assessment does not accord with either the Wiltshire County Council or the National Road Traffic Forecasts figures.
- 7.5.27 The traffic flows used in a traffic model can have a major negative effect on a COBA economic calculation if they are forecast too high.
- 7.5.28 When local people have had a fair opportunity to express an opinion on Alternative Route 4, they have been very substantially in favour of it. A leaflet issued by ACT in July 2000, raising issues about what is now Alternative Route 4 received 542 replies. No less than 97% of the respondents were in favour of Alternative Route 4, with only 3% against. It is accepted that the leaflet (Document ACTP/0/10) asks on the front for support for a full assessment of Alternative Route 4, while the question on the back of the leaflet asks people to support Alternative Route 4.
- 7.5.29 At a Roads Seminar organised by ACT in the Guildhall at Salisbury on 3 October 2001, there were presentations regarding the approved route for

the A303 improvement and other alternatives including Alternative Route 4. Of the 70 people who voted after hearing the presentations, 65 (93%) voted in favour of Alternative Route 4, with 5 (7%) voting against. Again, it is accepted that the question asked was "Do you agree that the people of Salisbury District should be able to vote for ACT Parker Plan evaluation to protect Stonehenge?".

- 7.5.30 Improving the A303 in the area of Stonehenge represents an exceptional problem. That is why it has been debated for so long without any agreed conclusion being reached. An exceptional problem requires an exceptional scheme. That is why it is worth looking beyond the immediate problem of the A303 at Stonehenge and having regard to the possibility of including a bypass for Salisbury and a scheme already being prepared to provide relief for the Wylve Valley in seeking to make an investment in roads which provides the best value for the area.

#### ***Support for Alternative Route 4***

- 7.5.31 As indicated in paragraph 7.5.2 above, Alternative Route 4 (under the title "The Parker Plan") has been discussed for some years in the area. In consequence of this knowledge of the scheme, it was mentioned as being preferred to the published scheme by 15 individual objectors to the published scheme some months before the Alternative Route was advertised with the other alternatives suggested by objectors. In addition, Alternative Route 4 was mentioned with approval in 22 of the letters of objection to the published scheme submitted by residents of Countess Road, and by 40 of the letters of objection submitted by residents of the Beverley Hills Mobile Home Park.
- 7.5.32 When Alternative Route 4 was advertised, this resulted in a further 17 letters of support for the Alternative, principally on grounds of cost and the opportunity to address a number of other problems at the same time as dealing with the issues at Stonehenge.
- 7.5.33 Alternative Route 4 was also supported by **Mr P Corp** and by **Councillor A J Brown-Hovelt**, who appeared at the inquiries as objectors to the published scheme. In addition, **Mr K Garland** appeared at the inquiries as a supporter of Alternative Route 4. He considers that Alternative Route 4 would provide the best possible cost benefit for money spent, given the other road problems, in addition to the improvement of the A303, which it would help to address. Mr Garland considers that there would be significant benefit in prosperity for the City of Salisbury arising from Alternative Route 4. It would provide dual carriageway access from the outskirts of the City, not only to the A303 and the South West, but also north to the M4, and all the way to the M3 and London. As the new road would pass very close to the Beehive "Park and Ride" site, to the north of Salisbury, this might well tempt travellers to take a break and to visit the City.

#### ***The response of the Highways Agency to Alternative Route 4***

- 7.5.34 The clear driver for ACT's Alternative Route 4 is the desire to secure a bypass for Salisbury. Such a bypass, on the southern side of the City,

was considered at a public inquiry in 1993/4, and the Government decided in 1997 on environmental grounds that it could not be proceeded with. During the course of the same inquiry, a northern bypass of Salisbury, which took a similar alignment in the area of Salisbury to that now proposed by ACT, was considered as an alternative route. The Inspector at that inquiry concluded that any advantage that such a northern alternative might have over the southern bypass proposed was "*outweighed by the impacts on the Woodford Valley and on Old Sarum*". He further stated that he had "*no hesitation in concluding that it should not be adopted*" (Document HA/13/14/1, Appendix E, page 295).

- 7.5.35 After the Salisbury Bypass had been removed from the Government's Targeted Programme of Improvements, a Salisbury Transport Study was set up to seek solutions to the area's traffic problems and develop a workable transport strategy as an alternative to the withdrawn Bypass (Documents HA/0/35, 36 and 37). The results of that Study have, in turn, fed into the Wiltshire Local Transport Plan (Document DD148). Neither that document, the Wiltshire Structure Plan (Document DD147), nor the Salisbury District Local Plan (Document DD149) makes any reference to a Bypass for Salisbury. There is no current proposal for such a Bypass.
- 7.5.36 Taking the A303 on a very long circuit well to the south of the present route, on a 25.7km journey to replace 17km of existing road, would be a very inefficient solution in transport terms for addressing problems of safety and congestion on the A303 and providing a bypass for Winterbourne Stoke. There is no reason in transport terms for such a long southerly shift, other than seeking to make the route into a Bypass for Salisbury in conjunction with a link around the north east side of the City. That "Eastern Link" is not needed to provide an alternative route for the A303. The road network, and proposed improvements to it in and around Salisbury, are matters for the local highway authority, Wiltshire County Council. They do not, however, support Alternative Route 4; in fact they are objectors to it. The Eastern Link is therefore not supported by the relevant policy documents, or by the authority which would be responsible for promoting its construction. There would thus seem to be no prospect of the Eastern Link being built.
- 7.5.37 If there were to be no Eastern Link forming a Bypass of Salisbury, even ACT (through its witness, Lt Col Parker), was ready to accept that a realignment of the A303 so far to the south would not be a viable or sensible proposition.
- 7.5.38 Alternative Route 4 would be 25.7km long between its start point at Berwick Down and its end point at Beacon Hill. The Eastern Link from the A345 junction at Salisbury would add a further 7.2km. In addition, there would be approximately 9km of the existing A303 that would need to remain open to serve as local access (Beacon Hill to Countess Roundabout, and west of Winterbourne Stoke to Longbarrow Crossroads).
- 7.5.39 There would be no need for a tunnel on Alternative Route 4 (although Variant D1 proposes one at Boscombe Down) but there would need to be

a considerable number of other structures, including three viaduct crossings of rivers and two railway bridges.

- 7.5.40 Long distance trunk road traffic travelling along the A303 would have to follow a detour of around 8km if it was using Alternative Route 4 rather than the published scheme. That would bring significant disbenefits in economic terms as a result of additional time and operating costs, as well as additional predicted accident costs. With Alternative Route 4, a substantial volume of traffic that would be accommodated on the published scheme would find its way to other local routes rather than using Alternative Route 4 because of this substantial diversion. Thus, not only would Alternative Route 4 provide a much longer route for the principal traffic that it seeks to serve, but it would also provide poorly for local traffic.
- 7.5.41 There would be some benefit as a result of Alternative Route 4 for roads in and around Salisbury, particularly on the A36 (Wylve Valley) with an approximate 30% reduction in flow, the A338 through the Bourne Valley (with a 15 to 21% reduction), and on parts of the A36 Churchill Way in Salisbury (with a reduction of between 20% and 33%).
- 7.5.42 It is not the case that Alternative Route 4 would perform the same function as the Wiltshire County Council proposal for the Wylve Valley Relief Road. The Wylve Valley Relief Road would be an A36 to A36 bypass of certain villages along the A36. It can thus be expected to remove most of the through traffic from the existing villages which would be bypassed. Alternative Route 4 would have no connection with the A36 on the western side of Salisbury, and would join the road network of the A303 just west of Winterbourne Stoke. It is therefore not surprising that the traffic model shows only limited relief to the A36 from Alternative Route 4. For those people wishing to access the western side of Salisbury, the A36 itself would continue to offer an attractive route. Similarly, Alternative Route 4 would not provide a substantial alternative to the Wylve Valley Relief Road. Traffic from the South Coast approaching Salisbury on the A338 and the A354 with destinations in Bath or Bristol would not use Alternative Route 4. As they do now, they would go through the City of Salisbury, on to the A36, and along the Wylve Valley.
- 7.5.43 The cost of Alternative Route 4 is estimated to be £173.6m construction costs plus £21.5m land costs. This cost has been prepared on the same basis as those for the other Alternative Routes, none of which has been challenged. The estimate reflects the number of structures involved and the terrain which the route would cross. The equivalent for the published scheme is £192m construction costs plus £5m land costs. The net present value produced by the economic assessment of Alternative Route 4 is minus £125.1m with low traffic growth and minus £84.91m with high traffic growth. In comparison with the published scheme, the Alternative would therefore provide very poor value for money. In fact, a large component of the benefits attributed to Alternative Route 4 would be derived from the Salisbury Eastern Link. If that Link were to be omitted, the net present value for the pure A303 realignment element of Alternative Route 4 would be in the region of minus £300m.

- 7.5.44 It is accepted that adjustments to the design of Alternative Route 4 and the traffic model could result in changes to the economic performance of the Alternative. For example, the high predicted flows on the Packway, A345 and the A3028 might be reduced by assuming the introduction of traffic management measures or by extending the model to accommodate potential strategic reassignment of traffic. However, whilst the predicted delays through Larkhill might then reduce, the economic time benefits and travel costs would correspondingly increase as a result of forcing traffic to use longer, less attractive routes. Overall, the economic performance of the proposal would probably deteriorate.
- 7.5.45 A positive feature of Alternative Route 4 would be the removal of most motorised traffic from all parts of the A303 and A344 within the WHS. For the published scheme, the open section of the A303 would result in some continuing severance in the eastern and western parts of the WHS (although not in areas where there would be open access), whereas Alternative Route 4 would allow the existing A303 to be removed. This could benefit users of the WHS in the future, if patterns of agriculture and land use were to change in order to permit public access to sites to the south of the A303 currently in private ownership and being actively farmed. Alternative Route 4 would have beneficial effects on four archaeological sites within the WHS, the most significant of which is the Winterbourne Stoke Group.
- 7.5.46 Although these additional benefits within the WHS are significant, they need to be considered in context. The published scheme would already deliver large cultural heritage benefits, and the additional benefits offered by Alternative Route 4 within the WHS would be away from Stonehenge itself, and would be more modest by comparison, in exactly the same way that eastward and westward extensions of the tunnel portals of the published scheme would provide diminishing returns.
- 7.5.47 Moreover, the value of the rich archaeological resource of the area does not stop at the WHS boundary. Physical loss of archaeological remains is important even if it takes place outside the WHS. Alternative Route 4, with its 32km crossing of mainly open countryside, would be proportionately more damaging to archaeology than the equivalent 10km length of road within the prescribed scheme outside the tunnel. A total of 5km of that length would be on the line of or immediately adjacent to the existing A303, which is not the case for Alternative Route 4. The Alternative Route would adversely affect many more known sites (53 in total, compared with 21 for the published scheme), having a direct effect on 37 sites and an indirect effect on 16, one of which would be a significant adverse impact on Old Sarum. Alternative Route 4 would also cut through the scheduled site at Beacon Hill.
- 7.5.48 Except for avoiding the temporary works associated with tunnel construction, Alternative Route 4 would have exactly the same visual effect as the published scheme in the Stonehenge MILS. In the outer areas of the WHS, removal of the A303 and traffic from Longbarrow Crossroads to Countess Roundabout would deliver additional visual benefits as compared with the published scheme. Alternative Route 4



would also have benefits for properties and sites north of Winterbourne Stoke. Against that must be set Alternative Route 4's adverse visual effects on a much higher number of residential properties, and on sites and monuments outside the WHS. The Eastern Link, in particular, would be close to residential areas and schools, and would be difficult to mitigate adequately. On balance, Alternative Route 4 would not offer an overall benefit in visual terms, and in terms of visual impact on properties, it would be significantly worse than the published scheme.

- 7.5.49 As regards landscape character, Alternative Route 4 would have significant adverse effects on areas of tranquil, high quality landscape, especially in the Woodford Valley.
- 7.5.50 Although Alternative Route 4 would provide some small additional benefits to ecology in the WHS compared with the published scheme, it would have an overall net adverse effect on ecology, both in relation to important designated sites and to valued resources outside designated sites. The route would cross the River Avon System SSSI in two places and the River Till SSSI in one.
- 7.5.51 Noise caused by road traffic at the Stonehenge monument would be reduced more with Alternative Route 4 than with the published scheme, but elsewhere there would be less acceptable noise impacts arising from the Alternative. A small number of properties in rural locations along the line of the route would experience a moderate to major (9dB to 17dB) increase in noise. There would also be a relatively large number of properties in Larkhill close to the Packway, in Durrington close to the A3028, and in Countess Road North, Amesbury that would experience a minimal to moderate (2dB to 7dB) rise in noise due to traffic reassignment. On the other hand, Alternative Route 4 would deliver minimal to moderate (1dB to 6dB) reductions in noise to a relatively large number of properties in Salisbury close to the A36, in Amesbury close to the existing A303, and alongside the A36 and the A338 in the Bourne and Wylde Valleys.
- 7.5.52 Alternative Route 4 would reduce traffic on roads in and around Salisbury, but not sufficiently to have a wide material effect on air quality. The Alternative would produce some benefits, in that nitrogen dioxide levels would reduce in the Air Quality Management Area at King Street, Wilton, but by 2008 levels there would be below the appropriate threshold with or without Alternative Route 4. For greenhouse gases, although Alternative Route 4 would reduce carbon dioxide emissions on the A303 corridor (by about 28,000 tonnes each year), it would increase carbon dioxide emissions on the corridor of the Alternative Route itself by a greater amount (48,000 tonnes each year). Compared with the published scheme, therefore, Alternative Route 4 would increase carbon dioxide emissions by 14% compared with the 4% increase which would arise from the published scheme by 2008.
- 7.5.53 Alternative Route 4 would deliver some relief from severance at villages along the A36 in the Wylde Valley, at Winterbourne Stoke and at Amesbury, but new severance would come about by the removal of the main link between Amesbury and Winterbourne Stoke/Shrewton, and as

- a result of additional traffic flows on some local roads.
- 7.5.54 The Alternative would share with the published scheme the removal of views of Stonehenge for passing drivers, although the route would offer pleasant views for drivers throughout most of its length.
- 7.5.55 The Alternative would result in the loss of almost 200ha of agricultural land, the majority of which would be higher quality land in Grade 2 and Grade 3a. This would be four times greater than the loss of agricultural land arising from the published scheme.
- 7.5.56 Alternative Route 4 would have a limited effect on A303 traffic flows during construction, as the route would be built for the most part a considerable distance from the existing road. There would be considerable disruption caused to both the Bristol to Southampton and the London to Penzance railway lines, however, both of which would have to undergo closures. There would also be considerable disruption to A36 traffic along Southampton Road, which would have to be realigned to tie in adequately with the Eastern Link. Alternative Route 4 would therefore be considerably more disruptive than the published scheme.
- 7.5.57 The Alternative would be in conflict with policies regarding cultural heritage, landscape, visual impact, community effect and agriculture contained in Local Plans, given that the new road would largely be located in relatively unspoilt and tranquil countryside.
- 7.5.58 The inclusion of the "Western Through Link" to allow improved access to the realigned A303 for traffic that would otherwise use the Packway as a through route would change priorities at junctions and provide a further intermediate access point to the realigned A303. The alteration to the Packway would result in marginally increased journey times for traffic using that road. However, traffic travelling from Shrewton (or passing through it) and wishing to head to Amesbury or places further east on the A303, would still need to travel a further 15km by the time the eastern tie in point is reached (or 12km to the centre of Amesbury via the A345). For these reasons, local traffic would be unlikely to find the addition to the scheme any more attractive than the original scheme layout.
- 7.5.59 In the same way, the variations A1, D1 and D3 put forward by ACT to the scheme would generally not change the assessments for the overall route. Variation D3 in particular is unacceptable on engineering grounds. There would be some landscape and property advantages arising from Variants D1 and D3, but the tunnelling proposed for D1 would increase costs significantly, making the variation even worse in terms of value for money. There would be additional nature conservation effects for both the eastern variations (D1 and D3). Variation A1 would create a greater adverse effect on landscape, and there could be difficulties in engineering the proposed revised junction close to the existing A36 junction at Deptford. Overall, Variation A1 would offer little advantage over Alternative Route 4.
- 7.5.60 Both Wiltshire County Council and Salisbury District Council have counter

objected to Alternative Route 4. There are also objections from five Parish Councils while not a single Parish Council supports the Alternative. The referendum carried out by ACT used such a muddled format that it is entirely unclear what people thought they were actually voting for.

#### **Objections to Alternative Route 4**

7.5.61 **Wiltshire County Council** sustained an objection to Alternative Route 4 by an appearance at the inquiries. The County Council says that Alternative Route 4 would be contrary to the adopted Structure Plan in that

- The key diagram indicates that the improved A303 should be on line past Stonehenge (that is broadly following the same route as the existing A303 rather than some other route).
- Policy T11 (1) states that the new trunk road should include a Winterbourne Stoke Bypass and a flyover at Countess Roundabout.
- Policies C1, C2, C3, C5, C9 and C12 require the safeguarding of County nature conservation resources, County conservation sites, important habitats, the water environment, special landscape areas and the best and most versatile agricultural land.
- Policy HE2 requires that features of archaeological and historic interest and their settings should be protected.

ACT did not object to the inclusion of those policies in the Structure Plan. Nor did they argue, when the Structure Plan was being prepared, for the inclusion of policies in support of Alternative Route 4.

7.5.62 As regards the figures drawn by ACT from "The Travel Report", the County Council says that the figures provided in that report were incorrect. The figures for growth (15.4% high growth, 8.3% low growth) relate to growth by 2006, not 2011. The low growth target figure to 2011 is now 19%. The County Council has made no site specific forecast about growth at Shrewton, and believes that it is inappropriate to do so based on a simple extrapolation of historic trends.

7.5.63 Representatives of **Save Bourne Valley** also appeared at the inquiries to make an objection to Alternative Route 4. Save Bourne Valley is an informal group of individuals opposed to that Alternative scheme. It arose out of attendance by a number of people at a meeting held to publicise the Alternative at Gormeldon on 13 January 2004. Lt Col Parker and Mr Ellis of ACT made a presentation concerning Alternative Route 4. There was considerable opposition to it from those attending the meeting, and some of the people concerned decided to organise a petition against Alternative Route 4. This petition was presented to the inquiries. It contains a total of 1,509 signatures, and comprises Document SBV/0/4.

7.5.64 In addition to the response made by the Highways Agency to the ACT regarding Alternative Route 4, Save Bourne Valley contends that Alternative Route 4 would not relieve traffic in the Bourne Valley, but

would lead to an additional 22,000 to 33,000 vehicles per day being diverted on to a new road through some of the most beautiful countryside in the UK, destroying it forever. It is regarded as amazing that public resources are devoted to giving serious consideration to such a scheme.

- 7.5.65 Alternative Route 4 has been presented to the public by its promoter as a scheme which offers substantial economic benefits. The assessment carried out by the Highways Agency reveals that to be a false claim. The true financial outturn of the scheme would be a substantial negative one, whether high or low traffic growth occurs over the next few years.
- 7.5.66 As regards the aesthetics of the scheme, it was claimed by ACT that the route would be hidden from sight in the Bourne Valley by a ridge, but the route published for the inquiries shows that this is simply not achievable. Both in the Bourne Valley and from Old Sarum, it would be an entirely apparent and extremely ugly part of the landscape.
- 7.5.67 One of the Variants suggested by ACT to Alternative Route 4 following points raised with the Association regarding the close proximity of the route to Idmiston is that the route could go under the reserve runway at Boscombe Down. It is inconsistent with the concerns expressed by ACT regarding the vulnerability of the published scheme's proposed tunnel running past Stonehenge to terrorist attack, for the same Association to suggest that it would be perfectly acceptable for their Alternative to be located in a tunnel under the runway of a military airfield. That is in any event also completely unrealistic, because there is no plan to close the airfield, and no discussion has taken place regarding the possibility of tunnelling beneath the runway. This is made clear by the answer to a Parliamentary Question set out at Enclosure 10a within Document SBV/1/1.
- 7.5.68 **Mrs R Wyeth** also appeared at the inquiries as an individual to make an objection to Alternative Route 4. Whilst she completely supports the need for a Salisbury Bypass, she does not believe that that is an appropriate topic to be raised at these inquiries. In any event, Alternative Route 4 does not offer a bypass to the City of Salisbury. Such a bypass would need to address the major routes from all around the City.
- 7.5.69 Linking the A303 improvement with the Wylve Valley Relief Road would put at risk the progress which has been achieved to date in securing a position for the much needed Wylve Valley Relief Road in the local roads programme. If Alternative Route 4 were to be recommended for further consideration following these inquiries, the need to fight for funding for the Wylve Valley Relief Road would begin all over again.
- 7.5.70 Alternative Route 4 is in fact a piecemeal road, which would cause significant damage across a beautiful unspoilt landscape and to communities along its route. It would take the road much closer to Berwick St James than the present A303, and continue to separate the villages of Winterbourne Stoke and Berwick St James. It would also intrude into the unspoilt Woodford Valley, an area justifiably protected

because of its beautiful setting.

- 7.5.71 Alternative Route 4 would also cut across an open landscape in close proximity to the site of Old Sarum. This is a very important historical site. It was, in turn, an Iron Age Hill Fort, a Saxon settlement, a Roman garrison, a Norman castle, the site of the first two cathedrals and the first City of Salisbury, the place at which William the Conqueror disbanded his victorious Army in 1070, and where he accepted the Domesday Survey in 1086. The site presently offers tranquillity and isolation, with spectacular views across the landscape from all directions. It would be an act of vandalism to destroy Old Sarum's setting, even if it would alleviate the Stonehenge WHS.
- 7.5.72 The villagers of Winterbourne Stoke urgently need their relief road to remove the A303 from their community. The A303 urgently needs upgrading to an acceptable standard to cut long tailbacks and the accident rate. Removing the 20<sup>th</sup> Century intrusion of traffic from the immediate environs of Stonehenge would return what was a sacred landscape to being a place of the spirit, in splendid isolation. The Highways Agency's published scheme would best deliver these three objectives. Alternative Route 4 would be destructive on environmental and archaeological grounds. It seeks to address, but does not alleviate, traffic problems in Salisbury and the Wylve Valley which are not before these inquiries. It cannot be considered to be a practical A303 Stonehenge improvement.
- 7.5.73 There were 55 written objections to Alternative Route 4. They include an objection from the MOD. Objections from the Wiltshire Fire Brigade and the Wiltshire Constabulary express concern about the effect on response times of the Alternative. The written representations include objections from Salisbury District Council, from the Parish Councils of Allington, Woodford, Newton Toney, Idmiston and Durrington and from the Parish Meetings of Wilsford cum Lake and Berwick St James.
- 7.5.74 The points raised in these written objections were covered in the Highways Agency response and in the objections to Alternative Route 4 recorded above, apart from one point made in a written objection from the promoters of the Solstice Park business development. They object to Alternative Route 4 on the basis that the viability of their scheme would be severely damaged by being distanced from the strategic road network by the more easterly reconnection of Alternative Route 4 to the existing line of the A303 than that proposed in the published scheme.
- 7.5.75 In other written representations, English Heritage expresses concern about the impact of Alternative Route 4 on Old Sarum. The Environment Agency opposes the route on the basis of its potential adverse impact on ground water, the wetland ecology, loss of trees and species rich hedgerows and archaeological interest. English Nature also has significant concerns about the potential impact of the route on designated sites and on wider biodiversity issues.

## **7.6 Alternative Route 5 – The Salisbury Green Party**

7.6.1 Salisbury Green Party is a reluctant advocate of Alternative Route 5. It was agreed that the Green Party would be the formal “promoter” of this Alternative purely to ensure that the Alternative was put before the inquiries. The Green Party sees it as the one viable road building option which would satisfy the heritage objectives and avoid further unacceptable damage to the landscape of the WHS.

### ***Description of Alternative Route 5***

7.6.2 The scheme would provide a 4.5km tunnel as an alternative to the 2.1km tunnel of the published scheme. At Stonehenge Bottom and at Longbarrow Crossroads, the route would be slightly to the south of the line of the published route. The western portal of Alternative Route 5 would be to the west of the existing Longbarrow Crossroads junction with the A360, and its eastern portal to the east of The Avenue. Whilst it would share the same Winterbourne Stoke Bypass as the published scheme, Alternative Route 5 would need a different location for its junction with the A360, with a grade separated junction, some 750m to the west of the existing Longbarrow Crossroads providing a link back to the present roundabout (which perhaps could be reduced in size).

7.6.3 As with the published scheme, a new byway would be created through the WHS, connecting Longbarrow Crossroads and Stonehenge Road. This would follow the line of the existing A303, providing a route for non tunnel users. The A344 would be stopped up to the south east of Stonehenge, and a footpath would be created on the line of the former A344.

7.6.4 For the published scheme, Stonehenge Road would provide emergency access to the eastern tunnel portal, and would be a key part of the tunnel safety strategy. For Alternative Route 5, the emergency access route would be via the agricultural access track running along the foot of Vespasian’s Camp. That track would need to be upgraded. It would need to be strengthened, widened to allow two vehicles to pass, surfaced and have steep gradients removed.

### ***Justification of Alternative Route 5***

7.6.5 An on line tunnel under the entire length of the WHS was not considered by the 1995 Planning Conference, because the Highways Agency stated at that time that an on line tunnel passing beneath Stonehenge Bottom was not a practical proposition. Instead, the longer tunnel proposal put forward by English Heritage and the National Trust at that time proposed a northerly alignment, tunnelling under the WHS from a point east of The Avenue to a junction on the A360 near Airman’s Corner.

7.6.6 The position now taken by the Highways Agency is that on line tunnelling beneath Stonehenge Bottom has been found to be feasible, and Alternative Route 5 therefore follows the line of the 4.5km tunnel option described and assessed in the Longer Tunnels Scheme Assessment Report of December 2003 (Document HA/0/8). In effect, what is being

suggested is that each of the proposed tunnel portals should be moved to extend the length of the tunnel.

7.6.7 The benefits of moving the eastern portal to a point roughly in line with Vespasian's Camp include

- The ability to restore the route of The Avenue where it is presently severed by the A303.
- The ability to dispose of some tunnel spoil on site, by restoring the ground levels where the A303 cuts through the ridge north of Vespasian's Camp.
- Integrating Vespasian's Camp with the rest of the WHS landscape.
- Allowing a gentler gradient down to Stonehenge Bottom.
- Allowing more flexibility in the depth of the tunnel where it passes through Stonehenge Bottom, which might be important on hydrological grounds.
- Avoiding any need for tunnel works to be carried out on the surface within Stonehenge Bottom.
- Moving the eastern tunnel portal further out of sight of Stonehenge, thus reducing the risk of light pollution.

7.6.8 The benefits of moving the western tunnel portal to the west of the A360 include

- Compliance with resolutions 2 and 3 of the 1995 Planning Conference.
- Avoiding the damage to the landscape of the WHS which would be caused by a new surface route dual carriageway within the Stonehenge Bowl.
- Allowing a gentler gradient up from Stonehenge Bottom.
- Removing the need for a new roundabout on the A360, with the possibility of a reduction in size of the present roundabout.
- Avoiding the light pollution that would be caused by a grade separated dual roundabout junction at Longbarrow Crossroads.
- Allowing the route between Stonehenge Bottom and Longbarrow Crossroads to be shifted southwards, thus moving the tunnel further away from the Stonehenge monument, dispelling fears that the tunnel might cause damage to the monument.

7.6.9 Whilst the longer tunnel would remove the view of Stonehenge presently enjoyed by travellers, the same is true of the published scheme, as it would be of any scheme which successfully removed the road entirely

from the environs of Stonehenge.

- 7.6.10 The Government has already accepted in principle the case for tunnelling to protect the WHS, so the only question of cost which arises is whether the Government is prepared to finance a scheme that will offer proper protection to the WHS. The greater cost of the 4.5km tunnel provides no ground for arguing that the flawed and damaging shorter tunnel proposed as part of the published scheme should be accepted. The only acceptable alternative to the longer tunnel would be a Do Minimum option.
- 7.6.11 The delay to the project which would be caused by rejecting the Highways Agency scheme in favour of Alternative Route 5 should be seen as a benefit. The future of mass road transportation is by no means clear cut. Even leaving aside the major issues of resource consumption, atmospheric pollution and sustainability, there still remains the lesser issue of the design and operation of road vehicles which could greatly affect the safe design and operation of a tunnel. There is a growing trend towards vehicles with power units which either produce zero emissions at the point of use or which have hybrid engines with a capacity for zero emissions in sensitive areas. There would be clear benefits, in terms of ventilation, cleaning, pollution control and fire risk, if construction of a tunnel were delayed until such time, because its use could be restricted to zero emission vehicles. There is also the possibility that future vehicles would incorporate electronic guidance controls, which could enable a future tunnel to be operated safely as a single bore, single carriageway, making it commensurately more affordable.
- 7.6.12 The Longer Tunnels Assessment Report makes it clear that the 4.5km tunnel option performs better than the published scheme on all the major environmental assessments, and that it complies better with policies. It is better for the landscape; it is better in terms of its impact on scheduled monuments; and it is better for biodiversity. It is strongly supported in principle by a wide range of objectors to the published scheme.
- 7.6.13 It may be that, ultimately, the longer tunnel is deemed to be unaffordable, but, if so, then those questions of affordability and value for money are reasons for pursuing a non road building solution for Stonehenge; they cannot be used as justification for an inferior, but still immensely expensive, scheme, which would inflict lasting damage on the WHS landscape.
- 7.6.14 There are drawbacks to the longer tunnel scheme. These include the greater amount of waste which would need to be disposed of. But the environmental disbenefit from the treatment and disposal of waste would be temporary. It is not a reason for rejecting Alternative Route 5 in favour of the published scheme, which would cause lasting environmental damage.
- 7.6.15 Wiltshire County Council draws attention to some relatively minor disbenefits of Alternative Route 5 in highway terms. As the only possible justification for the scheme rests on heritage interests being more important than highway interests, however, those disbenefits, whilst real,



should not be grounds for withdrawing the longer tunnel from further consideration. As to the delay which consideration of a longer tunnel would cause, the published scheme would be delayed in any event, if the National Trust insists on the operation of Special Parliamentary Procedure in connection with the intended compulsory acquisition of their land. It is accepted, however, that Alternative Route 5 would still affect inalienable land of the National Trust. It is important to note that the County Council agrees that Alternative Route 5 has environmental benefits and complies with the relevant plans and policies.

- 7.6.16 Alternative Route 5 is viable; it meets the essential heritage objectives; it is better for the environment; and it overcomes most of the major objections to the published scheme which have been put before the inquiries. It is therefore a proper candidate for further consideration, and the published scheme should be rejected in favour of that course of action.

#### ***Support for Alternative Route 5***

- 7.6.17 Support for Alternative Route 5 came from a number of objectors to the published scheme who appeared at the inquiries. That group included ICOMOS UK, the Prehistoric Society, the CBA and the WANHS. The Alternative is also supported by the Parish Councils of Bishopstone, Little Cheverell and Durrington and by the Wilsford cum Lake Parish Meeting. There were 15 written representations of support for a longer tunnel contained in the original objections to the published scheme, and two further letters of support specifically for Alternative Route 5.

#### ***The response of the Highways Agency to Alternative Route 5***

- 7.6.18 A tunnel 4.5km long would require a smoke extraction system. Chimneys, positioned 250m to 300m from each of the tunnel portals, would be around 5m in diameter, and would protrude above ground level by between 2m and 5m. A 4.5km tunnel would also require approximately 24 additional cross passages compared with the published scheme, and would have an increased power requirement, needing at least five plant rooms, accessed from within the tunnel, compared with the three required for the published scheme. The energy usage and running costs of a 4.5km tunnel would be double those of a 2.1km tunnel.
- 7.6.19 Alternative Route 5 would be constructed using an Earth Pressure Balance Tunnel Boring Machine. The use of such a machine would be cheaper than the Sprayed Concrete Lining method for a tunnel of 4.5km, and this would optimise the construction period.
- 7.6.20 Tunnelling would excavate about 1,200,000 cu m of wet chalk (almost double the amount of the published scheme) which would have to be stored and treated. This would require an additional site compound at the western end of the tunnel of approximately 26ha.
- 7.6.21 Because the depth of ground cover near the proposed eastern tunnel portal would be less than that at which a tunnel boring machine could

operate, the first 90m of tunnel would have to be constructed using the cut and cover technique. There would therefore be a need for a further site compound located to the south of the A303, near Stonehenge Road, to service the cut and cover works. A length of temporary single carriageway diversion for A303 traffic would be needed to the north of the existing A303 to facilitate excavation for the tunnel portal and the cut and cover section. A haul route would also be required along this section, parallel to the temporary carriageway. At the Western Tunnel Portal, a length of temporary single carriageway diversion would be needed to the south of the existing A303 to facilitate the construction of the new A360 junction.

- 7.6.22 The cost estimate for Alternative Route 5 is £380m, compared with £192m for the published scheme. Tunnel operating costs for the 4.5km tunnel would be in the order of £2.5m per year, compared with £1.3m per year for the published scheme.
- 7.6.23 Alternative Route 5 would force some traffic moving between the A360 and the A303 to travel a further 1.5km, making routes on minor roads appear more attractive than using the A303 and A360 for some journeys. The movements most affected would be those from areas to the north and west of Shrewton, travelling to the Amesbury area, which would increase flows on the Packway and Countess Road North. There would also be a small transfer of Salisbury traffic from the A360 to the A345, and an increased traffic demand through Winterbourne Stoke. Some of these effects could be mitigated, in part, through traffic management measures, but, even with such measures in place, flows on local roads would be increased.
- 7.6.24 An economic analysis of Alternative Route 5 delivers a net present value with low traffic growth of minus £259.34m. With high traffic growth, the figure is minus £161.93m. For consistency with the assessments of other Alternative Routes, the assessment for Alternative Route 5 does not include the impact of traffic delays during construction or of any works and user costs arising during tunnel maintenance. For this reason, and because of the inclusion of tunnel operating costs, those figures are different from the figures presented in Table 5.2 of Document HA/0/8.
- 7.6.25 At double the capital cost of the published scheme, and with net present values in substantial minus figures, Alternative Route 5 would provide very poor value compared with the published scheme.
- 7.6.26 The maintenance demands of a longer tunnel would be more extensive than those of the published scheme. Alternative Route 5 would require two night time closures for each tunnel bore each month. Because the A360 junction proposed with Alternative Route 5 would be so close to the western tunnel portal, there would be a need to close the junction partially during maintenance, and to divert some of the A303 traffic on to the Packway. The close proximity of that junction to the western tunnel portal would also result in considerably more lane changing near and within the tunnel in normal operation than would be the case for the published scheme, which would increase driver stress, as would the greater length of the tunnel proposed in Alternative Route 5.

- 7.6.27 The lengthening of the proposed tunnel would result in greater benefits to the WHS than those provided by the published scheme. Alternative Route 5 would also provide greater compliance with Objective 11 of the WHS Management Plan, which seeks an improvement in the character of the wider WHS landscape through the removal or screening of existing inappropriate structures.
- 7.6.28 Of the 67 cultural heritage sites within the study area for the scheme, 50 would attract no further benefit from Alternative Route 5 than from the published scheme. However, five sites which would suffer a direct adverse effect from the published scheme would no longer be affected by Alternative Route 5. Three of these sites (23, 30 & 38), all small parts of buried ditches, are assessed as important. Site 48 comprises remains of minor importance in Stonehenge Bottom, and Site 66 covers the potential for discovery of pits of moderate importance on King Barrow Ridge. Although the repositioning of the western tunnel portal to the west of the A360 would remove direct effects from the land within the WHS on its western side, archaeological remains identified to the south of Longbarrow Crossroads (pits at Site 17 and a field system at Site 19) extend on both sides of the A360. The portal position for Alternative Route 5 would, therefore, also have a direct effect upon these sites, albeit the area of impact would be reduced from that with the published scheme. Similarly, the revised position of the junction of the A360 would also impact upon buried remains in that area (Sites 9 and 16). There would be an additional risk to as yet undiscovered archaeological remains in this area from the fact that trial trenching has been not been carried out throughout the area of direct impact of the revised junction, nor any survey for the additional construction compound.
- 7.6.29 Alternative Route 5 would reduce the risk of discovery of as yet undetected archaeological resource within the western part of the WHS, though some disturbance would be necessary at the smoke extraction shafts, which could be within the WHS. However, with the exception of the buried pits and gulleys (Sites 17 and 19) immediately south of Winterbourne Stoke long barrow, the possibility of burials close to a flattened barrow (Site 37), and part of the buried ditch (Site 38) at the western tunnel portal, no archaeological remains have been found in the 1.5km between the A360 and the long barrow (Site 41) north of Normanton Gorse. The 4.5km tunnel would therefore bring little demonstrable benefit to buried archaeological remains over the published scheme in the western part of the WHS.
- 7.6.30 Twelve sites would receive additional benefits as compared with the published scheme as a result of reduced indirect effects.
- 7.6.31 Alternative Route 5 would remove most motorised traffic from the western part of the WHS. This could benefit visitors to the WHS in the future, if patterns of agriculture and land use were to permit wider public access.
- 7.6.32 Alternative Route 5 would also bring cultural heritage benefits to the very important Winterbourne Stoke Barrow Group (Sites 26 and 26A) and to

other features to their south (Sites 32 and 38A) as a result of improvements in visual and noise effects as well as effects on their context. Similarly, the removal of the western tunnel portal from the WHS would bring beneficial effects to the settings of the very important barrows on the rim of the MILS (Sites 39, 41 and 42) and further afield (Sites 44, 45 and 46).

- 7.6.33 Moving the eastern tunnel portal 600m to the east would bring few benefits. The repositioning would potentially result in the preservation of buried remains (at Site 66, scattered pits) considered to be of moderate importance, and a slight improvement to the setting of a single extant round barrow (Site 69). However it would also increase the risk of damage to as yet undiscovered remains close to the barrows because of the proximity of the revised portal location and the necessary construction of haul roads.
- 7.6.34 With regard to The Avenue, any buried remains which may once have existed there were largely destroyed between the highway fence lines by the construction of the existing A303, so the removal of the road would not restore the monument or its integrity. As The Avenue is not a visible feature in the landscape east of King Barrow Ridge, its setting would not be improved. Improvements to the track to the west of Vespasian's Camp (Site 71) would result in a significant adverse indirect visual effect upon the setting of the monument, and exacerbate the adverse visual effects already created by the relocated portal and control building.
- 7.6.35 The shifted western tunnel portal would result in a moderate adverse landscape effect to the west of Longbarrow Crossroads. East of the tunnel portal, there would be a moderate beneficial landscape effect at Longbarrow Crossroads and between Longbarrow Crossroads and Stonehenge Down. The landscape between Longbarrow Crossroads and Stonehenge Down is, however, relatively ordinary. Thus, although Alternative Route 5 would add 1.8km to the published scheme tunnel in a westerly direction, the benefits would not be nearly as significant as those of the published scheme in the Stonehenge MILS.
- 7.6.36 The shifted eastern tunnel portal would result in a moderate beneficial landscape effect at King Barrow Ridge. East of the ridge, there would be a minor beneficial landscape effect between King Barrow Ridge and Vespasian's Camp. During construction, the effects of Alternative Route 5 would be considerably worse than the effects of the published scheme, but these temporary effects weigh less heavily than permanent effects.
- 7.6.37 As regards nature conservation and biodiversity, the conversion of more of the WHS to chalk grassland, and the removal of the A303 in the western part of the WHS, could increase the significance of benefits for barn owls and other breeding birds in the WHS, though off site enhancements would make this improvement of little consequence. The impacts of Alternative Route 5 on ecological resources during the construction phase would be broadly similar to those in the published scheme, although they would extend for a longer period.
- 7.6.38 Because of its greater depth and length, the 4.5 km tunnel with

Alternative Route 5 would encounter ground water over a longer distance than the published scheme. As the alignment of the tunnel would be significantly lower through Stonehenge Bottom than that of the published scheme, it is likely that there would be sufficient residual permeability above the tunnel to allow current ground water flow to continue unhindered. Consequently, cross tunnel drainage as proposed for the published scheme would not be necessary, and Alternative Route 5 would in this respect have the same neutral impact as the published scheme.

- 7.6.39 Alternative Route 5 would also provide noise benefits on two rights of way, at two barrow groups and at sixteen residential properties. On the other hand, the need for tunnel maintenance operations with Alternative Route 5 requiring the diversion of traffic overnight through Larkhill and along Countess Road North would have an adverse noise impact on residents along those roads.
- 7.6.40 Alternative Route 5 would require the permanent loss to agriculture of 42.3ha of land, some 8ha less than the published scheme.
- 7.6.41 The construction period for Alternative Route 5 is estimated at 60 months, in comparison with the 42 months programme for the published scheme. Much of the spoil extracted from the tunnel in Alternative Route 5 would require treatment before its removal to tip after being cut by a boring machine. On the other hand, the excavated material from the published scheme tunnel removed by mechanical extractor would be largely reusable without treatment. If all the additional chalk over and above that produced by the published scheme had to be removed to tip off site, this would generate perhaps an additional 150,000 trips by heavy goods vehicles compared with those generated by the published scheme. This would be necessary if arrangements could not be made with landowners adjacent to the scheme for disposal of the additional spoil in the immediate area.
- 7.6.42 Alternative Route 5 would achieve greater compliance with the relevant planning and policy guidance, from national through to local level, than the published scheme. This would arise primarily because of the additional heritage benefits which would be secured for the WHS by the longer length of tunnel. In overall terms, however, the environmental benefits accrued by Alternative Route 5 over and above the published scheme would be relatively modest, and the additional costs would be very substantial. Alternative Route 5 would require the publication of revised draft Orders and a new Environmental Statement. It is estimated that it would delay the earliest opening date of the scheme from August 2008 to mid 2013.

### ***Objections to Alternative Route 5***

- 7.6.43 Wiltshire County Council makes the point that even the 2.1km tunnel proposal required a special arrangement by the Treasury to provide £70m from heritage sources to assist in meeting the cost of its construction. That contribution is far less than the additional costs which the 2.1km tunnel would generate, but the contribution is apparently capped at that figure. Alternative Route 5 is therefore put forward on the

basis that the scheme is unfinanced, and likely to remain so, to the extent of £188m. Thus, even if the 4.5km alternative was attainable, there would be further pre construction delay caused by financing difficulties, further environmental assessment and consultation and a further public inquiry. Even if construction were able to start on a 4.5km tunnel, it would take 5 years to complete, as compared with the 3.5 years estimated for the 2.1km tunnel. During that time, road safety and environmental benefits would be lost, and congestion problems would continue.

- 7.6.44 A total of 17 written objections to Alternative Route 5 was received. Those representations included objections from the MOD and from the Parish Councils of Woodford and Idmiston.
- 7.6.45 Wiltshire Fire Brigade considers that the longer tunnel would significantly increase response times for emergency vehicles to Shrewton and the surrounding areas, to Winterbourne Stoke and to Berwick St James, partly because of the increased distance to be travelled, and partly because of the reduced speed which would be achieved within the tunnel. A much longer tunnel would result in increased potential for incidents within the tunnel, and an increased scale of any incident which might occur because of the increased response times. Much the same points are made by Wiltshire Constabulary.

## **7.7 Alternative Route 7 – Mr H J Case**

- 7.7.1 Mr H J Case is an individual objector. His letter of objection to the published scheme dated 3 September 2003 argues for a longer tunnel, similar to that proposed in Alternative Route 5. On 17 December 2003, however, he also submitted a southern Alternative Route for consideration at the inquiries. His subsequent letter of 21 January 2004 makes it clear that he regards a longer tunnel as preferable to the published scheme, but that he considers his proposal, Alternative Route 7, to be preferable to either of the tunnel schemes.
- 7.7.2 Mr Case was not able to attend the inquiries to put forward the arguments for his Alternative Route, but the route was nevertheless advertised and considered at the inquiries, with a full response from the Highways Agency.

### ***Description of Alternative Route 7***

- 7.7.3 Alternative Route 7 is similar to Alternative Route 4, in that it seeks to provide a Stonehenge bypass for the A303 outside the WHS and a Salisbury bypass by way of an additional link road to the east of the City, connecting the A36 to the A303. The Stonehenge bypass would carry A303 traffic from the A36/A303 interchange at Deptford in the west, passing south of the WHS boundary, before rejoining the A303 in the east at Beacon Hill. The eastern link from a new A303/A345 interchange would connect with the A36 at Petersfinger, to complete an eastern bypass for Salisbury.
- 7.7.4 Like Alternative Route 2, this route would extend the dualling of the A36

from east of its junction with the A303, and it would require substantial modification of the existing A303/A36 interchange at Deptford. A new 1.5km section of dual carriageway would be required to connect the western part of the A36 to the upgraded A303 dual carriageway to the east. This would affect existing attractive listed farm properties close to the existing interchange. Additional roundabouts, link roads and three new bridges would be needed to complete the interchange. The existing length of the A303 towards Winterbourne Stoke and Longbarrow Crossroads would be downgraded to a minor road and single carriageway.

- 7.7.5 The existing A36 would be upgraded to dual carriageway standard, bypassing Steeple Langford and East Clyffe to the north, with a new grade separated junction to provide access to the Langford villages. The proposed route would directly affect either the farm buildings at Southington Farm or the River Wylfe in order to accommodate the dual carriageway.
- 7.7.6 The new road alignment would leave the A36 just west of Stapleford to pass south of the village, crossing the River Wylfe valley on a 700m viaduct between 4.5m and 10m high. A grade separated junction with the A36 would be formed south east of Stapleford. After climbing the valley side in a south easterly direction to cross the A360 at a grade separated junction of dumb bell layout, the route would then drop downhill to cross the River Avon between the villages of Little Durnford and Lower Woodford on a viaduct 300m long and about 7m high.
- 7.7.7 On the east side of the new crossing, the route would pass through a cutting up to 20m deep through the ridge of high land known as Little Durnford Hill. It would then bear north east, to form a large grade separated junction with the A345, allowing for a new dual carriageway link to the east of Salisbury, to link with the A36 to the south east.
- 7.7.8 The Alternative Route would proceed in a north easterly direction, skirting the southern edge of Boscombe Down Airfield, and turning north to join the existing A303 at a new grade separated junction south east of Bulford Camp. Alternative Route 7 would be 24km long, including the existing A36 improvements. As a dual carriageway bypass throughout, it would allow the closure of the A344 past Stonehenge and the A303 between Longbarrow Crossroads and Stonehenge. Between Countess Roundabout and Stonehenge, the A303 would be retained as a single carriageway, and kept open for access.
- 7.7.9 The proposed Eastern Link would be a 7.3km two lane dual carriageway. From its junction with the A303, this link would move south east to a junction with Portway, a local road, in the form of an at grade roundabout with four arms. It would then cross the River Bourne on a low 350m viaduct, before crossing over the London to Penzance Railway and the A338 just north of Broken Cross bridge. There would be a new junction with the A30 approximately 300m east of the existing A30/A338 junction, and this would take the form of an at grade roundabout. The route would then head in a southerly direction, passing between the high ground of Cockey Down and Laverstock Down in the east and the

residential areas of Laverstock and Milford in the west. The route would pass beneath the Southampton to Bristol Railway at the location of an existing railway bridge, and would form a new junction with the A36 at Petersfinger. The existing A36 would be realigned over a length of 800m east of this point, and alterations would be made to the existing local road network to allow adequate access to property in this area. Several new retaining walls would be required to support the railway and the A36 in this vicinity.

### ***Justification of Alternative Route 7***

- 7.7.10 At its eastern end, Alternative Route 7 shares the line of Alternative Route 4 between the tie in to the existing A303 south of Bulford Camp and Downbarn West, to the west of Porton. It crosses the River Avon at Little Durnford, however, in order to maintain a greater separation from Old Sarum than Alternative Route 4. The Eastern Link to the A36 proposed in Alternative Route 7 would also be at a significantly greater distance from Old Sarum than that proposed in Alternative Route 4.
- 7.7.11 West of the Avon crossing, Alternative Route 7 is designed to follow the existing A36 corridor so far as possible, in order to avoid excessive intrusion into open downland. Although Alternative Route 7 would have an impact on sensitive landscapes, this would be much less than the impact of other off route alternatives.
- 7.7.12 Alternative Route 7 would provide relief routes for Amesbury and Salisbury, as well as a bypass for villages along the A36, at the same time as removing the intrusion of traffic from Stonehenge.

### ***Support for Alternative Route 7***

- 7.7.13 Despite the fact that it was advertised, no representation was received in support of Alternative Route 7.

### ***The response of the Highways Agency to Alternative Route 7***

- 7.7.14 No less than 22km of the 24km of new road required to provide the A303 realignment section of Alternative Route 7 would run across open countryside. The remaining 2km would be the on line widening of the A36. In addition to the further 7.3km of new road required to produce the Eastern Link, approximately 17km of the existing A303 would need to remain open to serve as local access from Wylde to Longbarrow Crossroads and from Stonehenge Bottom to Beacon Hill.
- 7.7.15 While there would be no need for a tunnel on Alternative Route 7, there would be a considerable number of other structures, including three viaduct crossings of rivers and two railway bridges.
- 7.7.16 The predominant use of the A303 is by long distance trunk road traffic with origins and destinations outside the immediate study area. All this traffic would be required to follow a detour of around 4km with Alternative Route 7 as compared with the published scheme. This would bring significant disbenefits in economic terms as a result of additional



time and operating costs as well as additional predicted accident costs.

- 7.7.17 Predicted traffic flows on Alternative Route 7 with high growth would range from 40,000 AADT in 2023 between the A345 junction and the eastern tie in with the A303, and 44,300 where the route merges with the A36 between Wylve and Stapleford. This compares with a maximum flow of 52,400 with the published scheme. A substantial volume of traffic that would be accommodated on the published scheme, would therefore find its way on to other local routes rather than using Alternative Route 7 and its diversion to the south. The Alternative would provide a much longer route for the principal long distance traffic that it seeks to serve, and it would also provide poorly for local traffic movements.
- 7.7.18 Alternative Route 7 would, however, result in a substantial reduction in traffic (up to 69%) on the A36 in the Wylve Valley, and it would also result in a substantial reduction in traffic (between 50% and 70%) on the A338 in the Bourne Valley. In Salisbury, parts of the A36 Churchill Way would also experience a reduction in traffic varying between 16% and 29%.
- 7.7.19 Alternative Route 7 is estimated to cost £167.3m (construction) plus £20.3m (land), as compared with the cost of the published scheme – £192m (construction) plus £5m (land). The economic assessment produces positive net present value figures for Alternative Route 7 of £87m with low traffic growth and £148m with high traffic growth. In comparison with the published scheme, therefore, Alternative Route 7 would provide good value for money. Almost all the benefits are derived, however, from the Salisbury Eastern Link. If that link were to be omitted, the net present value for the A303 realignment element of Alternative Route 7 would be in the region of minus £370m. Given that the Eastern Link would fall to be constructed by Wiltshire County Council, who are counter objectors to Alternative Route 7, this is a highly relevant factor.
- 7.7.20 Alternative Route 7 would substantially remove motorised traffic from the A303 and the A344 within the WHS, except for access traffic between Countess Roundabout and Stonehenge Bottom.
- 7.7.21 It would avoid disturbance to archaeological remains within the WHS, but, with its 31km crossing of mainly open countryside, it would be proportionately more damaging to archaeology than the 5km length of new and improved road proposed as part of the published scheme. Alternative Route 7 would adversely affect 78 known archaeological sites compared with the 21 which would be affected by the published scheme. There would be a direct effect on 32 sites (including partial destruction of the Scheduled Monument at Beacon Hill).
- 7.7.22 Alternative Route 7 would benefit the Conservation Areas in Cholderton, Boscombe, Winterbourne Earls and Winterbourne Gunner by the removal of a proportion of through traffic on the A338, but it could have an adverse visual effect on five Conservation Areas which lie along the A36 at Wylve, Steeple Langford, Hanging Langford, Stapleford and Great Wishford. Increased traffic flows could adversely affect a sixth

Conservation Area in Bulford. Alternative Route 7 would also have an adverse impact on the water meadows which are included within the Conservation Area of Lower Woodford. Three Grade I, two Grade II\* and 25 other listed buildings and structures spread throughout the villages close to the route would be adversely affected by Alternative Route 7.

- 7.7.23 The scale of impact of this Alternative Route is such that, even when balanced against the significant additional positive benefits which it would deliver within the western part of the WHS, the overall effect of the Route on cultural heritage assets is a major adverse one.
- 7.7.24 The overall landscape assessment for Alternative Route 7 is minor adverse, in comparison with the moderate beneficial assessment for the published scheme. The landscape assessment of Alternative Route 7 takes into account the significant adverse impacts which the 31km new route would have on largely unspoilt countryside. This is particularly severe on locations such as the Cranborne Chase and West Wiltshire Downs AONB in the Wylve Valley and across the Woodford Valley.
- 7.7.25 As regards nature conservation and biodiversity, the proposed crossings of the River Avon System cSAC would be of concern. The two crossings of the River Wylve, the routing of the road immediately adjacent to the River for over 500m, the proximity of the route to the end of the River Till, the crossing of the River Avon and a side channel (also part of the cSAC) south of Lower Woodford, and the crossing of the River Bourne in one of its most undisturbed areas south of Winterbourne Earls, would all result in an increased number of risks to the cSAC during construction, and perhaps in operation, compared with the published scheme. English Nature has expressed concern over such multiple crossings of the cSAC in terms of the combination of risks to the qualifying interests of the cSAC.
- 7.7.26 The crossing of the Lower Woodford Water Meadows SSSI/SNCI and the crossing of the Steeple Langford Down SSSI/SNCI would result in direct habitat loss, damage from road spray, fragmentation and increased light, noise and motion disturbance.
- 7.7.27 With over 120 necessary new field boundary crossings, many through substantial woody vegetation, Alternative Route 7 would almost certainly cross a number of important flight corridors. The effects of the route on badgers could also be very extensive. The route would have adverse impacts on existing stone curlew nesting areas and on the ecological potential of large areas identified by the Royal Society for the Protection of Birds as target areas for stone curlew recolonisation.
- 7.7.28 Alternative Route 7 would cross three rivers, in each case on a viaduct completely spanning the flood plain. There would be a small potential for flood risk upstream of these crossings. There would also be a risk of contamination of the rivers during construction of the viaduct crossings. The Alternative Route crosses Source Protection Zones ("SPZs") designated by the Environment Agency to protect ground water abstractions for public water supply in the Salisbury area. In total, the route crosses 4.6km of SPZ I and 4km of SPZ II. Drainage for Alternative Route 7 where it crosses these SPZs would be problematic.

The Environment Agency is unlikely to agree to DTAs, as planned for the published scheme. An alternative more expensive system for drainage would be needed, possibly involving a greater degree of treatment or pumping to a discharge point outside the SPZs.

- 7.7.29 By closing the A303 and the A344 at Stonehenge, Alternative Route 7 would secure significant reductions in noise levels of 20dB or more, and would do much to restore a peaceful and quiet setting to the Stones. Within the outer areas of the WHS, Alternative Route 7 would provide greater reductions in noise than the published scheme between the west portal and Longbarrow Crossroads and between the east portal and Countess Roundabout. The route would also deliver a minimal to moderate reduction in noise (2dB to 7dB) for a relatively large number of properties in Salisbury close to the A36, in Amesbury close to the existing A303, and bordering the A36 and the A338 in the Wylve and Bourne Valleys. On the other hand, a small number of properties in rural locations along the line of the route would experience a moderate to major (9dB to 17dB) increase in noise, and a number of properties in Larkhill close to the Packway, in Durrington close to the A3028, and at Countess Road North, Amesbury would experience a minimal to moderate (2dB to 7dB) rise in noise as a result of traffic reassignment.
- 7.7.30 For greenhouse gases, Alternative Route 7 would increase carbon dioxide emissions by about three times as much as the published scheme (12% compared with 4% in 2008). This would be a result of the longer distance that vehicles would need to travel with Alternative Route 7 both on the A303 and on local roads.
- 7.7.31 Alternative Route 7 would provide some relief from existing severance in Winterbourne Stoke and the villages along the A36 in the Wylve Valley and along the A338 in the Bourne Valley. New severance would, however, occur in Stapleford and Great Wishford and, as a result of the removal of the existing A303 between Amesbury and Winterbourne Stoke and Shrewton creating additional traffic flows on local roads to the north of the A303, in Larkhill, Durrington and Bulford.
- 7.7.32 Alternative Route 7 would share with the published scheme the loss of views of Stonehenge, although there would be pleasant views for drivers throughout most of the route.
- 7.7.33 The Alternative would result in the loss of more than 160ha of agricultural land, the majority of which would be higher quality land in Grade 2 and Grade 3a. This is three times as much as the agricultural land which would be lost to the published scheme. Alternative Route 7 would also result in the demolition of two properties and two farm buildings at Southington Farm, west of Serrington, and a further two properties at the end of the reserve runway at Boscombe Down Airfield. An agricultural building would also need to be demolished at Petersfinger. The modifications of the A303/A36 interchange at Wylve could necessitate the demolition of buildings, some of which are listed, at Deptford Farm.
- 7.7.34 The Eastern Link would pass directly through a site at Petersfinger which

is allocated by Policy TR8 (ii) of the Salisbury District Local Plan for the development of a park and ride site. Alternative Route 7 would also require the acquisition of part of a playing field at the school in Laverstock.

7.7.35 During construction, Alternative Route 7 would have a limited effect on A303 traffic flows. There would be some disruption during construction of the various junctions and at the tie ins, and there would be considerable disruption caused to both the Bristol to Southampton and the London to Penzance railway lines, both of which would need to be closed for a time.

7.7.36 With an existing section of A303 remaining in the Stonehenge WHS, Alternative Route 7 would be less compliant with the aims and objectives of the WHS Management Plan than the published scheme. As regards the Eastern Link element of Alternative Route 7, there is no provision in the Wiltshire Structure Plan for an eastern, or indeed any, bypass of Salisbury. The construction of an Eastern Link would put pressure on the land between the eastern limit of Salisbury and the new road to be developed, thereby potentially expanding the existing City limits. In addition, the building of a new road through relatively unspoilt and tranquil countryside would be in conflict with policies relating to cultural heritage, landscape, visual impact, ecology, water, agriculture and land use in the Development Plan for the area.

### ***Objections to Alternative Route 7***

7.7.37 Save Bourne Valley indicated their objection to Alternative Route 7 during their appearance at the inquiries. In addition, nine written objections to the Alternative were received. They included objections from Wiltshire County Council, the MOD and the Parish Councils of Stapleford and Idmiston. The objections covered issues raised in the response of the Highways Agency to the Alternative Route proposals. Wiltshire Constabulary and Wiltshire Fire Brigade consider that the Alternative Route would adversely affect emergency response times to Winterbourne Stoke, Berwick St James and Shrewton. The Fire Brigade expresses particular concern also about the adverse impact of Alternative Route 7 on access to Porton Down, Allington and Newton Toney.

## **7.8 Alternative Route 8 – Dr J R Moon and Mrs J Moon**

### ***Description of Alternative Route 8***

7.8.1 Alternative Route 8 would follow the same line as the published scheme. It would have its eastern tunnel portal in the same location as that proposed for Alternative Route 5. At the western end of the tunnel, however, the tunnel would return to the surface approximately 250m west of Longbarrow Crossroads. No junction would be provided with the A360, which would be maintained as a north-south route across the roof of the tunnel. The existing roundabout at Longbarrow Crossroads, together with its street lighting, would be removed. The existing A303 would be stopped up to the east of Winterbourne Stoke, just east of the access to Hill Farm Cottages. A new compact, grade separated junction

between the B3083 and the Winterbourne Stoke Bypass element of the A303, to the north of the village, would provide access to Winterbourne Stoke and Shrewton.

### ***Justification of Alternative Route 8***

- 7.8.2 The Highways Agency has spent the last twenty years enhancing the A303 to either side of the WHS. Not surprisingly, the remaining single carriageway section which the published scheme seeks to improve creates at present a blockage on the route. If the A303 is not to be closed, a tunnel is necessary. The published scheme would have an adverse impact on the WHS. A longer tunnel is required to avoid that adverse impact.
- 7.8.3 The principal argument against the longer tunnel proposed in Alternative Route 5 is that of cost. In other European countries, notably in Switzerland, bored tunnels longer than 2.1km are being built through less sensitive landscapes than that of Stonehenge. An example is the fairly recent E27 autoroute in northern Switzerland between Delémont and Porrentruy. This includes two 3.2km tunnels joined by a viaduct within an 8km stretch through the Jura foothills. Cost is therefore not regarded as an argument against a longer tunnel in that much less protected environment.
- 7.8.4 If cost is regarded as a substantial argument against a longer tunnel for Stonehenge, however, Alternative Route 8 would save some of the price of the published scheme proposals (let alone the projected cost of Alternative Route 5) by omitting the interchange between the A303 and the A360 in the area of Longbarrow Crossroads. There is no real need for such an interchange, and its omission from the scheme would considerably improve the setting of the features at Longbarrow, would remove traffic noise from a much wider area of the WHS, and would help fulfil the UK's commitments to conserve the outstanding cultural heritage assets of the WHS and improve their setting.

### ***Support for Alternative Route 8***

- 7.8.5 Despite being advertised, no representation in support of Alternative Route 8 was received.

### ***The response of the Highways Agency to Alternative Route 8***

- 7.8.6 The major potential effect of Alternative Route 8 would be the rerouting of traffic from the A360 on to the B3083, resulting in an increase on the B3083 from 700 vehicles per day to 9,400 vehicles per day. Actual flows would be lower than 9,400 vehicles per day because the road is simply not capable of achieving such capacity, but the B3083 would still carry considerably higher flows than it currently does. The existing road is not suitable for carrying significantly increased volumes of traffic, nor is it a viable route for HGVs.
- 7.8.7 Some of the traffic originating from the A360/B390 at Shrewton would divert to the B3086/Packway/A345. Demand flows on the Packway

would increase by approximately 25%. In fact, the limitations on the capacity of the B3083 referred to above would mean that more traffic would be likely to use the Packway route to Amesbury and the A303 to the east, substantially increasing the amount of traffic through Larkhill. This would present significant safety issues and possible congestion at peak times through this speed restricted residential area.

- 7.8.8 With regard to the proposed A303/B3083 junction, as a matter of principle the Highways Agency would have significant concerns about the provision of a junction between a main dual carriageway trunk road and a minor road of the existing standard of the B3083. This is especially the case where such a junction would be effectively substituting for a junction with an A class road. The Highways Agency would not seek to promote a junction between the improved A303 and the B3083.
- 7.8.9 Wiltshire Constabulary has concerns regarding the temporary diversion of traffic in the event of any incident affecting the A303. Because the A360 junction would not be available, other routes would need to be considered, but the Police regard the alternatives available as totally unacceptable, particularly for large goods vehicles to negotiate safely.
- 7.8.10 Both Wiltshire Constabulary and Wiltshire Fire Brigade have also raised concerns about the response times for incidents on the A303 with the proposed removal by Alternative Route 8 of the junction with the A360.
- 7.8.11 The existing network of rural roads which links Winterbourne Stoke, Shrewton and Larkhill is unsuitable for the increased traffic flows that would result from Alternative Route 8. The Highways Agency could not promote a scheme with such operational consequences. The impact on the local road network and on local communities such as Shrewton and Larkhill could not be contemplated. The published scheme is designed to relieve the local community of Winterbourne Stoke, and it is not a tenable proposition for the Highways Agency to contemplate the promotion of an alternative which would have opposite consequences elsewhere.

### ***Objections to Alternative Route 8***

- 7.8.12 Six written objections were received to Alternative Route 8. They included objections from Wiltshire County Council, Idmiston Parish Council, Wiltshire Constabulary, Wiltshire Fire Brigade and the MOD. The only point raised in these objections which is not covered above is the argument that the additional chalk spoil which would fall to be disposed of from a longer tunnel would either have local disadvantages (if disposed of on agricultural land) or wider environmental disadvantages (if it needed to be transported away from the site).

## **7.9 Alternative Route 9 – Mrs J Robertson**

### ***Description of Alternative Route 9***

- 7.9.1 This proposal would widen the existing A303 to dual carriageway on a similar line and level to the existing trunk road, and would make use of

the existing carriageway wherever feasible. The main differences between this proposal and Alternative Route 1 are the layout of the junction at Longbarrow Crossroads and a proposal to include a museum beneath a new viaduct to the south east of Stonehenge.

- 7.9.2 A grade separated junction would be provided at Longbarrow Crossroads, with a large roundabout junction with the A360 at ground level, and the A303 passing overhead on an elevated structure approximately 150m long, 7m above ground level. The roundabout would connect the A360 north and south with sliproads to and from the A303, and it would provide a link back to Winterbourne Stoke.
- 7.9.3 To the east of Longbarrow Crossroads the proposed route would follow the line of the existing A303 at existing ground level, to pass through the pinch point between the long barrows and round barrows at Sites 41 and 42. Byway Amesbury 12 would pass beneath the dual carriageway in an underpass with a headroom of 4m. Immediately south of Stonehenge, the proposed road would rise on a 3m to 4m high embankment, and then be carried on a viaduct structure approximately 200m long. The viaduct would be located precisely to coincide with buried remains discovered in this area, and it would be used to accommodate a museum beneath its arches.
- 7.9.4 The westernmost arch of the viaduct would be of sufficient headroom for access to be provided between the Stonehenge triangle and a link to what is now Byway Amesbury 11, parallel to the south side of the new A303 road. The easternmost arch would provide emergency access from the westbound carriageway of the new A303, linking northwards to join a new byway on the line of the existing A344 to Stonehenge. The A344 would be closed east of the existing Stonehenge Visitor Centre, and Stonehenge Road would remain open as a link with Amesbury.
- 7.9.5 The proposed Alternative Route 9 road would cross Stonehenge Bottom on an embankment up to 7m high, to climb up to King Barrow Ridge. From The Avenue eastwards, this Alternative would be the same as the published scheme.

#### ***Justification of Alternative Route 9***

- 7.9.6 The cost of a tunnel is exorbitant and unnecessary. The A303 could be improved by creating a two lane dual carriageway (and one of the carriageways is already there) with flyovers at the Countess Roundabout and at Longbarrow Crossroads, and a bypass for Winterbourne Stoke.
- 7.9.7 Hundreds of tourists who pass Stonehenge when travelling from London to the West Country or from Southampton to Wales stop for a chance to view what is their monument. Millions more see Stonehenge from the road without stopping. They should not lose that view. Alternative Route 9 would retain it for them, while removing the blockage to traffic.
- 7.9.8 If the view of Stonehenge from the road is lost, tourists might well cease to stop at Stonehenge.

- 7.9.9 The dualling of this section of the A303 was halted around fifteen years ago because it affected inalienable land of the National Trust. It had been intended that the A303 would provide a major highway from London to the West Country. Instead, this part of it became a dangerous bottleneck. At the 1995 Planning Conference, it became clear that there was another reason why the improvement of the A303 had been stopped. The Conference was told by the Chief Archaeologist of English Heritage that the on line dualling of the route would destroy 22 archaeological sites, including six scheduled monuments (the Normanton Down Barrows). There were two unscheduled surface monuments, which are still there to either side of the existing A303, and 14 round barrows in a cluster to the south of Stonehenge, buried about 2m below the existing A303.
- 7.9.10 This cluster of 14 barrows should be identified, and the second lane of the A303 should be constructed on a flyover above the site. When the new piece of road is ready to be used, the two way traffic could be transferred to it. The original A303 could then be altered where necessary, to match the new road. Over the excavation, the central reservation of the dual carriageway could be comprised of glass panels to allow daylight to reach the exposed barrows below. Walls and windows could be built around the barrows to protect them. The enclosed area could then be opened as an "Excavation Museum", and the A303 dual carriageway could travel on top of it. At one end of this building would be a route for fire engines and emergency vehicles, while at the other end there would be a route for wheelchairs, bicycles etc. This would also provide an underpass for Byway 11.
- 7.9.11 At the 1995 Planning Conference, the CBA enunciated four principles governing work on an archaeological site. There should be minimum damage to archaeological remains; minimum impact on undeveloped land; minimal visual intrusion on monuments and the landscape; and maximum reversibility at the end of the road life. Each of these principles is respected by Alternative Route 9.
- 7.9.12 Alternative Route 9 would relieve the traffic jam in the area of Stonehenge. It would also allow the Visitor Centre at Stonehenge, together with its car park, to remain on the present site. That site is completely invisible from the Stonehenge monument. It is also a site which has already been investigated for archaeological remains. It is convenient for access to Stonehenge, particularly for people with access related disabilities. There would be outrage if the view of the Tower of London were to be blocked off, and people who wanted to visit it were told that they had to park 5km away and travel to the The Tower on a ferry. Something similar is now being proposed for Stonehenge. Alternative Route 9 would avoid it.

### ***Support for Alternative Route 9***

- 7.9.13 Following advertisement, one written representation of support for Alternative Route 9 was received. It suggests that this Alternative is the most practical of those suggested, and that hiding Stonehenge from the passing public would almost certainly be illegal.



***The response of the Highways Agency to Alternative Route 9***

- 7.9.14 Alternative Route 9 would require the construction of a new flyover for the A303 at Longbarrow Crossroads. The proposed seven arm roundabout would operate satisfactorily for the traffic flows that are envisaged, but there would be no operational advantage compared with the layout proposed for the published scheme.
- 7.9.15 The viaduct/museum to carry the A303 near Stonehenge would be an unusual structure, which would be visible from Stonehenge.
- 7.9.16 Alternative Route 9 would upgrade the A303 through the central and most sensitive part of the WHS, and would remain in sight of the Stones. This would be in direct conflict with the objectives of the WHS Management Plan, the over arching framework within which this "exceptional environmental scheme" is being developed. The Alternative would, in general terms, deal with only one part of the problem to be solved at Stonehenge, that is the transportation aspect. The environmental effects would in overall terms be much worse with Alternative Route 9 than with the published scheme. By not offering the opportunities presented by the published scheme in terms of landscape restoration, biodiversity improvements and open access opportunities in compliance with the Land Use Plan, Alternative Route 9 would fail in most respects in providing an acceptable solution in this environmentally sensitive location.
- 7.9.17 In terms of cultural heritage, Alternative Route 9 would have a major adverse overall effect through the core of the WHS, whereas the published scheme has been assessed as major beneficial. These effects would be in substantial contrast with the aims and objectives of the Stonehenge WHS Management Plan (Document DD65) and relevant policies for cultural heritage contained in PPG15, PPG16, Policies HE1 and HE5 of the Wiltshire County Structure Plan, and Policy CN24 of the Salisbury District Local Plan. As regards landscape, the removal of the tunnel and the placing of the road at ground level or above would prevent key landscape opportunities offered by the published scheme from being achieved within the Stonehenge MILS. These include the provision of views from Stonehenge and within the MILS of a landscape largely free from the visible impact of traffic and its associated noise, the expansion of areas of chalk grassland in the Stonehenge core, and the opportunity for open access to be provided without fear for the safety of walkers.
- 7.9.18 The published scheme would offer opportunities for beneficial effects with respect to nature conservation and biodiversity that Alternative Route 9 would deny. These improvements offered by the published scheme almost all arise from the provision of the tunnel, and the expansion of habitat in place of the road, without the intrusion of vehicle noise and pollution.
- 7.9.19 With regard to the effects on the users of rights of way, there would be significant improvements with the published scheme which would not be available with Alternative Route 9, because the Alternative would not

facilitate open access within the WHS.

- 7.9.20 The cost estimate for Alternative Route 9 is £74.4m. It would therefore be very significantly cheaper than the published scheme, and this is reflected in the economic analysis, which shows net present values of £98.27m with low traffic growth and £218.53m with high traffic growth. Alternative Route 9 would therefore represent very good value for money in comparison with the published scheme.
- 7.9.21 There would be a delay in the delivery of Alternative Route 9, however, because of the need for revised draft Orders, a new Environmental Statement and a further public inquiry. Given the opposition of the National Trust even to the published scheme, it could be envisaged that the Trust would invoke Special Parliamentary Procedure in relation to their inalienable land which would be affected by Alternative Route 9.
- 7.9.22 Overall, the Alternative fails to address the main environmental aspects that the published scheme has set out to achieve. It would not be in compliance with significant planning and development policies, and would not provide the benefits that the published scheme would secure.

### ***Objections to Alternative Route 9***

- 7.9.23 Wiltshire County Council objects to Alternative Route 9 on broadly similar grounds to those raised by the Highways Agency. An objection was received from the MOD. Wiltshire Constabulary advises that it would expect Police to have access to Stonehenge via the emergency access proposed in Alternative Route 9, but that measures would be necessary to ensure that vehicles of the general public did not block this access.

### **7.10 Mr P Lawrence**

- 7.10.1 Mr Lawrence is an individual objector to the published scheme. He is a retired Civil Servant, having been a Motorway Project Manager at the Department for Transport. His experience includes work on the M4, M5, M6 Relief Road, M25, M40 and M69. During the course of the inquiries, he submitted an alternative route. This was a southern alternative to the on line improvement of the A303. I considered that sufficient work had already been done on southern alternatives to allow this proposal to be realistically assessed. I therefore agreed to give consideration to it at the inquiries. The scheme was not advertised in the way that Alternative Routes 1 to 9 had been. No representation in relation to the Lawrence Alternative was therefore received, whether of support or of objection.

### ***Description of the Lawrence Alternative***

- 7.10.2 At the western end, the Lawrence Alternative would take the A303 along the line of an upgraded, dual carriageway A36 between Wylde and Steeple Langford. This would be likely to affect, either directly or indirectly, the nearby listed buildings and their setting at Deptford Farm.
- 7.10.3 The Lawrence Route would diverge from the existing A36 at Steeple Langford, requiring a grade separated junction, and head east to cross

the Till Valley on a 250m viaduct. Between the Rivers Till and Avon, the route would cross Stapleford Down, and run north of Boreland Hill. It would run to the north of Upper Woodford, before crossing the Avon Valley on a 300m long viaduct between Upper Woodford and Great Durnford.

- 7.10.4 East of the River Avon, the route would run parallel to the main runway of Boscombe Down Airfield on its east side, outside land in MOD ownership. The route would then pass under the secondary runway in a cut and cover tunnel about 400m long. It would continue north east, rising gently on a series of low embankments and shallow cuttings, to join the existing A303 at Beacon Hill, south east of Bulford Camp.
- 7.10.5 The Lawrence Alternative would involve the construction of 21.7km of new dual carriageway road, comprising 19.6km across open countryside, and 2.1km of on line widening of the A36. The Lawrence Alternative would remove the A303 from within the WHS, but approximately 15km of the existing A303 would need to be kept open for local access purposes.

***Justification of the Lawrence Alternative***

- 7.10.6 The published scheme fails to preserve a major National Trust site; it seriously scars a WHS; it unreasonably condemns travellers to a long tunnel; and it has a potential cost to the taxpayer which is scandalous.
- 7.10.7 Although originally the National Trust itself promoted the idea of a Stonehenge tunnel, that could only be achieved by vandalising the very ground the Trust is supposed to be protecting on behalf of the nation. In producing the published scheme, the Highways Agency is not offering a viable and practical scheme, because it can give the inquiries no guarantee that the land required would be available. If the National Trust invokes Special Parliamentary Procedure in relation to its inalienable land, the land might not be available. On that ground alone, the Orders should be rejected.
- 7.10.8 Apart from the need to modernise the A303, the principal driver of the published scheme is the improvement of the environment of the WHS. Yet the published scheme would gouge a massive cutting through the site.
- 7.10.9 A tunnel past Stonehenge would deprive travellers along the A303 of the sight of the Stones. It would also involve avoidable danger should any incident take place in the tunnel. Not every user would be able to walk up to 1km to an exit. Emergency vehicles would find it more difficult to access a tunnel than a site on an open road.
- 7.10.10 Yet there is no need to go to the trouble and expense of creating a tunnel. The diversionary route can achieve the desired aims at significantly less cost than that estimated for the published scheme. The A303 should be kept in the open. In 1994, the Royal Fine Arts Commission spoke strongly in favour of finding an answer that would "*provide a humane solution for the motorist which a long tunnel would not*".

- 7.10.11 There is no realistic route to the north of the A303 because of the amount of residential property and the use of land for military purposes. Any off line route must therefore run to the south of the A303.
- 7.10.12 The Lawrence Alternative would take such a line. It would provide a route which is capable of being built without undue delay. That route would not cross National Trust land. Nor would it enter or cross the WHS. The Lawrence Alternative would remove traffic from Winterbourne Stoke. It would reduce traffic at Countess Roundabout and thereby help Amesbury. It would allow closure of the A344 at Stonehenge.
- 7.10.13 The Lawrence Alternative would have minimal impact on existing properties, and would provide an attractive and scenic route. It would fit in well with the landscape, because it is much simpler to blend a new route into the countryside in undulating ground such as that which occurs south of the WHS.
- 7.10.14 The Lawrence Alternative could be achieved at considerably lower cost than the published route, even accepting the Highways Agency figure for the estimated cost of the Alternative of £128.5m.
- 7.10.15 The Lawrence Alternative would be straightforward to construct, with modest earthworks, and relatively few structures for a route of its length. Existing A303 traffic would not be delayed or seriously disrupted during construction.
- 7.10.16 It would not be possible to avoid the route having an impact on Great Durnford and the outskirts of Upper Woodford. This is one of the few residential locations on the route of the Lawrence Alternative. That section of the route would need to be designed with extra care and to be offered plenty of screening and landscaping. It is one of the consequences of putting a WHS label on a large area of land that pressure is placed on land just outside the boundary of that WHS to take development. This can be seen in the site chosen for the works compound for the published scheme and the apparent site chosen for the replacement visitor centre for Stonehenge.
- 7.10.17 The only intermediate interchanges envisaged for the Lawrence Alternative are at the crossings of the A345 and the A360. The removal of A303 traffic would reduce noise in Amesbury and at Winterbourne Stoke.
- 7.10.18 The Lawrence Alternative would also offer the opportunity of creating a link to the A36. From the junction of the route with the A345 to the east of Great Durnford, a new and apparently straightforward link for the A36 could be provided southwards to the existing and underused Bishopdown Roundabout on the A30 north east of Salisbury. The length of this extra link would be 5.5km. It is shown on Document PL/0/1. Although that is accepted as not being a matter before these inquiries, the point is made because such a relatively short, low cost link would bring much wanted relief along the Wylde Valley and through Wilton and Salisbury. It would also improve the connection which Salisbury has to London. These are

benefits which cannot be offered by the published scheme.

- 7.10.19 If the Lawrence Alternative were the published scheme, it is difficult to believe that the scheme put forward by the Highways Agency at an additional cost of £64m, making a huge and unnecessary cutting through a WHS, providing a poorer option for Amesbury and Winterbourne Stoke and being destructive of a major National Trust property would be preferred to it. That is a useful test to apply in considering whether the scheme put forward by the Highways Agency should be supported at these inquiries.

***The response of the Highways Agency to the Lawrence Alternative***

- 7.10.20 It is accepted that a tunnel such as that put forward in the published scheme would deprive travellers along the A303 of the sight of Stonehenge; but so would the Lawrence Alternative.
- 7.10.21 The cost of the Lawrence Alternative is estimated at £128.5m (construction) plus £13.7m (land). It would therefore be cheaper to construct than the published scheme, but would not provide as much benefit to traffic. This is reflected in the economic assessment. The Lawrence Alternative has a net present value of minus £59.22m with low traffic growth and a positive net present value of £10.32m with high traffic growth. This represents worse value for money than the published scheme, which offers a shorter route for the A303 and would better accommodate travel movements within the local road network. All of those figures ignore the possible link to the A36 shown in Document PL/0/1, which Mr Lawrence rightly accepts is not a matter before the inquiries.
- 7.10.22 The Lawrence Alternative would require significant alterations to the Deptford interchange. The intersection of the A303 with the A36 could not take place other than at a grade separated junction. Similarly, a junction to provide access to Steeple Langford would be required. Once the A36 and the A303 flows have been brought together, if that junction were omitted, then the A36 traffic would have to stay on the new route as it continued in an easterly direction. It would not be able to leave to gain access to the A36 down the Wylde Valley. None of the traffic with a destination in the Wylde villages or Wilton or on the west side of Salisbury would be able to access those destinations without a significant detour. The Highways Agency would not omit a junction for Steeple Langford, because it would not be reasonable to do so.
- 7.10.23 The viaduct crossings of the River Till and the River Avon would need to be substantial structures, providing clearance of the valleys and maintaining the hydrological regime. Unless those issues are properly addressed, together with the maintenance of wildlife corridors, the Environment Agency and English Nature would not be satisfied with the proposals. But, in addressing the concerns of those agencies, the degree of visual intrusion generated by the construction becomes difficult to mitigate, particularly in the areas concerned which comprise largely unspoilt countryside.

- 7.10.24 The Lawrence Alternative would have an adverse impact on the Cranborne Chase and West Wiltshire Downs AONB, because it would involve the creation of a significant length of new road across the AONB.
- 7.10.25 Despite avoiding the main runway at Boscombe Down, it would involve building a substantial tunnel beneath the secondary runway, which would have security implications at a military airfield.
- 7.10.26 Thus, while the Lawrence Alternative would take the A303 out of the WHS, and thereby bring major benefits for Stonehenge, it would do so at the expense of major adverse consequences elsewhere. Those adverse impacts would fall in particular on heritage, landscape and ecology.
- 7.10.27 Notwithstanding the additional benefits it would secure for the WHS in comparison with the published scheme, the Lawrence Alternative performs poorly against the published scheme in most aspects of its assessment.

## **7.11 Mr M and Mrs S Aubrey**

- 7.11.1 Mr and Mrs Aubrey submitted an alternative route during the inquiries. Their proposal amounted to an on line route with a longer tunnel than that included in the published scheme. I considered that sufficient work had already been done on on line tunnels to enable this alternative to be evaluated during the course of the inquiries. I therefore agreed to give consideration to it at the inquiries. The proposal was not advertised in the way the Alternative Routes 1 to 9 were advertised. No representation in relation to the Aubrey Alternative was therefore received, whether of support or of objection.

### ***Description of the Aubrey Alternative***

- 7.11.2 The Aubrey Alternative would replace, with a cut and cover tunnel, the section of open dual carriageway proposed in the published scheme from east of Longbarrow Crossroads to the western tunnel portal. That section of the published scheme is proposed to be mainly in cutting, with a depth of up to 14m.
- 7.11.3 The western portal for the Aubrey Alternative would be at Ch.6830, just east of where the east facing slip roads for Longbarrow Crossroads junction would tie in with the main carriageway. The eastern end of the cut and cover tunnel would connect directly to the published scheme's 2.1km bored tunnel at Ch.7900. The tunnel would thus be extended by approximately 1.1km, resulting in a tunnel of a total length of 3.2km. The gradient of the western end of the bored tunnel would be lowered to allow it to meet the eastern end of the cut and cover tunnel below existing ground level.
- 7.11.4 For the first 500m from the western portal, the cut and cover section of tunnel would be constructed in the form of a reinforced concrete box consisting of three cells. A box type structure would minimise the depth of construction and, more importantly, the width of excavation within the WHS. The cross section would combine both tunnel bores and a services

duct/escape passage in one box unit. The cut and cover tunnel would be covered with fill and topsoil to match previous ground level. The surface above the tunnel would be restored to grassland. The carriageway and footway widths within the tunnel would be the same as for the published scheme, and fans for ventilation purposes would be provided in the roof of the tunnel. In the event of an emergency, escape would be via a longitudinal escape passage between the bores. That would differ from the published scheme, where escape would be via cross passages to the opposing tunnel.

- 7.11.5 After the first 500m, the cross section would need to widen in order to match and tie in with the more widely spaced trafficked bores and services tunnel of the bored tunnel section.
- 7.11.6 The cut and cover section would follow closely the existing ground profile, resulting in a second low point and associated sump for drainage within the tunnel at approximately Ch.7200. This is necessary to avoid over deepening the cut and cover section on the approach to the bored tunnel.
- 7.11.7 At 3.2km in length, the tunnel would be beyond the 3km limit where some European countries (for example Germany and Switzerland) would consider a smoke extraction system necessary.
- 7.11.8 West of Ch.6190 and east of Ch.8190, the Aubrey Alternative would be identical to the published scheme. Between these chainages, the alignment would differ vertically to suit the proposed cut and cover tunnel. Between Ch.6280 and Ch.7480, the horizontal alignment would also differ to enable the proposed cut and cover tunnel to be constructed off the line of the existing A303.

### ***Justification of the Aubrey Alternative***

- 7.11.9 The need to improve the A303 and to provide a bypass for Winterbourne Stoke is fully accepted. The section of the published scheme between the western tunnel portal and Longbarrow Crossroads, however, includes a deep cutting in an attempt to hide the dual carriageway. This would cause continued, and indeed increased, severance between the areas of the WHS to the north and south of the A303. There would be long lasting visual effects on the surrounding ancient sites and landscape. The traffic noise would be disruptive to walkers and riders on the newly created by way along the de-trunked A303, directly adjacent to the proposed dual carriageway.
- 7.11.10 If the landscape west of the currently planned tunnel portal is to be severed to the degree set out in the published scheme, then any future restoration to grassland of the arable land to the south of the dual carriageway would lose its meaning as part of a restored landscape.
- 7.11.11 A 4.5km tunnel would provide the best option for dealing with the A303 in the area of Stonehenge assuming cost was no object. Mr and Mrs Aubrey believe, however, that the chances of achieving this are remote. Hence their suggested Alternative, which would provide for a different type of longer tunnel through the section from Longbarrow Crossroads to

- the tunnel planned as part of the published scheme.
- 7.11.12 The extra spoil created by the Aubrey Alternative could be utilised to provide the covering over the increased length of tunnel. There should therefore not be any large increase in spoil to be removed from the site.
- 7.11.13 The Alternative would not increase the footprint of the area affected by construction, and there should not therefore be any increased disruption to the landscape than that caused by the published scheme. There would still be an intrusion into the landscape of the WHS, particularly in the area south of the Longbarrow itself (Site 26a), but no more than would arise from the construction of the junction slip roads under the published scheme.
- 7.11.14 It is accepted that the area on the line above the tunnel would be disturbed archaeologically, but to no greater degree than it would be with the published scheme. Careful pre work excavation would bring to light any archaeology in the area that had not already been found by survey. Any finds would be recorded, preserved and carefully removed before construction of the tunnel began. Only one scheduled site would be close to the Aubrey Alternative. This is Site 37, a round barrow on the south side of the Alternative at Ch.7500. That would be equally close to the dual carriageway under the published scheme.
- 7.11.15 The Alternative would result in light from the western entrance of the tunnel and light from vehicles travelling along the open section of dual carriageway being moved further away from the core area around the Stonehenge monument.
- 7.11.16 Combining a bored tunnel method with cut and cover tunnelling is possible. There is an example of the system being used in work which is being carried out at present at the Dublin Port Tunnel.
- 7.11.17 Any extra financial investment required to deliver the Aubrey Alternative should be regarded as a long term investment for the people of Britain, but also as a demonstration to the whole world of how much this country cares for its heritage.
- 7.11.18 The Aubrey Alternative would remove the noise and sight of traffic from a substantial additional area of the WHS. Although the published scheme would involve a road in cutting from its western tunnel portal to Longbarrow Crossroads, it would not involve a cutting with a depth of 14m for the whole of that length of highway. In fact, for around half of that length, some 900m, the depth of the road cutting would be insufficient to hide a 4m high HGV from any view point equal in height to existing ground level.
- 7.11.19 With the published scheme, a walker on the proposed byway between Longbarrow Crossroads and the western tunnel portal would be subjected to the noise of the traffic on the adjoining dual carriageway (which the Highways Agency noise contours show to be within the 60dB to 65dB range in some places, and between 65dB and 70dB in others) for the whole of that distance. For a significant length of the route, the sight of



vehicles, particularly HGVs would also be unavoidable.

- 7.11.20 Having walked behind the western tunnel portal of the published scheme to barrows 41 and 42, a walker would catch the first view of the Stonehenge monument over the ridge crest ahead. That moment would be marred, however, by the still present background noise of traffic entering and leaving the tunnel close by. A walker looking back towards the Winterbourne Stoke barrows on the horizon would see the complete length of the cutting, with the traffic on the road visible for most of its extent.
- 7.11.21 In the area north of the Stonehenge monument, the National Trust and English Heritage have started to encourage more exploration of the landscape and the surrounding scheduled sites. If the area to the west of the Stonehenge monument were to be given the same treatment, with walkers being encouraged to use the new byway and the permissive National Trust footpaths, then the road and the cutting would be a serious hindrance to their appreciation of the landscape and the visible scheduled sites.
- 7.11.22 The lowest portion of the current road would be cut by the 100m contour line. This would also be true of the published scheme. The ground to the north of the road rises to a spot height of 121m. Whilst it may not be possible to see the traffic from the top of the hill because of the shape of the intervening ground, it would be possible to see the traffic from the 105m, 110m and 115m contours. With open access to this area, walkers would have a clear view of the lower ground to the south, including the traffic on the open section of the new road.
- 7.11.23 The round barrow at Site 39 and the long barrow at Site 41 near the western tunnel portal are on National Trust land. This National Trust area south of the A303 may also be opened up to the public, and, in the years ahead, the privately owned land to the south of the new dual carriageway may be bought by the National Trust and restored to grassland, with public access being allowed.
- 7.11.24 If the published scheme were to proceed, the traffic in much of the area of the cutting would be seen from much of the surrounding higher ground. The cutting itself would become a permanent feature of the landscape, with no prospect of being repaired. These disadvantages would be avoided by the Aubrey Alternative.
- 7.11.25 At the eastern end of the tunnel proposed as part of the published scheme, no change is made by the Aubrey Alternative. The proposed flyover at Countess Roundabout would bring much needed relief both to travellers on the A303 and to local traffic seeking to cross the trunk road. Whilst there would be an increase in noise and light, both of these would be small, and balanced by the benefits arising from the easier flow of traffic.
- 7.11.26 As regards the portion of The Avenue currently crossed by the existing dual carriageway, if the road were being built from new, The Avenue should be avoided, but that is not the case. There is no prospect of the

route of The Avenue being recreated as far as the River Avon, and the current road protects what remains of The Avenue.

- 7.11.27 The 4.5km tunnel would be the best solution for the A303 in the area of Stonehenge if it could be afforded, but the Aubrey Alternative would deliver many of its benefits at a significantly reduced cost.

***The response of the Highways Agency to the Aubrey Alternative***

- 7.11.28 The estimated cost for the Aubrey Alternative is £242m. This does not include the cost of a possible smoke extraction system. If such a system had to be installed, it would increase costs by around £5m and require two smoke extraction chimneys within the WHS. The operating costs for the 3.2km tunnel would be in the order of £1.8m per year, compared with the £1.3m estimated for the 2.1km tunnel.
- 7.11.29 The economic analysis of the Aubrey Alternative shows a net present value of minus £87.21m with low traffic growth and a positive return of £33.05m with high traffic growth. The higher works and running costs of the Aubrey Alternative make it poorer value for money than the published scheme.
- 7.11.30 As with the published scheme, tunnel maintenance would be carried out during night time closures of each tunnel bore, although such work for a longer tunnel would be more extensive and would therefore require up to two night time closures for each bore each month. During maintenance of the longer tunnel proposed, because the revised western tunnel portal would be so close to the Longbarrow Crossroads junction, there would be a need partially to close the junction and to divert some of the A303 traffic via the Packway.
- 7.11.31 In normal operation, moreover, the close proximity of the western tunnel portal to Longbarrow Crossroads under the Aubrey Alternative would result in considerably more lane changing near and within the tunnel than would be the case for the published scheme. This would introduce a safety issue in a situation where drivers would already be confronted by unfamiliar circumstances. In addition, presenting tunnel users with different escape arrangements in different sections of the tunnel would raise safety concerns.
- 7.11.32 The 3.2km tunnel proposed would involve two significantly different construction methods. This would result in higher procurement and construction costs together with higher maintenance costs, but these are reflected in the estimates quoted above.
- 7.11.33 The construction of a section of cut and cover tunnel would result in direct impacts upon buried remains which might lie within the trace. The degree of impact would be the same as for the published scheme, as the cut and cover tunnel would require a similar construction footprint.
- 7.11.34 The published scheme would result in substantial benefits to the cultural heritage in the central part of the WHS. The Aubrey Alternative would provide no further benefit to the most important central part of the WHS.

Elsewhere, it would not secure benefits in terms of direct effects, but would result in beneficial indirect effects upon four additional sites. The impact on the area around Longbarrow Crossroads would remain unchanged, because the junction effects would be similar to the published scheme.

- 7.11.35 The Aubrey Alternative would extend the concealment of the A303 within the boundaries of the WHS, but these boundaries are not based on heritage criteria; they are mainly based on physical markers, such as roads and rivers, and are therefore somewhat arbitrary. In the area of the proposed cut and cover tunnel, there is comparatively little of archaeological importance.
- 7.11.36 The Aubrey Alternative would, however, reduce the landscape effect of the scheme to the east of Longbarrow Crossroads, because it would remove the road from sight in this area. The landscape between Longbarrow Crossroads and Stonehenge Down is, however, relatively ordinary.
- 7.11.37 The Aubrey Alternative would have a beneficial visual effect on the northern barrows of the Winterbourne Stoke Group (Site 26), the Longbarrow south east of Longbarrow Crossroads (Site 32) and the group of barrows on Stonehenge Down (Sites 39, 41 and 42). Visitors to all of those monuments would still experience slight adverse visual effects, as in every case the junction at Longbarrow Crossroads or part of the cutting would remain visible.
- 7.11.38 The Aubrey Alternative would clearly produce greater noise reductions than the published scheme within the locality of the additional tunnel section. It is likely that there would be a noticeable change in the noise environment in areas such as Byway Amesbury 12 west of Stonehenge and the northern end of the Winterbourne Stoke group of barrows.
- 7.11.39 As regards nature conservation and biodiversity, the removal of the A303 in the western part of the WHS would marginally increase the connectivity of the surrounding habitats.
- 7.11.40 The effects of the Alternative on the water environment would be neutral with appropriate mitigation in place. Construction of the cut and cover tunnel section would be above the water table level.
- 7.11.41 The Aubrey Alternative would have a negligible impact on local air quality. The air quality within the tunnel would be likely to give rise to the need for more frequent operation of the tunnel longitudinal ventilation system during normal operation than would be needed with the published scheme, as a result of the increased length of the tunnel.
- 7.11.42 The Alternative would extend the overall construction period from 42 months to 48 months, and the construction of a cut and cover tunnel would require considerably more dust mitigation than would be needed in relation to the published scheme.
- 7.11.43 The Aubrey Alternative would permanently remove approximately 44ha

of land from agriculture, some 6ha less than the published scheme.

- 7.11.44 The Alternative would have very similar effects to those of the published scheme on pedestrians, cyclists, equestrians and nearby communities. There would be the potential for additional free roaming by visitors in the west of the WHS. These benefits would only be realised, however, through changes to land use and agricultural practice of which there are no known plans at present, and which would not be facilitated by the present land ownerships.
- 7.11.45 Should the Aubrey Alternative be recommended for further consideration as a result of these public inquiries, it might be necessary to publish new Orders and prepare a new Environmental Statement. The design and construction contract would also have to be retendered. Construction of the Aubrey Alternative could not therefore start before 2008, and completion would not be before 2012.
- 7.11.46 Overall, the extended length of tunnel with the Aubrey Alternative would do little more than to hide the A303 as it crosses an area of relatively ordinary landscape, containing little of archaeological interest. The main benefit of the Alternative would accrue to users of the new byway that would be created along the line of the existing A303. It is difficult to justify an additional capital investment of £50m or more plus higher running costs in order to secure the relatively modest levels of additional benefits that would be delivered by the Alternative.

## **7.12 Other alternatives put forward at the inquiries**

- 7.12.1 During the inquiries, **Mr G T Heath**, a retired Civil Engineer, submitted an alternative which amounted to a southern bypass of Stonehenge. It would run as a dual carriageway from a new roundabout on the A303 west of Amesbury Park, splitting to either side of Coneybury House, skirting Rox Hill and continuing to a new grade separated roundabout at the A360 north of Eighteen Acre Plantation. Another grade separated roundabout would be provided at the junction of the A36 (T) and the B3083, and the route would rejoin the existing A303 to the south west of the Deptford junction, a total distance of approximately 16km.
- 7.12.2 I indicated when this proposal was first received that it did not appear to me to have sufficient substance to justify consideration at the inquiries. This was because Mr Heath said in his written submission that he had not found time to check the feasibility of the proposal on site, and because his estimated cost for the scheme of £20m seemed to me to bear no relationship to reality.
- 7.12.3 Despite that, Mr Heath attended the inquiries at a later stage, and took the opportunity to raise his alternative route. By then, he had revised it to eliminate the roundabout at West Amesbury to remove the splitting of the road to either side of Coneybury House, and to avoid any alteration to the grade separated junction at Deptford. The proposal would now be that the route would rejoin the existing A303 to the north east of the Deptford junction. Mr Heath had also revised his estimated cost of the proposal from £20m to £130m. His final proposal as presented at the

inquiries is shown in some detail (as to the proposed route) on Document GH/0/2.

- 7.12.4 Following his appearance at the inquiries, Mr Heath sent a further written representation making additional amendments to the alternative route he was proposing. These amendments are shown in Document GH/1/1. They comprise moving the intersection of the alternative line of the A303 with the A360 southwards by about 100m to a low spot (allowing more economical bridge works at this grade separated junction) and realigning the alternative route to follow valleys so far as possible (reducing the environmental impact of the new road). This revised line has not been drawn on a map produced to the inquiries. Mr Heath also states in that letter that he feels that he did not place sufficient stress when he presented his alternative to the inquiries on the effect his alternative would have where it would run parallel to the A36 (T). Along that part of the route, it would act as a relief road for the A36, which has a bad accident record.
- 7.12.5 Before he came to the inquiries to raise his alternative scheme, Mr Heath spent some time on site, and discussed his ideas with some of the people whose properties would be affected by it. Although the route had not been advertised, this led to 23 representations expressing concern about the scheme.
- 7.12.6 During the inquiries a further alternative scheme was received from **Mr J Berkley-Matthews**. This proposed a route to the north of Stonehenge for the A303 eastbound two lane carriageway, and a southern route for the westbound two lane carriageway. The eastbound carriageway would follow a similar alignment to the 1995 purple route, and the westbound carriageway would follow a similar line to the 1993 grey route. Both these routes had been investigated and rejected in the past because of their adverse effects on the heritage resource, landscape and ecology. Although what was now proposed was a single two lane route in each direction rather than a dual carriageway along each of the route corridors, it seemed to me that the same adverse effects would arise in relation to this proposal. In addition, there would be considerable inconvenience for local traffic in coping with a one way system over an area around 5.6km long and some 2.3km wide. Moreover, the proposal would cut through the Cursus, pass very close to the visible part of The Avenue, cut through King Barrow Ridge, and the map provided showed no detail as to how or where the route would rejoin the A303 in the west.
- 7.12.7 I did not consider that the proposal had sufficient substance to justify consideration at the inquiries as a late alternative.
- 7.12.8 Despite that, Mr Berkley-Matthews attended the inquiries at a later stage to raise his alternative route. It had been given some local publicity, and had attracted support from Tisbury Parish Council and from one local resident. Mr Berkley-Matthews made it clear at the inquiries that his proposed routes would come together again on the section of the published scheme which would provide the bypass for Winterbourne Stoke.

## **7.13 Other alternatives put forward in writing during the inquiries**

- 7.13.1 During the course of the inquiries, an alternative was suggested involving the proposed A303 tunnel being constructed some 7m lower than proposed by the Highways Agency. It was suggested that this would allow the construction of a car park above the tunnel and along its length, accessed from slip roads from both sides of the A303. There would be acoustic baffling to the Stonehenge side of the parking area, which would be completely invisible from the Stonehenge monument. This proposal would also include a new Visitor Centre, on two levels, the upper level providing panoramic views of Stonehenge. Clearly, this structure would thus be visible from Stonehenge.
- 7.13.2 This was a radically different alternative from any scheme put forward in response to the direction of the Secretary of State. It raised issues which were not raised by any of the alternatives which had been assessed in advance of the opening of the inquiries. No information was provided regarding the land which would be required for allowing access to the suggested car park or regarding the comparative costs of the scheme. I did not regard it as possible for sufficient work to be carried out while the inquiries were proceeding to allow a meaningful assessment of the proposal to be made. On the brief details provided, the proposal did not appear to me to have substance. In line with the guidance in paragraph 6.20 of Document CD/INQ/1, I therefore did not consider it further.
- 7.13.3 A further alternative suggested during the course of the inquiries was a southern surface level diversion of the A303 from the western proposed commencement of the published scheme at Berwick Down to the area of the junction of the A303 with the A3028 some 2.5km east of Amesbury. No detail of the line of this proposed route was provided, other than that it should pass between West Amesbury and Wilford. In particular, it was not clear how it would negotiate the town of Amesbury and Boscombe Down Airfield. Other southern routes were being promoted in detail at the inquiries. I did not consider that this proposal had substance, and I therefore did not consider it further.
- 7.13.4 Another southern alternative suggested during the inquiries, running in cutting from the grounds of Amesbury Abbey to Longbarrow Crossroads, was submitted without any plan or detail, and with no indication of how the road would run to the west of Longbarrow Crossroads. I did not consider that the proposal had substance, and I did not consider it further.
- 7.13.5 An alternative proposal which did include adequate detail as to the suggested line was received when the inquiries had already been in progress for six weeks. From east to west, this route would start with a new grade separated Countess interchange, curve southwards through a cutting in Coneybury Hill, and cross a dry valley to a new flyover junction with the A360. From that point, it would continue northwards until it met the alignment of the Winterbourne Stoke Bypass around the north of the village, as proposed in the published scheme. Alternatively, a bypass route to the south of Winterbourne Stoke could be pursued, in which case the route would cross the A360 at a flyover junction some 800m south of

the proposed Longbarrow Crossroads, rejoining the A303 at Berwick Down. This was a thoughtful proposal, on which considerable trouble had been taken to consider how it could fit into the landscape and minimise its impact on residential properties and heritage assets. It seemed to me, however, that there were potentially substantial issues to consider in relation to the impact the proposal would have on West Amesbury, Winterbourne Stoke and Berwick St James, as well as on archaeological sites at Coneybury and Wilsford Down. In addition, a thorough assessment of its deliverability in highway design and engineering terms and its impact on agricultural land would be necessary. At the late stage during the inquiries at which the proposal was received, it did not seem to me to be feasible for the Highways Agency to give due consideration to these issues or for notice of the proposal to be given to those who might be affected by it. I therefore did not consider it further.

7.13.6 During the course of the inquiries, Mr Wort (who appeared at the inquiries as an objector to the published scheme – see section 6.26 above) also submitted in writing an alternative route. This would commence with a new junction on the M3, south of Micheldever. It would cross the River Test south of Chibolton, the River Bourne south of Porton, the River Avon south of Lower Woodford and the River Wylye south of Chilhampton, before rejoining the existing A303 north of Fonthill Bishop. This would involve building some 61km of what Mr Wort suggested should be a three lane dual carriageway. I considered it to be far too extensive to regard as an alternative to the published scheme, particularly when it was not submitted until some months after the deadline for the submission of alternative schemes and during the course of the inquiries. I therefore did not consider it further.

## **7.14 Other alternatives put forward in writing as part of the objections to the Orders.**

7.14.1 The written objections to the Orders included the suggestions that a flyover should be built over Stonehenge to take the A303, and that the Stonehenge monument should be moved and faithfully recreated on a site elsewhere within the WHS. The suggestion was also made that the existing roads around Stonehenge should be made one way, by closing the A303/A344 junction to right turns. Traffic travelling west would then use the A303 between that junction and Longbarrow Crossroads, while traffic travelling east would use the A360 and the A344. Another suggestion was that the tunnel included in the published scheme should be built, but the existing A303 should also be retained. The tunnel would then only be used while Stonehenge was open to visitors. At night time, when traffic is lighter, the existing A303 could return to use. This would extend the life of the tunnel, and also mean that an immediate alternative route was available in case of any incident in the tunnel.

7.14.2 None of these suggestions was submitted as an alternative in response to the direction of the Secretary of State. I did not consider them to have substance, and I have not considered them further.

## **8 THE CASES OF THOSE WHO MADE REPRESENTATIONS**

The material points are:

### **8.1 The Druid Network and the British Druid Order**

- 8.1.1 The Druid Network and the British Druid Order originally appeared at the inquiries (by way of joint representation) as objectors to the published scheme. Following their appearance and subsequent discussions with the Highways Agency, however, they asked that they should be reclassified as making representations rather than as objectors (Document DN/1/3).
- 8.1.2 The Druid Network does not claim to represent all Druids, but seeks to work as a bridge between those involved with the proposals for the Stonehenge road improvement and the international Druid community as a whole. The British Druid Order is an international spiritual organisation, with about 1,200 members of the Order itself and between 5,000 and 6,000 additional members through affiliated groups.
- 8.1.3 There is a wide range of views among Druids regarding the proposed road scheme. Views range from the position that the A303 should not be widened, through the view that a longer bored tunnel would be acceptable, to those who feel that damage done during the building phase of the published scheme would be compensated for by the long term improvement of the area.
- 8.1.4 The common position, however, is that Stonehenge is an ancient sacred site, created and used by the priests of the Druid heritage, in a religion that revered the powers of nature. Stonehenge is a temple to many thousands of practising Pagans and Druids. As a result, Stonehenge as a circle of stones, and the burial mounds that surround it, are considered to be of exceptional importance by Druids and those of other Pagan traditions throughout the world.
- 8.1.5 The key concerns which all share are that the sanctity of the landscape and the ancient ceremonial and funerary monuments which lie upon it must be respected, and that any human remains discovered during the progress of work should be treated with appropriate respect.
- 8.1.6 These key concerns could most effectively be addressed by the making of an agreed Statement of Intent by the Highways Agency, offering appropriate assurances to cover these points should the road scheme proceed.
- 8.1.7 The Statement of Intent should acknowledge the sanctity of the land in the area, and include courses of action that would enable the Pagan and Druid community to be involved throughout the years of significant disruption. Provision for rituals to take place at significant points and times would be advisable. These would include the first ground breaking on any approved scheme, to ease the spirits of place and ancestral spirits; when work nears particularly sensitive sites such as Longbarrow Crossroads, The Avenue and the Heel Stone; at times of archaeological finds, when these are significant or of human remains; and at the end of



the work, when a reconsecration ritual could take place.

- 8.1.8 The Statement of Intent should also address the treatment of human remains. English law encourages the reburial of excavated Christian remains, with appropriate ritual. The same respect should be accorded to our pre-Christian, Pagan ancestors. Such reburial should be conducted with respect for the possible beliefs of the group who initially interred the person or persons concerned. Christian reburial of the remains of Pagan ancestors offends Pagan sensitivities.
- 8.1.9 There is no wish to prevent archaeologists from gaining knowledge from any remains discovered during the work, but removing human remains to be stored in museums is not regarded as acceptable. Human remains found should be reburied with the appropriate Pagan ritual as close to the site of discovery as possible, together with their grave goods (or appropriate facsimiles).
- 8.1.10 Ideally, a piece of land should be set aside within the WHS that could act as a ceremonial funerary shrine for the Pagan and Druid community. This could be used not only for the reburial of the ancient dead, but also as a place of honouring the dead within many modern spiritual communities.
- 8.1.11 There is particular concern about the disruption which the scheme would cause around Longbarrow Crossroads. Every effort should be made to protect the main area of barrows in that location. There is also a need for careful investigation of the proposed location of the contractor's compound before work begins. Sites 20 and 21 appear to be particularly at risk in that area.

**The response of the Highways Agency to the representations of the Druid Network and the British Druid Order**

- 8.1.12 The Environmental Statement, volume 1 (Document DD9) acknowledges in section 5.3.4 the spiritual aspects of Stonehenge, recognising its importance to different groups.
- 8.1.13 The Highways Agency welcomes the suggestion that a Statement of Intent might be prepared, within which that acknowledgement could be reiterated.
- 8.1.14 The Highways Agency would be very ready to discuss with representatives of Druids and Pagans the desire to conduct rituals at significant points and times within the construction process, if the Orders are approved. Such discussions would need to take place in the context of other considerations which would need to be taken into account, such as the requirement to ensure full compliance with all health and safety considerations and the need to fit in with the construction programme.
- 8.1.15 The Highways Agency is aware of the concern for appropriate treatment of human remains, and confirms that any found during the construction of the scheme would be treated with respect. The question of exactly how any remains would be treated, including the decision on any

reburial, would be a matter for the Home Office, as any removal of human remains has to be conducted under a licence granted by the Home Office, and such a licence would specify how the remains must be treated. The location of any site for reburial would thus not be within the control of the Highways Agency, but the Highways Agency, through its contractor, would ensure that there was full liaison between all relevant parties in the event of such circumstances arising.

8.1.16 The setting aside of a piece of land within the WHS for reburial is not a matter which the Highways Agency itself could address. Highway land could not be used for such a purpose. Requests for the use of land within the WHS but outside the highway boundary should be made through English Heritage.

8.1.17 As regards the specific areas of concern to the Druids during the construction process, no burial mound would be directly impacted by the published scheme. Full surveys have been undertaken, and specific measures would be adopted to protect buried remains. The design of the scheme has ensured that there would be no direct impact on any of the Scheduled Monuments at Longbarrow Crossroads. As regards the sites within the contractor's compound, Site 21, a very important scheduled ring ditch, would be fenced, and all activities would be excluded from it. Site 22 is part of a minor important linear boundary ditch, which is not scheduled, but it would be protected by a geotextile membrane and imported aggregate.

### **Update on progress regarding the proposed Statement of Intent**

8.1.18 The Druid Network and the British Druid Order appeared at the inquiries on 25 February 2004. Following their appearance, they had meetings outside the inquiries with representatives of the Highways Agency. On 23 April 2004, before the inquiries closed, a Document (DN/1/3) was submitted to the inquiries on behalf of the Druid Network and the British Druid Order providing updated information on the preparation of the suggested Statement of Intent.

8.1.19 As at 23 April 2004, the Statement of Intent had been developed into a document which was acceptable to representatives of the Druids and to the Highways Agency. The meetings which had taken place had involved further representatives of the Pagan and Druid community, leading to the setting up of a pan-Pagan organisation, called Honouring the Ancient Dead.

8.1.20 Although the agreed Statement of Intent was not produced at the inquiries, my understanding is that it meets satisfactorily the issues raised at the inquiries by the Druid Network and the British Druid Order.

## **8.2 Mr J S S Stewart**

### ***Accident prevention***

8.2.1 Many road traffic accidents are preventable. Those which occur at the A303/A344 junction, at Longbarrow Crossroads and in the village of

Winterbourne Stoke should be reduced immediately by the closure of the A344 junction with the A303, the installation of traffic lights at Longbarrow Crossroads, and by enhanced traffic calming measures in Winterbourne Stoke. These actions should not have to await a decision on the proposed improvement of the A303.

#### ***Partial closure of the A344***

- 8.2.2 There is general agreement that the A344 should be closed from the junction with the A303 to the byway just beyond the Stonehenge car park. The intention to close the entire road should, however, be reconsidered. Insufficient thought has been given to the number of people who might visit Stonehenge. The existing car park could be used as a dropping off point for visitors and to provide parking for people with disabilities.
- 8.2.3 Where any road is returned to pasture, the sites of important features, now lost, should be marked in the way that the position of post holes has been marked in the existing Visitor Centre car park. This would allow the possible significance of such features in relation to alignments to be assessed on site in future by anybody carrying out research.

#### ***Archaeo-Astronomy***

- 8.2.4 The importance of archaeo-astronomy should be recognised and taken into account in the planning process. Archaeologists conducting excavations in areas where road proposals raise cultural heritage issues should be encouraged to collect relevant data, even if they do not give credibility to archaeo-astronomy.

#### ***Research at Stonehenge***

- 8.2.5 An important, newly discovered stone hole was reported in 1981, Stone Hole 97, the neighbour of the Heel Stone (Stone 96). The position of Stone Hole 97 remains unmarked. It should be marked, because it is relevant to research related to the primary axis at Stonehenge. There are photographs taken on the primary axis from the footway on the south western side of the A344, close to the perimeter fence adjacent to the Heel Stone. These will be more difficult to interpret now, because the level of the footway was raised some years ago.

#### ***The primary Stonehenge astronomical alignment***

- 8.2.6 Most people believe that the primary astronomical alignment at Stonehenge is mid summer sunrise, but there is substantial evidence that the primary alignment is mid winter sunset. Research related to the primary Stonehenge axis should be supported to assist the planning process. This would provide further information about what the people who built Stonehenge believed, but it is accepted that this does not need to be pursued before a decision is taken regarding the future of the A303.

### ***The Stonehenge custodians***

- 8.2.7 English Heritage and the National Trust do much good work, but they should be more ready to listen to the views of their supporters or members before taking a position on an important issue such as the proposals for the A303 at Stonehenge. Before agreeing to a tunnel of any length, full consideration should have been given to a solution which would take the A303 well away from the WHS. If the short term improvements to reduce accidents referred to above were undertaken, this would provide time for all viable alternative schemes to be fully considered.

### **The response of the Highways Agency to the representations of Mr J S S Stewart**

- 8.2.8 The immediate closure of the A344 junction with the A303 would cause additional congestion on the A303, with some traffic being attracted to use inappropriate local roads. The predictability of journey times for emergency services vehicles between Shrewton and Amesbury would be adversely affected, giving rise to safety concerns. Visitor Centre traffic from the east would be subject to a longer route and to potential delay, and the A344 would need to remain open in any event between Airman's Corner and the Visitor Centre.
- 8.2.9 Traffic lights are not necessary at Longbarrow Crossroads to make the existing roundabout work effectively. They would not make the roundabout safer; they could increase the danger of accidents.
- 8.2.10 Traffic calming has already been introduced in Winterbourne Stoke. If anything more could be done to improve safety there, it would be done, without waiting for a decision on the published scheme.
- 8.2.11 The modification put forward by the Highways Agency to the inquiries seeks only to close the A344 from its junction with the A303 to the existing Visitor Centre car park. The future of the remainder of the A344 will be a matter for Wiltshire County Council, and is outside the scope of these inquiries.
- 8.2.12 That is also the position regarding recognition for archaeo-astronomy and the marking of the position of Stone Hole 97. The position of the Stone Hole is the concern of English Heritage, Wiltshire County Council and the National Trust. Speculation about the primary astronomical alignment of Stonehenge and the responsiveness of the National Trust and English Heritage to their members and supporters are equally issues which go beyond the scope of the present inquiries.

### **8.3 Professor D Maddison**

- 8.3.1 Professor Maddison is an Associate Professor of Environmental Economics at the University of Odense in Denmark. He was one of the authors of the CSERGE report of 1998, a summary of which was placed before the inquiries as Document SA/2/9 by the Stonehenge Alliance. The full report is at Document DM/1/1. The report was prepared for English

Heritage, and it is thought to be the first study in the UK which attempted to value the environmental impact of changes in road layout.

- 8.3.2 It was done at a time when evaluation methodologies were still in an embryonic state, but it showed what might be achieved. It sought to value environmental benefits, including reduced noise, visual intrusion and severance. Those benefits were to be expressed in monetary terms, so that they could be put alongside accident costs and time savings which are typically the only things that are given a monetary value in existing road appraisals.
- 8.3.3 Despite the fact that the environmental impacts of road transport had not been much studied using these techniques, there are many other applications of environmental valuation methodologies which do reduce environmental impacts to a monetary value. The UK Government uses these techniques, for example, to evaluate the environmental impacts of the construction of new quarries, the preservation of biodiversity, the recreational use of forests, and changes in agricultural techniques which might have an effect on the landscape. Perhaps the best known and most important application of environmental valuation methodologies is the evaluation of the environmental impacts caused by the Exxon Valdez disaster in Alaska several years ago. An evaluation study formed the basis for the damages which Exxon had to pay. The use of these environmental techniques was fully explored in the American courts, perhaps the most testing environment to which a new methodology could be exposed, and the techniques were accepted. The valuation technique has also received an endorsement from a panel of Nobel prize winning economists in the USA, who have considered whether the use of the technique is valid, and who decided that, provided certain guidelines are followed, it is.
- 8.3.4 The CSERGE study was carried out at a time when the proposal was to build a 2km cut and cover tunnel at Stonehenge. The study attempted to elicit people's maximum willingness to pay through extra taxes for the construction of a tunnel of 2km at Stonehenge. The cost benefit decision rule is that, if aggregate willingness to pay an environmental value exceeds the costs of construction, the tunnel would be welfare enhancing, but if willingness to pay was in aggregate less than the construction cost, the project would be welfare diminishing.
- 8.3.5 A survey was distributed by a professional interview company to five hundred randomly selected households throughout Great Britain and also to three hundred visitors to the Stonehenge site. People were asked first to choose between the construction of a 2km tunnel under the Stonehenge site and the continuation of the present situation. Then, whichever response group they fell into, they were asked what was the smallest amount they would be willing to pay in additional tax to secure their preferred option.
- 8.3.6 Follow up questions were used to determine the motives underlying people's payment decisions, to ensure that values arising from time savings and reduced accidents could be excluded.

- 8.3.7 Half the people questioned were indifferent to the current road layout, considering that it did not affect the site one way or the other. Of those who had a view on the current layout, however, the vast majority thought that it disfigured the site.
- 8.3.8 Overall, 55% of respondents wanted to retain the current road layout, and 45% wanted to change it. The preference strength of those who wanted to retain the layout was, however, much less than that of those who wished to change it. Those who wanted the tunnel would be prepared to pay an average of £8.90 per household per year over a 2 year construction period, while those who wished to retain the current layout would be prepared to pay an average of only £2.69 per household per year.
- 8.3.9 For those who wished to pay for the tunnel, the most frequently quoted reasons were to protect Stonehenge and because the existing roads made the site look ugly. For those who wished to retain the existing layout, the most frequently quoted reasons were that they disliked driving through tunnels and that they would miss the sight of Stonehenge while driving by the site.
- 8.3.10 If the average payment per household for and against the tunnel is aggregated over the total number of households in Great Britain, taking into account the differing proportions for and against the tunnel, there is a net heritage benefit for the construction of the tunnel of £114m. At the time the survey was done, this appeared to be just enough to cover the shortfall between the costs of constructing the tunnel and the monetarised financial benefits of those items to which a conventional value could be attached – time savings and accident cost savings.
- 8.3.11 If median values are used, however, (taking the amount per person half way down the line arranged with the person prepared to pay most at one end and the person prepared to pay nothing at the other) the aggregate benefit is zero. This is because, half way down the line, you have already reached the people who are prepared to pay nothing for the construction of a tunnel. That suggests that, if the decision to build the tunnel were put to a referendum, it would not pass, because the majority of people do not care what happens as long as it does not affect their tax liability.
- 8.3.12 This study was carried out at a time when such studies were in their infancy. The precise values which emerged from the study are not defended today. But Stonehenge is such an important site that it surely merits now carrying out an additional valuation study, using all the techniques and advances which have occurred in the six years since this study was undertaken. Presenting a cost benefit which does not evaluate the environmental impact in monetary terms is a waste of time.
- 8.3.13 Such a new study should also evaluate the new options now put forward, such as the 4.5km tunnel and any realistic northern or southern diversionary route. In addition, it should seek to encompass the views of non residents and non visitors, given that it is clear that there are some people who live outside the UK who have preferences about how the roads around the Stonehenge site are treated, and who might be

prepared to pay a small amount to secure their preferred option.

**The response of the Highways Agency to the representations of Professor Maddison**

- 8.3.14 The Highways Agency agrees entirely that the environmental impacts of the published scheme should be taken fully into consideration in assessing the effect of that scheme, and in comparing it with potential alternative solutions.
- 8.3.15 The published scheme is the product of consideration over a long period since 1991, during which time a large range of potential solutions to the difficulties on the A303 at Stonehenge has been assessed. This process has been carried out following prescribed methodologies. Professor Maddison is advocating an alternative approach, but there is no prescribed methodology for assigning monetary values to environmental resources or to the effects of a scheme on such resources. Indeed, there is much doubt as to whether it is really possible to assign monetary values to natural or heritage resources.
- 8.3.16 As well as the CSERGE report, the POST report is before the inquiries (Document CD/CBA/2). That report states at section 3.2:

*"despite the considerable efforts of many environmental economists around the world to derive rigorous and objective measures of the value of environmental and social 'goods', no consensus has yet emerged on how best this should be carried out, and no meaningful monetary values have been identified that can be applied across a wide range of projects.*

The report goes on to state at section 3.3:

*"an alternative approach may be to assess environmental and social impacts in non monetary terms, relying on scientific analysis and narrative descriptions of the scale and importance of the effects"*

- 8.3.17 This is exactly the basis of the Government's prescribed approach, which the Highways Agency has followed. The Highways Agency has identified and assessed all relevant effects (positive and negative), enabling them to be weighed in the balance and assessed against the financial costs. Decisions on whether environmental benefits justify investment costs are a matter of judgement, but such decisions are helped by benchmarking and comparing relative costs against relative benefits. That is the approach which has been adopted in the evidence produced to the inquiries.

**8.4 Mr R Moykopf**

- 8.4.1 Mr Moykopf is a local resident, who had been abroad during most of the time for which the inquiries were sitting. He notes the firmly held views of the proponents and supporters of the published scheme and of those who oppose it.

8.4.2 Two things must come from these inquiries, a good decision (which places a heavy responsibility on those who have to make it), and a readiness to accept that decision by all parties once the decision is made. This latter will call for maturity and generosity of spirit from those whose views have not been accepted.

## **8.5 Written representations**

8.5.1 **The Countryside Agency** has reviewed the landscape assessment set out in the Environmental Statement, and considers that it represents a fair assessment of the existing landscape and the impacts of the proposed road scheme.

8.5.2 **The Open Spaces Society** urges that the longest feasible tunnel length should be provided in order to remove the sight and sound of the road from the vicinity of Stonehenge and nearby burial grounds. The presently proposed position of the western portal would separate the Longbarrow Crossroads barrow group from the rest of the archaeology. The tunnel should extend westwards, below the A360, to emerge on the hillside above Winterbourne Stoke village. This would minimise the damage to the designated WHS area, as well as restoring its visual integrity.

8.5.3 **The Wiltshire Badger Group** points out that there is a healthy badger population in the area affected by the published scheme. That population currently suffers a significant number of road casualties. In response, the Highways Agency says that it has liaised fully with English Nature, and mitigation measures include an underpath, a green bridge, badger fencing and planting for foraging.

8.5.4 **Dr Derek McNally** made a written representation as Chairman of the Royal Astronomical Society's Stonehenge Committee in relation to the light pollution environment at Stonehenge.

8.5.5 Whilst the astronomical alignment of Stonehenge with the rising mid summer and setting mid winter sun is well known, the relationships between the night sky and the monument are less well established. It is well known from other prehistoric and historic cultures, however, that aspects of the night sky had a strong cultural significance in the past. In fact, UNESCO is currently developing a strategy for implementing a thematic programme on archaeo-astronomical sites as World Heritage Centres.

8.5.6 In restoring Stonehenge to its landscape, the site should be restored to the total environment which would have been perceived in antiquity, including a dark night sky. Certainly, there is a need to maintain the darkness of the night sky at a level which is no worse than that currently experienced at Stonehenge. If that were achieved, then night time astronomical observation of the historical context of Stonehenge would be safeguarded. That request is not made solely from an academic point of view. Dark skies tourism is a developing enterprise in the darker areas of the UK, and Stonehenge could become the beneficiary of such tourism if its current relatively dark sky environment is not degraded further.



- 8.5.7 In response to that written representation, the Highways Agency pointed out that, in removing the A303 and the A344 (in part) from the landscape setting to Stonehenge, the published scheme would remove traffic and passing vehicle lights. Anybody standing at Stonehenge would not be able to see the traffic on the A303. The effect would be to achieve a much lower level of light pollution than exists at present during the hours of darkness, and a much improved environment for astronomical observations. There are other sources of light visible from Stonehenge within the existing night sky. These include Larkhill and Strangways (direct glare and sky glow), Boscombe Down Airfield floodlighting (direct glare and sky glow) and Salisbury street and external building lighting (sky glow). The existing sky glow from Salisbury, for instance, can be seen clearly at night time from Stonehenge, and this would remain in the future. On completion of the published scheme, however, there would be no direct glare from vehicle headlights on receptors near to Stonehenge.
- 8.5.8 As regards highway lighting, there would be no permanent lighting on the main carriageway of the published scheme except within the tunnel. Twice a month, temporary lighting would be erected at the central reserve maintenance crossing points on either side of the tunnel as part of the traffic management "contraflow" arrangement, facilitating maintenance in one tunnel bore while all the traffic is running through the other bore. The tunnel would also be permanently lit, but at night time the lighting would become dimmer, particularly near the tunnel portals, so that drivers entering and leaving the tunnel would be able readily to adjust between the darker and brighter conditions outside and inside the tunnel. This dimming towards the portals, together with the fact that the tunnel portals would be set down well below the line of sight from Stonehenge, would mean that any light emanating from the tunnel would not be visible from the Stones.
- 8.5.9 At Longbarrow Crossroads, having undertaken further work during the course of the inquiries, the Highways Agency would not now propose to provide standard road lighting as part of the grade separated junction proposed between the A303 and the A360. Other measures would be pursued to make the junction layout evident to drivers and to enable it to operate safely. The existing roundabout junction is lit, and the removal of lighting would therefore secure an improvement in the night time environment for the nearby Winterbourne Stoke barrow group.
- 8.5.10 At Countess Roundabout, new lighting would be provided, but only as a replacement for existing lighting on the roundabout itself and on the approach roads. Lighting would not be provided on the new A303, which would pass over the roundabout. The existing lighting would be replaced with a design intended to minimise light spillage outside the highway, thus reducing the visual impact.
- 8.5.11 Having had an opportunity to consider these proposals of the Highways Agency, Dr McNally sent a further written representation to the inquiries warmly welcoming what he regarded as a positive response from the Highways Agency.

- 8.5.12 **Mr Mike Pitts**, the current Editor of "British Archaeology" made a written representation to the inquiries in a personal capacity.
- 8.5.13 While a longer tunnel than that proposed in the published scheme would be preferable from the perspective of the WHS, the boundaries of the WHS are to a certain extent arbitrary, and tunnel portals would be an intrusion wherever they were placed. The proposed scheme has many benefits, and would be preferable to no action being taken.
- 8.5.14 The purpose of a tunnel would be primarily to hide road traffic from visitors to Stonehenge. It would have the secondary effect of breaking a significant barrier to north-south movement within the WHS. The longer the tunnel, the greater the heritage benefit would be. That benefit has to be balanced, however, against the negative impact of the two tunnel portals and the enormous cost of a tunnel scheme.
- 8.5.15 Wherever one placed the portals, archaeological damage would be likely to occur. The landscape in the area of Stonehenge has been continuously frequented by people for over 10,000 years, and many have left their traces. Judgements as to which piece of landscape is more important than another, or whether, for example, a Bronze Age ditch is more significant than a First World War railway track, can only be subjective and influenced by current values. The case for extending the tunnel is largely driven by a desire to distance the portals from Stonehenge.
- 8.5.16 It may appear that the area immediately close to Stonehenge is particularly rich in ancient remains. In most respects, however, there is little exceptional about the landscape there other than the monuments of the Cursus, The Avenue, the hidden palisade and Stonehenge itself. The number of barrows, for example, is at least as high to the north east of the WHS, and is matched elsewhere in Britain, for example, in parts of Dorset. Much of the WHS, especially close to Stonehenge, has been intensively farmed for over a century, and preservation of prehistoric and Roman remains is poor. By contrast, immediately to the north, inside the much larger military training area of Salisbury Plain, preservation is exceptional, because military activity caused farming and human settlement to cease during the 19<sup>th</sup> century. Here, for example, are some of the best preserved long barrows in Britain, much better than anywhere else inside the WHS, unparalleled systems of fields and settlements reaching from at least the Bronze Age to Roman times, and overall an ancient landscape whose integrity may be unmatched anywhere else in Europe. It is therefore clear that Stonehenge and its immediately associated monuments constitute the defining part of the WHS.
- 8.5.17 Archaeologists are able to visualise the WHS without modern intrusions. The majority of people experience the WHS as it appears on the ground. Archaeologists are also in a minority in the way in which they perceive the wider landscape beyond the Stones. The vast majority of visitors start and end their experience at the Stonehenge car park.
- 8.5.18 Widening public experience of the WHS by encouraging and enabling people to see Stonehenge in the context of its landscape and associated

monuments is a key goal of the National Trust and English Heritage. It is also important to the Heritage Lottery Fund as a significant sponsor of the proposed facilities. Precisely how this would be done is still under discussion, but there can be no doubt that a road tunnel, even of the size of the present proposals would make this an achievable goal. The proposed tunnel would also open up the physical and visual possibilities of north-south movement through the landscape in ways which are presently impossible.

- 8.5.19 Debate has focused on the east-west corridor of the A303, particularly on its cleavage of The Avenue to the east (which took place when the road was routed through it in 1967) and the Winterbourne Stoke barrows to the west. But the proposed tunnel would allow movement across the buried road. In the immediate vicinity of Stonehenge, this would allow visitors to explore the wider landscape around the Stones, both on foot or merely by lifting their eyes in a way that a natural desire to avoid looking at the road presently inhibits. It would also facilitate the opening up of what could be one of the greatest heritage walks in Europe.
- 8.5.20 Byways and other rights of way provide a complete public access pedestrian route through the WHS from its southern boundary at Lake to the north at Durrington. The walk along Lake Bottom and Spring Bottom provides an exceptional experience of the WHS landscape at its best. It culminates in a gentle climb up to Normanton Down, where the walker, among an important group of Bronze Age barrows and close to the famous Bush Barrow containing the richest known group of craft artefacts in the region, is suddenly presented with a dramatic view of Stonehenge below. Neither tunnel portal in the present proposals would be visible from this ridge.
- 8.5.21 With the A303 in a tunnel and present fences close to Stonehenge removed, the walker could continue uninterrupted to Stonehenge and if desired, to the northern boundary of the WHS and beyond to the important Neolithic site of Robin Hood's Ball. This walk, suitably managed and presented, could rival the Inca Trail and other famous heritage routes.
- 8.5.22 There is no evidence to say whether or not this route was used in prehistory. However, there are several long earthworks, some surviving as upstanding banks and ditches, others visible only as soil or crop marks, that divide the landscape into large blocks whose alignment is quite different from that of the A303, but comparable to the valley of Lake and Spring Bottom. The proposed tunnel, by opening up the landscape to north-south pedestrian access, would thus encourage a conceptual reorientation that would seem to be more in keeping with ancient landscape use than the present east-west emphasis imposed by the A303.
- 8.5.23 This is more significant than the often discussed idea that The Avenue might be opened up as a walk. That route begins among private houses and gardens where there is no public parking, crosses private fields and a local access road and passes under high power electricity lines before reaching the A303. We can not know if Neolithic people ever walked up

The Avenue. It may be the space between the banks was taboo and avoided by people. A fixed walk could not be created along The Avenue route, for fear of erosion damage to a significant Scheduled Ancient Monument. Tunnelling the A303 to permit the recreation of The Avenue where the two cross would allow an existing 2km walk to be extended (access on to a currently private and cultivated field permitted) by perhaps 400m. This would occur out of sight of Stonehenge, and would not promote a changed landscape perception.

- 8.5.24 Values change. What one generation considers insignificant, the next can treasure. The Stonehenge WHS was inscribed because of Stonehenge and other more or less contemporary monuments. What all archaeologists today agree to be extremely special remains in the landscape around Stonehenge, even fifty years ago were in some cases barely noticed. There are other features which future generations might come to value highly. There are historically significant military and aviation remains dating from the time of the First World War.
- 8.5.25 No formal objection was raised to the cutting of the A303 through The Avenue or to the excavation of the pedestrian underpass at Stonehenge when those changes took place in the relatively recent past. We might wish that our predecessors had acted differently, but we can not know what future generations might wish we had done. We can only evaluate our actions against the wishes of our own society and of our own times.
- 8.5.26 Leaving Stonehenge as it is is not an option. If nothing is done, things will change. Road traffic will increase. Accidents and worsening congestion will encourage localised, short term road solutions that could damage the WHS. If the proposed tunnel were to be constructed, the visitor experience would change radically. The wider public would begin to experience on the ground the WHS as archaeologists, in their imaginations, do now. As people learn to value aspects of the landscape of which they are presently unaware, it is likely that in time demand would grow for further changes.
- 8.5.27 The current proposals were initiated in principle when English Heritage was formed in 1984. Earlier schemes to resolve the fundamental road and visitor facility problems reach back into earlier decades. It may be a long time before people are again prepared to devote so much to Stonehenge if the proposed tunnel is rejected in favour of retaining the present road arrangements. Nothing remotely comparable in ambition to the proposed scheme has been a realistic option since Stonehenge was first taken into public ownership in 1918.
- 8.5.28 One written representation suggests that **the A344 should be closed and replaced with a bridleway** instead of a footpath along the whole of its length. In the modified Side Roads Order, as it is now put forward by the Highways Agency to be made, however, the Agency asks only for the section of the A344 between the junction of the A303 and the existing Visitor Centre car park to be stopped up and replaced by a footpath.
- 8.5.29 Two written representations ask for brown and white **"Bypassed**

**Community” signs** to be erected on the Winterbourne Stoke Bypass to draw attention to local businesses which would be bypassed if the published scheme were carried out

- 8.5.30 The issue of “Bypassed Community” signs is one of the remaining reservations of **Salisbury District Council** concerning the published scheme. Currently, the A303 through Winterbourne Stoke provides direct access to a petrol filling station with a small shop, a public house and two Guest Houses. In addition, a farm shop and public house are located on the B3083 in the village of Berwick St James, approximately 1.5km to the south of the present junction with the A303. These facilities are signed from the A303. They provide an important service to the local community, where public transport is at best infrequent and where alternative facilities are not accessible other than by private motor car. It is important to retain facilities within local communities wherever possible, and passing trade from travellers on the A303 makes an important contribution to the continuing viability of these services, encouraging their availability for the benefit of local residents.
- 8.5.31 The adopted Local Plan (Document DD149) contains Policy PS3, resisting the change of use of premises within settlements which are or have been used for retailing, as a public house or to provide a community facility central to the economic or social life of the settlement, in order to prevent the loss of such facilities to local communities.
- 8.5.32 Government regulations allow for the signing of local facilities from trunk roads, and that should be undertaken in the present case in order to assist the ongoing viability of local facilities in accordance with the policy framework provided by the Local Plan.
- 8.5.33 The other outstanding matter of concern to Salisbury District Council is the retention on safety and amenity grounds of the present **pedestrian underpass at Countess Roundabout**. The Highways Agency proposes to provide pelican crossings over the new slip roads at Countess Roundabout, and to remove the existing underpass. On the westbound slip road from the A303, drivers approaching the Countess Roundabout would be leaving an unrestricted dual carriageway, and travelling downhill to the roundabout signals. The District Council considers that the current poor record of shunt accidents on the roundabout approaches does not inspire confidence as to the safety of such signals. Whereas a shunt between two vehicles may not necessarily be other than minor, if a crossing pedestrian or cyclist is hit by a car, the consequences could well be serious. On the eastbound slip road from the roundabout to the A303, drivers will be expecting to accelerate up this road away from the junction, and traffic signals in this position will therefore be unexpected. The proposals for pelican crossings thus appear to the District Council to be unnecessarily risky in road safety terms, with concerns as to whether vehicles would stop safely when the signals were at red. Important support to the Council’s case is provided by the technical advice in the DMRB, volume 6, section 2, which recommends avoiding at grade cycle or pedestrian crossings on grade separated junction slip roads, whether signalised or not; grade separated pedestrian facilities are preferred.

- 8.5.34 The Highways Agency response is that "Bypassed Community" signs are only provided where there are clear road safety and traffic management benefits. They are associated with a break during journeys, and are intended to provide information about local tourist attractions and to guide travellers to locations which provide a range of facilities available for most of the day. Winterbourne Stoke has insufficient facilities to justify such signs. There is also the issue of precedent to consider. If individual facilities were advertised, this could lead to a proliferation of signs across the road network which would be wholly unsatisfactory. Signs need to be provided on a consistent basis across the trunk road network, so that users know what to expect.
- 8.5.35 As regards the pelican crossings planned to replace the existing Countess Roundabout underpass, the arrangement which is proposed at Countess Roundabout is by no means unusual. It is common to find traffic signals located at the ends of slip roads from dual carriageways as part of a grade separated junction layout, and it is also common to find pedestrian crossing facilities at the entries to and exits from roundabouts where there is a need to make provision for such facilities. The proposed layout at Countess Roundabout is in full compliance with standards.
- 8.5.36 The existing accident record on the present heavily trafficked and often congested approach roads to the free flow Countess Roundabout could not be taken as an indicator of a future problem on the much more lightly trafficked signalised slip roads, which would be provided once the roundabout had been grade separated. Traffic on the westbound off slip would not be travelling downhill, but would be on the existing relatively level approach. From a safety perspective, drivers leaving a trunk road via a slip road would be expecting a junction, and would reduce speed accordingly. In this instance, drivers would encounter traffic signals controlling their movement at the roundabout, whether or not there were pedestrians waiting to cross. On the eastbound slip road, the layout of the signals would be such that traffic would be held back at the sets of signals on the roundabout and on Countess Road North for the duration of the pedestrian green phase. With the signals arranged in this way, there would be no circumstance in which accelerating traffic would unexpectedly encounter a red pedestrian signal.
- 8.5.37 The advice in the DMRB is intended to discourage the installation of pedestrian crossing points on slip roads remote from a junction, where traffic speeds may be expected to be higher than at the junction itself. A controlled pedestrian crossing provided at or near the point where a slip road joins a roundabout, where vehicle speeds would naturally be below 40 mph, would offer no different risk factors from a controlled crossing elsewhere within a 40 mph speed limit, provided the necessary signing was in place.
- 8.5.38 The retention of the existing Countess Roundabout underpass is not a viable option within the published scheme. The existing underpass would have to be extended, strengthened and refurbished in order to extend across the width of the new junction and to secure a satisfactory maintenance regime and design life for the structure. The cost involved would be almost £500,000. This could not be justified with an at grade

crossing facility in place. With that at grade facility, there would be little if any use of the underpass. If the at grade facility were not provided, the relatively light traffic on the slip roads would encourage pedestrians and cyclists to cross at grade in any event, but without the support of a pelican crossing system. This itself would clearly increase the accident risk.

## **9. OVERALL RESPONSE OF THE HIGHWAYS AGENCY**

The material points are:

- 9.1 Virtually all who have come to the inquiries agree that action is needed to improve the A303 in the area of Stonehenge. A few argue for an online, at grade solution, but the vast majority agrees that the existing roads should be removed from the immediate setting of Stonehenge.
- 9.2 Almost all agree also that the published scheme would bring substantial benefits to the heart of the WHS. A few wish to consider only the damage which they say the published scheme would cause to the WHS, and to ignore the benefits. It must be accepted, however, that roads already exist within the WHS. The published scheme would reduce the impact of those roads. To undertake an analysis of the scheme without taking account of the benefits it would deliver is incomprehensible.
- 9.3 Almost all agree also that the part of the scheme which provides a bypass for Winterbourne Stoke should be supported. The only real challenge to that aspect of the scheme is as to whether a dual carriageway is needed. On the basis of DfT standards, that is the case.
- 9.4 Some objectors argue that, under the World Heritage Convention, however minimal the benefit which would be achieved, each state party is bound to spend whatever is necessary to achieve that benefit within a WHS. But it can never have been the intention of the UK Government, or any other Government, to commit itself to unlimited expenditure to achieve even minimal benefit. That this was so was confirmed by DCMS (Document DCMS/1/5).
- 9.5 The Stonehenge WHS was inscribed in 1986 as a cultural property. It was not inscribed as a cultural landscape, because such a category did not exist until 1994. It is inappropriate to apply considerations which now govern cultural landscapes to a site inscribed as a cultural property. It is equally inappropriate to argue that prospective changes to the Operational Guidelines for the implementation of the World Heritage Convention should be anticipated. It is the current Guidelines which apply.
- 9.6 In the same way, the fact that WHSs inscribed today are the subject of a statement of significance, setting out the outstanding universal value for which they are recognised, is of no assistance in dealing with Stonehenge. This was not the practice when Stonehenge was inscribed, and thus the outstanding universal value of Stonehenge must be gathered from the nomination and inscription. The nomination and inscription concentrate on Stonehenge and its associated sites and monuments. That cannot be altered by any subsequent comments

contained in the Stonehenge Management Plan. To alter the justification for the inscription of Stonehenge, it would be necessary to renominate the site.

- 9.7 There is substantial, but not universal, agreement that not everything within the WHS is of outstanding universal value. Those who say everything within the WHS is of outstanding universal value need to argue for the outstanding universal value of the A344, the A303 and the existing Visitor Centre.
- 9.8 The reality is that it is necessary to determine a methodology which discriminates between those things which give the WHS its outstanding universal value and those which are of lesser importance. This process has been substantially assisted by the fact that English Heritage has undertaken a detailed survey of the WHS (Document HA/7/4 Appendix A) with the specific purpose of identifying all archaeological remains which are broadly contemporary with the sites around which the WHS inscription was based. This work was undertaken with a view to its being available for use at inquiries such as these. The Highways Agency has relied on that information in determining what is of outstanding universal value within the WHS.
- 9.9 The scheme avoids a direct impact on any of the known archaeological assets listed by English Heritage. As regards indirect impacts, the methodology employed has been to assess the effects of the scheme on the setting of each of the archaeological assets. This methodology complies with the requirements of the DMRB, and the detailed approach was agreed with a Working Group of eminent archaeologists. All criticisms of the methodology adopted need to be weighed very carefully in the light of that background.
- 9.10 Those criticisms include the following:
- No map was produced showing the setting of each monument. But it is not possible to place a boundary around each monument and to say that boundary represents its setting. One of the large hangars at Boscombe Down could have an effect within the WHS, while a much smaller item at the same location would have no impact at all. The extent of the setting depends upon what is proposed.
  - The settings of all the monuments were not considered together. But all that can sensibly be undertaken is to consider the visual effects of the scheme on each individual monument, including any potential views between monuments, and in this way to ensure that the assessment takes all the significant effects of the scheme into account. This is the methodology required by the DMRB.
  - The analysis of setting does not acknowledge what ICOMOS UK called "the palimpsest of layers across the site". But ICOMOS UK was not able to point to any relevant omission from the landscape or heritage assessments provided to the inquiries by the Highways Agency. The Highways Agency believes that the assessment has covered all the main effects that the published scheme would be likely to have on the WHS.



- The assessment of the visual aspect of setting has not taken account of below ground archaeological features not apparent on the surface. But, if something is invisible, it cannot have a visible aspect. Paragraph 6.1 of Part 2 of Section 3 of volume 11 of the DMRB indicates that visual intrusion, as an impact on setting, is only relevant for archaeological remains which are clearly visible to the human eye. The Highways Agency has undertaken its assessment in accordance with that guidance. Nevertheless, knowledge of identified below ground remains and the effect of the published scheme on their relationship with visible monuments has been taken into account in the assessment of context.
- No assessment has been provided of the setting of the whole WHS, and no assessment has been made of the WHS as a whole. But the boundaries of the WHS have been drawn by reference to modern and easily recognisable features. Consideration of the setting of the boundary of the WHS would thus be of no great value. In fact it would be misleading, in that it would fail to take account of important features which lie outside the boundary. As regards the assessment of the overall effects of the scheme on the WHS, this has been done, and has been put before the inquiries, even though, as agreed with the Archaeological Working Group, each monument and site has also been considered individually.

- 9.11 Some objectors argue that undiscovered buried archaeology should be listed in an additional category of "uncertain" with an assessment of the likelihood of discovery. This is not, however, required by the DMRB. The assessment methodology used by the Highways Agency has been based on sampling, and some uncertainty is thus inevitable. Certainty could only be achieved by stripping the trace of the proposed development in advance of authority to proceed with the proposed scheme. Where significant risk of undiscovered remains is anticipated, however, this has been identified in the Environmental Statement.
- 9.12 Objectors also raise issues about monuments which are part of a group and need to be assessed cumulatively. Where that is the case, it has been done. Those decisions were taken within the Archaeological Working Group. Similarly, an overall assessment has been made for each site, whether it is the site of a single monument or part of a group; all factors have been included (visual and noise impacts and context) in the assessment of the significance of the effect on the site. Other environmental factors such as ecology were not included in the cumulative cultural heritage assessment, because ecological matters have no direct relevance to the cultural heritage assessment.
- 9.13 The Environmental Statement, as published, is fully compliant with Section 105 of the Highways Act 1980, and the Highways Agency request a finding of fact to that effect.
- 9.14 The Stonehenge Management Plan sets out guidance and identifies long term objectives against which it is accepted that the published scheme should be assessed.
- 9.15 Objective 6 calls for special treatment for the WHS and for a unified approach by Government Departments, agencies and other statutory

- bodies. That is precisely what has happened, from the inception of the Stonehenge Master Plan, through scheme design and assessment, and including the innovative approach to the funding proposed for the scheme.
- 9.16 Objective 9 seeks the restoration of the appropriate landscape setting of the Stones and the immediately related ceremonial monuments in the core. "The core" is described in paragraph 1.5.13 of the Management Plan as largely defined visually by the immediate ridge lines and horizons that surround Stonehenge; but in fact those ridge lines do not form a continuous horizon. The core is further defined in paragraph 1.5.13 by reference to section 5.2 and Figure 8 of the Management Plan. They envisage a core area of permanent grassland. Table 1 immediately follows figure 8, and provides a definition of the key landscape and visual characteristics of the core *"Well defined amphitheatre created by horizons along King Barrow Ridge in the east, Normanton Down in the south, Winterbourne Stoke Down and Fargo Plantation in the west and the woodland screening Larkhill in the north"*.
- 9.17 It was against this background of uncertainty that the Highways Agency sought as a priority, during scheme assessment for the area, to determine which roads were required to be removed or screened to provide an improved landscape setting for the Stones. This resulted in the definition of the MILS. Whilst some objectors claim that Objective 9 should be related simply to the area shown on Figure 8, no one has disputed the accuracy of the MILS in relation to what it purports actually to show.
- 9.18 The text which follows Objective 9 in the Management Plan goes on to state that a tunnel for the A303 and the removal of the A344 are critical elements in any strategy for improving the setting of the core area and for restoring the Stones to their landscape. It continues, *"Removal of the A303 and the A344 could also restore the integrity of The Avenue, an important ceremonial route currently severed by roads and traffic"*. The use of the word "could" acknowledges that there is a number of other road crossings over the remainder of The Avenue which also interrupt its route.
- 9.19 Management Plan Objective 11 makes clear the differentiation between the restoration of the landscape required in the core of the WHS under Objective 9 and the removal or screening of inappropriate structures within the wider WHS landscape.
- 9.20 Objective 19 seeks arrangements for managed, open access on foot within the core zone of the WHS. In the following text, paragraph 4.5.8 states that the tunnelling of the A303 and the closure of the A344 are critical to the achievement of this Objective.
- 9.21 Objective 23 argues for the comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety and enhance the historic environment. Paragraph 4.6.4 of the Management Plan states that a strategy to achieve this includes three separate strands – placing the A303 in a tunnel; closure of the A344; and related landscape restoration schemes within the Stonehenge Bowl, including the removal of the A344 in the

longer term. Some objectors argue for a reading of this text which would require the placing of the A303 in a tunnel throughout the Stonehenge Bowl. But to reach such a conclusion would require reading the word "within" as meaning "throughout". That is not what it says.

- 9.22 The Management Plan goes on to recognise that putting the A303 in tunnel may inevitably have detrimental consequences within the WHS. However, the Plan expressly states that such adverse consequences need to be properly balanced against the major benefits that removal of the A303 over the tunnel section would bring to the WHS. Some objectors ignore this statement in the Management Plan, and argue that any detrimental effect of the scheme on the WHS is sufficient to reject the scheme. The reality is that, as the Management Plan recognises, sometimes improvements can only be achieved at an environmental cost. It is then a matter of judgement as to what cost is acceptable for a particular range of benefits.
- 9.23 The published scheme is thus in substantial compliance with the relevant objectives of the Stonehenge Management Plan. In 2000, when the Management Plan was published, the Master Plan contained provision for a 2km cut and cover tunnel. The Master Plan was stated within the Management Plan to be an "action plan" for the proposed tunnel. Nobody has suggested at the inquiries that the changes made, increasing the length of the tunnel to 2.1km and changing to a bored system of tunnelling, have done anything other than to introduce environmental improvements. It must therefore follow that the published scheme is consistent with what is envisaged in the Management Plan.
- 9.24 Stonehenge is probably the UK's best known prehistoric monument, and is famous internationally as an icon of this country. Its current setting has been described as a national disgrace, and the existence of busy highways close to the Stones contributes to that poor setting. Over many years, efforts have been made to find a solution to the highway problems, both in transport and heritage terms, which stood a realistic chance of being achievable. That has now been made possible by an innovative approach by the Treasury, which has allowed DCMS to contribute a substantial sum towards the cost of the published scheme to reflect the major heritage benefits that would be derived from its implementation. This is an opportunity which must not be lost.
- 9.25 The Highways Agency seeks approval of the draft Orders, taking into account the variations set out in document HA/0/53.

## **10. CONCLUSIONS**

- 10.1 Bearing in mind the submissions and representations I have reported, I have reached the following conclusions, reference being made in square brackets to earlier paragraphs where appropriate.

### **Structure of conclusions**

- 10.2 I refer first to the matter reported in Section 3 above, the argument that sensitivity testing of the Highways Agency evidence on transport economics should have been required. I then set out the tests which the Orders before the inquiries are required to satisfy if they are to be made. Next, I reach conclusions about relevant policies against which the scheme should be judged. I reach brief conclusions on the background and history to the A303 Stonehenge scheme, before turning to consideration of the objections to the scheme. I deal with the issues raised by objectors on a topic by topic basis, in order to avoid constant repetition, since many of the same issues were raised by a variety of different parties. I also reach conclusions on issues raised by supporters of the published scheme, before balancing the arguments in favour of and against the proposal. I then set out my conclusions on the case of each of the objectors who appeared at the inquiries. I next consider the alternative routes proposed, and then other matters raised at the inquiries and in written representations. Finally, I reach a conclusion on each of the Orders before the inquiries, relating that conclusion to the statutory tests which the Order concerned must meet.

### **The argument for sensitivity testing of the Highways Agency evidence on transport economics**

- 10.3 The Stonehenge Alliance argued that the Highways Agency's evidence on transport economics was not robust, and that the Agency should be directed to carry out additional sensitivity testing of that evidence. The Highways Agency resisted this contention on the basis that the evidence concerned had been produced in accordance with the prescribed methodology for highway schemes.
- 10.4 The arguments on this matter are summarised in Section 3 of this report, and the documents in which these arguments are developed are listed there [3.11].
- 10.5 I ruled that no further sensitivity testing was required of the Highways Agency for reasons which are briefly summarised at paragraphs 3.8 to 3.10 of this report, but which are set out in full in the transcript of the inquiries for the morning of Day 18 at pages 2 to 5.
- 10.6 I promised, however, to draw attention in this report to the reservations expressed by the Stonehenge Alliance regarding reliance being placed on evidence based on the National Road Traffic Forecasts, which date from 1997, when the Alliance argues that emerging thinking in transport policy questions fundamental principles and policies upon which those forecasts are founded. It is the Stonehenge Alliance's contention that, if the

National Road Traffic Forecasts change in the light of new information or in the light of changes in policy, then the results of the economic appraisal of the published road scheme could change, and that would raise the question whether it should be reappraised, and whether the impact of that evidence on any decision taken in this case should be reassessed.

- 10.7 I do not find that argument persuasive, because it could be applied to new information or to a change of policy affecting any issue relevant to a decision such as this, with the result that no decision could ever be taken while any new information might be forthcoming or any policy upon which the decision was based might be amended. I believe that this would prevent many decisions being taken in a timely way.

### **The tests for the making of the Orders**

- 10.8 As indicated in the case details set out at pages 1 to 3 above, the Line Order and the Slip Roads Order are drafted under Sections 10 and 41 of the Highways Act 1980. The Detrunking Order is drafted under Sections 10 and 12 of the Highways Act 1980. These provisions allow the Secretary of State, if he is satisfied after taking into consideration the requirements of local and national planning, including the requirements of agriculture, that it is expedient for the purpose of extending, improving or reorganising the national system of routes for through traffic in England and Wales, to make an Order directing that a highway or proposed highway shall become or cease to be a trunk road.
- 10.9 The Side Roads Order is drafted under Sections 12, 14 and 125 of the Highways Act 1980. These provisions allow the Secretary of State by Order to authorise the stopping up of any highway or private means of access and the provision of any improved or replacement highway or new means of access to premises adjoining or adjacent to a highway. The stopping up of any access or highway may only be authorised if the Secretary of State is satisfied that no access to the premises is reasonably required, or that another reasonably convenient means of access or route is available or will be provided.
- 10.10 The Compulsory Purchase Order is drafted under Sections 239, 240, 246 and 250 of the Highways Act 1980 and Section 2 of the Acquisition of Land Act 1981. For this Order to be made, the land affected must be required for the construction or improvement of or the carrying out of works to a trunk road, or for the provision of buildings or facilities to be used in connection with the construction or maintenance of a trunk road. Those powers extend to the acquisition of land to mitigate any adverse effect the existence of a highway would have on the surroundings of that highway. The powers also extend to the acquisition of rights over land. In addition to the tests contained in the two Acts of Parliament, for land and interests to be included in a confirmed Compulsory Purchase Order ODPM Circular 02/03 requires that there is a compelling case for acquisition in the public interest; that this justifies interfering with the human rights of those with an interest in the land affected; that the acquiring authority has a clear idea of how it is intending to use the land it seeks to acquire; that all necessary resources to carry out its plans are

likely to be available within a reasonable timescale; and that the scheme is unlikely to be blocked by any impediment to implementation. (Circular 02/03 has now been replaced by ODPM Circular 06/04, but the earlier Circular continues to apply to Orders such as the Compulsory Order in this case which were made before 31 October 2004.)

- 10.11 The Tunnel Regulation Order is drafted under Sections 1, 2 and 122A of the Road Traffic Regulation Act 1984. The Byway Regulation Order is drafted under Sections 1, 2, 22 and 122A of the Act of 1984. These provisions allow the Secretary of State to make an Order preventing the use of a road by vehicular traffic of a kind which is unsuitable having regard to the character of the road, if he considers it expedient to do so. Exemptions may be allowed in the Order. Section 122A of the Act allows such Orders to be made in anticipation of the provision of the highway concerned. Section 22 of the Act applies to roads forming part of or lying adjacent to or contiguous with land belonging to the National Trust which is held by the Trust inalienably. Such roads can be the subject of regulation which has the purpose of conserving or enhancing the natural beauty of the area, or of affording better opportunities for the public to enjoy the amenities of the area, or recreation or the study of nature in the area.

### **The policy context**

#### ***Transport policy***

- 10.12 The Government's White Paper, "A New Deal for Transport – Better for Everyone" (Document DD32) establishes the national transport policy against which the A303 Stonehenge Improvement should be judged. While the White Paper makes it clear that building new roads should no longer be regarded as the first option, particularly in environmentally sensitive areas [6.6.46], it also recognises that parts of the existing trunk road network are under considerable stress [4.179]. Thus, at the same time as the White Paper was issued, the Government also published "A New Deal for Trunk Roads in England" (Document DD33), which made it clear that trunk roads such as the A303 would continue to be part of the country's transport system [6.6.120, 6.10.20]. Document DD33 introduced a targeted programme of large scale improvements to trunk roads, one of which was the present scheme.
- 10.13 Document DD32 also sets a policy of increasing opportunities for walking and cycling in the countryside [4.181].

#### ***Land use policy issues***

##### *The relevance of inscription as a WHS*

- 10.14 Stonehenge is inscribed (with Avebury) as a WHS under the World Heritage Convention, which the UK has ratified [4.119, 5.1.7, 5.7.2]. The Government is thus committed to the "identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage" of the site. The Convention has not been incorporated into domestic law in the UK and it is thus not enforceable

directly in any domestic court or tribunal [5.1.35, 5.7.4, 6.2.2], but the status of WHS is recognised in Government policy guidance [5.7.7, 6.1.12]. While neither paragraph 2.22 nor 2.23 of PPG15 is directly applicable to the proposals before the inquiries, all parties accept (and **I conclude**) that the inscription of Stonehenge as a WHS is a key material consideration to be taken into account in the consideration of the Orders before the inquiries [5.1.14, 6.2.4, 6.2.50, 6.6.21]. This conclusion is borne out in case law, in which it has been held that WHS inscription signals the particular importance of a site as a material consideration in determining any proposal which would affect it [6.2.29, 6.6.96, 6.18.4 to 6.18.11]. It is clear from the cases referred to, however, that each case falls to be decided on its merits, after all the evidence produced has been evaluated, and that the positive benefits of a scheme need to be weighed against any adverse effects before a decision is reached [6.6.96].

- 10.15 I have applied the conclusion that WHS status represents a key material consideration in assessing the published scheme below.

*The nature of the inscription of Stonehenge as a WHS*

- 10.16 Stonehenge was inscribed in 1986 as a cultural (as opposed to a natural) WHS [5.1.5]. Since 1992, it has been possible to inscribe sites as cultural landscapes [5.1.6], but that category did not exist at the time that Stonehenge was nominated [6.1.8, 6.2.37].

- 10.17 The inscription of the site sets out the justification for the nomination [5.7.10]. Whilst it makes reference to a "landscape without parallel", I do not consider that the use of these words can translate the inscription into one of a cultural landscape, a category which did not exist until six years after Stonehenge was inscribed [6.1.8, 6.2.37, 9.5]. ICOMOS - UK suggested that the site was inscribed for the whole landscape, not just for the main monuments [6.2.8], but that is in no way supported by the ICOMOS report to the World Heritage Committee of April 1986, which concentrates to a very substantial extent on the monuments of Stonehenge and Avebury [6.2.32].

- 10.18 Now, the nomination of a site would include a statement of its significance, but this also did not apply at the time that Stonehenge was nominated. It is therefore necessary to look at the wording of the nomination and at the justification for that nomination to see what was the basis of the case for the inscription of Stonehenge [5.7.12, 6.2.35, 6.2.38, 9.6]. From that document, it is clear to me that the emphasis was on the archaeological aspects of the site, a view shared by English Heritage and the DCMS, amongst others [5.1.9, 5.7.11, 6.2.36, 6.2.37, 6.6.78, 8.5.16, 8.5.24, 9.6]. I consider that it was Stonehenge and its associated sites and monuments which demonstrated the outstanding universal value for which this part of the Stonehenge and Avebury WHS was inscribed. English Heritage has undertaken a detailed survey of the WHS to identify all archaeological remains which are broadly contemporary with the sites on which the WHS inscription was based. This has been used by the Highways Agency (as it was intended by English Heritage to be) to determine what is of outstanding universal value within the WHS [6.2.40].

10.19 It was argued at the inquiries that the boundaries of the Stonehenge WHS had been drawn in an arbitrary way, with more attention to modern and easily recognised features than to those things which contribute to the historic or landscape value of the site [5.1.12, 5.7.11, 6.6.77, 8.5.13]. Much of the area surrounding but outside the designated WHS is also considered to be of importance to the cultural heritage [5.1.13]. On the other hand, the WHS includes modern roads and the existing Visitor Centre for Stonehenge [6.2.39]. I consider that, however the boundaries have been drawn, they define the area which is now subject to the WHS inscription and therefore to the special consideration which that implies. Sites of cultural heritage importance outside the WHS boundary will attract their own protection, depending on any independent recognition of status (as a scheduled monument or listed structure, for example).

10.20 **I conclude** that Stonehenge is inscribed as a cultural WHS, that the emphasis of the nomination was on Stonehenge and the associated sites and monuments within the WHS, and that the inscription covers the area within the approved WHS boundary.

*The implications of the inscription of Stonehenge as a WHS*

10.21 Some (but not all) objectors argue that, by ratifying the World Heritage Convention, a State Party accepts an obligation under Article 4 of the Convention to protect and conserve the WHS to the utmost of its resources [6.6.13], and therefore that, regardless of the cost of any necessary work, to the extent that any finance is available to the State Party, all such finance should be used to protect and conserve the WHS [9.4]. English Heritage is the Government's statutory advisor on the historic environment, including the provision of advice on the application of the World Heritage Convention [5.1.8]. English Heritage advises that it is not a tenable interpretation of the Convention to argue that expenditure on a WHS represents the pre eminent call on a Government's resources. It would mean that even the poorest of countries would always have to put the preservation and presentation of WHSs ahead of feeding the hungry, healing the sick and providing homes for the homeless [5.1.33, 5.1.34, 5.7.5]. Nor is that view supported by DCMS, which has policy responsibility for the implementation of the provisions of the Convention in the UK, and represents the country on the World Heritage Committee [5.7.2, 9.4]. This approach of the DCMS and English Heritage is supported by the way the Convention has been interpreted in other countries and in other translations [5.7.6].

10.22 **I conclude** that, in considering the nature of the UK's obligations under the Convention, a judgement has to be made as to what is reasonable, and it is not the case that the Convention requires that WHSs will represent the pre eminent call on the resources of a State Party.

10.23 WHSs are places of outstanding universal value, which it is the duty of the international community as a whole to protect [5.1.3, 5.7.2]. The protection of such sites involves sustaining the outstanding universal value for which the site is inscribed [6.2.4].



- 10.24 The World Heritage Committee has set out criteria for establishing outstanding universal value in Operational Guidelines [5.1.7]. Cultural sites such as Stonehenge must also demonstrate authenticity, while natural sites must demonstrate integrity [5.1.7, 5.7.12, 6.2.33].
- 10.25 ICOMOS advises the Secretariat of the World Heritage Committee regarding cultural heritage sites [5.1.4, 5.7.3]. It has a presence in this country through ICOMOS-UK. ICOMOS-UK is one of the objectors to the published scheme [6.2]. ICOMOS-UK argues that outstanding universal value is a characteristic of the Stonehenge WHS as a whole, and consequently the site has integrity, a test which is mentioned in emerging new Operational Guidelines which are close to being finalised by the World Heritage Committee. ICOMOS - UK therefore argues that integrity is no longer relevant only to natural WHSs [6.2.4]. It is clear from the nature of these documents, however, that they cannot operate retrospectively. **I conclude**, therefore, that it is the current Operational Guidelines which apply in this case, and that it is authenticity rather than integrity which is relevant to the Stonehenge WHS [5.7.12, 6.2.33, 9.5].
- 10.26 The Operational Guidelines encourage State Parties to use a system of management zones for WHSs [5.7.12], and this is reflected also in national guidance contained in PPG15 [5.7.7]. **I conclude**, however, that the Management Plan for Stonehenge (which was commended by the World Heritage Committee [5.7.14]) has not (as some objectors contend) redefined the outstanding universal value of the WHS. Only the World Heritage Committee is able to agree the outstanding universal value of a site in the context of a nomination or re nomination [5.1.19, 6.2.38].
- 10.27 Nor do I consider (as some objectors argue) that the whole of a large site such as Stonehenge should be regarded equally as of outstanding universal value [6.2.13, 6.18.12, 6.23.2]. Clearly, the whole of the area included by the boundary is within the WHS, and therefore entitled to special consideration, but I do not consider that this means that the whole of the site need necessarily demonstrate outstanding universal value. The modern roads within the Stonehenge WHS and the sewage works south of Larkhill, for example, do not in my view contribute substantially to the outstanding universal value of the site [6.2.9, 6.6.105, 9.7].
- 10.28 I do not accept that the WHS designation means that the Stonehenge WHS becomes an archaeological reserve under the Valletta Convention [6.6.14]. Various historic assets are protected by statutory designation as scheduled monuments, and the fact that the area is inscribed as a WHS means that it is given particular importance in the planning system as stated above. But there is nothing in the Convention (which has not been specifically imported into UK domestic law) which gives the WHS as a whole the status of an archaeological reserve [6.6.81].
- 10.29 Similarly, in relation to the Australian cases on the Burra Charter [6.6.15], these arise from the fact that Australia has enacted domestic legislation to support the World Heritage Convention. That is not the case in the UK [6.6.82].

10.30 I return below at paragraph 10.306 to the issues of whether the outstanding universal value of the Stonehenge WHS and its authenticity would be compromised by the proposed scheme.

*The Development Plan*

10.31 The Development Plan for the area includes the Wiltshire Structure Plan (2011), adopted in 2001, and the Salisbury District Local Plan, adopted in 2003. A new deposit draft alteration to the Wiltshire and Swindon Structure Plan is just beginning a process of consultation, but, at this early stage, **I conclude** that little weight should be attached to the provisions of that new deposit draft [4.182].

10.32 Structure Plan Policy T11 and the Key Diagram show an on line improvement of the A303, and provide that the improvement should include a bypass for Winterbourne Stoke and a Countess Roundabout flyover [5.2.1].

10.33 Policy HE1 of the Structure Plan provides that the WHS and its landscape setting should be afforded protection from inappropriate development, and that no development should take place which by reason of its scale, siting or design would prejudice the WHS and its setting in the landscape [6.1.13]. Policy HE2 indicates that features of archaeological or historic interest and their settings should be protected from inappropriate development. Where nationally important archaeological or historic remains, whether scheduled or not, would be affected by proposed development, there should be a presumption in favour of their physical preservation in situ [6.1.13].

10.34 Turning to the Local Plan, Policy CN20 provides that development which would adversely affect a scheduled ancient monument or other nationally important archaeological features or their settings will not be permitted, and Policy CN24 indicates that development which would adversely affect the archaeological landscape of the Stonehenge WHS or the fabric or setting of its monuments will not be permitted.

10.35 The District Council has also adopted the Stonehenge Management Plan as supplementary planning guidance [4.183]. PPG12 confirms that supplementary planning guidance can be taken into account as a material consideration when assessing a proposal for development. **I conclude** that the provisions of the Management Plan which are particularly relevant to the published scheme include Objectives 9, 16, 19, 20 and 23 [5.1.21, 5.1.25, 6.1.6, 6.4.22, 6.4.36, 6.5.14 to 6.5.20].

10.36 Objective 9 requires that the appropriate landscape setting for the Stones and the immediately related ceremonial monuments in the core area of the WHS should be restored [6.5.14]. Objective 16 proposes that degraded and other archaeological features within the WHS should be enhanced where appropriate [6.1.6]. Objective 19 indicates that arrangements for managed open access on foot within the core WHS zone should be provided [6.5.15]. Objective 20 suggests that access and circulation to other key archaeological sites within the WHS landscape

should be improved to relieve pressure on the Stones and to increase public awareness [6.5.20]. Objective 23 requires that measures should be identified which will provide comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety and enhance the historic environment [6.5.17].

*National and regional planning policy guidance*

10.37 National policy guidance contained in PPGs 1, 7, 9, 11, 13 and 24 underlines the importance of protection of the historic environment [6.6.22], quite apart from the more specific guidance contained in PPG15 and PPG16. PPG 15 underlines the importance of protecting physical survivals of our past, particularly in WHSs, where the guidance provides that development proposals should always be carefully scrutinised for their likely effect on the site or its setting in the longer term [6.1.12]. PPG15 also makes it clear that the historic environment of England is all pervasive, and cannot in practice be preserved unchanged [6.6.93]. PPG 16 demonstrates a similarly balanced approach. While recognising that archaeological remains are irreplaceable, and represent a finite resource, with a presumption in favour of their physical preservation [6.1.11], the guidance goes on to record that the case for the preservation of archaeological remains must be assessed on the individual merits of each case [6.6.93].

10.38 Regional Policy Guidance includes Policies TRAN2 and TRAN4, which establish the A303 improvement at Stonehenge as being within the first priority five year time horizon of the Guidance [6.6.94].

*The 1995 Planning Conference*

10.39 Some objectors contend that the resolutions of the 1995 Planning Conference [4.3] ought to be given weight in assessing the published scheme [6.7.4, 6.8.2]. The Conference was, however, a non statutory process, designed to offer an opportunity for the public and interested parties to express a view on ways in which the problems on the Stonehenge section of the A303 might be overcome [6.7.17, 6.8.25]. Neither the Conference nor its resolutions have any special status in relation to the scheme now under detailed consideration some nine years later. **I conclude** that very little weight should attach to the resolutions of the Planning Conference in considering the present applications.

***The overall policy context***

10.40 Because of the policy protection offered to the WHS and its monuments by the provisions outlined above, the need to address the traffic problems of the A303 in the area of Stonehenge must clearly have regard to the special nature of the area through which the road travels [4.26, 5.1.1]. Equally, it is necessary to recognise that the major roads which pass close to the Stones are long established [5.1.1] and presently in place [6.2.56].

10.41 Those roads in their present form might have existed for only a brief

moment in the long period of development of the WHS landscape [6.3.8, 6.4.48, 6.18.17, 6.26.6], but access to the WHS using the appropriate transport of the time has presumably been possible for as long as the major monuments have been in position.

- 10.42 While some would argue for a policy approach agreed shortly after Stonehenge was given to the nation [6.26.2], the Prehistoric Society points out that decisions taken over the last 80 years in relation to development in the immediate area of Stonehenge have often very rapidly been regarded as mistakes [6.3.9]. Those decisions have quickly been recognised as obtrusive, and have needed to be undone. Attitudes move on, and greater protection is now generally considered to be appropriate for such a special area than was envisaged even only 35 years ago [6.3.9, 6.3.12, 6.10.19].
- 10.43 Faced with these conflicting views, **I conclude** that it is the policies and standards of today which should be applied to the proposals put to the inquiries. The standards and policies of the future can only be a matter of speculation at this stage. **I further conclude** that the proposals put to the inquiries should be considered against the situation which currently applies on the ground.

### **The background and history to the A303 Stonehenge scheme**

- 10.44 The A303 trunk road is part of the Trans European Route Network, and plays an important role in linking London with the South West of England [1.1].
- 10.45 The section of the A303 between Amesbury in the east and Berwick Down in the west is the first single carriageway section of road encountered by a driver travelling on the M3 and the A303 to the South West after leaving London [1.2].
- 10.46 The published scheme would upgrade the 9km section of single carriageway which currently runs past Stonehenge and through the village of Winterbourne Stoke. Extending to 12.4km of dual carriageway, the scheme would include a 2.1km twin bored tunnel through the heart of the Stonehenge WHS, designed to remove the impact of roads and traffic from the immediate area of Stonehenge. The scheme would also provide a bypass for Winterbourne Stoke [1.3].
- 10.47 Stonehenge is the southern part of the "Stonehenge, Avebury and Associated Sites World Heritage Site", although in practice it is treated as a distinct and separate entity from Avebury, which lies more than 25km to the north. The WHS at Stonehenge covers an area of some 2,665ha, and contains 416 individual monuments, which are grouped into some 175 scheduled areas with the benefit of statutory protection [2.19]. Its boundary is shown on Figure 2.1 of Volume 1a of the Environmental Statement (Document DD10). The published scheme would run through the area of the WHS between Longbarrow Crossroads and Countess Roundabout [2.8]. There are also many other archaeological sites and monuments in the immediate area, which lie outside the designated WHS [2.19]. It is thus an area in which it is difficult to carry out road building

without having some effect on archaeological assets.

- 10.48 Proposals for the improvement of the A303 between Berwick Down and Amesbury have been the subject of study and consultation since 1991. More than 50 possible routes have been considered [4.1].
- 10.49 The 1995 Planning Conference recommended that the A303 past Stonehenge should be placed in a 4km tunnel to remove the impact of the sight and sound of roads and traffic from the immediate environs of Stonehenge [4.4]. The Conference also recommended that a bypass for Winterbourne Stoke should be constructed as a separate scheme [4.4].
- 10.50 In 1996, the then Secretary of State for Transport rejected the idea of a 4km tunnel as unaffordable, and the A303 scheme was removed from the Government's Roads Programme [4.5].
- 10.51 In 1997, however, English Heritage (who are the custodians of Stonehenge) made a proposal for the on line dualling of the A303, with the section running past Stonehenge being placed in a 2km cut and cover tunnel. This proposal had the support of the National Trust, which owns the majority of land in the immediate area [4.7].
- 10.52 That proposal was compared with three representative alternative routes [4.8], and, in July 1998, the proposal was included in the revised Government Road Programme as an "exceptional environmental scheme" [4.10]. What has now been agreed as a fixed contribution of £70m to the total cost of the scheme would be provided from heritage sources, in recognition of the fact that the tunnel component was being included specifically to secure environmental benefits for Stonehenge [4.10]. The use of a tunnel to avoid unacceptable heritage impacts in the WHS was a consistent thread in consultations following the 1995 Planning Conference. Surface dualling across the WHS was generally not regarded as acceptable [6.4.3], though that is a view which some objectors would challenge [6.9.5, 6.20.7, 6.21.2].
- 10.53 Following public consultation [4.11], further development work on the scheme [4.12], and the consideration of other tunnel options [4.13 to 4.15], the draft Orders for the scheme were published [4.16]. They included a bypass for Winterbourne Stoke and a grade separated junction at Countess Roundabout [4.11], an extension of the proposed tunnel to 2.1km, and a proposal to construct the tunnel by boring, rather than by using the cut and cover method [4.15].

### **Conclusions regarding the need for an A303 scheme at Stonehenge**

- 10.54 The section of the A303 which would be affected by the published scheme carries between 22,000 and 33,000 vehicles per day, some 9% of which are HGVs. While speed control can maintain a steadier flow of traffic along a road, and therefore increase its effective capacity to some extent [6.7.9], I am satisfied that current traffic flows along this route are substantially more than the current single carriageway can accommodate satisfactorily, so that traffic queues occur regularly [4.18]. For

- pedestrians, the busy existing single carriageway is difficult to cross [4.155].
- 10.55 Although the overall accident record of the road is presently around the national average for a road of its type, I accept that there are concentrations of accidents at particular places along the affected route [4.20], and that dealing with them is difficult along a single carriageway [4.21]. I note that the closure of the junction of the A 303 with the A344 would remove a further source of accidents [5.2.9] and (given the inclusion of the proposed tunnel) substantially remove the effects of roads and traffic from the immediate surroundings of the Stonehenge monument [4.28].
- 10.56 In competitive bidding for resources for major road improvements, the A303 at Stonehenge does not demonstrate the most urgent case for funds judged by the usual standard of the best economic return on investment [6.1.3], but it has been included in the Targeted Programme of Improvements as an "exceptional environmental scheme" because of recognition by the Government of the additional need (over and above the highway case) to address the environmental problems which the presence of the road currently causes to Stonehenge [4.26].
- 10.57 The village of Winterbourne Stoke is badly affected by the intrusion of traffic, by severance, and by a high risk of accidents [4.23, 5.2.8, 5.3.1 to 5.3.10 and 5.4]. There is wide support for addressing these problems in Winterbourne Stoke [9.3].
- 10.58 Securing environmental and heritage benefits for Stonehenge is the sole reason for the inclusion of the proposed tunnel within the scheme [4.28, 5.7.19]. Some objectors are ready to agree that it would enhance the setting of the Stones and other nearby monuments, help to restore the physical and perceptual relationships of some key landscape associations across the part of the WHS through which the tunnel would run [6.4.9], and also reduce severance in that area [6.5.2]. In addition, it would remove the severance of The Avenue by the A344 in the immediate area of Stonehenge [6.5.7].
- 10.59 The removal of traffic from the immediate area of the Stonehenge monument is one of three principal components of the Stonehenge Project. The other two main components are the relocation of the Stonehenge Visitor Centre, which currently lies adjacent to the A344, and the reorganisation of land use within the Stonehenge Estate of the National Trust [4.29]. These other two components of the Stonehenge Project depend on the carrying out of the road scheme for their achievement, but the same is not true in reverse. The road scheme is independent of the other components of the Stonehenge Project [4.30, 4.31].
- 10.60 **I conclude** that there is a traffic need for an improvement scheme on the A303 at Stonehenge to deal with congestion, to improve road safety, and to improve conditions in Winterbourne Stoke. There is also an environmental and heritage need to improve the setting of the Stonehenge monument.

### **The scheme proposals**

- 10.61 The objectives of the A303 Stonehenge Improvement scheme are thus to
- address the under capacity of the single carriageway A303 [4.18, 4.19]
  - reduce accidents on the A303 [4.20]
  - provide a bypass for Winterbourne Stoke [4.23]
  - remove the impact of roads and traffic from the immediate area of Stonehenge [4.28]
  - open the way for wider public access to the land in the immediate area of the Stonehenge monument [4.29]
  - open the way for the relocation of the Stonehenge Visitor Centre from its present position very close to the Stonehenge monument [4.29].
- 10.62 The way in which the published scheme seeks to achieve those objectives is described in detail between paragraphs 4.35 and 4.65 above, subject to modifications requested during the course of the inquiries, which are summarised at paragraph 4.190, and listed in Documents HA/0/2, HA/0/13, HA/0/38 and HA/0/42.
- 10.63 The forecast traffic flow for the road justifies the provision of a dual two lane carriageway [4.35]. Some objectors argue, however, that, rather than planning to provide for that traffic flow, steps should be taken to reduce it [6.7.11, 6.8.13, 6.8.19]. I return to this issue at paragraphs 10.202 (in relation to tourist traffic) and 10.215 to 217 below (in relation to the required capacity of the Winterbourne Stoke Bypass), concluding that the case for a dual two lane solution has been made out. On the other hand, the long term adequacy of a dual two lane solution is challenged by some objectors [6.9.9, 6.26.7 to 6.26.10]. These challenges were not supported by any evidence of substance, hence **I conclude** on the basis of the detailed expert evidence produced by the Highways Agency that a dual two lane carriageway would accommodate satisfactorily existing and anticipated traffic along the A303, including induced traffic [4.34, 6.6.126].

### **Conclusions regarding design standards**

- 10.64 Apart from eight departures from standards in respect of horizontal and vertical alignment in the area of Countess Roundabout, the scheme complies fully with the DMRB [4.66, 4.67]. The departures have been accepted by the Highways Agency's Technical Approval Authority, subject to the inclusion of a length of anti-skid surfacing, which has been included in the scheme [4.67].
- 10.65 Such design requirements regarding tunnels as are contained in the DMRB have been followed in the preparation of the stretch of the published scheme which it is proposed to place in tunnel. The tunnel would also comply with almost all the requirements of the current draft EU Tunnel Directive (Document DD81). That Directive is likely to be ratified during 2004. When the final form of the Directive is known, full compliance could be achieved within the contingency provision made for

the scheme [4.68].

- 10.66 Safety arrangements for people using the proposed tunnel have been considered in the design process in a Tunnel Design and Safety Group, which has included representatives of the emergency services [4.70 to 4.74]. The emergency services have raised no objection at the inquiries to the inclusion of the proposed tunnel in the scheme. The original objection of the Fire Brigade to the scheme proposals was withdrawn before the opening of the inquiries [1.12]. Tunnel safety remains, however, a concern to some objectors.
- 10.67 Objectors argue that tunnels are more dangerous to construct and use than surface roads. They claim that they should only be employed when absolutely necessary, not just for cosmetic reasons [6.9.5, 6.13.4, 6.14.1, 6.17.9]. If users of a tunnel are expected to involve themselves in self rescue in any emergency (as is planned for the proposed tunnel), objectors argue that this would imply a need for special survival training for every user of the tunnel [6.19.6]. The point is also made that some people find it difficult to travel through tunnels [6.20.5]. Objectors also claim that, when an accident happens in a tunnel, it is more difficult to deal with than an accident on the open road [6.9.10, 6.17.11], and that a tunnel would be more prone to terrorist attack than an open road [6.9.10].
- 10.68 The Highways Agency accepts that tunnels attract construction risks which are more difficult to manage than those for equivalent open roads. But those risks are properly understood, and the Agency claims that they would be effectively managed by the JV, which would take all necessary measures to ensure safety during construction [6.17.19]. There is no evidence that a modern road tunnel attracts a greater risk of accident than travel on the open road. The proposed tunnel would provide a well lit, dry and frost free environment within which there would be no road junctions and a high degree of surveillance [6.9.23]. There are tunnels of up to 3.2km in the UK, and they have an exceptionally good safety record [6.9.19, 6.13.9, 6.17.19]. They appear to operate successfully without the need for each tunnel user to be given special survival training, and the vast majority of people who wish to use them seem to do so without difficulty. Recent serious tunnel incidents abroad have taken place in tunnels of a very different design from that proposed at Stonehenge, in which there were few points of escape and no means of driving smoke away from stationary vehicles [6.19.22]. Most accidents which occurred in the proposed tunnel on the A303 would be easier to deal with in a one way dual carriageway tunnel than on the existing single carriageway open road [6.9.23].
- 10.69 If a tunnel is provided, objectors argue that it should be provided with the maximum level of protection in the form of smoke extraction, fire suppression and measures to isolate affected areas of the tunnel [6.8.12].
- 10.70 The Highways Agency agrees that appropriate measures to ensure tunnel safety must be planned as part of the tunnel construction. The Agency says that this has been done in conjunction with the Tunnel Design and



Safety Consultation Group [6.8.32, 6.20.13], which has considered emergency scenarios which could arise in great detail [6.9.23, 6.21.5].

10.71 **I conclude** that, apart from approved departures, the published scheme complies with the DMRB. **I conclude** further that existing tunnels in UK have a good safety record; that risks during construction and operation of the proposed A303 tunnel have been properly assessed; and that the planning which has gone into the proposed design of the tunnel means that there is no argument which represents an obstacle to the approval of the scheme in relation to tunnel safety.

10.72 During the design and development of the published scheme generally, there was extensive consultation and liaison with relevant agencies and interest groups [4.75 to 4.82]. There was no challenge to design issues concerning the published scheme save in relation to the specific issues concerning the design or inclusion of elements of the scheme dealt with in the balance of these conclusions. Despite that, there remains substantial disagreement between the Highways Agency and its supporters on the one hand, and the objectors to the published scheme on the other hand, regarding in particular ***the extent to which the scheme complies with relevant policy, its impact on the environment, and its economic justification.***

#### **Conclusions regarding compliance of the published scheme with relevant policy**

10.73 I set out between paragraphs 10.12 and 10.43 above the policy context within which the published scheme must be judged. I now conclude on whether the published scheme complies with the relevant policies.

#### ***Transport policy***

10.74 Given that a scheme for the improvement of the A303 in the area of Stonehenge was specifically authorised as an exceptional environmental scheme in Document DD33, which was published at the same time as and in the light of the Government's national transport policy document (Document DD32) [6.10.20], I do not see that it can be argued that the published scheme is at odds with Government policy [6.10.1 to 6.10.5 and 6.10.15]. That policy was framed with the inclusion of a road improvement at Stonehenge in mind. **I conclude** that a proposal to improve the A303 in the area of Stonehenge was clearly envisaged within the transport policy adopted by the Government.

10.75 **I conclude** that the scheme would also increase opportunities for walking and cycling in the countryside, in line with national policy, through proposals to safeguard and to extend the rights of way system in the area of the scheme [4.181]. There are objections to some aspects of the published scheme from rights of way interests, which are set out in Sections 6.24 and 6.25 above, but they do not challenge the effect of the scheme on walking and cycling. The rights of way objections are dealt with in detail at paragraphs 10.220 to 10.244 below.

***Land use policy***

- 10.76 The adopted Structure Plan contains Policy T11 and the Key Diagram showing an on line improvement of the A303 at Stonehenge, with a bypass for Winterbourne Stoke and a flyover at Countess Roundabout [5.2.1, 6.6.95]. The Regional Planning Guidance includes Policies TRAN2 and TRAN4, which establish the A303 improvement at Stonehenge within the first priority five year time horizon of the Guidance [6.6.94]. **I conclude** that the published scheme would be in line with these policies of the Structure Plan and the Regional Planning Guidance.
- 10.77 Policy HE1 of the Structure Plan deals specifically with the WHS of Stonehenge and Avebury. It provides that the WHS, together with its landscape setting, should be protected from inappropriate development. It defines "inappropriate development" as that which, by reason of its scale, siting and design, would prejudice the WHS and its setting in the landscape [6.1.13]. In my view, in Policy HE1, the Structure Plan does not differentiate (as certain other policy documents do) in the application of that protection as between various parts of the WHS. The County Council considers that the proposed scheme would be in accordance with this policy [5.2.2], and indeed the Structure Plan itself welcomes the proposals contained in the then Stonehenge Master Plan, which provided for a 2km cut and cover tunnel [5.2.2]. The County Council's position in terms of the compliance of the published scheme with Policy HE1 is contested by objectors.
- 10.78 Although I consider that the published scheme would offer benefits for the immediate area of the Stonehenge monument, I agree with objectors that it would, in some places, prejudice the WHS and its setting in the landscape [6.6.34, 6.23.3]. Although the WHS is currently effectively separated into two sections by the surface level A303 trunk road, it is possible to cross from one side of the trunk road to the other with care [6.2.22]. That would not be possible at the western end of the WHS if the published scheme were to be carried out, because the division between the north and the south portions of the WHS would be a dual carriageway running from the western tunnel portal to the Longbarrow Crossroads, parts of which would be in a cutting up to 14m deep [6.3.13]. This would be a new and dominant feature in the WHS landscape [6.6.34, 6.6.35], and in my view it would represent inappropriate development, which, by reason of its scale and siting would prejudice the WHS and its setting in the landscape. Notwithstanding the view of the County Council expressed at paragraph 26.26 of the Structure Plan [6.6.95], **I conclude** that the published scheme would conflict with Policy HE1 of the adopted Structure Plan.
- 10.79 Structure Plan Policy HE2 deals with features of archaeological and historic interest generally and individually; it is not specific to Stonehenge. Again, it seeks to protect from inappropriate development not just cultural heritage assets, but also their settings [6.1.13]. Although I accept the evidence that no known nationally important archaeological or historic remains would be directly affected by the published scheme proposals [4.126, 9.9], it seems to me that the settings of some archaeological assets would be affected by inappropriate

development. The Highways Agency accepts that, at either end of the proposed tunnel, the portals and approach cuttings would form a new, locally visible feature within the WHS [4.89]. English Heritage agrees with this assessment [5.1.28]. Objectors contend specifically that the western tunnel portal would have a significant adverse impact on the settings of three Scheduled Ancient Monuments (Sites 39, 41 and 42) which the Environmental Statement accepts as very important, and one unscheduled archaeological site (Site 38) which the Environmental Statement accepts as important [6.1.26, 6.1.29, 6.3.14, 6.3.20]. As regards the eastern tunnel portal, objectors argue that this would have a major adverse impact on Site 66, part of King Barrow Ridge [6.1.35, 6.3.16].

- 10.80 While I consider that there can be argument about the importance of the extent of the impact of the published scheme in these respects, in my view it is clear that aspects of the scheme would adversely affect the setting of some of the monuments identified by objectors, and, to that extent, **I conclude** that the published scheme would be in conflict with Policy HE2 of the adopted Structure Plan.
- 10.81 Structure Plan Policies HE1 and HE2 are reflected in Local Plan Policies CN24 and CN20 respectively. Again the Policies seek to protect not just archaeological assets, but also their settings [6.1.14]. Salisbury District Council, the local planning authority, considers that the published scheme conforms with the policies in the Local Plan [5.8.2]. That view is also contested by objectors, however, and in my estimation the same issues arise as those which applied to the Structure Plan policies. While there would be no direct physical effect on any Scheduled Ancient Monument or on any known nationally important archaeological feature [4.126, 9.9], I consider that the settings of the WHS and of specific monuments within it would be adversely affected by aspects of the published scheme.
- 10.82 Despite the view of the local planning authority, **I conclude** that the published scheme would be in conflict with Policies CN20 and CN24 of the adopted Local Plan.
- 10.83 Turning to the issue of compliance with the supplementary planning guidance provided by the relevant objectives of the Management Plan, I consider each of these in turn.
- 10.84 Objective 9 requires that the appropriate landscape setting for the Stones and the immediately related ceremonial monuments in the core area of the WHS should be restored. Paragraph 4.4.6 of the Management Plan explains that a core area of permanent grassland, surrounded by a mixed agricultural landscape farmed in an environmentally sensitive manner, should be the basis for the future management of the WHS. It goes on to suggest that the removal of the A303 from the landscape is a critical element in any strategy for improving the core area and for restoring the Stones to their landscape [6.5.14].
- 10.85 The core area of the WHS (as envisaged by the Management Plan) is defined in section 5.2 of the Management Plan, shown on a map (figure 8 of that Plan) and further explained in Table 1 of the Plan [6.1.18,

6.5.16]. Although the Management Plan also refers to the Stonehenge Bowl and the Stonehenge Amphitheatre, it does so only by reference to the use of those terms in other reports or documents. I do not accept the Highways Agency's contention that there is any ambiguity in what is meant by the WHS core area [6.4.46, 9.16, 9.17]. Nor do I accept the contention that the definition of the core area in section 5 of the Management Plan was prepared purely for the purpose of defining a management zone. In my view, the definition is clearly to be applied throughout the Management Plan, and hence to the many references to the core zone in the various objectives contained in section 4 of the Management Plan. Consequently, I do not often refer in these conclusions to the area referred to by the Highways Agency as the MILS [4.87, 4.129], which was defined by the Agency in order to establish the area of visual influence of the Stonehenge monument [6.1.70]. I endeavour to relate the Objectives of the Management Plan to the areas to which the Objectives themselves refer.

- 10.86 I consider that the proposals of the published scheme for the treatment of the A303 and the A344 within the core zone of the WHS would materially assist the creation of a pastoral downland landscape in the central area of the WHS [5.1.25]. Some objectors are prepared to accept that the published scheme would comply fully with Objective 9 [6.1.6, 6.5.19], but I share the view of other objectors [6.6.10] that the published scheme proposals would not wholly achieve Objective 9, because the tunnelled section of the A303 would emerge into the landscape within the core zone at both its easterly and its westerly ends.
- 10.87 Objective 16 of the Management Plan provides for degraded and other archaeological features within the WHS to be enhanced where appropriate [6.1.6]. The thinking behind this is to widen visitor interest in the WHS beyond the present concentration on the Stonehenge monument [6.1.43]. In particular, reference is made in paragraph 4.4.21 of the Management Plan (which contains supporting text to Objective 16) to action being taken under that Objective to reinstate the ceremonial route of The Avenue, and to emphasise its location on the ground to visitors [6.1.43]. There are presently many practical obstacles to the restoration of The Avenue to the south of the A303 [6.1.85], and the part of The Avenue which lies beneath the A303 is not scheduled [6.1.38], but I do not accept that the published scheme would prevent the achievement of Objective 16 in relation to The Avenue, however unlikely such restoration might be to the south of the A303.
- 10.88 Objective 19 of the Management Plan seeks arrangements for managed open access on foot within the core zone of the WHS, and argues that the tunnelling of the A303 and the closure of the A344 would be critical to the achievement of this Objective [6.5.15, 9.20]. I agree with the Highways Agency that the published scheme would facilitate arrangements for open access on foot within the core zone [6.8.29], though again access would not be assisted between those parts of the core zone in which the A303 would not be in tunnel because of the obstacle provided by the cuttings and the safety arrangements for the dual carriageway in those parts of the core zone. I note that land to the south of the A303 at the proposed western tunnel portal is, in any event,

currently in private ownership, and therefore not accessible to the public [6.3.20, 6.3.34, 6.9.17].

- 10.89 Objective 20 of the Management Plan provides that access and circulation to other key archaeological sites within the WHS landscape should be improved in order to relieve pressure on the Stones and increase public awareness of other monuments within the WHS. Objectors claim that the published scheme would deliver an opposite effect, by creating new obstacles within the WHS because of the road cuttings. This is said to have a particularly damaging effect at Longbarrow Crossroads [6.5.20]. In response, the Highways Agency contends that the scheme, by removing much of the A303 and the A344 and by creating a new byway within the WHS, would make a major contribution to the achievement of Objective 20 [6.5.32]. Again, I consider that the published scheme would offer progress in achieving Objective 20, without securing its full achievement.
- 10.90 Objective 23 of the Management Plan requires that measures should be identified which will provide comprehensive treatment of important road links within the WHS in order to reduce traffic movements and congestion, improve safety and enhance the historic environment [6.5.17]. Paragraph 4.6.4 within the supporting text to the Management Plan refers to placing the A303 in a tunnel, closure of the A344 and related landscape restoration schemes within the Stonehenge Bowl [5.1.22]. The reference to the Stonehenge Bowl is to a wider area than the core area [6.5.17, 6.5.18]. Paragraph 4.6.4 accepts that tunnelling may have an inevitable detrimental effect on archaeology along the A303 route corridor, but indicates that this should be balanced against the major benefits for the WHS which would result [6.4.37, 9.22]. These are identified as including the reunification of the landscape, the reduction of visual and noise pollution around the Stones, and the provision of increased and safer access to the Stones and their immediate environs [5.1.22].
- 10.91 Some objectors argue that Objective 23 requires the complete removal of roads from the WHS [6.4.22], or from the Stonehenge Bowl [6.5.19, 6.6.8, 6.6.10, 9.21]. This is clearly incorrect. The Objective refers only to the treatment of road links to **reduce** traffic movement [5.1.22, 5.2.4], not to remove traffic entirely from the WHS. The accompanying text refers to the use of a tunnel, but does not specify how long it should be [6.5.17]. To argue for a reading of the text which would require the placing of the A303 in a tunnel within the whole of the Stonehenge Bowl would require the interpretation of the word "within" as meaning "throughout". That is not what the text says [9.21].
- 10.92 The Stonehenge Master Plan spoke of a 2km tunnel for the A303 past Stonehenge [5.1.17]. The subsequent Management Plan refers to "a tunnel of appropriate length" [5.1.22]. But the Management Plan refers to the Master Plan as a mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered [5.1.26]. I agree with the Highways Agency and their supporters that, if the Management Plan had been intended to change radically the length of the proposed tunnel, it could not have

referred to the Master Plan in those terms [5.1.26, 9.23]. I do not consider that debate regarding the drafting of the Management Plan is of assistance in interpreting the final form of that document [6.6.11]. It is the wording of the final form of the two documents which needs to be considered [6.6.73, 6.6.74].

- 10.93 Against that background, I consider that the published scheme would substantially comply with Objective 23. It would reduce traffic movement and congestion within the WHS; it would improve safety; and it would enhance the historic environment, at least in the area from which the tunnel would remove traffic.
- 10.94 **I conclude**, therefore, that the published scheme is in line with the requirements of the Management Plan as supplementary planning guidance, in that, while it does not fully achieve any of Objectives 9, 16, 19, 20 or 23, in each case the published scheme would offer progress in the achievement of those objectives, and raise no insuperable obstacle to further, more extensive achievement.
- 10.95 Turning to compliance with the Government's published guidance on planning policy, PPGs 15 and 16 offer the most directly relevant advice.
- 10.96 Objectors to the scheme contend that the assessment of the scheme has failed to have regard to its long term effects, since they argue that the carrying out of the scheme would preclude the complete fulfilment of a number of the objectives in the Stonehenge Management Plan [6.4.20], in particular Objectives 9 and 23 [6.4.22]. For the reasons given in paragraph 10.92 above, I do not consider that the relevant objectives of the Management Plan would be prejudiced by the published scheme.
- 10.97 Nor do I accept that the published scheme would be contrary to the guidance contained in PPG 16, as argued in paragraph 6.6.24, on any of the bases there set out. In particular, I do not consider the integrity of the WHS to be a relevant consideration under PPG 16. I do not accept that the objector can say that "*the proposals would cause serious damage to sites not at present readily apparent*", any more than the promoter could say with total certainty that they would not. What I find to be the case is that great diligence has been exercised to ensure that archaeological remains not presently apparent would not be needlessly destroyed [6.4.45]. I do not consider that the published scheme would bring with it any adverse impact on opportunities for interpretation and understanding of the WHS [6.18.25, 6.18.29]. As I indicate at paragraph 10.37 above, I consider that PPG 16 exhibits a very balanced approach to the issue of development affecting archaeological assets.
- 10.98 **I conclude** that the published scheme respects the guidance offered in PPG 15 and PPG 16.
- 10.99 On policy compliance overall, therefore, **I conclude** that the published scheme would comply with the Government's transport policy (10.74, 10.75), with Structure Plan transport Policy T11 (10.76), and with Regional Policy Guidance Policies TRAN2 and TRAN4 (10.76). It would comply with, but not wholly achieve the supplementary planning

guidance contained in Objectives 9 (10.86), 16 (10.87), 19 (10.88), 20 (10.89) and 23 (10.93). It would also respect the guidance contained in PPG 15 and PPG 16 (10.98). The proposal would not comply with Structure Plan Policies HE1 (10.78) and HE2 (10.80) or with Local Plan Policies CN20 and CN24 (10.82). This is a matter to which I return in my overall evaluation of the scheme at paragraph 10.296 to 10.319.

## **Conclusions regarding the impact of the published scheme on the environment**

### ***Criticisms of the Environmental Statement***

- 10.100 Some objectors question the adequacy of the Environmental Statement (Documents DD8, DD9, DD10 and DD11/1 to DD11/9 inclusive). Specific criticisms are contained in paragraphs 6.2.15, 6.2.16, 6.2.19, 6.2.23, 6.4.7, 6.5.8, 6.6.17 to 6.6.20 and 6.6.67. In particular, the main complaints made are that the Statement gives no special recognition to the fact that the site affected is a WHS [6.2.15]; that the impact of the published scheme on relationships between monuments [6.2.16, 6.5.8], the relationships between monuments and their surrounding landscape [6.2.23] and the impact of the scheme (including the cumulative impact) on the outstanding universal value of the WHS should have been considered [6.2.19, 6.4.7, 6.6.23]; that the possible impact on unknown archaeology has been underestimated [6.4.7, 9.11]; that relatively too much credit has been claimed for the reduction of noise in the core of the WHS [6.4.7]; that the assessment takes a standard approach to measuring environmental impact, based on methods devised for considering road schemes [6.6.17]; and that no attempt has been made to assess spiritual impacts on the site [6.6.67, 6.10,11].
- 10.101 Objectors contend that the Environmental Statement should have contained additional detail regarding the alternatives to the published scheme which had been considered [6.4.32], including any alternative which did not involve road building [6.6.18].
- 10.102 In fact, I accept that the Environmental Statement was carefully prepared, in accordance with the requirements of the DMRB, but developed further in consultation with appropriate experts [6.2.42, 6.2.43, 6.4.38, 6.6.83], having regard to the sensitivity of the site and its status as a WHS [6.2.48 to 6.2.50, 6.6.83]. The agreement reached on the assessment process to be followed included agreement on the values to be ascribed to different elements of the overall assessment [4.76, 6.2.42, 6.2.43]. I consider that regard has been paid to the relationships between monuments [6.4.42, 6.6.87]. I am satisfied that all appropriate care has been taken to avoid, so far as possible, damage to unknown archaeology [6.1.80, 6.4.41, 6.5.26]. I accept the difficulty the promoter faced in assessing in an objective way the spiritual impact of the proposals [6.6.135]. I note that representatives of Druids who appeared at the inquiries were broadly supportive of the proposals [5.6.1, 8.1.19]. I do not see a basis upon which removal of traffic from the immediate environs of Stonehenge could be regarded as having an adverse spiritual impact [6.2.52, 6.10.23]. The Environmental Statement is based on methods of assessment devised for road schemes because it concerns a

road scheme [6.6.85]. To have followed a different path would have invited justified criticism [6.6.86]. I consider that the assessment carried out for the Highways Agency covered all the main effects which the published scheme would be likely to have on the WHS [6.2.47].

10.103 In my view, the Environmental Statement contains adequate detail of the alternatives to the published scheme which have been considered [6.6.91]. It is necessary to bear in mind that the purpose of an Environmental Statement is to be an aid to efficient decision making. It is not an obstacle course. The purpose of the Statement is to provide information to assess the main effects in environmental terms of the road proposals contained in the published scheme. I note that English Heritage considers that there is more than adequate information contained in the Environmental Statement on which a judgement of the effects of the road proposals can be made in this case [5.1.36], and that the Environment Agency and English Nature clearly considered that sufficient information was available to them to allow them to withdraw their objections to the published scheme [1.12]. In addition, I note that the Countryside Agency considers that the Environmental Statement represents a fair assessment of the existing landscape and the impacts of the proposed road scheme [8.5.1].

10.104 **I conclude** that criticism of the Environmental Statement is unjustified. In my view it complies with Council Directive 85/337/EEC, as amended by Council Directive 97/11/EC. I consider that the Environmental Statement complies with section 105 of the Highways Act 1980 [9.13].

10.105 Objectors also claim that the published scheme would have an impact on the River Avon cSAC near Amesbury [6.6.19], and that therefore an appropriate assessment of the effects of the scheme on the cSAC should have been provided [6.6.20, 6.28.17]. The Appropriate Assessment for the published scheme under the Habitats Regulations will, however, be undertaken by the Secretary of State for Transport as the competent authority for the scheme. The Secretary of State will have available the Statement to Inform the Appropriate Assessment (Document DD132), which English Nature agrees provides adequate information for the purpose [4.110], as the basis for undertaking the Appropriate Assessment [6.6.92, 6.28.24]. I note that English Nature has withdrawn its objection to the published scheme in the light of that document, and confirmed that it "*is a comprehensive and objective document that covers the required issues*"[6.28.24].

### ***Landscape and visual***

10.106 I consider that landscape impacts of the proposed scheme have been assessed in accordance with the requirements of the DMRB [4.84]. For the Highways Agency to have used any other approach in connection with a road scheme would have been inappropriate [6.6.86]. In particular, it is inappropriate to refer to guidance on the methodology for multi modal studies [6.6.38], because the proposed scheme is not part of a multi modal study [6.6.111].

10.107 The scheme includes landscape mitigation designed to blend the new



form of the A303 into the landform [4.86].

- 10.108 Within the WHS, roads already exist [6.2.56]. I agree that this must be reflected in the assessment of the impact of the published scheme [6.6.107]. The published scheme would improve views across the landscape for visitors to the Stonehenge monument itself by removing traffic and roads from their view [4.87]. A 2.1km section of road within the WHS would also be removed from views within the wider area around Stonehenge [6.2.55]. On the other hand, at either end of the proposed tunnel, the portals and approach cuttings would be visible to people approaching the tunnel [4.89]. Parts of the WHS would have a surface level road of increased width, and an increased proportion of the WHS would be severed by a road in cuttings [6.18.13]. The proposed River Till viaduct would be visible within the landscape from the north side of Winterbourne Stoke [6.9.12], but I recognise the fact that acceptable routes for a Winterbourne Stoke Bypass have only been identified to the north of the village. Any route to the south would pass through a landscape to which greater damage would be caused, and would be likely to have an adverse impact on the village Conservation Area [6.9.26].
- 10.109 Objectors contend that the cuttings east and west of the tunnel portals would sever what they call the "visual interconnectedness" of the landscape, and compromise access to and enjoyment of the site [6.2.17, 6.2.25, 6.6.34]. Some objectors argue that a road in cuttings would make it difficult to explain to visitors the interrelationships of monuments and sites [6.18.14]. It is the case, however, that the proposed scheme would not have an adverse impact on intervisibility between monuments, and that the eastern part of the WHS is already severed by a dual carriageway. I do not see how the width of a road or whether or not it is in cutting has a bearing on the difficulty of interpreting or explaining the site to visitors. I agree with objectors, however, that it is the 1.6 km section of the WHS between the proposed western tunnel portal and Longbarrow Crossroads where the scheme would have a substantially greater landscape and visual impact on the WHS than that of the existing A303 [6.6.29, 6.8.5, 8.5.2]. That part of the WHS would also suffer increased severance caused by the creation of the dual carriageway, partially in cutting, as compared with the existing, at grade, single carriageway A303 which presently exists in that area [6.2.55].
- 10.110 I do not agree, however, that those impacts on the landscape are alone sufficient to condemn the published scheme. I share the view of the Highways Agency that positive and negative impacts should be balanced against each other in evaluating the proposed scheme [6.1.87, 6.6.105, 6.6.106, 6.6.110, 6.8.27]. In that evaluation, consideration should also be given to the various points within the surrounding landscape from which the proposed roadworks would be visible [6.1.78, 6.5.11, 7.11.18]. It follows that I reject the contention of some objectors that the balancing of positive and negative impacts is inappropriate in a WHS [6.2.29, 6.3.22]. I note that one of the cases quoted by objectors in support of the view that a balancing exercise is inappropriate in fact makes it clear that this is precisely the exercise that should be undertaken [6.6.96].

- 10.111 While I recognise that the proposed tunnel works would involve breaking the surface of the land at Stonehenge Bottom and installing an impervious layer [6.6.30, 6.16.5], I accept the evidence of the Highways Agency that the reinstatement planned would avoid any long-term adverse effect on vegetation in that area [6.6.101, 6.16.15]. It would therefore have no long term landscape or visual impact.
- 10.112 I accept that the creation of a road in tunnel, as proposed in the published scheme, would improve access between sites within the WHS by making it possible to walk across the roof of the tunnel between the parts of the WHS to the north and south of the existing line of the A303 [6.2.52, 6.5.24]. This would allow the National Trust to open up its land in that area to achieve its policy of an open grassland area [6.1.71, 6.4.40]. On the other hand, the emergence of the road in cutting from the proposed western tunnel portal would sever direct access between the barrow group at Winterbourne Stoke on the one hand, and the Bush Barrows, Normanton Barrows and the Lake Group on the other hand [6.2.20]. I note, however, that there is no evidence that straight line, direct access between those monuments has ever formed part of any recognised route [6.6.109], and that much of the land to the south of the A303 between the Winterbourne Stoke Group and the other barrows mentioned is currently in private ownership, with no provision for public access to it [6.5.27].
- 10.113 **I conclude** that the published scheme would have both positive and negative effects on the landscape and the visual appearance of the area through which it would run, and that these need to be balanced in the overall assessment of the scheme. I return to this issue at paragraph 10.296 below.

### ***Archaeology and cultural heritage***

- 10.114 Consideration of the impact of the proposed scheme on archaeological assets was the subject of discussion between the Highways Agency and the specialist archaeological advisors of English Heritage, the National Trust and Wiltshire County Council while the published scheme was being prepared [4.76]. They agreed the survey process adopted [4.125]. The results were shared with a wide group of interested parties [4.77].
- 10.115 The impact of the proposed scheme on each cultural heritage component of the affected area has been assessed by a modified version of the DCMS non statutory criteria for the scheduling of Ancient Monuments, as implemented by English Heritage [4.130]. The implications for the WHS as a whole have also been reviewed [4.134, 9.10].
- 10.116 I accept the evidence of the Highways Agency to the effect that the published scheme would have no direct impact on any Scheduled Monument, Grade I or Grade II\* Listed Building, Registered Park or Conservation Area [4.126, 9.9]. The only Grade II items affected are listed milestones, which are not in their original pockets. Subject to Listed Building Consent, they would be repositioned if the scheme were to be approved [4.127].

- 10.117 I also accept that assessment of the impact of the proposed scheme on the archaeological and cultural heritage assets which might be affected has been carried out in accordance with the DMRB [6.4.38]. No route through the WHS, however carefully selected, could avoid all adverse impacts. There would be some impacts on remains of lesser importance [4.131]. The Highways Agency contends, however, that the loss of and impact on cultural heritage would be insignificant in comparison to the benefits which the published scheme would bring to the WHS, even without allowing for the benefits which would be delivered by the comprehensive mitigation strategy proposed [4.132, 4.135, 4.137].
- 10.118 English Heritage considers that the level of archaeological investigation carried out in this case is unprecedented for a road scheme such as this, and is reasonably certain that direct impact on archaeological remains would be minimal [5.1.28].
- 10.119 Despite that endorsement, objectors question the cultural heritage assessment on a number of bases. It is argued that the scheme would put unknown archaeological remains excessively at risk; it is argued that the settings of non visible remains would not be preserved by the published scheme; it is argued that the published scheme would have adverse impacts on archaeological assets in the areas of Longbarrow Crossroads, the western tunnel portal, Wilsford Down and the eastern tunnel portal; and it is argued that the published scheme should be condemned for failing to remove the current severance of The Avenue by the A303.
- 10.120 Consideration also needs to be given to the impact of the published scheme on the later listed features at Winterbourne Stoke and Amesbury.
- 10.121 Objectors contend that, while the published scheme sets out to avoid disturbance to known archaeological sites, there may be many unknown sites which would be affected [6.1.53, 6.4.12, 6.9.7, 6.15.7]. It might be necessary to trowel and hoe the entire subsoil surface of the trace of the scheme to be sure of not missing a major but insubstantial site. This is not part of the draft mitigation strategy [6.4.14]. Objectors argue that the approach therefore does not comply with PPG16, which presumes in favour of preserving nationally important archaeology, whether it is scheduled or not [6.4.13]. As noted above, however, (10.37) PPG16 follows a balanced approach, recognising that the case for the preservation of archaeological remains must be assessed on the individual merits of each case.
- 10.122 The procedure followed for assessing the likelihood of meeting buried archaeology has included document based research, the use of aerial photographs, and sampling by way of physical excavation. Investigation continued until each member of the Archaeological Advisory Group was satisfied [4.76, 6.2.43]. Where there is an accepted higher than average risk of finding previously unrecorded remains, test trenches have been dug [6.1.74]. In an area so rich in archaeological resource, I accept that some uncertainty as to what might be found during construction cannot be avoided [6.3.30]. Sampling techniques, by definition, cannot be relied upon to find every item, but I consider that the risk of finding unknown

archaeological remains has been properly assessed, and because the mitigation would provide for archaeological supervision of topsoil stripping, even unforeseen remains would be catered for [6.4.41, 6.9.15, 9.11].

- 10.123 In relation to the setting of non visible monuments, I note that the Highways Agency have assessed direct impacts on known buried remains, and have recognised that buried remains contribute to the context of a place [6.4.43]. I do not accept, however, that existing planning guidance provides that non visible remains have a setting which needs to be preserved [6.3.19, 6.18.12]. Paragraph 27 of PPG16 refers only to visible remains [6.3.19], and the DMRB indicates that visual intrusion, as an impact on setting, is only relevant for archaeological remains which are clearly visible to the human eye [6.3.33, 9.10].
- 10.124 In relation to the impact of the published scheme on the archaeological or cultural heritage in specific locations or areas, at Longbarrow Crossroads objectors contend that the published scheme would impact on the setting of the barrow group to a greater extent than the medium adverse assessment contained in the Environmental Statement [6.3.14]. There would be an impact also on the Winterbourne Stoke Group. It is alleged that the setting of this Group is already compromised by the proximity of the current A303, but that the proposed dual carriageway and the complex of roundabouts and sliproads included in the published scheme would make the impact much greater [6.15.2 to 6.15.6].
- 10.125 As the Highways Agency points out, however, the design of the published scheme has succeeded in avoiding direct impact on any scheduled monument. It has also limited the landtake in the area so far as possible. The scheme would displace the main carriageway of the A303 to the south, making use of low lying ground which appears never to have contained prehistoric burial mounds. It would also reuse the existing A303 as sliproads in order to reduce the landtake for the highway. The northern roundabout would be some 30m further away from the Long Barrow than the present roundabout, and the main carriageway would be in cutting, as well as being displaced to the south [6.3.28, 6.5.28, 6.15.19]. I accept that the methodology used in assessing the impact of the published scheme on the barrows at Longbarrow Crossroads is the same as that used throughout the Environmental Statement [6.3.28].
- 10.126 I consider, however, that the impact of the published scheme on the barrows in this area is an adverse one, which needs to be weighed in the balance with the benefits which would accrue from the published scheme elsewhere in the WHS.
- 10.127 In relation to the impact of the published scheme in the area of the western tunnel portal, objectors contend that, seen from the west, the portal cutting would dwarf the round barrow sites 41 and 42, and appear dominant in relation to the modest scale archaeological features of barrows 39, 41 and 42 [6.1.26]. It is claimed that the western tunnel portal would also have a direct impact on Site 38, which could be a palisade feature of some importance [6.1.28, 6.3.15]. It is further

argued that the placing of the road in a substantial cutting would permanently remove the possibility of direct access between archaeological features to the north and south of the A303 [6.5.10]. In particular, the separation of the Neolithic long barrows on Wilsford Down from the remainder of the earlier Neolithic ceremonial landscape (the two Cursuses and Robin Hood's Ball) would be made worse by the emergence of the A303 at the western tunnel portal in a deep cutting. Although land south of the A303 in this area is in private ownership and not accessible to the public, objectors make the point that this need not always be the case. The deep cutting west of the tunnel would make a serious north/south physical barrier in a way which does not apply now [6.3.20].

- 10.128 I note, however, that these barrows are separated by the A303 at present; that the potential importance of the palisade feature is disputed [6.3.29]; that Robin Hood's Ball is 5km away from the western tunnel portal on a military training range; and that the creation of the tunnel would allow easier passage across the present line of the A303 in the area of the Stonehenge monument [6.3.24]. Intervisibility between monuments would not be affected [6.3.34].
- 10.129 The Highways Agency also argues that the placing of the road in a cutting and a tunnel would not be irreversible [6.3.38]; that there is no evidence that walking directly between barrows was important in Prehistoric times [6.6.109]; that the spatial relationship of monuments would remain unaltered [6.6.100]; and that the relationship between sites could still be appreciated [6.6.108]. The cutting at the western tunnel portal would only be visible in limited areas, but, where it was, it could not be confused with the natural topography [6.6.100]. It would, however, conceal the traffic on it from much of the WHS [6.6.100].
- 10.130 Despite the Highways Agency's response, again I consider that the impact of the western tunnel portal on the WHS raises issues which will need to be weighed in the balance with the benefits which would accrue from the published scheme elsewhere in the WHS.
- 10.131 In relation to the eastern tunnel portal, this is assessed in the Environmental Statement to have a major adverse direct impact on Site 66, close to King Barrow Ridge [6.1.35]. Objectors argue that the setting of the southern most group of barrows at King Barrow Ridge would also be affected by the proximity of the eastern tunnel portal, the depth and width of the proposed road in this area [6.3.16], and the noise and visual impact of traffic [6.6.28]. I note, however, that the scheme would place the eastern tunnel portal some 100m to the east of King Barrow Ridge, and remove the existing dual carriageway and its traffic from a position adjacent to the Ridge [6.3.31].
- 10.132 Again, however, I consider that the impact of the eastern tunnel portal on the WHS will need to be weighed against the benefits of the published scheme in the WHS.
- 10.133 The Avenue is the next specific location raised by objectors. It runs by a circuitous route from Stonehenge to the banks of the River Avon [2.21], and it is thought to have provided a ceremonial route from the river to

the Stonehenge monument [6.1.41].

- 10.134 The Avenue is crossed by both the A344, close to Stonehenge, and by the A303, close to King Barrow Ridge [2.21, 4.128]. The crossing of The Avenue by the A303 dates from the 1960s, when the road in the area of Amesbury was upgraded to dual carriageway standard [6.1.37].
- 10.135 South of the A303, The Avenue is not readily visible on the ground [4.128]. It is visible from the air [6.1.45], and parts of it can sometimes be traced on the ground in certain climatic conditions [6.3.18]. The part of The Avenue south of the existing A303 is mainly in private ownership, and much of it is in active agricultural use. It is also crossed by two further roads, a bridleway and a private access road, and it runs beneath a Grade I listed building [6.1.85, 6.2.51].
- 10.136 Objective 9 of the Management Plan provides that the appropriate landscape setting for the Stones and the immediately related ceremonial monuments in the core area of the WHS should be restored [6.5.14]. The Avenue is the archaeological site most closely related to the Stones, because it is part of the same scheduled monument [6.1.17, 6.1.41]. While the parts of The Avenue under the A303 and Stonehenge Road are not scheduled, the schedule entry makes no distinction between other parts of The Avenue, whether they lie to the north or to the south of the A303 [6.1.38]. I accept that The Avenue represents one monument; I do not accept, however, that the whole of The Avenue should be regarded as within the Stonehenge core [6.1.18]. It is abundantly clear from Figure 8 and Table 1 of the Management Plan that part of The Avenue to the south of the A303 is within the Avon Valley zone, rather than within the core [6.1.42].
- 10.137 The Avenue north of the A303 and part of The Avenue to the south of the A303 are, however, within the core area, in which Objective 9 seeks that the appropriate landscape setting should be restored [6.5.14]. I do not accept the criticism of the published scheme made in relation to Objective 9 on the basis that it does not restore the integrity of The Avenue [6.16.4]. Objective 9 does not seek the restoration of the integrity of The Avenue [9.18]. I consider that the published scheme does much to advance the restoration of the appropriate landscape setting for The Avenue to the north of the A303, and it does nothing to impede the restoration of the appropriate landscape setting to the south of the A303.
- 10.138 As regards, Objective 16 of the Management Plan, this provides that degraded and other archaeological features within the WHS should be enhanced where appropriate [6.1.43]. The line proposed for the A303 would do nothing to enhance The Avenue by removing the present severance to the south of the A303, but nor would it do anything to prevent the restoration of the monument in that area. If the A303 provided the only break in the route of The Avenue between the River Avon and Stonehenge, the Highways Agency says that the severance would be reversible, though I take the point made by the National Trust that this would be costly and unlikely [6.1.46]. But the reality is that the chance of restoring The Avenue south of the A303 is also remote [6.5.29,

- 8.5.23, 9.18]. That being so, the expenditure of an additional £50m to extend the proposed tunnel by 600m to the east in order to remove the current severance of The Avenue by the A303 is difficult to justify [6.19.14].
- 10.139 I note that when the WHS was inscribed in 1986, the concern of the World Heritage Committee was wholly focused on the removal of the A344 from The Avenue, which the published scheme would achieve [5.7.8, 6.16.14]. There was no mention of the impact on The Avenue of the A303, which was, of course, already in place in its existing form [6.2.54]. Nor has the issue been raised by the World Heritage Committee when it has regularly reviewed developments at Stonehenge [5.7.13] or when what has become the published scheme was reported to the Committee [5.7.15], despite the fact that by then ICOMOS was arguing for a longer tunnel. Moreover, the restoration of The Avenue is not identified as a priority in the National Trust Land Use Plan [6.6.103]. Some objectors suggest that an inadequate report was given to the World Heritage Committee of the potential impact of the published scheme on the WHS [6.4.23, 6.6.12], but I note that the consideration of the proposals for the A303 at Stonehenge by the World Heritage Committee has included a visit to the exhibition of the proposals by a member of the World Heritage Centre [5.7.15].
- 10.140 Given the very close link of The Avenue with Stonehenge itself, however, I again believe that the impact of the published scheme on The Avenue should be considered alongside the benefits which would accrue to the WHS from the published scheme.
- 10.141 The impact of the published scheme on the later listed features at Winterbourne Stoke and Amesbury has not been strongly raised by any objector, but nevertheless falls to be considered.
- 10.142 I accept the evidence that the published scheme would have a beneficial effect on the Winterbourne Stoke Conservation Area, as the new road would bypass the historic core of the village. It would result in significant visual and environmental gains for the whole village [2.13, 4.136, 5.3.4].
- 10.143 The Amesbury Conservation Area extends southwards from the A303 to include the historic centre of the town [2.15]. The proposed road scheme would not impinge on the boundaries of the Conservation Area. Those boundaries would remain well screened by vegetation [2.15]. Consequently, neither the character nor the appearance of the Conservation Area would be affected by the scheme.
- 10.144 Amesbury Abbey Park would also be well screened from the proposed road works by existing and planned additional vegetation [4.136]. The scheme would not encroach on the boundaries of the park, and would not affect the character of the historic landscape.
- 10.145 The eastern end of the proposed scheme would, however, affect the setting of the old farm house at Countess Farm, together with its group of attractive barns on the north side of Countess Roundabout. These buildings are Grade II listed buildings [2.15]. The construction of a new

A303 flyover across the roundabout would have an adverse visual impact on the surroundings, including the farm buildings [4.136]. This has to be compared, however, with the existing environment of the Countess Roundabout, particularly the effect of heavy traffic using that roundabout, which passes very close to the listed barns [2.15]. The scheme would take the trunk road traffic flows away from the corner of the roundabout and the curtilage of the listed buildings. The traffic on the roundabout would in future be more local in nature, and less intrusive in the setting of the listed barns [4.59]. On the other hand, the proposed flyover bridge would carry all the through traffic on the trunk road at a high level, not very far from the historic farm buildings. Initially, at least, I consider that this would have a significant visual impact on the setting of the listed buildings, but the proposed landscaping of the roundabout and embankments of the flyover would eventually soften this impact [4.59]. Because the heaviest traffic flows would be moved away from the buildings and the A303 dual carriageway would be screened by landscaping when it matures, it is my view that the Countess Roundabout proposals would ultimately have a neutral effect on the setting of Countess Farm.

- 10.146 **I conclude** that the impact of the published scheme on the archaeological and cultural heritage of the WHS in the areas of Longbarrow Crossroads, the western tunnel portal and the eastern tunnel portal, together with the impact on The Avenue, need to be weighed against the benefits to the WHS which would arise from the published scheme. **I conclude** that the risk to unknown archaeological remains has been properly assessed; that there is no criticism to be made of the published scheme on account of the way that its impact on non visible remains has been assessed; and that there is no reason to reject the scheme on account of its impact on later listed features.

### ***Ecology and biodiversity***

- 10.147 As well as crossing a WHS which is a focus of archaeological assets [4.120], the published scheme would cross or adjoin several sites enjoying protection as valuable ecological resources [4.93 to 4.101]. Mitigation is proposed, both on site [4.102] and off site [4.104]. Although the Wiltshire Wildlife Trust expressed concern about the proximity of the proposed dual carriageway to the Parsonage Down NNR [6.28.19], English Nature is satisfied with the proposals and with the mitigation suggested [4.108 to 4.112, 6.28.26]. I share that view, which was not substantially challenged during the inquiries. **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to ecology and biodiversity.

### ***Drainage and water quality***

- 10.148 The scheme would not affect any ground water source of a public water supply [4.113]. Appropriate arrangements would be made to prevent damage to the water quality of the Rivers Avon and Till during construction works [4.114]. If the published scheme were to be carried out, the creation of DTAs would reduce the chance of contamination of the water environment compared with the situation which applies now



[4.116]. Whilst the Wiltshire Wildlife Trust has concerns about the responsibility for long term maintenance of the DTAs [6.28.22], and the Highways Agency accepts that the use of vegetative systems for the treatment of highway surface runoff is a relatively new science [6.28.29], these arrangements have been found acceptable by the Environment Agency and by English Nature [6.6.119], subject to a schedule of understandings and undertakings between the Highways Agency and those bodies, which are set out in Document HA/0/46. I commend that Document and its provisions to the Secretaries of State, should they be minded to make the Orders [4.118].

- 10.149 Objectors express concern that the proposed tunnel would represent a barrier within the aquifer which could interrupt groundwater flows and private water supplies [6.6.42, 6.14.2, 6.23.4, 6.28.18]. I accept the very clear and persuasive expert evidence submitted on behalf of the Highways Agency, however, that the form of tunnel proposed would cause no significant change to the existing groundwater flow regime [6.6.114, 6.14.5, 6.23.9]. I also note that there is no active groundwater private supply which could potentially be affected by the published scheme [6.6.115].
- 10.150 As regards the need to plan for a major pollution incident [6.6.44], I consider that such an incident would represent a significantly smaller risk to water supplies if the published scheme were constructed than it would if it were to take place at present [6.6.116, 6.6.117].
- 10.151 In relation to the possibility that horizontal drains across the top of the tunnel, designed to allow water to pass the tunnel when the water table is high, might become blocked [6.6.45], on the basis of the evidence I heard, I consider that the size and spacing of the proposed drainage pipes would prevent this occurring [6.6.118].
- 10.152 As regards concerns about the impact of the proposed tunnel on the water table and the possible pollution of aquifers by sewage from villages such as Shrewton, Tilshead, Orcheston and Chitterne [6.20.6], it is evident that those villages lie in different groundwater and river catchments from the proposed tunnel [6.20.14]. I note that the Environment Agency is satisfied that the proposed tunnel would not cause problems in connection with the disposal of sewage in Chitterne [6.20.14].
- 10.153 **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to drainage and water quality.

### ***Air quality***

- 10.154 In operation, the proposed scheme would meet relevant air quality standards at all receptors [4.138], and would meet the vegetation related air quality thresholds within all ecologically protected areas [4.139]. With planned mitigation measures, no site would exceed an acceptable threshold for dust during construction [4.141].

- 10.155 Within the area covered by the traffic network for the scheme, road transport generated greenhouse gas emissions would increase by 4% [4.140]. This would conflict with Government policy to reduce such emissions [6.10.18]. However, overall greenhouse gas emissions from the UK are falling, and total road transport emissions from the local transport model area amount to only 0.1% of the 22% of UK greenhouse gas emissions attributable to road transport [4.140, 6.10.26].
- 10.156 The concern expressed about damage to air quality in the area of Countess Roundabout [6.8.15, 6.9.11, 6.17.5] is not supported by the evidence produced to the inquiries [6.9.25, 6.17.15]. Nor is the concern expressed on the same subject in relation to the wider area of Amesbury [6.19.3, 6.19.19].
- 10.157 **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to air quality.

***Noise impact***

- 10.158 Noise in the area of Stonehenge comes from four main sources – road traffic, flights from Boscombe Down Airfield, the Army’s big guns fired into the Larkhill ranges about 2km north of Stonehenge, and from substantial local military helicopter traffic [6.8.4]. Road traffic is, however, the main source of persistent noise at Stonehenge [6.8.26].
- 10.159 The evaluation of the traffic noise which would arise from the published scheme has been carried out in accordance with the DfT memorandum CRTN [4.144]. Objectors claim that this process is based on very old and outdated information regarding traffic noise generation [6.15.13]. I accept, however, that the CRTN provides the prescribed method for calculation of traffic noise levels in environmental assessments [6.15.27].
- 10.160 The CRTN prescribes mean traffic speeds to be used in the calculation of traffic noise unless available data indicate a traffic speed significantly different from the prescribed speed for the class of road being evaluated [6.15.24]. Objectors contend that the average traffic speed used by the Highways Agency in the CRTN calculations (96 kph to 98 kph) is too low, and that an average speed of 112 kph [6.7.10] or 120 kph [6.15.12] is more likely. I agree with the Highways Agency that producing calculations on the basis of an average speed at or in excess of the maximum legal speed limit is unrealistic [6.15.24].
- 10.161 Objectors also contend that increased traffic on the A303 would generate increased noise on the above ground sections of the road [6.2.26, 6.15.12]. I accept the Highways Agency’s evidence, however, that increases in traffic would be small, given the preponderant long distance use of the A303, which would mean that the journey time saving for users taking advantage of the published scheme would represent only a small proportion of their total journey time [6.15.25].
- 10.162 Traffic noise assessments at specific locations are challenged by objectors.

- 10.163 At Countess Roundabout, objectors argue that the proposed flyover would cause additional noise, which would affect 15% of properties in Amesbury, and would have an impact on the Amesbury Conservation Area, Amesbury Abbey Park and the listed buildings at Countess Farm [6.8.15, 6.9.11, 6.16.7, 6.28.6]. The increase would, however, not be more than 2.5dB, which would be barely perceptible. The elevation of traffic over the proposed flyover would to some extent be offset by the increased distance of traffic from the properties concerned as a result of the realignment of the carriageway over the centre of the roundabout [6.9.25, 6.16.17, 6.17.14].
- 10.164 At Longbarrow Crossroads, objectors contend that the slowing effect of the roundabout would be removed, and higher speed traffic across the junction would therefore generate increased noise [6.15.6, 6.15.15]. The only evidence submitted, however, is that the increase in noise level would be minimal at around 1dB [6.15.15, 6.15.21].
- 10.165 At Winterbourne Stoke, objectors suggest that, in place of the noise from a 40mph road running through the village, residents would perceive the noise from a 70mph dual carriageway less than 500m away [6.7.10]. The evidence produced to the inquiries indicated, however, that there would be major reductions in noise for properties next to the A303 in Winterbourne Stoke [4.147, 5.2.8, 5.3.3], and that no property would be eligible for an offer of sound insulation under the Noise Insulation Regulations 1975 (as amended) [4.148].
- 10.166 Objectors argue that the Highways Agency has not taken into account the variability of traffic noise depending on wet or dry road conditions, the varying condition of the road surface, and refraction effects caused by wind and temperature inversions [6.15.17]. I note, however, that different climatic conditions are taken into consideration by the CRTN model [6.15.28], which remains the prescribed method for calculation of traffic noise levels in environmental assessments [6.15.27].
- 10.167 Objectors also suggest that the Highways Agency has a history of underestimating the traffic noise associated with major new road schemes [6.15.18]. The evidence produced in support of that contention, however, (Annex D to Document JM/1/3) does not indicate the correction value that should have been applied to the various road surfaces that would have remained in place without the schemes being built [6.15.30]. The appropriate noise level correction value has been built into the CRTN calculations for the published scheme, but no beneficial effect has been presumed, because the existing road would be resurfaced with a low noise thin wearing course surface whether or not the scheme proceeds [6.15.31].
- 10.168 Although noise from traffic would, under prevailing south westerly wind conditions, still be discernable in the core area around Stonehenge [6.9.6, 6.28.12], the evidence indicates that there would be a major reduction in that noise [6.9.20]. There would also be a substantial reduction in noise at the Stonehenge monument itself [4.146, 5.1.22].
- 10.169 **I conclude** that there is no argument which represents an obstacle to

the approval of the published scheme in relation to noise impact.

***Impact on land use***

- 10.170 Most of the land needed to construct the published scheme is currently in agricultural use. Some 143.53ha of agricultural land would be affected by the scheme, but 90ha would be restored to agriculture on completion of the proposed works. There would be a permanent loss of 2ha of Grade 2 agricultural land and almost 38ha of Grade 3a land. DEFRA has been consulted, and does not consider such a loss in this location to be an issue of concern [4.161].
- 10.171 No farm would have its viability brought into question as a result of the proposed scheme [4.162]. There are some specific objections to the inclusion of particular parcels of land in the Compulsory Purchase Order [6.1 and 6.29]. I deal with them in detail between paragraphs 10.276 and 10.288 below.
- 10.172 In Winterbourne Stoke, the scheme would remove the trunk road, and the passing trade which it brings, from the petrol filling station/shop and the public house in the village. This would be likely to have a damaging effect, particularly on the petrol filling station/shop, which would probably have to close [4.164]. There is no provision for compensation applicable in that situation [6.28.15], but compensation is not a matter before the inquiries. Representations were made that, if the published scheme is approved, the continuing existence of businesses in Winterbourne Stoke should be advertised by the erection on the A303 of brown and white "Bypassed Community" signs [8.5.29 to 8.5.32]. I accept the evidence of the Highways Agency, however, that the range of facilities provided in Winterbourne Stoke would not justify the erection of such signs, and that it is important that a consistent approach is taken to the provision of these signs in order to allow motorists to make informed decisions about diverting from a major route [8.5.34].
- 10.173 On the other hand, on the basis of the written evidence placed before the inquiries, I cannot see how it can be said that the proposals contained in the published scheme would undermine and compromise the viability of the service station at Countess Roundabout [6.28.14].
- 10.174 The National Trust has a land use plan for the land in the WHS around Stonehenge. The intention is to return arable land to chalk grassland around the Stonehenge monument, converting fields to pasture in order to stop plough damage in this archaeologically sensitive area [4.159]. The achievement of this plan would be facilitated by the proposed scheme [4.163].
- 10.175 Subject to consideration of the objections to the Compulsory Purchase Order below, **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to land use.

***Construction impact***

- 10.176 Construction of the published scheme would be estimated to take three

and a half years. The impact would be minimised by a Contractor's Environmental Management Plan [4.166, 4.167]. The Wiltshire Wildlife Trust argues that the CEMP should be available before any decision is taken on the Orders [6.28.21]. I accept, however, that scheme construction methods have not been settled to the extent that a CEMP can be prepared at this stage [6.28.28]. The use of a tunnel boring machine as opposed to the promoter's planned construction method, for example, is an open issue before the inquiries [6.1.52]. In my view, this would have a substantial impact on the detail of the CEMP.

- 10.177 Despite the doubts of objectors [6.9.4], it is evident that one lane of traffic in each direction would be maintained throughout construction on the A303 [6.9.16]. Disruption to traffic would be minimised by the extent to which the published scheme would be built alongside or beneath the existing road corridor [6.13.8]. Existing traffic movements would also be maintained on the A345, A344 and A360, and all rights of way would be kept open [4.168].
- 10.178 Between 50 and 100 HGVs would require access to the construction compound each day, but delivery of materials would take place outside peak traffic times wherever possible [4.169].
- 10.179 There would be a balance between excavated material and the total fill requirement for the scheme [4.171].
- 10.180 There would be no impact on ecology and biodiversity during construction which should give rise to concern [4.98 to 4.102].
- 10.181 Extensive mitigation matters planned to be put in place during construction would avoid any problem in relation to drainage and water quality [4.114].
- 10.182 With best practicable means mitigation measures in place, no problem would arise in relation to air quality during construction [4.141].
- 10.183 Limits for construction noise have been agreed with the Salisbury District Council Environmental Health Officer [4.149]. During construction, day time limits would be exceeded at one property for one month. Evening limits would be exceeded at eleven properties for one month [4.150]. I consider that those disbenefits should be balanced against the wider environmental benefit of the earlier opening of the Winterbourne Stoke bypass element of the scheme, which they would facilitate [4.150, 4.148]. When that is done, I consider that the balance of advantage for the public (including in particular local residents) is substantially in favour of securing the earlier opening of the bypass.
- 10.184 **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to construction impact.

#### **Conclusions on impact on travellers**

- 10.185 Travellers on the A303 would lose the view of Stonehenge [4.90, 4.172], but they would also lose the delays, accidents and concomitant stress

often experienced on the A303 in the area of Stonehenge at present [4.173, 4.184].

- 10.186 It is clear that a significant number of objectors would regard the loss by travellers of the view of Stonehenge from the road passing the site as a real and substantial loss [6.6.39, 6.12.1, 6.14.4, 6.20.7, 6.21.1, 6.22.2]. That loss is, however, an unavoidable result of what I regard as a stronger priority to remove the sight and sound of traffic from Stonehenge [6.6.112, 6.12.7, 6.20.12, 6.21.4]. That priority is supported by the Structure Plan [5.2.1] and by the supplementary planning guidance contained in the Stonehenge Management Plan [5.2.4, 6.21.4]. The opportunity to appreciate the immediate landscape setting of Stonehenge free from 20<sup>th</sup> Century clutter would be a benefit for the hundreds of thousands of people who make a special journey to see Stonehenge. I agree with the Highways Agency that this would greatly outweigh the loss of passing views [6.21.4].
- 10.187 Objectors suggest that Stonehenge owes much of its iconic status to views enjoyed by generations of people passing on the A303 in vehicles [6.6.39]; but the iconic status of Stonehenge dates from well before motor vehicles were available [6.6.112].
- 10.188 **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to the effect on travellers.

#### **Conclusions on community impact**

- 10.189 At least 95% of existing traffic would be removed from the village of Winterbourne Stoke, and residents there would find it much easier in future to join or to cross the A303 [4.174]. The removal of traffic from Countess Roundabout would make it much easier to travel between Amesbury and Countess Road North [4.175]. Both of these changes would reduce the severance experienced by the communities concerned at present.
- 10.190 **I conclude** that there is no argument which represents an obstacle to the approval of the published scheme in relation to community impact.

#### **Conclusions on economic assessment**

- 10.191 A COBA analysis of the scheme has been carried out [4.186]. Forecast traffic flows were prepared using a SATURN computer based model covering a study area encompassing the section of the A303 proposed to be improved and all major routes within adjacent communities. Data were derived from road side interviews and manual classified counts. Forecast traffic flows reflect expected changes in the study area, and apply growth assumptions consistent with the National Road Traffic Forecasts [4.32] and the DfT's TEMPRO programme, which covers local growth for cars [6.6.125]. The traffic and economic forecasts were prepared in accordance with the provisions of the DMRB [6.6.125]. I consider that criticisms of the adequacy of that method of assessment [6.10.6 to 6.10.8, 6.10.13] need to be raised generally rather than in

relation to an individual scheme such as the proposed scheme in this case. That is the view expressed in Document CD/INQ/1 (referred to in paragraph 3.8 above). The promoter of an individual scheme needs to apply the existing prescribed tests to that scheme, and I consider that the promoter has done so in this case [6.10.21].

- 10.192 A low level of induced traffic has been anticipated [4.34, 6.6.126, 6.10.24], and the Highways Agency therefore carried out its appraisal on a fixed trip matrix [6.6.52]. Objectors challenge this assessment [6.6.55] in the context of related road improvements planned for or taking place on other parts of the A303 corridor [4.180]. They claim that these changes would cause increased traffic growth, which would in turn lead to the progress of traffic on the A303 around Stonehenge slowing once again, thereby eroding the time savings reflected in the economic assessment [6.6.49, 6.26.7 to 6.26.10]. The Highways Agency responds that there is no need to take into account the cumulative traffic effect of upgrading the rest of the A303, because the published scheme can cope operationally with any foreseeable future traffic levels [6.6.126, 6.6.128]. I have carefully considered the Alliance evidence and the Highways Agency's response, and it seems to me that the input material to the economic analysis can be regarded as reliable.
- 10.193 Because the revised location of the Stonehenge Visitor Centre has yet to be determined, the economic assessment has been carried out on the basis that it would still be in its present location in the assumed opening year of 2008 [4.33].
- 10.194 The published scheme is estimated to cost £192m at 2003 Quarter 2 prices, excluding preparation and land costs. The operating cost of the proposed tunnel would be £1.3m per year at current costs, and this has been taken into account in the economic assessment. The net present value of the scheme, discounted to 1998, would be minus £35m assuming low economic and traffic growth, or plus £85m assuming high growth [4.187]. These figures reflect the high cost of the scheme because of the proposed tunnel construction [4.188].
- 10.195 The impact of the scheme would last for many generations, and objectors therefore contend that the cost of the heritage contribution should be spread over a longer period than the 30 years timescale of normal transport cost benefit analysis [6.4.28]. That is, however, not allowed for in the standard assessment method.
- 10.196 Objectors make the point also that these figures place a monetary value only on assumed time savings and assumed accident savings arising from the published scheme. The assessment produced makes no attempt to place a monetary value on environmental costs or benefits [6.4.26], even though there are emerging and respected bases for preparing such assessments [6.6.6, 8.3.2].
- 10.197 I accept the Highways Agency response that, while environmental impacts should be taken fully into consideration, there is currently no accepted methodology for reducing such impacts to a monetary value [8.3.15]. It is therefore a matter of judgement to determine whether

environmental benefits justify financial costs [6.4.48, 6.6.72, 8.3.17].

- 10.198 **I conclude** that the economic assessment of the scheme has been properly carried out. The issue of cost is one to which I return, however, in the immediately succeeding paragraphs below.

### **Conclusions on other issues raised by objectors**

#### ***Costs, economic issues and affordability***

- 10.199 At a more fundamental level than that of the methodology and mechanics of the economic assessment, objectors also raise issues regarding the overall cost of the proposed scheme. There are those who contend that, while action is needed to address problems on the A303, the cost of providing and operating a road tunnel is unnecessary [6.16.3, 6.20.7, 6.21.2, 6.22.2]. The logical extension of that position is to argue for a surface on line or bypass solution. I therefore conclude on the cost objection at paragraphs 10.605 and 10.606 below, after considering the non tunnel alternative schemes put forward at the inquiries.
- 10.200 The provision of a tunnel is also challenged on the basis that the assumed eventual need for a third lane for traffic in each direction would be much more expensive to provide in a tunnel than by way of addition to a surface route [6.9.9]. This point also raises the acceptability of a surface on line or bypass solution, but in fact I accept the Highways Agency evidence that the published scheme could carry flows of up to 80,000 vpd. It would therefore be sufficient to meet any anticipated traffic flow on the A303 at Stonehenge, even with high traffic growth [6.6.126, 6.9.24].
- 10.201 Another reaction from some objectors to the estimated cost of the published scheme is that the considerable resources which would be involved could more appropriately be redirected to an alternative priority [6.10.10, 6.11.3, 6.12.5]. I accept the evidence of the Highways Agency, however, that the Government is seeking to apply available resources in a balanced and sustainable manner [6.11.3]. I consider that the question whether available resources should be directed to this or to another scheme in the same or in a completely different area of activity is essentially a matter for Government. It is not a matter on which substantial evidence was produced at the inquiries. On the other hand, I consider that the cost of the published scheme has been properly assessed [4.64], and that the means of meeting that cost have been considered by Government, which has produced an innovative and collaborative method of meeting the cost [5.2.12, 9.15, 9.24].
- 10.202 Objectors also suggest that expenditure on the published scheme is inappropriate because the need for the road improvement arises largely from people making leisure trips of questionable economic value [6.8.19]. Again, I accept the evidence of the Highways Agency that the A303 is in fact used for a variety of purposes, and that many of the leisure journeys on the road contribute substantially to the local and to the regional economy [6.8.40]. This is borne out by the written evidence of the Regional Tourist Board [5.8.3].



- 10.203 **I conclude** that the future potential cost of providing an additional lane for the proposed tunnel does not represent an obstacle to the approval of the published scheme. Nor do the suggestions that the resources which the scheme would demand could be more appropriately directed to a different priority or that the nature of the use made of the road concerned does not justify the expenditure proposed. **I conclude** further that proper consideration has been given to the funding of the published scheme, and, should it be approved, there is a reasonable expectation that the necessary resources are likely to be available to carry it out within a reasonable timescale [4.10, 4.64, 4.65, 4.188, 9.24]..
- 10.204 The promoter originally claimed as a benefit of the published scheme that it would reduce the effect of peripherality in the South West [4.180]. Faced with evidence suggesting that road building does not necessarily achieve economic benefits for peripheral regions [6.10.9], this claim was not strongly pursued [6.10.22]. **I conclude**, however, that it has not been shown that road building alone automatically has a positive effect on a peripheral region.
- 10.205 On a different tack regarding expenditure on the proposed scheme, some objectors argue that, since the promised £70m heritage contribution to the total scheme cost is not earmarked for any separately defined expenditure or derived from the cost of any element of the proposed scheme, it represents simply a subsidy to the normal roads budget. It cannot therefore operate as a limit on the cost of the heritage benefits which could be included in the scheme [6.4.24 to 6.4.26]. No evidence has been presented to the inquiries that there is a maximum acceptable cost for the Stonehenge Improvement Scheme [6.1.3], even though the heritage contribution has been capped at £70m [4.10, 4.64]. It has therefore not been shown that a more expensive scheme to improve the A303 which some objectors would find more acceptable is unaffordable [6.4.30].
- 10.206 Objectors suggest that, since the Highways Agency claims that heritage benefits cannot be quantified, and evidence put to the inquiries has not suggested that there is a maximum cost for the Stonehenge scheme, the Highways Agency must accept that a greater potential negative net present value than £35.1m could be accepted in relation to the scheme. Therefore an alternative scheme, which might cost more to achieve, but which delivered greater environmental benefit, could be regarded as justified [6.6.68]. In response, the Highways Agency suggests that not pursuing the published scheme could put at risk the heritage contribution which is presently available [6.6.134].
- 10.207 Although funds to assist work in a WHS can be sought from other countries under the World Heritage Convention [6.6.5, 6.18.16], I accept that it is unrealistic to expect other countries to help in any substantial way an economy with the strength of the UK economy [6.6.71, 6.18.31].
- 10.208 **I conclude** that, while the published scheme has been put forward on the basis that it could be delivered within the cost estimate provided in evidence by the Highways Agency to the inquiries, there is no evidence

that that is the maximum available finance for a scheme, and that alternative approaches at greater cost, which might deliver additional heritage benefits, should be given fair consideration. In that consideration, however, **I conclude** that it remains a matter of judgement to determine whether such benefits justify financial costs [6.6.72, 8.3.17]. I therefore return to the issue of cost at paragraphs 10.605 and 10.606 below, when I have reached a conclusion on the published scheme and on the various Alternative Routes proposed.

### ***Impact of Lighting Proposals***

- 10.209 Some objectors expressed concern at the impact of road lighting associated with the published scheme on the night time view of the Stonehenge monument [6.9.6, 6.15.5], and that view was also expressed by the Chairman of the Royal Astronomical Society's Stonehenge Committee [8.5.4]. Objectors also expressed concern regarding the impact of lighting at specific locations within the proposed scheme [6.19.3].
- 10.210 In fact, it is evident that the section of the A303 affected by the published scheme would not be lit except through the proposed tunnel and at the Countess Roundabout junction [4.35]. At present, the traffic on the A303 and the A344 causes a high degree of light pollution on starry nights at Stonehenge [4.122]. On completion of the published scheme, headlight pollution would be removed at the Stonehenge monument, because there would be no direct line of sight to vehicles from Stonehenge [6.9.20].
- 10.211 The Highways Agency had originally planned to provide lighting at Longbarrow Crossroads, but, in response to representations received during the inquiries, the Agency now proposes to adopt other measures to enable that junction to operate safely [5.1.43, 6.15.20].
- 10.212 Within the proposed tunnel, lighting would reduce progressively to provide a safe transition from external to internal light levels. Tunnel lighting would be at its peak during bright daylight, reducing automatically to a minimum at night [4.73].
- 10.213 In relation to Countess Roundabout, more modern lighting at the roundabout and on its approaches would reduce light spill at that location [6.16.18, 6.19.18].
- 10.214 I note that, having considered the Highways Agency proposals for the lighting of the published scheme, the Chairman of the Royal Astronomical Society's Stonehenge Committee sent a further response to the inquiries, warmly welcoming what he regarded as the positive response of the Highways Agency to the issues which he had raised on behalf of the Committee [8.5.11]. **I conclude** that there is no obstacle to the approval of the published scheme on the basis of the proposals which it contains for the lighting of the A303.

***Specific objections to particular elements of the published scheme***

- 10.215 It is argued by objectors that any ***Winterbourne Stoke Bypass should be restricted to a single carriageway*** [6.7.11, 6.8.13]. If it were backed by a comprehensive programme of traffic calming, objectors claim that a single carriageway bypass would be sufficient to cater for existing traffic levels [6.8.13].
- 10.216 The Highways Agency responds, however, by pointing out that the existing single carriageway route through Winterbourne Stoke is already overloaded at certain times. Predicted flows would exceed by 16% the capacity of even a wide single two lane carriageway by 2008 [6.7.19, 6.8.35]. All justifiable traffic calming measures have already been undertaken in Winterbourne Stoke [6.8.35].
- 10.217 **I conclude** that a single carriageway bypass for Winterbourne Stoke would be inadequate to deal with existing and future traffic levels.
- 10.218 Dr and Mrs Moon argue that there is ***no need for an interchange between the A303 and the A360*** [6.15.8, 6.15.9]. Their contention is that there are existing viable alternative routes to the A303 from north and south, which are well known to and widely used by local traffic. The omission of a Longbarrow Interchange from the published scheme would save money, and reduce environmental damage to the complex of barrows in the immediate area of Longbarrow Crossroads. The Highways Agency responds that the omission of a junction at Longbarrow Crossroads would significantly inconvenience local traffic and local communities [6.15.23].
- 10.219 The omission of an A303/A360 interchange is put forward in more detail as part of Alternative Route 8, and I reach a conclusion on the proposal when I consider that Alternative Route from paragraph 10.561 below.
- 10.220 I deal next with ***objections concerning the proposed Stonehenge Byway***. The Byway would run from Longbarrow Crossroads to Stonehenge Road. Along the 2.1km stretch of the proposed tunnel, it would follow the line of the former A303 [4.52]. It would have a surface around 12m wide, with a 3m width of hard surface [4.53].
- 10.221 The Tunnel Regulation Order would prohibit pedestrians, cyclists, animals ridden, led or driven by a person, vehicles drawn by animals, motor cycles with an engine cylinder capacity of less than 50cc and invalid carriages from using the proposed tunnel. All of those classes of traffic, with the exception of motor cycles of less than 50cc, would be able to use the Stonehenge Byway [6.24.2]. Most motor vehicles would, however, be excluded from the Byway under the provisions of the Byway Regulation Order. The exceptions would be vehicles carrying people with disabilities operated by English Heritage or the National Trust, the vehicles of statutory undertakers and the emergency services, agricultural vehicles, and vehicles being used to gain access to Stonehenge Cottages [1.7]. Vehicles excluded from both the tunnel and the Byway (small motor cycles) would be diverted around a northern

- route, using the A360, the Packway and the A345 roads [4.52].
- 10.222 The National Trust objects to these proposals, because it considers that the proposed Byway should be classified as a bridleway from the outset, thereby excluding all motor vehicles from using it. The Trust considers that allowing motorised vehicles to use the Byway would harm the setting of Stonehenge and associated monuments [6.1.57] and prejudice the achievement of Objective 23 of the Stonehenge Management Plan, which includes the proposal to downgrade byways within the WHS to bridleways [6.1.58]. The Trust considers that the limited number of vehicles for which access to the Byway is necessary could be accommodated by way of private means of access and wayleaves [6.1.59].
- 10.223 The Highways Agency responds by making the point that it is necessary to make reasonable alternative provision for non tunnel users, and this category includes drivers of horse drawn carriages, who would be prohibited from using a bridleway [6.1.91].
- 10.224 Amesbury Town Council takes a different line in relation to the exemptions contained in the Byway Regulation Order. The Town Council considers that the exemption of "invalid carriages and disabled transport vehicles designed specifically to carry up to eight disabled or less able bodied persons and driven by a designated representative from English Heritage or the National Trust" is a discriminatory measure, designed to aid English Heritage and the National Trust rather than the wider community of people with disabilities. The Town Council considers that the exemption should be made available to all types of transport for people with disabilities, with no restriction on drivers or operators [6.22.8]. The Highways Agency responds that the limited exemption is intended to restrict vehicular use of the Byway in order to minimise the impact of vehicles on the Byway in the immediate area of Stonehenge.
- 10.225 A third issue in relation to permitted vehicles on part of the Byway is raised by objectors representing rights of way interests.
- 10.226 What is now Byway Amesbury 11 (following reclassification during the course of the inquiries) joins the present A303 from the south close to Stonehenge [6.24.3]. Some 400m to the west of that junction, the A303 is joined from the north by Byway Amesbury 12 [6.24.4]. At present, users of the two Byways can move between them by using the A303 [6.24.5]. If this 400m section of the A303 were placed in tunnel, however, and the restrictions contained in the Byway Regulation Order were to apply, this would mean that users of motor cycles and other motor vehicles would not be able to move between Byway 11 and Byway 12 along the proposed Stonehenge Byway. Byway Amesbury 11 would therefore become a dead end for those classes of users [6.24.5].
- 10.227 To address this issue, the objectors concerned seek an exemption from the restriction on vehicular traffic on the 400m length of the proposed Stonehenge Byway between the junctions of that route with Byway Amesbury 11 and Byway Amesbury 12 [6.24.6, 6.25.9].
- 10.228 This is opposed by the Highways Agency on the basis that allowing

vehicles on that section of the proposed Stonehenge Byway would bring them within approximately 250m of the Stonehenge monument, and would have an adverse effect on precisely those amenities of the area which would be improved by placing the A303 in a tunnel [6.24.16] in line with the requirements of the Development Plan and the supplementary planning guidance contained in the Stonehenge Management Plan.

- 10.229 The objectors counter by pointing out that both the Management Plan and the Stonehenge Land Use Plan indicate that there should be a comprehensive review of access requirements for vehicular traffic in the WHS [6.24.8]. They say that the time to consider any restriction of rights is when that review takes place. They contend that the justifications for the Byway Regulation Order put forward in the statement of reasons by the Highways Agency would not be met by the removal of vehicular rights between Byways 11 and 12 [6.24.9]. The prohibition would not improve the amenities of the area; that would be achieved by the tunnel [6.24.10]. Vehicles used by such as members of the Trail Riders' Fellowship would not be unsuitable having regard to the intended character of the road [6.24.10]. They would have less impact than agricultural vehicles, statutory undertakers' vehicles, emergency vehicles and transport vehicles for people with disabilities [6.24.11]. Nor would the Order conserve the flora, fauna or beauty of the area [6.24.10]. As presently drafted, the Byway Regulation Order would mean that motorised traffic (apart from those classes covered by existing exemptions in the draft Order) would need to turn back at the northerly end of Byway 11 and find an alternative route before being able to rejoin the byway network [6.24.12]. This would involve using a link either 4km west or 5km east to continue a north/south journey [6.25.9].
- 10.230 I note that the County Council appears already to have committed itself to prohibiting motor vehicles from using byways within the WHS [5.2.7], although it is not clear from the evidence produced to the inquiries that that decision was taken following the sort of comprehensive review of access requirements and further detailed studies envisaged by the Stonehenge Management Plan.
- 10.231 It is necessary for the proposed arrangements to make reasonably convenient provision to replace rights of access and rights of way affected by the scheme. If the proposed Byway were reduced to a bridleway, this would offer no replacement provision along a direct route between Longbarrow Crossroads and Stonehenge Road for horse drawn carriages, in effect requiring them to follow the same diversion which motor cycles of less than 50cc would be expected to use. It is one thing to expect a powered vehicle to take such a route. In my view it is a different matter to impose that additional distance on a carriage driver. It might be that such a proposal would be found acceptable if it were properly investigated, but no evidence to that effect was presented to the inquiries. I consider that relatively few carriage drivers would be likely to use the Stonehenge Byway, and in my view those that would do so would be less intrusive than many of the classes of permitted vehicles regarded as acceptable under the Byway Regulation Order.

- 10.232 **I conclude** that the proposal contained in the published scheme that the right of way between Longbarrow Crossroads and Stonehenge Road should be a Byway Open to All Traffic should be supported.
- 10.233 As regards the limitation on the operators of vehicles for people with disabilities exempted from the Byway Regulation Order, I understand the point made by the Amesbury Town Council, but the exemption they seek would open the whole length of the proposed Byway to all orange card holders, for example. I consider that this would represent too wide an exemption, when reasonable alternative provision is proposed by English Heritage and the National Trust for people with access related disabilities. **I conclude** that the restriction proposed by the Highways Agency in this respect should be supported.
- 10.234 As regards the short distance of the proposed Byway between Byways Amesbury 11 and Amesbury 12, I entirely take the point made by the objectors – if the short distance between those two connections were not open to motor vehicles using Byway 11, then that Byway would be turned into a dead end. At the moment it can be used with the A303 as part of a rights of way network, but, if the present Byway Regulation Order were confirmed as requested by the Highways Agency, then that would no longer be possible. I cannot see how such an arrangement can represent a reasonably convenient alternative provision, as required for the approval of the Side Roads Order. Nor can I see how it would improve the amenities of the area to ban motorised users of Byways 11 and 12 from using the 400m length of the Stonehenge Byway. Those users would still be able to take their vehicles perfectly legally to within around 250m of Stonehenge on either Byway 11 or Byway 12; they simply would not be able to travel between the two. This seems to me to be completely illogical.
- 10.235 **I conclude** that the amendment sought by rights of way users to remove the exemption which would deny access to motor vehicles to the 400m of the proposed Stonehenge Byway between the junctions of that proposed Byway with Byways Amesbury 11 and 12 should be supported, and I shall recommend accordingly.
- 10.236 I appreciate that to many **this** will seem an illogical position, when considerable funds would be committed, if the published scheme were approved, to removing traffic from the immediate surroundings of Stonehenge. What my conclusion underlines, however, is the good sense of the proposal in paragraph 4.6.4 of the Stonehenge Management Plan that there should be a thoroughgoing review of rights of way in the WHS. In my view such a review would benefit substantially from consultation with and the involvement of interested parties.
- 10.237 The Byways and Bridleways Trust raises two other points of objection to two of the Orders before the inquiries, not limited to the Stonehenge Byway, but it is convenient to deal with these matters also here.
- 10.238 The first point of objection relates to the impact of the Side Roads Order on public rights of way in the area affected by the published scheme. A number of public rights of way which join or cross the A303 are shown on

the Definitive Map for the area as bridleways or footpaths, and the Highways Agency has adopted that status in references to them in the Side Roads Order. The rights of way concerned are, however, the subject of longstanding disputes concerning their status, and the Byways and Bridleways Trust argues that these disputes should have been resolved before the draft Orders were produced [6.25.3].

- 10.239 It is in my view unfortunate that such disputes were not resolved before the Orders were drafted, but I accept that their resolution was not in the hands of the Highways Agency [6.25.10]. In the circumstances, I do not see that the Highways Agency had any alternative but to show the rights of way concerned in the draft Orders with the status for each of them which is shown on the Definitive Map [6.25.11]. Given that applications have now been made to amend that status in each case, modifications requested by the Highways Agency to the Side Roads Order would provide for the automatic recognition of any higher status subsequently found to apply to the routes concerned [6.25.5, 6.25.12]. I consider that that proposed modification would deal satisfactorily with this point of objection. It is not possible for me to recommend the alternative approach advocated by the Byways and Bridleways Trust of amending the draft Orders to reflect the status claimed for the disputed rights of way [6.25.6], because I do not consider that all the relevant evidence regarding the status of the routes concerned was before me at the inquiries, and third party rights might be affected by decisions which were not advertised as to be taken at these inquiries.
- 10.240 On the other hand, I note that the modification sought by the Highways Agency to meet this point of objection would effectively be rendered worthless if the County Council were to proceed without any further consideration of the matter to promote Orders prohibiting motor vehicles from any of the rights of way concerned which might be found to be subject to vehicular rights. A wide ranging review of rights of way in the WHS would avoid that situation.
- 10.241 **I conclude** that the objection regarding the way in which various rights of way have been recorded by the Highways Agency in the draft Side Roads Order cannot be sustained.
- 10.242 The second issue raised by the Byways and Bridleways Trust concerns the power of the Highways Agency to acquire land for the proposed new line of the A303 where that line coincides with the line of existing publicly maintainable highways [6.25.7].
- 10.243 I agree with the Highways Agency that, in some instances, where the proposed line of the new trunk road would cross the line of existing public rights of way, the existing public rights would be stopped up by the Orders, and new public rights would be created [6.25.15]. The land concerned would, however, only be acquired under the Compulsory Purchase Order by the Crown if it was not already owned, or if the existing ownership was only of a limited right, such as a right extending only to the topsoil and not including the subsoil [6.25.14, 6.25.15]. I do not see that this would involve any payment from public funds for rights which the public already enjoy, and I do not consider that the Highways

Agency's proposals in that regard extend beyond the powers available in the Highways Act 1980 and the Acquisition of Land Act 1981.

- 10.244 **I conclude** that this basis of objection cannot be sustained.
- 10.245 Some objectors argue that ***the closure of the A344 junction with the A303 should be pursued immediately***, regardless of the outcome of these inquiries, on road safety or environmental grounds or both [6.4.31 to 6.4.34, 6.6.58, 6.8.9, 6.8.11, 6.8.21, 6.10.14, 8.2.1].
- 10.246 The Highways Agency responds that closure of the A344 junction would cause increased congestion on the A303 if it took place without the A303 being provided with a dual carriageway. This would lead to more frequent queues and delays. Both local and long distance traffic would be attracted to inappropriate local roads. Response times for emergency vehicles would suffer. Visitor Centre traffic from the east would be subject to a longer route and to potential delay [6.8.33, 8.2.8]. The A344 is the responsibility of Wiltshire County Council. The County Council has made it plain that, as highway authority, it would not be prepared to close the A344/A303 junction without the completion of an A303 Stonehenge Improvement Scheme.
- 10.247 **I conclude** that the closure of the A344 independently of the proposed improvement of the A303 would not be justifiable, in that it would increase congestion on the A303 and elsewhere in the local road system, causing additional problems for emergency vehicles.
- 10.248 Objectors contend that ***the Countess flyover should be omitted from the scheme***. They argue that the flyover would cause increased noise, visual intrusion and pollution in Amesbury [6.8.15, 6.19.3]. In their view, the retention of a surface level roundabout with the addition of safety features for cyclists and pedestrians would continue to provide a proper transition between the continuous dual carriageway to the east and the mix of single and dual carriageway to the west. The point is made that the flyover was not included in the scheme at the time of the public consultation in 1999. It was added later in the light of anticipated traffic problems which could flow from English Heritage's preferred site for the new Visitor Centre at Countess East [6.8.14]. That site does not have planning permission for the new Visitor Centre, and there is substantial opposition to the grant of such permission [6.8.16].
- 10.249 The Highways Agency responds that the public consultation in 1999 was presented with options for Countess Roundabout which included both grade separated and at grade solutions. The majority of respondents favoured grade separation. While the design contained in the published scheme would cater for the estimated traffic flows if the Visitor Centre were relocated to Countess East, the published scheme does not prejudice the relocation of the Visitor Centre to another location [6.8.37]. In the longer term, an at grade roundabout would not secure sufficient capacity for the A303 alone, and congestion would occur [6.8.38].
- 10.250 I note that the concern about air quality and noise is not supported by evidence produced to the inquiries [6.9.25, 6.17.15, 6.19.9 and 6.16.17,



6.17.14, 6.19.17], and I have already concluded that the mitigation proposed for the flyover will eventually produce a neutral effect on nearby residential properties (10.145, 10.146). As regards potential light pollution, vehicle headlights on the proposed flyover would be no higher above ground level than the existing roundabout lighting. The existing low pressure sodium lanterns on the roundabout approaches would be replaced by high pressure sodium full cut off lanterns, which would cause less light spillage [6.19.18].

- 10.251 **I conclude** that, regardless of the eventual location of the new Stonehenge Visitor Centre, the published scheme proposal for a grade separated junction at Countess should be supported, because it would secure long term capacity for the A303 in that location, and it would not cause the adverse effects claimed by the objectors.
- 10.252 Objectors including Amesbury Town Council argue that, even if a grade separated junction is created, ***the existing pedestrian underpass at Countess should be retained*** [6.19.5, 6.22.3 to 6.22.7]. This issue is also raised by Salisbury District Council [8.5.33]. They say that the pedestrian underpass offers a well used and valuable safe access between the centre of Amesbury and the residential areas and villages to the north of the town. Its replacement by pedestrian crossings on the proposed slip roads, controlled by traffic signals, would represent a reduction in pedestrian safety [8.5.33].
- 10.253 The Highways Agency responds that the introduction of the proposed flyover would cause a substantial reduction in traffic using the Countess Roundabout. Even if the underpass were retained, it is anticipated that most pedestrians would prefer to use a safe surface route rather than a below ground route [6.19.20], encouraged by the light traffic which would remain on the slip roads. They would then be crossing the road, however, without the support of the proposed pelican crossing system [8.5.38]. Present use of the underpass amounts to around 50 movements per day, but this might reduce to around 15 if the published scheme were carried out [6.22.10]. If it were to be retained, the existing underpass would need to be extended to serve the greater width of land used for the roads in the published scheme. This would involve expenditure of around £500,000 to extend, refurbish and upgrade the underpass [6.22.10]. The arrangement proposed for pedestrian crossings at Countess Roundabout is by no means unusual, and complies fully with standards [8.5.35].
- 10.254 **I conclude** that the retention of a pedestrian underpass at Countess would not be justified on safety grounds if the published scheme were carried out, and that the additional expenditure involved would not be justified by the likely level of use of such a facility.
- 10.255 The Amesbury Link Road Action Group is concerned that ***the interplay of the A303 proposals and a proposal to create a new link road between the A345 and the A303 Solstice Park junction*** has not been considered [6.19.10, 6.19.11].
- 10.256 The Highways Agency responds that any effect which this local highway

authority proposal would have on the A303 would be felt to the east of the area affected by the published scheme [6.19.30].

- 10.257 **I conclude** that this issue does not affect the case for or against the published scheme.
- 10.258 One objector raised the issue that implementation of the published scheme would mean that access to Stonehenge would be operated on a basis which would **conflict with the covenants in the Deed of Gift of Stonehenge** to the nation [6.14.3]. In response, DCMS states that those covenants are no longer enforceable, a view which has been upheld by the Court of Appeal in a decision reached in 1991 [6.14.6].
- 10.259 **I conclude** that this does not represent a basis on which the published scheme can be challenged.
- 10.260 Another objector suggested that, in determining this case, **the Secretary of State would have a conflict of interest**, on the basis that he would be determining Orders of which he himself (through the Highways Agency) was the promoter [6.18.18]. The Highways Agency responds that the report will be considered both by the Secretary of State for Transport (in whose name the draft Orders are promoted) and by the First Secretary of State. The Agency argues that there would be no prejudicial conflict [6.18.32].
- 10.261 Responsibility for determining Orders such as these has been allocated by Parliament to the Secretaries of State, and the arrangements have been accepted by the Courts. Decisions taken are subject to challenge on matters of law, which include the rationality of the decision and the fairness of the process. **I conclude** that there is no special factor in relation to this scheme which renders those arrangements subject to doubt.
- 10.262 Another objector argued that **the Highways Agency cannot be trusted to carry out an environmental scheme in a sensitive landscape with due regard to environmental issues**. He made this suggestion on the basis of a highway scheme completed at Twyford Down, near Winchester, where he considered that assurances given by the Highways Agency had not been honoured [6.10.17].
- 10.263 At the objector's request, I visited Twyford Down [1.10]. It was not possible for me to reach any conclusion on noise and landscape effects, because I had no evidence relating to pre existing conditions, but I was able to consider the accuracy of the photomontage of the Twyford cutting as compared with the scheme as built, and the way in which assurances regarding the Itchen Navigation had been honoured.
- 10.264 I accept the evidence of the Highways Agency that the scheme drawings for the Twyford cutting correctly show the constructed cutting width [6.10.29]. It also seems to me that the photomontage produced before the scheme was built shows a reasonable representation of the scheme as it now exists on the ground. The scheme also appears to me to have provided, as promised, for the possible reinstatement of the Itchen

- Canal, should the waterway ever again become navigable [6.10.29].
- 10.265 **I conclude** that this is not an objection which in any way calls into question the case for the published scheme.
- 10.266 Three written objections contend that ***the published scheme would have an adverse effect on the energy field of Stonehenge*** [6.28.31]. The first of these suggests that the energy flow through Stonehenge could be disrupted if a road were to be built within the energy field of Stonehenge. But it seems to me that many roads already exist within the immediate area of Stonehenge [2.1 to 2.10], and the published scheme proposal would produce a road between Amesbury and Longbarrow Crossroads (some 2.5km west of Stonehenge) along the corridor of the existing A303 [1.5]. I therefore cannot see how there would be any change in road lines which would have an impact on the energy field.
- 10.267 The second objector states that any tunnelling in the area would interfere with the energy field. However, there has been tunnelling in the past at Stonehenge, when the underpass from the existing Visitor Centre was created, and there has been extensive archaeological research in the area, to which no exception has apparently been taken. I cannot see that the tunnel proposed in the published scheme raises any new or additional issue apart from its scale, a matter not mentioned in the objection.
- 10.268 The third objector argues for an off line scheme (a matter considered as part of the evaluation of certain of the Alternative Routes suggested), on the basis that the Stonehenge Ley passes through the line of the proposed tunnel. But, if that is so, then the Ley must pass through the line of the existing road, so again I see no difference from the present situation.
- 10.269 **I conclude** that these issues do not represent a justifiable basis of objection to the published scheme.
- 10.270 One objector complains that ***the Highways Agency did not produce an up to date Appraisal Summary Table for the scheme*** until requested to do so. The Stage 3 Assessment produced (Document HA/0/28) contained significant differences from the Stage 2 Assessment on which the Government's decision to support the published scheme was based [6.7.13, 6.7.14].
- 10.271 The Highways Agency responds that the negative and positive effects of the published scheme are fully presented in the Environmental Statement, which provides much more detail than an Appraisal Summary Table would. The balance of effects is heavily positive, a view supported by DCMS and by English Heritage [6.6.111].
- 10.272 I consider that an Appraisal Summary Table is often a very useful tool to show in short compass overall judgments regarding a scheme. It can be useful and effective in crystallising areas of disagreement at an inquiry. But it is not a substitute for the sort of detailed consideration of the

effects which the published scheme would have which has been possible at these inquiries, and which are summarised in this report.

- 10.273 **I conclude** that, following the inquiries, there is no lack of information on the impact which the published scheme would have on the environment, on safety, on the economy, accessibility and integration, the objectives covered by the headings in an Appraisal Summary Table. The Stage 3 Assessment is available as an inquiry document, and the inquiries have provided an opportunity (which has been taken) to challenge the judgements in that document. The grounds on which the decision to bring forward the published scheme for consideration was made have been open to challenge at the inquiries in accordance with presently prescribed methodologies. **I conclude** that the fact that the Highways Agency did not produce an up to date Appraisal Summary Table until asked to do so does not constitute a justifiable basis of objection to the published scheme.
- 10.274 Objectors complain that ***the scheme justification calls erroneously on the SWARMMS study for support***, when in fact SWARMMS took the Stonehenge scheme as a given [6.6.47, 6.10.16]. The Highways Agency states, however, that the published scheme does not seek to rely on the SWARMMS study as part of its justification. The published scheme stands by itself because of the unique context created by its proximity to Stonehenge. The only point made is that the published scheme can be seen to be consistent with what is proposed elsewhere on the A303 following an appropriate multi modal study [6.10.28].
- 10.275 **I conclude** that the SWARMMS study is not put forward as part of the justification for the published scheme, and that this point of objection is therefore not well founded.

### **Conclusions on objections to the Compulsory Purchase Order**

- 10.276 I have carefully considered the case for the acquisition of each of the plots included in the Compulsory Purchase Order. That consideration has extended in particular to the plots affected by the six objections from persons or organisations with an interest in land included in the Compulsory Purchase Order which remained outstanding at the close of the inquiries [6.29.1].
- 10.277 In relation to the objection of the **National Trust** to the Compulsory Purchase Order, it is clear that the opposition of the Trust to the acquisition of its land would be withdrawn if the longer tunnel sought by the Trust were to be agreed [6.1.64]. The objection of the Trust to the acquisition of its land is thus based on principle rather than on practical considerations. No specific objection to the acquisition of any individual parcel of its land was advanced by the Trust at the inquiries.
- 10.278 Subject to the deletion from the Compulsory Purchase Order of the Trust's interests mentioned in Documents HA/0/2 and HA/0/42 (so that the Order, as made, would accord with the revised version contained in Document HA/0/53), I am satisfied that all of the land and interests of the National Trust included in the Compulsory Purchase Order in the form

now requested by the Highways Agency to be made would be required for the published scheme.

- 10.279 In relation to the objection of **Berwick Down Limited** to the compulsory acquisition of plots **1/4a, 1/6c, 2/2 and 2/3b**, which are included in the Compulsory Purchase Order principally to provide land for earthworks mitigation of the proposed scheme [6.29.2], I am satisfied that the land within these plots is required for the purpose of mitigating the adverse effect which the published scheme would otherwise have on its surroundings [6.29.3]. The plots concerned are necessary to avoid a visible change of slope within a Special Landscape Area [6.29.4 to 6.29.6].
- 10.280 In relation to the objection of **R J Moore & Sons** to the acquisition of plots **2/6a, 2/6b, 2/6d, 2/6g, 2/6h, 2/6j, 3/1a, 3/1c and 3/1e**, again these plots are included in the Compulsory Purchase Order to provide land for earthworks mitigation [6.29.7]. I consider that this is particularly important in connection with the proposed Winterbourne Stoke Bypass element of the published scheme, as it runs through what is currently open countryside to the north of the existing line of the A303 and close to the boundary of the Parsonage Down SSSI [2.26, 4.39]. The importance of the acquisition of these particular plots is graphically shown on Drawing ENG 6.3 in Document HA/2/3 [2.26].
- 10.281 I accept the evidence of the Highways Agency that the plots concerned are not proposed to be acquired purely for spoil disposal [6.29.3, 6.29.11, 6.29.14], as the objectors contend [6.29.10]. The productivity of any agricultural land eventually returned to the objectors appears to me to be a matter related to valuation or compensation, rather than to the need for compulsory acquisition [6.29.8, 6.29.9, 6.29.12, 6.29.13]. I am satisfied that the plots concerned are required for mitigating the adverse effect which the published scheme would otherwise have on its surroundings.
- 10.282 In relation to the objection of **Mrs M J Turner** to the acquisition of plots **3/2a, 3/2b, 3/2d, 3/2f and 3/2h**, again these plots are included in the Compulsory Purchase Order to provide land for earthworks mitigation [6.29.15]. The important contribution which these plots would make to allowing the grading out of the significant difference in level between the road and the surrounding landform is again shown on Drawing ENG 6.3 in Document HA/2/3 [2.26]. Plot 3/2b would also assist in screening the road system from houses in Winterbourne Stoke [4.41]. I am satisfied that the plots concerned are required for mitigating the adverse effect which the published scheme would otherwise have on its surroundings.
- 10.283 **Plots 3/4, 3/5r, 3/5s, 3/5v, 4/1a and 4/1b** are owned by **Mr and Mrs R L Turner**. Once more, they are included in the Compulsory Purchase Order to provide land for earthworks mitigation [6.29.16], this time as the Winterbourne Stoke Bypass crosses the Till Valley [4.45]. I consider that the mitigation which these plots would allow would reduce the acknowledged adverse impact of the Winterbourne Stoke Bypass on the Till Valley [4.89]. I am satisfied that the plots concerned are required for mitigating the adverse effect which the published scheme

would otherwise have on its surroundings.

- 10.284 **The Druid's Lodge Partnership** owns **Plot 4/3b** within the Compulsory Purchase Order, which the Highways Agency wishes to acquire to provide a site for the contractor's compound [6.29.17]. The objector contends that the compulsory acquisition of a site for a contractor's compound goes beyond the powers contained in the authorising legislation [6.29.18]. I agree with the Highways Agency, however, that Section 240 (2) (a) of the Highways Act 1980 provides powers to acquire land compulsorily which is required in connection with the construction or improvement of a highway [6.29.19], and I consider that these powers are wide enough to encompass the acquisition of land for a contractor's compound.
- 10.285 Because the scheme has been prepared on the basis of early involvement of the selected contractor [4.12], the contractor's requirements are sufficiently well defined at this stage to be able to identify an appropriate area, and the allocation of space within it, for a compound which would meet the requirements of the published scheme [6.29.19 to 6.29.21]. I am satisfied that the plot concerned is required in connection with the construction or improvement of the A303 highway in accordance with the proposals contained in the published scheme.
- 10.286 The remaining eight outstanding objections to the Compulsory Purchase Order were made by parties opposed to the published scheme in principle. They objected to all of the Orders before the inquiries, but did not specify any particular ground of objection to the Compulsory Purchase Order. Seven of them appeared at the inquiries. These included WANHS, Wiltshire FOE and the Avebury Society, together with the Stonehenge Alliance and the CPRE, Dr Fielden and the Pagan Federation, all of whom appeared as part of the Stonehenge Alliance. The remaining outstanding Compulsory Purchase Order objector in principle was the Salisbury Branch of the Friends of the Earth.
- 10.287 In relation to the land and interests in land covered by the Compulsory Purchase Order in the form contained within Document HA/0/53 which are not the subject of objections, I have considered each of the plots concerned against the reasons for acquisition given in the remarks column of Document DD5, 3 of 5, in the revised version contained in Document HA/0/53. I am satisfied that all the land contained within the revised Compulsory Purchase Order is required to carry out the proposals contained in the published scheme.
- 10.288 **I conclude** that, should the published scheme be authorised, there is a compelling case in the public interest for the acquisition of all the plots included in the Compulsory Purchase Order (including those plots which are the subject of specific objections recorded above) in the form of that Order contained in Document HA/0/53.

#### **Support for the published scheme**

- 10.289 The published scheme is supported by DCMS [5.7.23], which has policy responsibility for the implementation in UK of the provisions of the World

Heritage Convention, and represents the UK Government on the World Heritage Committee [5.7.2]. The scheme is also supported by English Heritage [5.1.2], the Government's statutory advisor on the historic environment [5.1.8, 5.7.3].

10.290 At a more local level, the published scheme is supported by Wiltshire County Council, the strategic planning authority for the area [5.2.1] and (subject to two points of detail) by Salisbury District Council, the local planning authority [5.8.2]. It is also supported by Winterbourne Stoke Parish Council [5.3.1 to 5.3.4].

10.291 There is written support for the published scheme from the Regional Tourist Board [5.8.3], which makes the point that it would improve the visitor experience at Stonehenge and ease travel to and from the South West, where tourism is very important to the local economy, supporting 237,000 full time equivalent jobs in the region. The published scheme is supported by the Ramblers' Association [5.8.4], the AA Motoring Trust [5.8.4], representatives of Druids Groups [5.6] and by certain archaeologists [5.8.5 to 5.8.7].

10.292 Supporters see the published scheme as bringing environmental benefit for the immediate surroundings of Stonehenge [5.2.8, 5.7.22, 5.8.1] and for the wider area which the scheme would serve [5.2.13, 5.3.1, 5.3.2]. They also identify safety benefits which the scheme would deliver [5.2.8, 5.3.1 to 5.3.3, 5.3.5 to 5.3.10], traffic benefits [5.2.8, 5.5.1, 5.8.1], and relief for the village of Winterbourne Stoke [5.2.8, 5.3.1 to 5.3.10, 5.4.1, 5.5.1, 5.8.1].

10.293 In effect, the supporters of the published scheme consider that it would fulfil all the objectives set for the Stonehenge Improvement scheme listed at paragraph 10.61 above.

10.294 The archaeologists see the published scheme as massively enhancing understanding and enjoyment of the unique archaeological landscape of Stonehenge [5.8.5], representing a sensible compromise, which delivers most of what is archaeologically desirable at a defensible cost [5.8.6]. They consider that it would be a deplorable outcome, if, in standing out for a longer tunnel, those who opposed the present proposal caused the road improvement to be further delayed or aborted [5.8.6, 5.8.7].

10.295 **I conclude** that the extent and nature of the support for the published scheme, not least the very substantial backing which the scheme has received from both national and local government, represents a powerful consideration to be borne in mind in assessing the scheme against the objections which have been made to it.

**Balancing of arguments in favour of and against the published scheme**

10.296 I consider that the published scheme would substantially achieve the objectives which the Highways Agency identified for the A303 Stonehenge Improvement Scheme which are listed at paragraph 10.61 above. It would:

- address the under capacity of the single carriageway A303 (10.63. 10.200)
- reduce accidents on the A303 (10.185)
- provide a bypass for Winterbourne Stoke (10.189)
- remove the impact of roads and traffic from the immediate area of Stonehenge (10.108, 10.186)
- open the way for wider public access to the land in the immediate area of the Stonehenge monument (10.88, 10.112. 10.174).

I consider that it would do nothing to inhibit the relocation of the Stonehenge Visitor Centre, and, if the published scheme were authorised, it would fulfil a condition precedent to the release of part of the necessary funding for the relocation of the Visitor Centre [4.30].

- 10.297 In achieving those objectives, I have concluded that the published scheme would comply with existing design standards, save for eight departures which have been accepted (10.64). The scheme also allows for provision to comply with emerging design standards when they are known (10.65).
- 10.298 I have also concluded that the published scheme would involve no direct impact on any Scheduled Monument, Grade I or Grade II\* listed building (10.116), and would raise no problem in relation to ecology and biodiversity (10.147), drainage and water quality (10.153), air quality (10.157), noise (10.169), land use (10.175 and 10.288), construction impact (10.184), community impact (10.190) or lighting proposals (10.214). I consider that the impact of the published scheme on travellers would be acceptable, because I take the view that removing the sight and, to a very large extent, the sound of traffic from Stonehenge is a stronger priority than retaining the view of Stonehenge for passing travellers on the A303 (10.186).
- 10.299 As regards compliance with policy, I conclude at paragraph 10.99 above that the published scheme would comply with national, regional and Structure Plan policy on transport, together with national planning guidance on archaeology and listed buildings. It would also comply with, but not wholly achieve, the requirements of adopted supplementary planning guidance. Despite the contrary opinions of Wiltshire County Council and Salisbury District Council, in my view the published scheme would not comply with relevant Structure Plan and Local Plan policies on the historic environment.
- 10.300 Strictly speaking, there is no planning application before me; but the decisions on the draft Orders which form the subject matter of the inquiries will have substantially the same effect as the determination of a planning application, in that they will establish whether the published scheme can proceed or not. It is right, therefore, that the decisions should have regard to the provisions of the Development Plan, unless material considerations indicate otherwise.
- 10.301 As indicated above, on my analysis, the published scheme complies with some policies of the Development Plan, but not with others. I cannot



therefore conclude that the published scheme would be in accordance with the Development Plan considered as a whole. It would thus only be in circumstances where other material considerations weigh in favour of acceptance of the published scheme that it could be regarded as justifying support. In that situation, it would be necessary to balance the benefits delivered by the published scheme against the harm which its failure to comply with policies of the Development Plan would cause [6.6.96, 10.110].

- 10.302 I consider that such harm would arise from the impact of the published scheme on the part of the WHS outside the proposed tunnel. The portals through which the tunnel would emerge, to the west and to the east, would be substantial structures. They would involve deep cuttings in order to return the road to existing ground level with an acceptable gradient. Because the A303 would be widened to dual two lane carriageway standard throughout the length of the published scheme, the road would be much wider and therefore more obtrusive in those parts of the WHS where there is at present only a single carriageway. I consider that these factors would have an impact on the setting of the WHS and on the settings of some of its monuments in the landscape. In addition, objectors argue that, by carrying out an expensive tunnelled scheme which does not provide for the reinstatement of The Avenue where it crosses (and is currently severed by) the A303, the published scheme would render the eventual reinstatement of The Avenue from the A303 to the River Avon much less likely to be achieved. Objectors contend that it would therefore have an adverse effect on The Avenue.
- 10.303 At the western end of the proposed tunnel, the western tunnel portal would be located close to Scheduled Monuments at Sites 39, 41 and 42. The Highways Agency assesses the impact of the published scheme on Sites 39 and 41 as neutral, and on Site 42 as moderate beneficial [6.1.75]. These judgements are contested by objectors, who say that too much weight is given to the reduction in traffic noise at these locations [6.1.30]. The method of assessing impact was agreed in advance of the preparation of the Environmental Statement with relevant and independent experts, however [6.2.42, 6.2.43], and I do not consider that it is appropriate to criticise the method subsequently on the basis of its application to individual sites. It is the method which has been used throughout the Environmental Statement (10.125).
- 10.304 Nevertheless, it is the case, in my view, that the western tunnel portal would represent a substantial feature in the landscape, close to the modest sized barrows at Sites 41 and 42. The western tunnel portal would also be close to the unscheduled monument at Site 38, on which the Highways Agency agrees that it would have a major adverse impact. This is a ploughed linear feature, 1.2km long, which is buried apart from a scheduled 20m section (Site 38A), located about 225m to the south of the line of the published scheme [6.1.26, 6.1.28]. Opinions differ as to the relative importance of this monument [6.3.15, 6.3.29]. On the basis of the present state of knowledge regarding the Site, I prefer the conclusion of the Highways Agency that it is a Bronze Age ditch of a type common in the area [6.3.29].

- 10.305 As regards the cutting between the western tunnel portal and Longbarrow Crossroads, objectors say that it would reduce archaeological coherence [6.2.18] and authenticity [6.2.19, 6.4.10] in a manner similar to that which is demonstrated by the cutting at the eastern end of the section of the A303 affected by the published scheme, which was created when the road was improved in the 1960s [6.2.20]. It would sever social and cultural relationships across the site [6.2.23], prevent the reinstatement of ceremonial routes [6.2.23], and represent an alien and visually intrusive feature [6.6.29].
- 10.306 As regards the question whether the authenticity of the WHS would be compromised by the proposed scheme, I note that the landscape around Stonehenge is no longer an authentic Neolithic or Bronze Age landscape. While the visible monuments are in their authentic topographical positions, many contemporaneous components of the landscape have probably been lost as a result of centuries of ploughing [6.4.39]. In my view, the published scheme would not affect the relative position of the monuments in the WHS [6.2.19]. It would not impact adversely on the intervisibility of monuments [6.2.52]. I therefore express the view at paragraph 10.109 above that the cutting would not sever what the objectors call the "visual interconnectedness" of the landscape. In my view, it would not affect the way in which the site demonstrates how prehistoric people used the natural landform, the watercourses and the heavens to articulate their abstract ideas and beliefs [6.4.2]. Thus, I also indicate at paragraph 10.109 that I consider that the cutting would not make it any more difficult to explain the relationship between monuments. I accept the Highways Agency's point that there is no evidence that walking directly between barrows was important in Prehistoric times [6.6.109].
- 10.307 In fact, the published scheme would remove a dominant non authentic element in the current landscape (the A303) from a substantial part of the site [6.4.10]. I accept, however, that the proposed tunnel would probably be the largest earthworks ever constructed within the WHS [6.4.10], and that its entrance portals would represent new and substantial non authentic intrusions into the WHS [6.23.3].
- 10.308 The published scheme would also increase severance in those parts of the WHS by presenting an obstacle which would be effectively impossible to cross north-south in place of the present busy trunk road, which, in the existing single carriageway section, can be crossed with care (10.78, 10.109).
- 10.309 As regards the impact of the scheme at Longbarrow Crossroads, the effect has been assessed as moderate adverse [6.18.27]. I consider that the important group of barrows at the Crossroads would be adversely affected by the proposed new grade separated road junction [6.3.14, 6.15.3, 6.15.4], but the setting of those monuments is already compromised by the proximity of the current A303. The northern roundabout of the system would be some 30m further away from the Long Barrow than the existing roundabout [6.5.28]. The two proposed roundabouts would be significantly smaller than the existing roundabout, although the overall area affected by the interchange would be greater

[6.6.29].

- 10.310 The eastern tunnel portal is assessed in the Environmental Statement to have a major direct adverse impact on Site 66, below ground archaeological remains within the trace of the published scheme. Because this Site has previously been investigated as a possible site for the proposed new Visitor Centre, it has been more than usually well researched [6.1.80]. No archaeological remains of significance were found, and I note that the Archaeological Working Group therefore agreed that it would be unreasonable to object to the scheme on the basis that important remains might exist at this Site [6.1.80].
- 10.311 Objectors argue that the setting of the southern most group of barrows at King Barrow Ridge would also be affected by the proximity of the eastern tunnel portal, the depth and width of the proposed road in this area [6.3.16], and the noise and visual impact of traffic [6.6.28]. I note, however, that the scheme would place the eastern tunnel portal some 100m to the east of King Barrow Ridge, and remove the existing dual carriageway and its traffic from a position adjacent to the Ridge, which leads to a conclusion in the Environmental Statement that the published scheme would have a major beneficial impact on the King Barrow Group [6.3.31].
- 10.312 In relation to The Avenue, as I have set out between paragraphs 10.133 and 10.140, this is the archaeological site most closely related to Stonehenge (10.136). It is part of the same monument, and most of it lies within the Stonehenge core (10.136). The whole of The Avenue lies within the WHS. Since the A303 road improvement of the 1960s, The Avenue has been severed by the trunk road (10.134). South of the A303, it is not readily visible on the ground; it is mainly in private ownership, and much of it is in active agricultural use; it is crossed by two further roads, a bridleway and a private access road, and it runs beneath a Grade I listed building (10.135).
- 10.313 The Avenue was already severed by the A303 when Stonehenge was inscribed as a WHS. The concern of the World Heritage Committee at that time was that action should be taken to remove the severance of the visible part of The Avenue by the A344 close to Stonehenge. The Committee made no mention of removing the severance by the A303, and has made no mention of this at any of the reviews of the Stonehenge WHS carried out since inscription (10.139). The possibility of restoring The Avenue south of the A303 is therefore in my view extremely remote. It does not figure as a priority in the Land Use Plan for Stonehenge prepared by the National Trust (10.139), and, for all of those reasons, I do not accept that it is a justifiable criticism of the published scheme that it does not provide for the removal of the severance of The Avenue by the A303.
- 10.314 In my view, therefore, the harm which would be caused by the published scheme and by its failure to comply with policies of the Structure Plan and the Local Plan on the historic environment amounts to:
- the impact of the two tunnel entrance portals, which, in their own

right, would represent new and substantial non authentic intrusions into the WHS

- the impact of the western tunnel portal on the setting of Sites 41 and 42
- the impact of sections of the A303 being located in deep cuttings within the WHS
- increased severance within the WHS where the existing single carriageway is replaced by dual carriageway, which, whether at surface level or in cutting, represents an obstacle to north-south movement within the WHS
- some overall adverse impact on the setting of the barrows in the area of Longbarrow Crossroads
- an adverse impact on Site 66 arising from the location of the eastern tunnel portal.

10.315 I note that the supplementary planning guidance contained in the Stonehenge Management Plan itself recognises that action to achieve the objectives it sets out might have negative effects. It accepts the need to balance positive and negative effects of the detailed proposals for the WHS (10.90). There is acceptance that putting the A303 in a tunnel may have an inevitable detrimental effect on archaeology, but that is seen as justified by the benefits of the reunification of the landscape, the reduction of visual and noise pollution around Stonehenge and the provision of increased and safer access to the Stones and their immediate environs.

10.316 As well as the protection offered by the Development Plan policies on the historic environment, the Stonehenge site must be given special consideration as a WHS (10.14). I consider that it is necessary to weigh the positive benefits which the published scheme would bring (10.296) against the identified harm (10.314), but also to consider whether the disbenefits are acceptable in their impact on the outstanding universal value of the WHS.

10.317 Within the WHS, roads already exist (10.108). They were there when the site was inscribed as a WHS. The World Heritage Committee therefore did not regard those roads as compromising the outstanding universal value of the site. They asked only for the removal of the A344, which the published scheme would make possible [6.2.54]. The published scheme would also remove traffic and roads from the view from Stonehenge (10.108), as well as removing the severance caused at present by the A303 and the A344 in the immediate area of the Stonehenge monument. Where the road was placed in tunnel, people would be able to walk across the site north-south without the inhibition which the busy A303 currently imposes. These are changes which I believe would increase the inspirational qualities and iconic status of Stonehenge [6.2.52]. A road tunnel such as that proposed in the published scheme would assist people to see Stonehenge in the context of its landscape and associated monuments [8.5.18].

10.318 I consider that these would be very much more substantial benefits to the WHS than the harm which would be caused to the WHS by the published scheme. I do not see that the acknowledged harm which

would be caused by the published scheme in any way threatens the outstanding universal value for which the Stonehenge site was recognised. **I conclude** that the balance of advantage to the WHS is decisively in favour of the published scheme, and that this is a material consideration justifying support for the published scheme notwithstanding that I regard it as failing to comply with Policies HE1 and HE2 of the Structure Plan and Policies CN20 and CN24 of the Local Plan.

10.319 **I conclude** that, on balance, the arguments in favour of the published scheme outweigh those against.

### **Conclusions on individual objections**

10.320 Applying these conclusions on the points of objection to the individual objections advanced at the inquiries, therefore, I reach the following conclusions on the cases of the individual objectors.

10.321 The **National Trust** changed its position during 2002 from one of support for the 2km cut and cover tunnel which it had originally jointly proposed with English Heritage to one of support for a longer tunnel [6.1.68]. At the inquiries, the Trust advanced a case for the length of the tunnel proposed in the published scheme to be extended by 200m in the west and by 600m in the east [6.1.7].

10.322 The Trust accepts that it has changed its mind about the length of the tunnel. It has done this because it had emerged by 2002 that a tunnel of 2.9km could be constructed without the need for intermediate, above ground ventilation shafts, which would have needed to be located within the WHS [6.1.23]. Previously, it had been understood that 2km was the maximum length of tunnel which could be constructed without above ground ventilation shafts.

10.323 The Trust argues that a tunnel of 2.9km would avoid the need to locate the tunnel portals in the midst of archaeological sites which would suffer adverse impacts, and that it would also reduce risk to unknown buried features [6.1.27]. It would also increase the area from which the impact of traffic noise would be removed [6.1.49]. In addition, the eastern extension would allow the restoration of the line of The Avenue, which is currently severed by the A303 [6.1.5]. I accept that these points are factually correct, but I note that a tunnel of 2.9km could only be achieved at an increased estimated cost of £67m [6.1.76, 6.1.83].

10.324 The National Trust claims that the additional cost of a tunnel of 2.9km would represent good value for money. The Trust accepts that a balance must be struck between benefits and cost [6.1.21], but it does not itself seek to strike such a balance [6.1.3].

10.325 In my view, the benefits which it is claimed would be achieved by a 2.9km tunnel would not justify the substantial additional cost. I consider that no route through the WHS could guarantee to avoid all unknown buried archaeology, but, for the reasons given in paragraph 10.122 above, I consider that the risk of finding unknown remains has been properly assessed. For the reasons given in paragraph 10.313 above, I

do not accept that failure to remove the severance of The Avenue by the A303 represents a justifiable criticism of the published scheme.

- 10.326 It is regrettable, in my view, that the suggested 2.9km tunnel was not put forward by the National Trust as a formal alternative to the published scheme in response to the direction of the Secretary of State [1.20 to 1.23, 6.1.88]. That would have allowed it to be fully assessed and published so that all those who might be affected by the proposal would have been able to consider their position and to advise the inquiries of the implications for them if such a proposal was pursued. It is the case, however, that, without any advertising of the National Trust's proposal, there was substantial opposition to it, including representations from five adjoining landowners, four of whom contend that the farming of their land would be adversely affected by the proposal [6.1.89].
- 10.327 The Trust also claims that the amendments it proposed to the published scheme could readily be achieved, without substantial delay [6.1.63]. I share the view of the Highways Agency [6.1.91] that there would need to be a republication of the Line Order and substantial amendment to the Compulsory Purchase Order, which, on the basis of the objections received in response to the Trust's proposal, would be likely to be opposed.
- 10.328 The Trust also argues that construction of a 2.9km tunnel should be achieved by the use of a tunnel boring machine rather than by the use of the New Austrian Tunnel Method, as the Highways Agency proposes for the published scheme [4.69, 6.1.2, 6.1.52]. At a length of 2.9km, the cost of constructing a tunnel would be roughly equal whichever of the two methods was employed [6.1.55].
- 10.329 I do not accept the case for a 2.9km tunnel, because I do not believe that the additional cost would be justified by the improvements it would deliver. If the published scheme were to be approved, the issue of the use of a tunnel boring machine would not arise, because it would not be justified for a tunnel of only 2.1km. I note, however, that there is a dispute about whether or not the construction of a 2.9km tunnel using a tunnel boring machine would generate additional volumes of spoil for disposal. The Trust points out that a Highways Agency briefing paper of September 2003 stated that the surplus spoil from even a 4.5km tunnel could be accommodated within the earthworks design of the scheme [6.1.54]. I prefer, however, the later and more considered evidence of the Highways Agency to the effect that a 2.9km tunnel, constructed using a tunnel boring machine, would require additional land to treat and dry excavated material, additional land for a further compound at the eastern portal, and the removal from site of 130,000 cu m of spoil [6.1.86].
- 10.330 The National Trust claims that the Highways Agency has determined the length of the tunnel included in the published scheme by applying the concept of the MILS, which concentrates on the visual horizons from the Stones rather than on the core of the WHS [6.1.4]. The Highways Agency confirms that that is the basis on which the MILS was defined, but claims that the concept was developed in the light of the variety of different terms applied to the area immediately around the Stonehenge

monument in the Management Plan [6.1.70]. As indicated in paragraph 10.85 above, I do not accept that there is any real ambiguity in the Management Plan regarding the areas to which reference is being made. I have not used the concept of the MILS in reaching my conclusions in this case.

- 10.331 In relation to the objection of the National Trust to the creation of the proposed Stonehenge Byway [6.1.56 to 6.1.59], for the reasons set out in paragraph 10.231, I conclude at paragraph 10.232 that the proposed Byway should indeed be a Byway Open to All Traffic, rather than a Bridleway, as the Trust suggests.
- 10.332 **I conclude** that the objections of the National Trust to the Orders before the inquiries cannot be sustained.
- 10.333 **ICOMOS-UK** argues that planning decisions in relation to Stonehenge should recognise the special status of the site as a WHS [6.2.2]. I agree (10.14), and have applied that approach in assessing the published scheme.
- 10.334 ICOMOS-UK contends that funds available should be spent to the advantage, not to the disadvantage of the WHS [6.2.3]. Again, I agree, but I consider that a balance must be applied in making this judgement (10.316). ICOMOS-UK does not accept that point, and argues instead that the question to be asked is simply whether any disbenefits are acceptable in a WHS [6.2.29]. As I note at paragraph 10.110 above, it is clear from the decision in one of the cases put forward in support of this argument that, in fact, a balancing exercise is precisely what is required. In the event, I also consider that the disbenefits which would arise for the WHS from the published scheme are acceptable in this case, in that they would not affect the outstanding universal value of the WHS (10.318).
- 10.335 ICOMOS-UK suggests that integrity is relevant to cultural sites such as Stonehenge, and therefore needs to be protected [6.2.4]. I disagree. It is the current Operational Guidance for WHSs which must be applied (10.25), and it is authenticity which is relevant to a cultural site. It is the wording of the nomination and inscription of Stonehenge which sets out the basis for that inscription, and I consider that the emphasis is on Stonehenge and the associated monuments (10.20).
- 10.336 ICOMOS-UK accepts that not everything within a WHS is of outstanding universal value, and that the cultural qualities which underpin the Stonehenge WHS are not evenly distributed across the site [6.2.9], but at the same time makes the point that the Stonehenge Management Plan is based on the conception that the whole site is of outstanding universal value [6.2.13], and also argues that parts of the site cannot have greater value than others [6.2.27]. I consider that the WHS designation applies to all the land within the area that has been inscribed (10.20), but that the outstanding universal value for which the Stonehenge WHS was inscribed is not spread evenly across the site (10.27).
- 10.337 For the reasons given in paragraphs 10.102 and 10.103, I do not accept the criticisms which ICOMOS-UK makes of the Environmental Statement

- [6.2.16].
- 10.338 Nor, on balance, do I conclude that the criticisms which ICOMOS-UK makes of the published scheme render it unacceptable [10.319].
- 10.339 ICOMOS-UK suggests that northern alternative routes should be considered in place of the published scheme or any scheme involving a tunnel through the WHS [6.2.30], but ICOMOS-UK did not put this forward as an alternative route in response to the direction of the Secretary of State [1.20], and it was not the view of the ICOMOS parent body as reported to the inquiries [5.7.15]
- 10.340 **I conclude** that the objections of ICOMOS-UK to the Orders before the inquiries cannot be sustained.
- 10.341 **The Prehistoric Society** argues strongly that it is wrong to concentrate on the Stonehenge monument to the exclusion of other remarkable monuments within the WHS [6.3.1], and that the MILS covers only a small part of the larger prehistoric landscape [6.3.7]. I agree that it is the whole of the WHS to which consideration must be given (10.20), and I have not used the MILS concept in considering the Orders (10.85).
- 10.342 The Society contends that a road scheme carried out now would represent a solution to a short term problem which would have long term consequences [6.3.8], and that many similar initiatives at Stonehenge carried out in the recent past have rapidly been regarded as mistakes [6.3.9]. Despite these points, I consider that it is the policies and standards of today which should be applied to the proposals put to the inquiries, and that those proposals should be considered against the situation which currently applies on the ground (10.43).
- 10.343 I have considered the impact of the published scheme on The Avenue [6.3.13] and the barrows at Longbarrow Crossroads [6.3.14] together with the impact which would be made by the eastern tunnel portal [6.3.16] and the western tunnel portal [6.3.15] in reaching my conclusions at paragraphs 10.318 and 10.319 above.
- 10.344 For the reasons given in paragraph 10.123, I do not accept that existing planning guidance provides that non visible remains have a setting which needs to be preserved [6.3.19].
- 10.345 I do not accept the claim that the scheme would affect a formerly intact archaeological landscape [6.3.21]. As I note at paragraph 10.108, roads already exist within the WHS, which has seen change throughout its history. Archaeological remains in particular have been affected by centuries of ploughing and cultivation of the land (10.306).
- 10.346 I deal below with the Prehistoric Society's favoured alternative to the published scheme (Alternative Route 5), but **I conclude** that the objections of the Prehistoric Society to the published scheme which would be authorised by the Orders before the inquiries cannot be sustained.
- 10.347 The **Council for British Archaeology** argues that there is no case for



- splitting landscape unity by distinguishing archaeologically between a core and a peripheral area [6.4.2]. This is, in fact, a distinction made in the Stonehenge Management Plan, which has been adopted as supplementary planning guidance. I conclude at paragraph 10.20 that inscription as a WHS applies to the whole area within the WHS boundary, although I consider that the outstanding universal value for which Stonehenge was inscribed is not spread evenly across the site (10.27).
- 10.348 For the reasons given at paragraphs 10.100 to 10.103, I conclude at paragraph 10.104 that criticisms of the Environmental Statement are unjustified.
- 10.349 For the reasons given at paragraph 10.122, I consider that the risk of finding unknown remains has been properly assessed.
- 10.350 I do not consider that there has been any intrinsic failure by the Highways Agency to have regard to the guidance offered in PPG 15 and PPG 16 (10.98). In particular, I do not accept that there has been a failure to analyse the long term effects of the scheme [6.4.20, considered at 10.96 and 10.92].
- 10.351 As regards the suggestion that the Stonehenge Master Plan is superseded by the Management Plan [6.4.21], I do not see how this can be the case when the Management Plan refers to the Master Plan as a mechanism by which the Management Plan's vision and many of its proposed objectives for the core of the WHS might be financed and delivered (10.92).
- 10.352 The MILS may well be a concept which suits the published scheme, as the CBA claims [6.4.22], but it is not a concept upon which I have placed any reliance in assessing the published scheme (10.85).
- 10.353 There is a need for an A303 improvement scheme at Stonehenge (10.54 to 10.57). A tunnel is included in the scheme to secure environmental and heritage benefits for Stonehenge (10.58). It is on that basis that a contribution to the cost from heritage sources is justified. As regards the suggestion that the cost of that heritage contribution could be spread over more than thirty years for purposes of the economic assessment, as I note at paragraph 10.195, that is not allowed for in the standard assessment method which the Highways Agency must use.
- 10.354 **I conclude** that the objections of the CBA to the Orders before the inquiries cannot be sustained.
- 10.355 **The Wiltshire Archaeological and Natural History Society** argues that views between monuments are important, as are arrangements for access between monuments [6.5.3]. As I note at paragraph 10.109, however, the published scheme would not have an adverse impact on intervisibility between monuments, and, at paragraph 10.112, there is no evidence that straight line, direct access between monuments was important in prehistoric times.
- 10.356 For the reasons given at paragraphs 10.100 to 10.103, I conclude at paragraph 10.104 that criticisms of the Environmental Statement are

unjustified.

- 10.357 Given the guidance which exists, and which the Highways Agency must follow in assessing a proposal (10.123), I do not accept that it can fairly be said that the importance of buried archaeology has been undervalued [6.5.9].
- 10.358 I have considered the impact which the published scheme would have on The Avenue [6.5.12] and the impact of the creation of the western tunnel portal and its associated cutting [6.5.10] in reaching my conclusions on the acceptability of the published scheme at paragraphs 10.318 and 10.319 above.
- 10.359 In relation to compliance with Objectives 20 and 23 of the Management Plan [6.5.19, 6.5.20], my conclusion is that the published scheme would offer progress in the achievement of those objectives, and raise no insuperable obstacle to further, more extensive achievement (10.94).
- 10.360 **I conclude** that the objections of WANHS to the Orders before the inquiries cannot be sustained.
- 10.361 **The Stonehenge Alliance** criticises the published scheme first on the basis that the Government cannot guarantee that there would be no damage to archaeological sites [6.6.5]. As I note at paragraph 10.122 above, however, I consider that the risk of finding unknown archaeological remains has been properly assessed, and, because the mitigation process offered would provide for archaeological supervision of topsoil stripping, even unforeseen remains would be catered for.
- 10.362 As I indicate at paragraph 10.207, I do not believe it is realistic to expect other countries to help in any substantial way with the cost of a scheme at Stonehenge, given the relative strength of the UK economy [6.6.5].
- 10.363 The Alliance claims that a monetary value should have been placed on heritage issues in the economic assessment of the road scheme [6.6.6]. For the reasons quoted at paragraph 10.197 above, I consider that the Highways Agency cannot fairly be criticised for its approach on this issue.
- 10.364 As regards the suggestion that the Stonehenge Management Plan supersedes the Master Plan [6.6.8], I do not see how this can be the case for the reasons outlined at paragraph 10.351 above. I accept, however, the argument [6.6.9] that the provisions of the Management Plan represent a material consideration in assessing the acceptability of the published scheme in planning terms (10.35). For the reasons given in paragraphs 10.91 and 10.94 above, I do not accept that the published scheme is in conflict with Objectives 9 and 23 on the Management Plan [6.6.10]. On the contrary, I conclude that the published scheme would offer progress in the achievement of those objectives.
- 10.365 For the reasons given in paragraph 10.110, I do not accept the contention [6.6.13] that the balancing of positive and negative impacts of a proposal is inappropriate in a WHS.

- 10.366 For the reason given in paragraph 10.28, I do not accept that the Stonehenge WHS has the status of an archaeological reserve under the Valletta Convention [6.6.14].
- 10.367 For the reason given in paragraph 10.29, I do not accept that the Australian cases on the Burra Charter have application to the Orders before the inquiries [6.6.15].
- 10.368 For the reasons given at paragraphs 10.100 to 10.103, I conclude at paragraph 10.104 that criticisms of the Environmental Statement are unjustified [6.6.17, 6.6.32], and for the reasons given at paragraph 10.197 I consider it correct that no attempt has been made to place a monetary value on environmental impacts [6.6.51].
- 10.369 I accept that the guidance contained in PPG 15 and PPG 16 [6.6.21] has relevance to the issues before the inquiries (10.14). I have applied it, and I conclude at paragraph 10.98 that there is no intrinsic failure in the published scheme proposals to have regard to that guidance.
- 10.370 I accept that in cases concerning another WHS the rejection of developments which would have caused only temporary damage to the WHS were upheld by the Courts [6.6.26], but, as I conclude at paragraph 10.14, each case must be decided on its own merits, balancing positive benefits against any negative effects.
- 10.371 I accept that the published scheme could involve the removal of archaeological remains from the route of the road [6.6.27], but I consider that the risk of finding remains has been properly assessed, and that proper mitigation is offered (10.122).
- 10.372 I have considered the impact which the published scheme would have on Longbarrow Crossroads and the impact of the creation of the western tunnel portal and the eastern tunnel portal and associated road cuttings in reaching my conclusions at paragraphs 10.318 and 10.319 on the acceptability of the published scheme.
- 10.373 As indicated at paragraph 10.111, I accept the evidence of the Highways Agency that the reinstatement planned would avoid any long term adverse effect on vegetation at Stonehenge Bottom [6.6.30].
- 10.374 It is impossible to walk along The Avenue now to the south of the A303 [6.6.31]. The proposals put to the inquiries should be judged against the present situation (10.43). I do not see that the failure of the published scheme to provide for the removal of the severance of The Avenue by the A303 represents a justifiable criticism of the scheme (10.313).
- 10.375 I consider that the landscape impacts of the proposed scheme have been assessed in accordance with the requirements of the DMRB, and that it is inappropriate to refer to the guidance on the methodology for multi modal studies [6.6.38] because the proposed scheme is not part of a multi modal study (10.106).
- 10.376 I consider that any effect on the iconic status of Stonehenge arising from

- the published scheme [6.6.39] would be positive (10.317).
- 10.377 I conclude that the hydrogeological impacts of the published scheme [6.6.41] do not provide any obstacle to its approval (10.153).
- 10.378 I conclude at paragraph 10.74 that a proposal to improve the A303 in the area of Stonehenge was clearly envisaged within the transport policy adopted by the Government [6.6.46].
- 10.379 As indicated at paragraph 10.192, I consider that the input material to the scheme's economic analysis can be regarded as reliable, including the allowance for induced traffic [6.6.52].
- 10.380 **I conclude** that the objections of the Stonehenge Alliance to the Orders before the inquiries cannot be sustained.
- 10.381 In relation to the objections of **Friends of the Earth (Wiltshire)**, I conclude at paragraph 10.39 that very little weight should be given to the resolutions of the 1995 Planning Conference, a non statutory process, with no special status, now nine years old [6.7.3].
- 10.382 I note at paragraph 10.54 that current traffic flows along the A303 exceed those which could be dealt with effectively merely by speed controls [6.7.9].
- 10.383 In relation to traffic noise [6.7.10], I conclude that there is no argument arising from any aspect of noise impact which represents an obstacle to the approval of the published scheme (10.169).
- 10.384 I conclude at paragraph 10.217 that a single carriageway bypass for Winterbourne Stoke would be inadequate to deal with existing and future anticipated traffic levels [6.7.11].
- 10.385 I conclude at paragraph 10.273 that the fact that the Highways Agency did not produce an up to date Appraisal Summary Table until asked to do so does not constitute a justifiable basis of objection to the published scheme [6.7.13].
- 10.386 **I conclude** that the objections of Friends of the Earth (Wiltshire) to the Orders before the inquiries cannot be sustained.
- 10.387 **The Salisbury Green Party** also referred to the resolutions of the 1995 Planning Conference [6.8.2]. For the reasons given in paragraph 10.39, I conclude that very little weight should be given to those resolutions.
- 10.388 The Green Party says that the published scheme would not restore integrity and tranquillity to Stonehenge [6.8.4]. For the reasons given in paragraph 10.25, I conclude that it is authenticity rather than integrity which is relevant to a cultural site such as Stonehenge. I agree with the point made by the Highways Agency that the published scheme would remove the main source of persistent noise at the monument [6.8.26].
- 10.389 For the reasons given in paragraph 10.247, I conclude that the

- immediate closure of the A344 junction with the A303, independently of the published scheme, would not be justifiable [6.8.9].
- 10.390 For the reasons given in paragraph 10.71, I conclude that there is no argument which represents an obstacle to the approval of the published scheme on the ground of tunnel safety [6.8.12].
- 10.391 I conclude at paragraph 10.217 that a single carriageway bypass for Winterbourne Stoke would be inadequate to deal with existing and future anticipated traffic levels [6.8.13].
- 10.392 The Green Party argues that the Countess flyover should be omitted from the scheme on the basis that it would cause noise, visual intrusion and pollution [6.8.15]. For the reasons outlined in paragraph 10.250 above, I conclude at paragraph 10.251 that the proposed flyover would not cause adverse effects.
- 10.393 The Green Party also makes the point that, even if the published scheme were to be approved, there would remain other single carriageway sections elsewhere along the A303 [6.8.18]. I consider, however, that the improvement to the A303 between Amesbury and Berwick Down is being driven by the need to deal with existing traffic conditions, remove roads and traffic from the landscape setting to Stonehenge and to provide a bypass of Winterbourne Stoke. The exceptional circumstances created by the proximity of the A303 to Stonehenge justify the pursuit of this scheme as a stand alone proposal, regardless of other proposals that may be pursued elsewhere along the A303 [6.8.39].
- 10.394 I note at paragraph 10.54 that current traffic flows along the A303 exceed those which could be dealt with effectively merely by speed controls [6.8.19].
- 10.395 The Green Party contends that no decision should be taken on the published scheme until the planning position regarding the relocation of the Stonehenge Visitor Centre is clear [6.8.16, 6.8.23]. I deal with this submission at paragraphs 10.642 to 10.645 below.
- 10.396 **I conclude** that, subject to the outstanding submission regarding the delaying of a decision on the Orders until the possibility of relocating the Stonehenge Visitor Centre is clear (referred to in the immediately preceding paragraph), the objections of the Salisbury Green Party to the Orders before the inquiries cannot be sustained.
- 10.397 **The Association of Council Tax Payers South Wiltshire** argues that the published scheme is contrary to the World Heritage Convention and contrary to the spirit of the Stonehenge Management Plan [6.9.2]. I conclude at paragraph 10.22 above that it is not the case that the World Heritage Convention implies that WHSs will represent the pre eminent call on a Government's resources. I consider that the published scheme would honour the Government's responsibilities under the World Heritage Convention, in that, on balance, the published scheme would sustain the outstanding universal value for which the Stonehenge WHS is inscribed. As regards the Stonehenge Management Plan, I conclude at paragraph

- 10.94 that the published scheme is in line with the requirements of the Management Plan.
- 10.398 In relation to construction impact, for the reasons outlined in paragraphs 10.176 to 10.183, I conclude at paragraph 10.184 that there is no argument which represents an obstacle to the approval of the published scheme in relation to construction impact.
- 10.399 I have considered the impact which the cutting between Longbarrow Crossroads and the western tunnel portal would have [6.9.5] in reaching my conclusions at paragraphs 10.318 and 10.319 on the acceptability of the published scheme.
- 10.400 In relation to noise and light at Stonehenge [6.9.6], I conclude at paragraph 10.169 that there is no argument in relation to noise impact which represents an obstacle to the approval of the scheme, and I reach a similar conclusion in relation to lighting proposals at paragraph 10.214. I consider that the Stonehenge monument would benefit from a major reduction in traffic noise as a result of the published scheme, and that the scheme would also remove headlight pollution [6.9.20].
- 10.401 For the reasons given in paragraphs 10.148 to 10.152, I conclude at paragraph 10.153 that there is no obstacle to the approval of the published scheme in relation to drainage and water quality [6.9.7].
- 10.402 As I note at paragraph 10.194, the operating costs of the proposed tunnel have in fact been taken into account in the economic analysis of the published scheme [6.9.8].
- 10.403 As regards the suggestion that a tunnel would eventually need a third lane in each direction [6.9.9], at paragraph 10.200 I accept the expert evidence from the Highways Agency that two lanes of traffic in each direction would be sufficient to meet any anticipated traffic flow on the A303 at Stonehenge.
- 10.404 In relation to the contention that accidents are more difficult to deal with in tunnels [6.9.10], I consider that most accidents which occurred in the proposed tunnel on the A303 would be easier to deal with in a one way dual carriageway tunnel than on the existing single carriageway open road (10.68). My conclusion on tunnel safety is that it does not represent an obstacle to the approval of the published scheme (10.71).
- 10.405 As regards noise and pollution at the proposed Countess flyover [6.9.11], I accept at paragraph 10.163 evidence that additional noise would be barely perceptible, and at paragraph 10.156 that the proposal would not damage air quality.
- 10.406 As I note in paragraph 10.108 above, acceptable routes for a Winterbourne Stoke bypass have only been identified to the north of the village [6.9.12].
- 10.407 **I conclude** that the objections of ACT to the Orders before the inquiries cannot be sustained.

- 10.408 **Dr C Gillham** argues that the published scheme is not in line with Government policy on road based solutions to traffic problems [6.10.1 to 6.10.5]. For the reasons stated in paragraph 10.74, I conclude that a proposal to improve the A303 in the area of Stonehenge was clearly envisaged within the transport policy adopted by the Government.
- 10.409 In relation to Dr Gillham's argument that the method used to assess the costs and benefits of highways schemes is flawed, I conclude at paragraph 10.191 that criticisms of that method need to be raised generally, rather in relation to an individual scheme. I conclude at 10.198 that the economic assessment of this scheme has been properly carried out.
- 10.410 In relation to the issue whether a road building scheme successfully delivers economic advantage to a peripheral region [6.10.9], this argument was not pressed by the Highways Agency in the face of evidence produced by Dr Gillham, and I conclude at paragraph 10.204 that it has not been shown that road building alone has a positive effect on a peripheral region.
- 10.411 In relation to the contention that resources available for any Stonehenge scheme could be put to better use [6.10.10], I state at paragraph 10.201 that I consider the allocation of resources between competing demands to be a matter for Government determination. I conclude at paragraph 10.203 that this argument does not represent an obstacle to the approval of the published scheme.
- 10.412 Dr Gillham argues that the published scheme represents a short term initiative which could cause long term damage [6.10.11]. I conclude, however, that the proposals put to the inquiries have to be considered against the situation which currently exists (10.43), and that the balance of advantage to the WHS is decisively in favour of the published scheme (10.318).
- 10.413 In relation to the contention that increased capacity on the A303 at Stonehenge would generate further traffic and move pressure to other parts of the road system [6.10.12], I accept the evidence of the Highways Agency that induced traffic arising from the published scheme would be very limited, and that the impact on other parts of the road system arising from any improvement to the section of the A303 between Amesbury and Berwick Down would likewise be limited (10.192).
- 10.414 In relation to increased green house emissions [6.10.13, 6.10.18], on the basis of the evidence discussed at paragraph 10.155, I conclude at paragraph 10.157 that there is no argument which represents an obstacle to the approval of the published scheme in relation to air quality.
- 10.415 I accept that the relocation of the Stonehenge Visitor Centre to an alternative site acceptable in planning terms could be achieved without any improvement to the A303 [6.10.14]. For the reasons set out in paragraph 10.247, however, I conclude that the A344 could not justifiably be closed independently of some improvement of the A303.

- 10.416 As indicated in paragraph 10.275, I conclude that the SWARMMS study is not put forward as part of the justification for the published scheme, and that this point of objection [6.10.16] is therefore not well founded.
- 10.417 On the argument that the Highways Agency cannot be trusted to carry out an environmentally sensitive scheme [6.10.17], for the reasons set out in paragraphs 10.263 and 10.264, I conclude at paragraph 10.265 that this is not an objection which in any way calls into question the case for the published scheme.
- 10.418 **I conclude** that, notwithstanding my acceptance of the point that it has not been shown that road schemes deliver economic benefit in peripheral regions, the other points of objection raised by Dr Gillham to the Orders before the inquiries cannot be sustained. I return to the economic benefit point at paragraph 10.617 below.
- 10.419 **Mr R Harvey** also argues that the resources available for a road improvement scheme at Stonehenge could be put to better use [6.11.3]. I state at paragraph 10.201 that I consider the allocation of resources between competing demands to be a matter for Government determination. I conclude at paragraph 10.203 that this argument does not represent an obstacle to the approval of the published scheme.
- 10.420 **I conclude** that the objection of Mr Harvey to the Orders before the inquiries cannot be sustained.
- 10.421 **Mr T Mayer** argues that the construction of a tunnel is costly and unnecessary [6.12.1]. As to the need for a tunnel, I note that the use of a tunnel to avoid unacceptable heritage impacts in the WHS has been a consistent thread in consultations since 1995 (10.52). As to the need for the scheme, I conclude at paragraph 10.54 above that current traffic flows along the A303 at Stonehenge are substantially greater than the current single carriageway can accommodate satisfactorily, so that traffic queues occur regularly. I also conclude that, for pedestrians, the road is difficult to cross. At paragraph 10.55, I accept that road safety would be improved by the published scheme. There is also a long standing need for a Winterbourne Stoke bypass (10.57). In addition to those matters, the published scheme would secure heritage and environmental benefits for Stonehenge (10.58). In relation to the cost of the proposed scheme, I conclude at paragraph 10.605 that none of the cheaper alternative schemes proposed at the inquiries would achieve the requirements of the A303 improvement scheme at a smaller cost than the published scheme. In relation to the more expensive alternatives proposed, I conclude at paragraph 10.606 that the additional costs would not be justified by the benefits that each of these proposals would deliver. There is a long history of attempts to deal with the problems experienced on the A303 at Stonehenge (10.48). I reject the contention that the published scheme is unnecessary, and, having explored all suggested alternatives, that it is costly.
- 10.422 As I find at paragraph 10.186 above, the loss of the view of Stonehenge to passing travellers on the A303 [6.12.1] is an unavoidable consequence



- of what I regard as the stronger priority to remove the sight and sound of traffic from Stonehenge.
- 10.423 For the reasons set out in paragraph 10.247, I conclude that the A344 could not justifiably be closed independently of some improvement of the A303 [6.12.2].
- 10.424 In relation to the risk of damage to buried archaeological assets [6.12.3], for the reasons set out in paragraph 10.122, I conclude at paragraph 10.146 that the risk to unknown archaeological remains has been properly assessed. I consider that proper mitigation has been offered.
- 10.425 I note Mr Mayer's view that the funds available for the improvement of the A303 would be better spent on the improvement of the local minor road network [6.12.5]. Responsibility for that network rests, however, with the local highway authority, and not with the Highways Agency.
- 10.426 Mr Mayer also argues that there should have been greater public consultation about the Stonehenge scheme [6.12.6]. I note, however, that a scheme for the A303 at Stonehenge has been discussed since 1991 (10.48). The favoured route was the subject of formal public consultation in 1999. Changes were made to the scheme as a result of that consultation. There was a public exhibition of the proposals contained in the published scheme in June 2003 [4.16]. In addition, there has been extensive consultation with relevant statutory agencies and interest groups [4.79, 4.97, 4.135, 4.178]. I consider that there has been appropriate and extensive public consultation regarding the published scheme.
- 10.427 **I conclude** that the objections of Mr T Mayer to the Orders before the inquiries cannot be sustained.
- 10.428 **Mr P Corp** contends that the published scheme represents poor value for money [6.13.1]. I conclude at paragraph 10.198 that the economic assessment of the scheme has been properly carried out. There is a highway need for a scheme at Stonehenge (10.54, 10.55, 10.57). That scheme must recognise the sensitivities inherent in its location (10.56). In my view, the published scheme achieves an acceptable balance between the demands of that location and cost (10.605, 10.606).
- 10.429 In relation to the risk of damage to buried archaeological assets [6.13.2], for the reasons set out in paragraph 10.122, I conclude at paragraph 10.146 that the risk to unknown archaeological remains has been properly assessed. I consider that proper mitigation has been offered.
- 10.430 For the reasons given in paragraphs 10.148 to 10.152, I conclude at paragraph 10.153 that there is no obstacle to the approval of the published scheme in relation to drainage and water quality [6.13.2].
- 10.431 In relation to the argument that tunnels are dangerous in use, I conclude at paragraph 10.71 that existing tunnels in UK have a good safety record; risks during construction and operation of the proposed A303 tunnel have been properly assessed; and that the planning which has

- gone into the proposed design of the tunnel means that there is no argument which represents an obstacle to the approval of the scheme in relation to tunnel safety.
- 10.432 Mr Corp argues that a tunnel is being provided here merely for cosmetic purposes [6.13.4]. In fact, I am satisfied that a tunnel is included in the scheme to achieve compliance with Structure Plan policy on transport (10.76) and the provisions of supplementary planning guidance (10.90).
- 10.433 **I conclude** that the objections of Mr P Corp to the Orders before the inquiries cannot be sustained.
- 10.434 **Mr P Matthews** also argues that the proposed tunnel is too costly and that it is provided purely for cosmetic purposes [6.14.1]. For the reasons outlined in paragraphs 10.605 and 10.606 above, I conclude that the cost of the published scheme must be incurred if an acceptable scheme which meets the requirements of the site is to be delivered. For the reasons outlined in paragraph 10.432 above, I reject the contention that the tunnel in this case is being provided merely for cosmetic purposes.
- 10.435 For the reasons given in paragraphs 10.148 to 10.152, I conclude at paragraph 10.153 that there is no obstacle to the approval of the published scheme in relation to drainage and water quality [6.14.2].
- 10.436 For the reasons outlined in paragraph 10.258, I conclude at paragraph 10.259 that the issue of conflict with the covenants in the Deed of Gift of Stonehenge to the nation does not represent a basis on which the published scheme can be challenged [6.14.3].
- 10.437 **I conclude** that the objections of Mr P Matthews to the Orders before the inquiries cannot be sustained.
- 10.438 **Dr and Mrs Moon** objected to the scheme first on the basis of the visual impact which the proposed interchange at Longbarrow would make on the WHS in that area [6.15.2]. This is an aspect which I have taken into account in arriving at the conclusion at paragraphs 10.318 and 10.319 that, on balance, the arguments in favour of the published scheme outweigh the arguments against it.
- 10.439 In relation to the issue of noise at Longbarrow Crossroads [6.15.6], I find at paragraph 10.164 that the only evidence submitted to the inquiries is that the increase in noise level would be minimal at around 1dB.
- 10.440 In relation to the danger to archaeological remains at the Longbarrow Crossroads [6.15.7], I consider that the risk of finding unknown remains has been properly assessed, and, because the mitigation process offered would provide for archaeological supervision of top soil stripping, even unforeseen remains would be catered for (10.122).
- 10.441 I consider Dr and Mrs Moon's submission that there is no real need for an interchange between the A303 and the A360 [6.15.8] in association with their alternative proposal, Alternative Route 8. For the reasons set out in paragraph 10.565, I conclude that Alternative Route 8 does not warrant

further investigation. On the same basis, I reject the suggestion that there is no need for an interchange between the A303 and the A360.

- 10.442 Dr and Mrs Moon criticised the traffic noise assessments made in relation to the scheme, particularly in its impact at Longbarrow Crossroads [6.15.10 to 6.15.18]. For the reasons outlined between paragraphs 10.164 and 10.167, I reject these criticisms, and conclude at paragraph 10.169 that there is no argument which represents an obstacle to the approval of the published scheme in relation to noise impact.
- 10.443 **I conclude** that the objections of Dr and Mrs Moon to the Orders before the inquiries cannot be sustained.
- 10.444 **East Amesbury Residents** criticised the value for money assessment of the published scheme, in particular on the ground that they say that the running costs of the proposed tunnel have not been included. I conclude that the running costs of the tunnel have been included in the economic assessment (10.194), and indeed that that assessment has been properly carried out (10.198).
- 10.445 In relation to the impact of the published scheme on archaeological assets [6.16.4], I have taken into account all the impacts mentioned by East Amesbury Residents in reaching my conclusions at paragraph 10.318 and 10.319 that, on balance, the arguments in favour of the published scheme outweigh those against it.
- 10.446 In relation to construction impact [6.16.5], having weighed the issues, I conclude at paragraph 10.184 that there is no argument which represents an obstacle to the approval of the published scheme in relation to construction impact.
- 10.447 As regards noise at Countess Roundabout [6.16.7], I consider this at paragraph 10.163, and reach the conclusion at paragraph 10.169 that there is no argument which represents an obstacle to the approval of the published scheme in relation to noise impact.
- 10.448 **I conclude** that the objections of the East Amesbury Residents to the Orders before the inquiries cannot be sustained.
- 10.449 **The Countess Road Residents' Group** also raised the issue of disruption during construction [6.17.3]. For the reasons outlined in paragraphs 10.176 to 10.183 above, I conclude at paragraph 10.184 that there is no obstacle to the approval of the published scheme in relation to construction impact. I therefore do not accept that this is a sustainable basis of objection to the published scheme.
- 10.450 In relation to the concern that Countess Road would be the diversion route used on any occasion on which the A303 was closed by an accident [6.17.4], I consider that incidents leading to a road closure would be less frequent with the published scheme than is the case at present, given that the published scheme would provide a two lane carriageway in each direction. Most incidents could be dealt with by means of a single lane closure, with traffic continuing to flow in the other lane, avoiding

congestion and the need for traffic to be diverted.

- 10.451 As regards the objection based on increased noise from traffic at the Countess flyover [6.17.5], for the reasons outlined in paragraph 10.250 above, I conclude at paragraph 10.251 that the proposed flyover would not cause appreciable adverse effects.
- 10.452 Nor is it the case that the published scheme would lead to the need to provide for a substantial amount of spoil removal from the site [6.17.6]. The evidence given to the inquiries was to the effect that there would be a balance between excavated material and the total fill requirement for the scheme (10.179).
- 10.453 For the reasons given in paragraphs 10.148 to 10.152, I conclude at paragraph 10.153 that there is no obstacle to the approval of the published scheme in relation to drainage and water quality [6.17.7].
- 10.454 In relation to tunnel safety [6.17.9], I conclude at paragraph 10.71 that existing tunnels in UK have a good safety record; risks during construction and operation of the proposed A303 tunnel have been properly assessed; and that the planning which has gone into the proposed design of the tunnel means that there is no argument which represents an obstacle to the approval of the scheme in relation to tunnel safety.
- 10.455 I note the various expressions of public opinion put to the inquiries [6.17.10, but also 5.3.10, 7.5.28, 7.5.29, 7.5.60, 7.5.63]. I have had regard to these expressions of public opinion, but it is essentially the evidence presented at the inquiries which has led to the recommendations which I shall make.
- 10.456 **I conclude** that the objections of the CRRG to the Orders before the inquiries cannot be sustained.
- 10.457 **The Avebury Society** refers to planning decisions taken in relation to the WHS at Avebury and also in relation to other WHSs in which the importance of inscription as a WHS has been underlined [6.18.3 to 6.18.11]. I recognise the importance of inscription at paragraph 10.14 above, but note that each case falls to be determined on its merits after the positive benefits of a scheme have been weighed against any adverse effects.
- 10.458 The Society next argues that below ground and undiscovered archaeological features are protected in the same way as upstanding monuments, whether scheduled or not [6.18.12]. I conclude at paragraph 10.122 above that the risk of finding unknown archaeological remains has been properly assessed, and at paragraph 10.123 that direct impacts on known buried remains have been assessed.
- 10.459 I have had regard to the impacts on the WHS mentioned by the Avebury Society and listed at paragraph 6.18.13 above in reaching my conclusions on the acceptability of the published scheme at paragraphs 10.318 and 10.319.

- 10.460 As indicated at paragraph 10.109, I do not see how the width of a road or whether or not it is placed in a cutting could give rise to any difficulty in explaining or interpreting a site for visitors [6.18.14].
- 10.461 In relation to the suggestion that the Secretary of State would have a conflict of interest in determining Orders of which he himself (through the Highways Agency) was the promoter [6.18.18], I note at paragraph 10.261 that these arrangements have been sanctioned by Parliament and accepted by the Courts. I conclude that there is no special factor in relation to this scheme which makes these arrangements subject to doubt.
- 10.462 **I conclude** that the objection of the Avebury Society to the Orders before the inquiries cannot be sustained.
- 10.463 **The Amesbury Link Road Action Group** also raises specific impacts which it says the published scheme would have on the WHS [6.19.3]. I have taken all of these impacts into account in reaching my conclusions on the published scheme at paragraphs 10.318 and 10.319. In particular, I have also concluded at paragraph 10.145 that the Countess Roundabout proposal would ultimately have a neutral effect on Countess Farm, and, at paragraph 10.251, that the published scheme would not have the adverse effects the Group fears on the town of Amesbury.
- 10.464 For the reasons given in paragraphs 10.148 to 10.152, I conclude at paragraph 10.153 that there is no obstacle to the approval of the published scheme in relation to drainage and water quality [6.19.4].
- 10.465 In relation to the proposed loss of the pedestrian subway at Countess [6.19.5], I conclude at paragraph 10.254 that the retention of a pedestrian underpass at Countess would not be justified on safety grounds if the published scheme were carried out, and that the additional expenditure involved would not be justified by the likely level of use of such a facility.
- 10.466 For the reasons given in paragraph 10.71, I conclude there is no argument which represents an obstacle to the approval of the published scheme on the ground of tunnel safety [6.19.6].
- 10.467 As regards consideration of the value for money offered by the scheme, I conclude at paragraph 10.198 above that the economic assessment of the scheme has been properly carried out in accordance with the relevant requirements for road schemes.
- 10.468 I conclude at paragraph 10.257 that the interplay of the A303 proposals and a local highways authority proposal to create a new link road between the A345 and the A303 Solstice Park junction [6.19.10] does not affect the case for or against the published scheme.
- 10.469 **I conclude** that the objections of the Amesbury Link Road Action Group to the Orders before the inquiries cannot be sustained.

- 10.470 **Mrs J Robertson** is concerned at the loss of the view of Stonehenge by travellers on the A303 [6.20.3]. As I find at paragraph 10.186 above, the loss of the view of Stonehenge is an unavoidable consequence of what I regard as the stronger priority to remove the sight and sound of traffic from Stonehenge.
- 10.471 Mrs Robertson also makes the point that some people find it difficult to use tunnels [6.20.5]. I note, however, at paragraph 10.68 that tunnels of up to 3.2km are used in many locations throughout the UK, and appear to be used successfully.
- 10.472 In relation to Mrs Robertson's concerns about the impact of the published scheme on the water table in the surrounding areas [6.20.6], I state at paragraph 10.152 that I accept the very clear expert evidence of the Highways Agency that the areas about which Mrs Robertson expresses concern lie in different ground water and river catchments from the published scheme. I note that the Environment Agency is also satisfied that the proposed tunnel would cause no problems in connection with the disposal of sewage in Chitterne.
- 10.473 As regards the cost of the published scheme [6.20.7], I conclude at paragraph 10.605 that none of the cheaper alternative schemes proposed at the inquiries would achieve the requirements of the A303 improvement scheme at a smaller cost than the published scheme.
- 10.474 **I conclude** that the objections of Mrs J Robertson to the Orders before the inquiries cannot be sustained.
- 10.475 **Mr G V Cowmeadow** is also concerned about the issues of the loss of the view of Stonehenge by travellers [6.21.1], cost [6.21.2] and tunnel safety [6.21.2]. As indicated above, I consider that the loss of the view of Stonehenge to passing travellers is an unavoidable consequence of the stronger priority to remove the sight and sound of traffic from Stonehenge. I consider that none of the cheaper alternative schemes proposed at the inquiries would achieve the requirements of the A303 improvement scheme at a smaller cost than that of the published scheme. I conclude that there is no argument which represents an obstacle to the approval of the published scheme on the ground of tunnel safety.
- 10.476 **I conclude** that the objections of Mr G V Cowmeadow to the Orders before the inquiries cannot be sustained.
- 10.477 The loss of view and cost issues are also raised by **Amesbury Town Council** [6.22.2]. I make the same responses as those given at paragraph 10.475 above.
- 10.478 In relation to the Town Council's objection to the loss of the Countess underpass [6.22.3], I conclude at paragraph 10.254 that the retention of a pedestrian underpass at Countess would not be justified on safety grounds if the published scheme were carried out, and that the additional expenditure involved would not be justified by the likely level of users of such a facility.

- 10.479 The Town Council also considers that the exemptions from the Byway Regulation Order which favour English Heritage and the National Trust rather than people with disabilities generally are discriminatory and wrong [6.22.8]. For the reasons given in paragraph 10.233 above, I disagree, and I support the Order as drafted in this respect.
- 10.480 **I conclude** that the objections of Amesbury Town Council to the Orders before the inquiries cannot be sustained.
- 10.481 **Councillor A J Brown-Hovelt** argues that Stonehenge needs to be viewed in the context of the whole of the WHS, all of which needs to be protected and preserved [6.23.2]. He considers that a tunnel would intrude into the landscape either through its portals or through its ventilation shafts or both [6.23.3]. He also argues that the published scheme proposals would be in conflict with the Local Plan [6.23.5]. I agree with the Councillor on this last point (10.82), but I have borne all these considerations in mind in balancing the benefits and disbenefits of the published scheme and in reaching my conclusions at 10.318 and 10.319.
- 10.482 I do not accept that the published scheme would give rise to any problem regarding spoil disposal or ground water [6.23.4] because, as I find at 10.179, there would be a balance between excavated material and the total fill requirement for the scheme, and, as I find at 10.153, there is no argument which represents an obstacle to the approval of the published scheme in relation to drainage and water quality.
- 10.483 **I conclude** that the objections of Councillor A J Brown-Hovelt to the Orders before the inquiries cannot be sustained.
- 10.484 I deal with the objections of **the Trail Riders Fellowship and the Byways and Bridleways Trust** in some detail between paragraphs 10.220 and 10.244 above.
- 10.485 In relation to the amendment to the Byway Regulation Order sought by the TRF, I conclude at paragraph 10.235 that the amendment should be made, and I shall recommend accordingly. That was the only point ultimately pursued by the TRF in its objection at the inquiries. If that amendment is made, the TRF does not challenge the Orders before the inquiries on any other basis.
- 10.486 The same point is raised by the BBT, and its objection on that point is similarly dealt with in my conclusion at paragraph 10.235.
- 10.487 The BBT also raises two other points. I conclude at paragraph 10.241 that the objection regarding the manner in which various rights of way have been recorded in the draft Side Roads Order cannot be sustained. At paragraph 10.244, I conclude that the Trust's objection on the basis that the Highways Agency's proposals for the acquisition of land exceed the powers available cannot be sustained.
- 10.488 Therefore, **I conclude** that all remaining points of objection of the BBT to

the Orders before the inquiries cannot be sustained.

- 10.489 **Mr R Wort** argues that the Fargo plantation should be removed to clear the horizon, and that there should be no trees on King Barrow Ridge [6.26.4]. I do not consider this to be a matter relevant to the decisions on the Orders before the inquiries.
- 10.490 Mr Wort considers that the A303 should not have been allowed to become such an important route as it now is [6.26.6]. I conclude at paragraph 10.43, however, that the proposals put to the inquiries must be considered against the situation which currently applies on the ground.
- 10.491 Mr Wort contends that the two lane carriageway proposed by the Highways Agency in the published scheme will rapidly prove to be inadequate to deal with increasing traffic [6.26.7]. As I indicate at paragraph 10.200, however, I accept the evidence of the Highways Agency that two lanes of traffic in each direction would be sufficient to meet any anticipated traffic flow on the A303 at Stonehenge, even with high traffic growth.
- 10.492 **I conclude** that the objections of Mr R Wort to the Orders before the inquiries cannot be sustained.
- 10.493 **Stapleford Parish Council** objects to the published scheme because the Council considers that the opportunity should have been taken to solve traffic problems in the Wylve Valley at the same time as improving the A303 [6.27.1]. Such a solution has, however, been rejected by the local highway authority (which is responsible for dealing with traffic in the Wylve Valley) following a public inquiry into the proposed Salisbury Bypass and receipt of the Salisbury Transport Study commissioned by the Government Office for the South West [6.27.5].
- 10.494 **I conclude** that the objections of Stapleford Parish Council to the Orders before the inquiries cannot be sustained.
- 10.495 Of the written objections which raised points not covered in the objections presented at the inquiries, I deal with the objection of Shell UK at paragraph 10.173 above, the objection of Mr C R Vince at paragraph 10.172 above, the objections of the Wiltshire Wildlife Trust at paragraphs 10.54, 10.147, 10.148 and 10.176 above, and the objections concerning the energy field of Stonehenge at paragraph 10.269 above.
- 10.496 **I conclude** that the additional points of objection contained in the written representations submitted cannot be sustained.

### **Conclusions on Alternative Route proposals**

#### ***Alternative Route 1***

- 10.497 Alternative Route 1 would provide a surface level dual carriageway for the A303 past Stonehenge, realigned slightly to the south in the immediate area of Stonehenge. To the west of Longbarrow Crossroads



and to the east of The Avenue, the route would be identical to that of the published scheme [7.2.2]. The junction of the A344 and the A303 would be closed, and the A344 between the A303 and the existing Stonehenge Visitor Centre would be replaced by a footpath [7.2.4].

- 10.498 Alternative Route 1 would be significantly cheaper than the published scheme [7.2.5], with an estimated cost of £70m. It would represent very good value for money [7.2.20]. It would avoid the maintenance and operating costs of a tunnel and also any risks associated with a tunnel. It would avoid any damage to the setting of the remaining Nile Clumps [7.2.5]. It would preserve the sight of Stonehenge for people passing the monument [7.2.6, 7.2.12]. Moving the road to the south in the area of Stonehenge would reduce the noise of traffic at the Stones [7.2.9], but there are many other sources of noise and visual intrusion at Stonehenge [7.2.10, 7.2.11], which visitors to the monument are able to ignore [7.2.10].
- 10.499 On the other hand, Alternative Route 1 would be in direct conflict with the provisions of the Development Plan relating to the A303, with the Regional Planning Guidance and with Objectives 9 and 23 of the Stonehenge Management Plan [7.2.16, 7.2.20, 7.2.27, 7.2.28]. It would have an adverse impact on 17 cultural heritage sites (including Stonehenge) compared with the published scheme [7.2.16], and would cause the loss of potential landscape [7.2.17], ecological [7.2.18] and public access [7.2.26] gains. It would require the importation of substantial quantities of fill to the site to achieve construction [7.2.26]. It would not have the support of either English Heritage or the National Trust, two of the major landowners in the area affected [7.2.23], and it would prejudice the achievement of the other two limbs of the Stonehenge Project [7.2.24].
- 10.500 I consider that the complete conflict with the provisions of the Development Plan and the Regional Planning Guidance relating to the A303 and the conflict which the proposal would have with the supplementary planning guidance contained in the Stonehenge Management Plan significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 1 does not warrant further investigation

### ***Alternative Route 2***

- 10.501 Alternative Route 2 would provide a surface level diversion of the A303 from Deptford, to the west of the western extent of the published scheme, to Beacon Hill, which lies to the east of Amesbury [7.3.2]. The western part of the route would be created by the upgrading to dual carriageway of the A36 between Deptford and Stapleford [7.3.3]. The eastern part of the route, which would lie to the south of the present line of the A303 past Stonehenge, would run mainly through open countryside [7.3.4], but part of it would incorporate the main runway of Boscombe Down Airfield [7.3.6]. Alternative Route 2 also envisages the returning to rail use of the Countess to Larkhill section of the 1914 military railway, which would then be extended underground to Stonehenge, the creation of a circular train service to connect Boscombe

Down Airfield with Salisbury and the Wylve Valley Line, and 24km of new railway, providing connections between Stonehenge and nearby villages [7.3.8].

- 10.502 The Group promoting Alternative Route 2 claims that the road construction and land acquisition costs of the Alternative would be £41m less than the comparable costs of the published scheme [7.3.9]. They claim that this saving would provide sufficient funds to cover the cost of their railway proposals [7.3.10]. They argue that Alternative Route 2 would integrate road, rail and air transport modes, in line with Government policy [7.3.9]. They say that the existing Development Plan for the area fails to deliver this policy [7.3.13], and that the published scheme does not deliver the absolute reduction in traffic on the A303 which they claim is the Government's aim on every road [7.3.12]. Alternative Route 2 would take the A303 completely outside the WHS [7.3.11].
- 10.503 On the other hand, I accept the evidence that Alternative Route 2 would necessitate the closure of Boscombe Down Airfield [7.3.15]; that the Airfield provides unique facilities, which it would be difficult and expensive to replace [7.3.33]; that its closure would involve the loss of a significant number of jobs to the area [7.3.31]; and that consequently there is no plan to close it [7.3.15]. In addition, Alternative Route 2 would involve the construction of 17.2km of new dual carriageway across open countryside [7.3.16], with economic disbenefits making it poorer value for money than the published scheme [7.3.17], and with greater damage overall to the cultural heritage of the area [7.3.19] and to the environment and the ecology of the area [7.3.20 to 7.3.23, 7.3.27]. Compared with the published scheme, the Alternative would also lengthen response times for the emergency services in the area [7.3.34]. I accept the contention of the Highways Agency that the Government target of an absolute reduction in road traffic does not apply to each and every road in the country taken individually [7.3.28].
- 10.504 There is substantial opposition to Alternative Route 2, and very little support for the proposal [7.3.14, 7.3.29 to 7.3.34].
- 10.505 I consider that the impracticability of the proposal involving Boscombe Down Airfield, the poor value for money which the Alternative Route would offer and the damage which would be caused to the heritage, the environment and the ecology of the area significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 2 does not warrant further investigation.

### ***Alternative Route 3***

- 10.506 Alternative Route 3 would provide a surface level dual carriageway to the north of Stonehenge between Winterbourne Stoke and a point just west of Countess Roundabout [7.4.2 to 7.4.4].
- 10.507 The route would avoid key archaeological sites within the WHS; it would avoid the need for the twin roundabouts proposed by the published scheme for Longbarrow Crossroads; and it would also avoid inalienable

land of the National Trust [7.4.6]. The route would bring greater benefits than the published scheme to parts of the WHS [7.4.11], and it would offer very good value for money compared with the published scheme [7.4.15].

- 10.508 On the other hand, Alternative Route 3 would cause considerable damage to the quality of life of residents in the communities through which it would pass, both during construction and in the longer term. It was rejected on that basis in 1995 [7.4.8]. It would have significant adverse impacts on some Scheduled Monuments, and would divide Stonehenge and the Cursus from other major monuments to the north [7.4.10]. It would have adverse effects also on some farm holdings [7.4.12] and would be at odds with the Local Plan, in requiring the acquisition of approximately 7ha of land designated for and currently in use as a military garrison. The MOD is an objector to the Alternative, because it wishes to continue to use the land concerned for military purposes.
- 10.509 There is substantial opposition to Alternative Route 3, and very little support for it [7.4.7, 7.4.16]. It would increase emergency response times in the area [7.4.17].
- 10.510 I consider that the severe adverse impact on the communities through which Alternative Route 3 would pass, together with the conflict with the Local Plan to which the proposal would give rise, significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 3 does not warrant further investigation.

#### ***Alternative Route 4***

- 10.511 Alternative Route 4 was originally a specific alternative route defined by a line drawn on a map. By the time it was promoted at the inquiries, however, it was put forward as a concept rather than as a defined route, because the promoter was ready to countenance a number of variations to the original proposal [7.5.2, 7.5.9, 7.5.10]. The concept was of a dual carriageway, to the south of the existing A303 past Stonehenge, running (at least) from west of Winterbourne Stoke to the area of Beacon Hill, south of Bulford Camp [7.5.3 to 7.5.7]. The scheme would also link with a proposed new road, joining it and the A345 to the A36 to the south east of Salisbury, providing a partial Salisbury northern bypass [7.5.5, 7.5.42]. The concept of Alternative Route 4 is thus one of a road which takes A303 traffic completely out of the Stonehenge WHS [7.5.12], but at the same time seeks to improve traffic movement for the area as a whole, by incorporating other planned or projected local road schemes [7.5.11].
- 10.512 It is argued that Alternative Route 4 would provide business advantages for the City of Salisbury [7.5.13] and be consistent with Local Plan policies [7.5.14]; that it would improve air quality in Salisbury [7.5.15, 7.5.16]; that it would avoid alleged groundwater problems at Stonehenge Bottom, remove the need for a viaduct in the Till Valley north of Winterbourne Stoke, and relieve disturbance caused by traffic to residents of Amesbury [7.5.17]. It is claimed that it would save the estimated £32m cost of providing a Wylde Valley Relief Road and the

- future costs of a Salisbury Bypass [7.5.18], and address longstanding problems in the Bourne Valley [7.5.20].
- 10.513 ACT, the promoter of Alternative Route 4, challenges the cost estimate for the Alternative produced by the Highways Agency, and also challenges the traffic data used in the economic assessment of Alternative Route 4 [7.5.24 to 7.5.27]. The Highways Agency states, however, that the cost estimate reflects the number of structures involved and the terrain which the Alternative would need to cross. The point is made that no other objector has challenged the Highways Agency's cost estimates [7.5.43].
- 10.514 I am satisfied that the cost estimates produced by the Highways Agency for the various Alternative Routes have been produced on a similar basis, and represent an acceptable guide to the relative cost of each of the Alternative Route schemes.
- 10.515 In relation to the economic assessment of Alternative Route 4, the Highways Agency accepts that adjustments to the design could result in changes to the inputs to the assessment, which might have an effect on the outturn [7.5.44]. I consider, however, that the Alternative would offer such very poor value for money, when compared with the published scheme, that relatively small changes in the economic assessment would not affect the overall result. I note also that a very large component of the benefits attributed to Alternative Route 4 would be derived from the proposed Salisbury Eastern Link [7.5.43], which is not needed to improve the A303, and which it would not be the responsibility of the Highways Agency to construct. The responsibility for the Eastern Link would fall to Wiltshire County Council [7.5.10]. I accept that Alternative Route 4 would offer some benefits for archaeological sites within the WHS [7.5.45].
- 10.516 The issue of providing a bypass for Salisbury was considered and rejected following a public inquiry in 1993/4 [7.5.34]. One of the alternative routes considered at that inquiry was similar to Alternative Route 4. It was rejected because of the adverse impacts it would have had on the Woodford Valley and Old Sarum [7.5.34]. I am satisfied that those arguments still hold good.
- 10.517 Moreover, after the proposed Salisbury Bypass was deleted from the Government's Roads Programme, a Salisbury Transport Study was set up to seek solutions to the area's traffic problems. The results of that Study have been fed into the Wiltshire Local Transport Plan. Neither that document nor the current Development Plan for the area now makes any reference to a Bypass for Salisbury [7.5.35]. Alternative Route 4, as a transport proposal, is therefore wholly unsupported by the relevant local planning documents.
- 10.518 This Alternative Route would represent a long detour for direct A303 traffic compared with the published scheme [7.5.36, 7.5.40]. That is why it performs poorly in its economic assessment [7.5.43, 7.5.44]. It would also adversely affect many more known archaeological sites than the published scheme [7.5.47], and have a much greater adverse

environmental effect than the published scheme [7.5.48 to 7.5.53, 7.5.66, 7.5.70, 7.5.75] in terms of visual impact, noise and ecological impact. It would also result in the loss of an additional 150ha of mainly good quality agricultural land [7.5.55], and cause disruption during construction to the rail network [7.5.56].

- 10.519 Alternative Route 4, under the title "The Parker Plan" was publicised for some time before formal alternatives to the published scheme were requested [7.5.2]. It was mentioned by some objectors to the published scheme in their original letters of objection [7.5.31]. It generated substantial support both before and at the inquiries [7.5.31 to 7.5.33], largely on the basis that it would represent good value for money, because it was seen as solving a number of road problems at one time. Some of the public support claimed for the scheme was, however, extremely questionable in my view, in that the issues put to the public often asked for support for the full evaluation of "The Parker Plan", rather than for support for the Plan itself as against any other scheme [7.5.28, 7.5.29, 7.5.60].
- 10.520 It is also the case that Alternative Route 4 generated very substantial opposition, both by way of appearances at the inquiries and by way of a petition [7.5.61 to 7.5.75]. The objectors to Alternative Route 4 appearing at the inquiries included Wiltshire County Council [7.5.61, 7.5.62], who would be the local highway authority responsible for constructing the Eastern Link, which was accepted by ACT as crucial to the justification for Alternative Route 4 [7.5.37]. The County Council make the point that the time at which a scheme such as that envisaged by Alternative Route 4 should have been raised was when the Structure Plan was being prepared, but it was not raised at that time, nor was it argued at that time that the Structure Plan preference for an online improvement past Stonehenge should be rejected [7.5.61].
- 10.521 I consider that the position taken by the County Council on this Alternative Route makes it clear that the Eastern Link would not be constructed. The Alternative Route is also at odds with the Transport Plan and with the transport provisions of the Development Plan [7.5.35, 7.5.61], and it would cause substantial environmental damage in the Bourne and Woodford Valleys. It would also represent poor value for money. These consequences would in my view significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 4 does not warrant further investigation.

### ***Alternative Route 5***

- 10.522 Alternative Route 5 would provide an on line two lane dual carriageway A303 between Berwick Down and Amesbury, but a total of 4.5km of the route would be in tunnel, from west of Longbarrow Crossroads to a point to the east of where The Avenue crosses the present A303. The Alternative would run slightly to the south of the line of the published scheme at Longbarrow Crossroads and at Stonehenge Bottom, and a new junction between the A360 and the A303 would be created some 750m to the west of the existing junction [7.6.2]. The emergency access route for the scheme would be via the agricultural access track which runs along

- the foot of Vespasian's Camp. This would need to be strengthened, widened, surfaced, and to have its steep gradients removed [7.6.4].
- 10.523 A 4.5km tunnel would mean that there would be less damage to the landscape of the WHS; less impact on the monuments in the areas of Longbarrow Crossroads and King Barrow Ridge; there would be no need for works on the surface at Stonehenge Bottom; the route between Stonehenge Bottom and Longbarrow Crossroads would be further away from the Stonehenge monument; and The Avenue could be restored where it is presently severed by the A303 [7.6.7, 7.6.8]. Tunnel spoil could be used to restore the ground levels where the A303 cuts through the ridge north of Vespasian's Camp, and this would better integrate Vespasian's Camp with the rest of the WHS.
- 10.524 Five sites which would suffer a direct adverse effect from the published scheme would no longer be affected by Alternative Route 5 [7.6.28]. Twelve sites would receive reduced indirect benefits [7.6.30]. I consider that moving the western tunnel portal would provide cultural heritage benefits for the Winterbourne Stoke Barrow Group and for barrows on the rim of the MILS [7.6.32], and, by removing most motorised traffic from the western part of the WHS, there would be the potential for wider public access throughout the WHS if future patterns of agriculture and land use would allow this [7.6.31]. Alternative Route 5 would require the permanent loss to agriculture of 8ha of land less than the published scheme [7.6.40].
- 10.525 The principle of tunnelling has already been accepted by the Government. It is only the issue of cost which suggests that the road should not be removed from the whole of the surface of the WHS [7.6.10]. The Longer Tunnels Report makes it clear that a 4.5km tunnel performs better than the published scheme on all major environmental assessments, and that it complies better with policies [7.6.12]. A longer tunnel would give rise to the need for the disposal of a greater quantity of spoil, but that would only be a temporary problem. The published scheme would have a long term environmental impact [7.6.14].
- 10.526 Like any alternative, a choice to give further consideration to Alternative Route 5 would delay work as compared with an acceptance of the published scheme [7.6.11], but the published scheme would be delayed in any event if the National Trust insisted on the operation of the Special Parliamentary Procedure because of its impact on inalienable land [7.6.15]. The delay involved in additional administrative work, design and construction of Alternative Route 5 is estimated at 5 years overall, as compared with the published scheme [7.6.42]. During that time, road safety and environmental benefits would be lost, and congestion would continue [7.6.43].
- 10.527 A 4.5km tunnel would cost approximately £380m, almost double the cost of the published scheme. The annual operating costs would also be around twice as much, at £2.5m per year [7.6.22], with additional maintenance demands [7.6.26]. The economic analysis of Alternative Route 5 shows net present values of minus £259.34m with low growth and minus £161.93m with high growth. It would therefore represent

- significantly worse value for money than the published scheme [7.6.24].
- 10.528 A tunnel of 4.5km would require a smoke extraction system, with chimneys around 5m in diameter protruding above ground level by between 2m and 5m [7.6.18]. While the chimney at the western end of a long tunnel could be located outside the WHS, that required at the eastern end might need to be located within the WHS [7.6.29]. A 4.5km tunnel would also require two additional site compounds [7.6.20, 7.6.21].
- 10.529 With Alternative Route 5, some traffic moving between the A360 and the A303 would need to travel an extra 1.5km, which might result in some traffic using local roads instead [7.6.23].
- 10.530 Because the A360 junction with Alternative Route 5 would be so close to the western tunnel portal, there would be a need to close the junction partially during maintenance and to divert some traffic on to the Packway. The close proximity of the portal to the junction would also result in more lane changing within and near the tunnel [7.6.26].
- 10.531 The Highways Agency claims that moving the eastern tunnel portal 600m to the east would achieve few heritage benefits [7.6.33] and only moderate beneficial landscape effects [7.6.36].
- 10.532 The Agency claims that any buried remains which once existed where The Avenue is currently crossed by the A303 will have been destroyed during construction of the current A303, so that the removal of the road which would follow the creation of a longer tunnel would restore neither the monument nor its integrity [7.6.34].
- 10.533 Objection to and support for Alternative Route 5 is fairly evenly balanced [7.6.17, 7.6.43 to 7.6.45]. Objectors to Alternative Route 5 include the MOD, which contends that the implementation of the Alternative could give rise to adverse impacts on the military operation of the Defence Estate at Larkhill, Boscombe Down and the Salisbury Plain Training Area. The basis on which that view is held is not stated, and I find it difficult to understand how Alternative Route 5 could have such an impact, given that it follows the line of the published scheme, to which no objection has been made by the MOD. Wiltshire Fire Brigade and the Wiltshire Constabulary object to Alternative Route 5 on the basis that a longer tunnel would increase the chance of incidents taking place in the tunnel, and would also increase the response times in the area [7.6.45]. In making those points, the emergency services are (correctly in my view) comparing the situation with a long tunnel (Alternative Route 5) to the situation with a 2.1km tunnel (the published scheme), rather than to the surface level single carriageway situation which applies now.
- 10.534 I consider that Alternative Route 5 would secure almost all the benefits available from the published scheme, but, in addition, would comply fully with all relevant policy and guidance offered at national, regional and local level. Unlike the published scheme, I consider that it would comply with Policies HE1 and HE2 of the Structure Plan and Policies CN24 and CN20 of the Local Plan. It would provide a basis for full compliance with Objective 9, and fuller compliance than that which would be provided by

the published scheme with Objectives 16, 19, 20 and 23 of the supplementary planning guidance contained in the Stonehenge Management Plan.

- 10.535 I accept the view of the promoters of Alternative Route 5 that the Alternative would perform better than the published scheme in relation to its impact on cultural heritage, landscape and biodiversity. It would result in 8ha less of land lost to agriculture, and would justify the use of a tunnel boring machine for construction of virtually the entire tunnel, which would mean that adverse impact on unknown archaeological assets would be less likely [6.1.62], and that the construction process would be safer [6.1.54].
- 10.536 I attach considerable weight to what I regard as the substantially reduced impact which Alternative Route 5 would have at the western end of the WHS, in particular on the Winterbourne Stoke Barrow Group, the Long Barrow and the Normanton Down Barrow Group. Avoiding the A303 running in a deep cutting through this part of the WHS would be, in my view, a considerable gain. While public access to some of these sites to the south of the A303 is not presently available, I regard their setting within the WHS as an important consideration, and this is a positive advantage of Alternative Route 5. These gains would come, however, at considerable additional cost.
- 10.537 I consider that Alternative Route 5 would offer much less substantial advantages at the eastern end of the route. It would take the surface level road somewhat further away from King Barrow Ridge, and also avoid the risk to buried remains at Site 66. It would not inhibit the eventual opening of the route of The Avenue from south of the present line of the A303 to the River Avon. For the reasons outlined in paragraph 10.313 above, however, I regard that as an extremely remote possibility. Again such gains would come with a considerable price tag.
- 10.538 Two of the arguments against Alternative Route 5 would have only a short term impact, and I attach less weight to them as a result. The use of a tunnel boring machine and the greater amount of spoil generated by a longer tunnel would require two extra site compounds, and probably a significant amount of haulage to remove excess material from the site; but those impacts would last only as long as the construction period of Alternative Route 5. Similarly, the delay which would necessarily attach to pursuing the Alternative would be at an end when the construction process was completed. I accept that existing problems on the A303 at Stonehenge would continue during any period of delay. I make due allowance for that fact, but I do not consider that it is of crucial weight, given the importance of securing a scheme worthy of Stonehenge and the WHS.
- 10.539 I consider that more substantial arguments against Alternative Route 5 are the need to provide smoke extraction chimneys and the impact of the increased maintenance requirement. It is hard to see how the eastern smoke extraction chimney could be located otherwise than in the WHS. It would be very difficult for a chimney of 5m diameter and rising between 2m and 5m above the ground to be unobtrusively located in an



area which includes the listed buildings at Countess Farm, the Registered Historic Park at Amesbury Abbey and Vespasian's Camp. I note that the need for such smoke extraction chimneys within the WHS was sufficient to persuade the National Trust to support a 2km tunnel at a time when it was believed that any tunnel of a greater length would require ventilation shafts [6.1.23].

- 10.540 As regards the increased regularity of maintenance which a longer tunnel would demand, and the need to divert some traffic during maintenance through residential areas, I consider this to be a significant burden to impose on people living along the affected roads. The same people would also be affected by traffic diverting on to local roads to avoid the tunnel. In that respect, Alternative Route 5 would perform less well than the published scheme.
- 10.541 But the main argument against Alternative Route 5 is the additional cost. What is already a comparatively expensive scheme would be roughly doubled in cost by Alternative Route 5, both in relation to original construction costs and in relation to the on going annual cost of operation and maintenance.
- 10.542 Neither the Highways Agency nor the DCMS has suggested that a maximum acceptable cost has been set for the Stonehenge scheme. Moreover, the fact that tunnels longer than that proposed in the published scheme have been rejected in the past by Ministers [4.5, 4.15] has not constrained my consideration of Alternative Route 5 now. The Secretary of State invited the submission of alternative routes to the published scheme [1.20], and I have felt able to give consideration to the Alternatives submitted, regardless of whether (as with Alternative Route 5) they would cost more than the published scheme.
- 10.543 In my view, however, that does not mean that relative cost is not a relevant factor. Additional benefits, over and above those which would be delivered by the published scheme, need to be weighed against additional cost, having regard also to any additional disbenefits. The conclusion is a matter of judgement.
- 10.544 My judgement is that a doubling of the cost of the published scheme would not be justified by the benefits which the Alternative would deliver. The published scheme would secure substantial advantages for the WHS (and for the national road system) at a price which can apparently be afforded. The benefits which Alternative Route 5 could deliver, offset by the short term and longer term problems which the Alternative would bring, would not, in my view, justify, on balance, the expenditure of an additional £190m.
- 10.545 It follows that **I conclude** that Alternative Route 5 does not warrant further investigation.

### ***Alternative Route 6***

- 10.546 Alternative Route 6 was withdrawn during the inquiries, and no consideration has therefore been given to it.

### ***Alternative Route 7***

- 10.547 Alternative Route 7 would run from the A36/A303 interchange at Deptford in the west, passing south of the WHS boundary, before rejoining the A303 in the east at Beacon Hill. It would also incorporate a partial Salisbury Bypass by way of an eastern link from a new A303/A345 interchange to connect with the A36 at Petersfinger [7.7.3]. The existing A36 would be upgraded to dual carriageway standard, bypassing villages through which the A36 now runs [7.7.5].
- 10.548 The promoter of Alternative Route 7 contends that it would provide relief routes for Amesbury and Salisbury, as well as a bypass for villages along the A36, at the same time as removing traffic from Stonehenge [7.7.12]. He argues that it would maintain a greater separation from Old Sarum than Alternative Route 4 [7.7.10], given that it would not run so far to the south as Alternative Route 4, and that it would avoid excessive intrusion into open downland [7.7.11]. It would not intrude at all into the WHS [7.7.3].
- 10.549 I accept that Alternative Route 7 would secure reductions in noise of 20dB or more at the Stonehenge monument itself compared with the present situation, and would produce greater noise reductions than the published scheme between the western tunnel portal and Longbarrow Crossroads and between the eastern tunnel portal and Countess Roundabout [7.7.29].
- 10.550 I also accept that this Alternative would reduce traffic on the A36 in the centre of Salisbury and in the Wylde Valley and also on the A338 in the Bourne Valley [7.7.18].
- 10.551 Alternative Route 7 would, however, run for 24km, of which 22km would need to be constructed across open countryside. In addition, a further 7.3km of new road would be required to produce the Eastern Link, and 17km of the existing A303 would need to be kept open [7.7.14]. The route would involve three viaduct crossings of rivers and two railway bridges [7.7.15]. Construction of the railway bridges would cause considerable disruption to the Bristol to Southampton and London to Penzance railway lines, both of which would need to be closed for a time [7.7.35].
- 10.552 Long distance traffic would face an additional journey of 4km [7.7.16], as a result of which it is predicted that a substantial volume of traffic would use local routes rather than Alternative Route 7 [7.7.17]. Alternative Route 7 would be anticipated to increase greenhouse gas emissions by about 12% compared to 4% for the published scheme [7.7.30].
- 10.553 This Alternative would perform badly in terms of its impact on nature conservation and biodiversity, with English Nature expressing concern at its potential impact on the River Avon System cSAC [7.7.25]. It would have an adverse impact on two SSSIs [7.7.26], and adversely affect the habitats of protected species [7.7.27]. There would be a risk of contamination within two SPZs [7.7.28].

- 10.554 The Alternative would avoid disturbing archaeological assets within the WHS, but it would have a significant adverse effect on a large number of known archaeological sites along its proposed route, including the partial destruction of the Scheduled Ancient Monument at Beacon Hill [7.7.21]. It would also affect and possibly require the demolition of listed farm properties at Deptford [7.7.4, 7.7.33]. It would have a positive effect on four Conservation Areas, but a negative effect on seven others, and it would have an adverse effect on three Grade I, two Grade II\* and twenty five other listed buildings and structures [7.7.22].
- 10.555 At least seven properties would need to be demolished to make way for Alternative Route 7, which would also involve the loss of 160ha of agricultural land (four times as much as the published scheme), the majority of which would be in Grade 2 and Grade 3a [7.7.33].
- 10.556 Alternative Route 7 would provide some relief from severance in Winterbourne Stoke and in the villages along the A36 in the Wylde Valley and the A338 in the Bourne Valley. New severance would occur, however, in Stapleford and Great Wishford and as a result of additional traffic flows in Larkhill, Durrington and Bulford [7.7.31].
- 10.557 With an existing section of the A303 remaining in the WHS, Alternative Route 7 would be less compliant with the aims and objectives of the Stonehenge Management Plan than the published scheme. As with Alternative Route 4, the Eastern Link is not supported by the Development Plan, and the building of a new road through open countryside would be in conflict with a wide range of Development Plan policies [7.7.36]. In addition, the proposed Eastern Link would pass through a site at Petersfinger allocated by Policy TR8 (ii) of the Salisbury District Local Plan for the development of a park and ride site [7.7.34].
- 10.558 The cost of Alternative Route 7 would be some £10m less than that of the published scheme. The Alternative would achieve positive net present value figures on the economic assessment of £87m with low traffic growth and £148m with high traffic growth. Almost all the benefits would be derived, however, from the Salisbury Eastern Link. If that aspect of the Alternative is omitted, the net present value for the A303 realignment would be minus £370m [7.7.19]. The construction of the Eastern Link would be the responsibility of Wiltshire County Council, but the County Council is a counter objector to Alternative Route 7 [7.7.19].
- 10.559 No support was received for Alternative Route 7 from any independent party, but there was opposition from the Save Bourne Valley Group (who appeared at the inquiries) together with nine written objections, including objections from the emergency services to the impact on response times to various specific locations [7.7.37].
- 10.560 I consider that Alternative Route 7 would be in serious conflict with the Development Plan, and would cause environmental damage and damage to cultural heritage assets. It relies for its economic viability on an Eastern Link road, which the responsible highway authority would not wish to build. As a pure A303 diversion, the route provides very poor

value for money. These consequences would in my view significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 7 does not warrant further investigation.

### ***Alternative Route 8***

- 10.561 Alternative Route 8 is, in effect, the long tunnel proposed in Alternative Route 5, but with a different arrangement of junctions to the west of the tunnel. There would be no junction provided with the A360, which would be maintained as a north-south route across the roof of the tunnel. The existing roundabout at Longbarrow Crossroads would be removed. A new grade separated junction between the B3083 and the Winterbourne Stoke Bypass element of the A303 would provide access to Winterbourne Stoke and Shrewton [7.8.1].
- 10.562 The promoters of Alternative Route 8 claim that it would offer a saving in cost as against Alternative Route 5, but this has not been quantified [7.8.4]. Certainly this Alternative would achieve all the benefits offered by Alternative Route 5 in terms of policy compliance and reduced impact on the barrow groups at the western end of the WHS, together with such benefits as Alternative Route 5 offers at the eastern end of the tunnel, and the benefits and associated problems which would arise from the use of a tunnel boring machine. I cannot see, however, how the cost of Alternative Route 8 could be significantly less than the cost of Alternative Route 5.
- 10.563 In addition, I accept the evidence of the Highways Agency that Alternative Route 8 would give rise to very significant traffic difficulties [7.8.6 to 7.8.8]. The B3083 could not cope with the traffic which would be diverted on to it; it is not a viable route for HGVs; and a junction between the B3083 and the A303 would give rise to operational concerns. In addition, there would be unacceptable environmental consequences for residents of the Packway [7.8.7] and the villages of Larkhill and Shrewton [7.8.11], and difficulties in connection with diversionary routes during any incident on the A303 [7.8.9] and in connection with emergency response times [7.8.10].
- 10.564 There was no independent support for Alternative Route 8. Six written objections were received, raising points which are dealt with above.
- 10.565 I consider that the traffic and transportation difficulties to which Alternative Route 8 would give rise would significantly outweigh the benefits which the Alternative could deliver. **I conclude** that Alternative Route 8 does not warrant further investigation. For the same reason, I reject the contention of Dr and Mrs Moon that there is no need for a junction between the A303 and the A360 [6.15.8].

### ***Alternative Route 9***

- 10.566 Alternative Route 9 would provide a surface level dual carriageway improvement to the A303 on a similar line to that of the existing trunk road. Indeed, it would use the existing trunk road wherever possible [7.9.1]. The main differences between the Alternative and Alternative

Route 1 are to be found in the layout of the junction at Longbarrow Crossroads, where, instead of passing beneath the A360, the A303 would pass over it [7.9.2], and in the immediate area of the Stonehenge monument, where the A303 would rise on a viaduct to accommodate a museum and emergency access arrangements beneath its arches [7.9.3, 7.9.4].

- 10.567 Alternative Route 9 would avoid the cost of a tunnel [7.9.6] and preserve the view of Stonehenge for travellers passing the site [7.9.7]. It would offer an opportunity for public appreciation of archaeological remains located beneath the line of the Alternative Route [7.9.10]. It would allow the existing Stonehenge Visitor Centre to remain on its present site, which is actually invisible from the Stonehenge monument [7.9.12]. It would cost around £120m less than the published scheme, and would represent very good value for money in terms of its economic analysis [7.9.20].
- 10.568 Alternative Route 9 fails to comply, however, with national and local planning policy, and it would perform significantly less well than the published scheme in terms of landscape restoration, biodiversity improvements, open access opportunities and impact on the cultural heritage and landscape [7.9.16 to 7.9.18].
- 10.569 There was minimal public response to Alternative Route 9, either in favour of it or against.
- 10.570 I consider that Alternative Route 9 would be in very substantial conflict with both national and local planning guidance, not least in its proposals for the creation of a museum in the immediate area of the Stonehenge monument and in its proposals for the treatment of the junction between the A303 and the A360. It would not deliver the environmental gains which would flow from the published scheme. Its substantially reduced cost would not in my view outweigh the damage which these failures would cause. **I conclude** that Alternative Route 9 does not warrant further investigation.

### ***The Lawrence Alternative***

- 10.571 This was a further southern Alternative Route submitted during the course of the inquiries, which, as a consequence was not advertised [7.10.1]. It would take a somewhat similar line to Alternative Route 2. It would avoid intrusion into Boscombe Down Airfield, although there would be a need to construct a tunnel beneath the secondary runway [7.10.2 to 7.10.4].
- 10.572 The Lawrence Alternative would remove the A303 from within the WHS [7.10.5]. It would therefore avoid the large cutting at the western end of the WHS [7.10.8]. It would avoid any possibility of challenge and associated delay arising from Special Parliamentary Procedure [7.10.7, 7.10.12]. It would retain the view of Stonehenge for passing travellers (although the number of travellers passing the Stonehenge monument would be substantially reduced) and avoid the possible dangers to people who might find it difficult to evacuate a tunnel [7.10.9]. It would also

avoid the substantial cost associated with a tunnel of 2.1km [7.10.10], but still allow for a bypass for Winterbourne Stoke, reduce traffic at Countess Roundabout and the closure of the A344 at Stonehenge [7.10.12].

- 10.573 The Lawrence Alternative would also offer the opportunity to create an eastern link from the Alternative Route to the A36, but the promoter of the Alternative has not sought to include this in the consideration of his proposal, because he accepts that it is not a matter before the inquiries [7.10.18].
- 10.574 On that basis, the Lawrence Alternative would cost some £55m less to provide than the published scheme (including land costs) [7.10.19, 7.10.21], but it would not provide as much benefit to traffic. It would have a net present value of minus £59.22m with low traffic growth and a positive net present value of £10.32m with high traffic growth. This represents worse value for money than the published scheme [7.10.21].
- 10.575 The Lawrence Alternative would require alterations to the Deptford interchange and the creation of a junction for Steeple Langford [7.10.22]. It would have adverse impacts on the villages of Great Durnford and Upper Woodford [7.10.18]. It would involve the construction of 21.7km of new dual carriageway road, of which 19.6km would cross open countryside. Some 15km of the existing A303 would also need to be kept open for access purposes [7.10.5]. It would involve viaduct crossings of the River Till and the River Avon, which would cause significant visual intrusion [7.10.23]. It would have an adverse impact on the Cranborne Chase and West Wiltshire Down AONB since it would involve the creation of a new road across the AONB [7.10.24]. It would also represent a security risk to the military airfield at Boscombe Down [7.10.25].
- 10.576 I consider that the poor value for money which the Lawrence Alternative would offer, together with the damage which it would cause to the environment and ecology of the substantial area of open countryside across which it would run would outweigh the benefits which the Alternative could deliver. **I conclude** that the Lawrence Alternative does not warrant further investigation.

### ***The Aubrey Alternative***

- 10.577 The Aubrey Alternative was also submitted during the course of the inquiries. While its promoters would in principle support Alternative Route 5, with its 4.5km tunnel, they consider that that Alternative would be unlikely to be achievable because of its substantial additional cost [7.11.11, 7.11.27]. They consider that extending the tunnel proposed in the published scheme to the east would have been justified if The Avenue were not already crossed by the A303, but, given that that is not the case, they do not believe that an eastern extension of the tunnel can be anticipated either [7.11.26].
- 10.578 Mr and Mrs Aubrey argue, however, for a 1.1km westerly extension of the tunnel proposed in the published scheme. In order to reduce the cost of this, they propose that the extension should be constructed in cut and

- cover. It would emerge in cutting at Ch 6830, some 130m to the east of Longbarrow Crossroads [7.11.3 to 7.11.8]. Combining a bored tunnel with a cut and cover tunnel is possible. It is a system presently being used at the Dublin Port Tunnel [7.11.16].
- 10.579 The Aubrey Alternative would avoid much of the severing effect of the deep cutting proposed as part of the published scheme to the east of Longbarrow Crossroads [7.11.9]. Above the cut and cover extension, the surface would be returned to the present ground level by the addition of fill and topsoil, and then restored to grassland [7.11.4]. This would provide a use for all or most of the additional spoil [7.11.12]. If greater public access then became available in the future to land to the south of the A303, this Alternative would increase the opportunity readily to take advantage of it [7.11.10, 7.11.23].
- 10.580 The noise and sight of traffic would be removed from an additional area of the WHS [7.11.18, 7.11.38]. This would be of benefit to (amongst others) walkers on the proposed Stonehenge Byway [7.11.19 to 7.11.22]. With the published scheme, despite the scale of the cutting between its western tunnel portal and Longbarrow Crossroads, for around half of its length the depth of the cutting would be insufficient to hide a HGV from any view point equivalent to existing ground level [7.11.18]. The Aubrey Alternative would remove the sight of HGVs from most of this area. In addition, light from vehicles travelling on the open section of dual carriageway would be moved further away from the core area of Stonehenge [7.11.15].
- 10.581 The Aubrey Alternative would assist nature conservation and biodiversity to an extent by increasing the connectivity of surrounding habitats in the area of the proposed tunnel extension [7.11.39]. It would involve the permanent loss of agriculture of six fewer hectares of land than the published scheme [7.11.43].
- 10.582 The Alternative would involve no greater disturbance to archaeological assets than the published scheme [7.11.14, 7.11.33]. It would have limited benefits for the settings of barrows around Longbarrow Crossroads, however, because the Longbarrow Crossroads junction or the cutting leading to it would still be wholly or partially visible from those locations [7.11.37]. It would reduce the landscape impact, as compared with the published scheme, in the area of the WHS between Longbarrow Crossroads and Stonehenge Down, but I accept that that landscape is (in pure landscape terms) relatively ordinary [7.11.36].
- 10.583 The Aubrey Alternative would cost £50m more than the published scheme, not including the cost of any smoke extraction system which might prove to be necessary [7.11.7]. The annual operating costs of a 3.2km tunnel would be £500,000 more than the tunnel proposed in the published scheme [7.11.28]. The economic analysis of the Aubrey Alternative shows a net present value of minus £87.21m with low traffic growth, and a positive return of £33.05m with high traffic growth. It would thus provide poorer value for money than the published scheme [7.11.29].

- 10.584 If a smoke extraction system were found to be necessary, this would cost an additional £5m and require the building of two smoke extraction chimneys, both of which would need to be located within the WHS [7.11.28].
- 10.585 During tunnel maintenance (which would need to be carried out twice a month with a tunnel of the length proposed in this Alternative), some A303 traffic would need to be diverted via the Packway because of the proximity of the revised western tunnel portal to the Longbarrow Crossroads [7.11.30]. That same issue would result in more lane changing within and near the tunnel which would give rise to safety concerns. Such concerns would also arise from the different escape routes from the tunnel which would be provided as a result of the use of different building methods in different sections of the work [7.11.31].
- 10.586 The Aubrey Alternative would extend the overall construction period for the scheme by six months [7.11.42], and the process involved in its consideration and implementation would delay completion of the scheme by four years [7.11.45].
- 10.587 I consider that the safety concerns which would arise with the Aubrey Alternative, together with its additional cost (including the additional ongoing annual cost) would not be justified by the limited range of benefits it would deliver. That is the case, in my view, even if smoke extraction chimneys proved not to be necessary. If they were found to be necessary, they would add to the extra cost, and also reduce the heritage and landscape benefits, given the resulting need to locate both chimneys within the WHS.
- 10.588 **I conclude** that the Aubrey Alternative does not warrant further investigation.

***Other Alternatives proposed***

- 10.589 I deal in sections 7.12 to 7.14 of this report with other alternative routes and alternative approaches put forward in response to the published scheme. Those sections of the report record why I did not consider the proposals concerned to justify further detailed examination, but, for the sake of completeness, I record my conclusions on them here.
- 10.590 The Alternative Route proposed at the inquiries by Mr G T Heath [7.12.1 to 7.12.5] did not appear to me to have sufficient substance to justify detailed consideration [7.12.2]. Despite Mr Heath's professional background, it also seemed to me to have a grossly underestimated price tag [7.12.2]. This was eventually conceded [7.12.3].
- 10.591 Notwithstanding the considerable effort which Mr Heath had put into drawing up his scheme, it was, until a late stage, entirely a paper scheme [7.12.2]. When he spent some time looking at the practicalities of the scheme on the ground, a series of amendments ensued [7.12.3, 7.12.4]. The ground work which led to the preparation of these amendments excited considerable opposition to the Alternative Route proposal from people whose properties would be directly or indirectly affected by it



[7.12.5].

- 10.592 Having been received only during the inquiries, this Alternative was not evaluated in detail by the Highways Agency; nor was it advertised so that all those people who might be affected by it could consider it and express a view on it. Despite having had the opportunity to hear an explanation of the scheme from Mr Heath during the inquiries, I continue to believe that this Alternative Route does not have sufficient substance and practicality to justify more detailed consideration. I do not understand, for example, the proposals for the extent of the retention of the existing A303 to serve properties which use it for access; and I do not understand the way in which the proposed route would relate to the A36 and the villages which that trunk road currently serves.
- 10.593 **I conclude** that this Alternative does not warrant further consideration.
- 10.594 An Alternative was also submitted during the course of the inquiries by Mr J Berkley-Matthews [7.12.6 to 7.12.8]. It proposed an east bound two lane carriageway for the A303 to the north of Stonehenge, with a west bound two lane carriageway to the south. The east bound carriageway would follow a similar alignment to the purple route considered in 1995, and the west bound carriageway would follow a similar line to the 1993 grey route. Both these routes had been investigated and rejected in the past because of their adverse effects on the heritage resource, landscape and ecology.
- 10.595 Although what Mr Berkley-Matthews was proposing was a single two lane route in each direction rather than a dual carriageway along each of the route corridors, I consider that each of the routes would suffer from the same adverse effects, notwithstanding the reduced road width involved in each direction. The northern (east bound) route would cut through the Cursus, pass very close to the visible part of The Avenue, and cut through King Barrow Ridge.
- 10.596 I consider that a one way system over such an extensive area (5.6km long and up to 2.3km wide) would cause considerable inconvenience for local traffic. Moreover the proposals submitted showed no detail as to how or where the route would rejoin the A303 in the west.
- 10.597 Having heard an explanation of the route from Mr Berkley-Matthews at the inquiries (including an explanation of where the Alternative would rejoin the A303 in the west), I consider that this Alternative Route would be unacceptable because of its effect on the heritage resource and the inconvenience to local traffic arising from the proposed one way system.
- 10.598 **I conclude** that the Alternative does not warrant further investigation.
- 10.599 Three other alternative proposals put forward in writing during the inquiries came with insufficient detail to permit further consideration at the stage at which they were received. These are described at paragraphs 7.13.1, 7.13.3 and 7.13.4 above. It remains my view that they do not warrant further investigation, and **I conclude** to that effect.

- 10.600 An alternative proposal which did include considerable detail was received six weeks into the inquiries, and is described at paragraph 7.13.5 above. Although I regard this as a thoughtful proposal on which considerable trouble has been taken, it seems to me that there are potentially substantial issues to consider in relation to the impact the proposal would have on West Amesbury, Winterbourne Stoke and Berwick St James, as well as on archaeological sites at Coneybury and Wilsford Down. In addition, a thorough assessment of its deliverability in highway design and engineering terms and its impact on agricultural land would be necessary. At the late stage during the inquiries at which the proposal was received, it did not seem to me to be feasible for the Highways Agency to give due consideration to these issues, or for notice of the proposal to be given to those that might be affected by it. I therefore did not consider it further, and **I conclude** that it does not now warrant further investigation.
- 10.601 A further alternative proposal received during the inquiries is described at paragraph 7.13.6. It would have involved building approximately 61km of three lane dual carriageway. I considered it far too extensive to regard as an alternative to the published scheme. **I conclude** that it does not warrant further investigation.
- 10.602 Four other suggested alternatives contained in written letters of objection are set out in paragraph 7.14.1 above. They were not submitted as formal alternatives following the direction of the Secretary of State [1.20]. I did not consider them to have substance, and that remains my view. **I conclude** that they do not warrant further investigation.

#### **Overall conclusion on Alternative Routes**

- 10.603 I have therefore considered all the Alternative Route proposals submitted in response to the Secretary of State's direction which were sustained as Alternatives at the inquiries. I have also considered the Lawrence and Aubrey Alternatives, which were submitted during the inquiries. I regarded it as possible to examine these two additional Alternatives in detail because they raised issues of which the promoter and people who might be affected by them were already aware. I have also considered all other Alternative proposals put forward either at the inquiries or in written representations. For the reasons set out between paragraphs 10.497 and 10.602 above, **I conclude** that none of these Alternative Route proposals warrants further investigation.

#### **Conclusion on the issue of cost in the light of consideration of the Alternative Routes proposed**

- 10.604 I have considered the various Alternative Route proposals on their merits, bearing in mind as a relevant factor the cost of each of the Alternatives which has been examined in detail.
- 10.605 Each of the Alternatives which would cost less than the published scheme (Alternative Routes 1, 2, 3, 4, 7, 9 and the Lawrence Alternative) is subject to what I consider to be a fundamental flaw or flaws which means that it does not warrant further investigation. **I conclude** that no

potentially acceptable Alternative proposal has been put forward which would achieve the requirements of the A303 improvement scheme at less cost than the published scheme.

- 10.606 In relation to the Alternatives which would cost more than the published scheme (Alternative Routes 5, 8 and the Aubrey Alternative), **I conclude** that the additional cost would not be justified by the benefits that each of these proposals would deliver. As indicated at paragraph 10.208 above, I have reached that conclusion in each case as a matter of judgement, without considering myself limited by any maximum level of finance available for the A303 improvement scheme.

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### **Conclusions regarding other matters raised**

- 10.607 Representatives of various **Druid organisations** who appeared at the inquiries welcome the proposed removal of roads from the immediate area of Stonehenge [5.6.3]. Those who appeared made the point that they did not claim to represent all Druids, amongst whom a variety of views is apparently held about the most appropriate road solution for the area around Stonehenge [8.1.3]. The common position, however, is that Stonehenge is an ancient sacred site, created and used by the priests of the Druid heritage, in a religion that reveres the powers of nature. It is a temple to many thousands of practising Pagans and Druids. As a result, Stonehenge and the burial mounds that surround it are considered to be of exceptional importance by Druids and those of other Pagan traditions throughout the world [8.1.4].
- 10.608 The key concerns which all Druids share are that the sanctity of the landscape and the ancient ceremonial and funerary monuments which lie upon it should be respected [8.1.5] and that any human remains unearthed during construction should be treated with respect [8.1.5] and reburied locally rather than being put on public display [5.6.5]. Such reburial, and any other rites carried out before, during or after completion of the proposed scheme, should be open to all Druid and Pagan organisations [5.6.6 to 5.6.8], and should respect the possible beliefs of the group who originally interred the person or persons concerned [8.1.8].
- 10.609 I recognise that the specific proposals of Druid organisations regarding reburial arrangements and the availability of land for this purpose in the area of Stonehenge [8.1.8 to 8.1.10] are outside the powers and responsibilities of the Highways Agency [8.1.15, 8.1.16]; but I believe that the consultation arrangements which have been set up between the Highways Agency and Pagan and Druid Groups [8.1.19] represent a positive response to the very constructive approach of the Druid organisations which were represented at the inquiries. I welcome and commend this initiative.
- 10.610 I am satisfied by the evidence given [8.1.17], and **I conclude** that the particular concerns of Druid organisations about the physical impact of the published scheme on barrows in the area around Longbarrow Crossroads [8.1.11] have been properly addressed by the proposals of the Highways Agency.

- 10.611 A representation was made that **the A344 should only be closed between its junction with the A303 and its junction with Byway Amesbury 12**. The existing Visitor Centre car park could then be used as a dropping off point for visitors to the Stonehenge monument [8.2.2]. One of the modifications put forward by the Highways Agency at the inquiries to the Side Roads Order and the Compulsory Purchase Order seeks to close the A344 from the A303 to the entrance to the Visitor Centre car park. This would achieve the road safety benefits sought by the published scheme, and also remove the severance of The Avenue by the A344. The future of the remainder of the A344 between the Visitor Centre car park entrance and the junction of the A360 at Airman's Corner would then be a matter for Wiltshire County Council as local highways authority [8.2.11]. The point raised by this representation in connection with the Orders is therefore met by the modified proposals of the Highways Agency. The issue regarding continuing use of the car park as a dropping off point would depend on future arrangements to be made by English Heritage in the light of the decision of the County Council in relation to the future use of the balance of the A344. This is not a matter before the inquiries.
- 10.612 Another representation was made to the effect that **the section of the A344 from the present junction with the A303 should become a bridleway** rather than a footpath [8.5.28]. If the published scheme were approved in the modified form requested by the Highways Agency, this would provide a link between the proposed Stonehenge Byway and Byway Amesbury 12 to the north west of Stonehenge, which would be subject to bridleway rather than simply to footpath rights. This right of way would cross the newly restored line of the visible part of The Avenue, immediately adjacent to Stonehenge, close to the Heel Stone. The proposal seems to me to have some merit, but I consider that it would be more appropriate if it were evaluated as part of a comprehensive review of rights of way within the WHS, if and when the future of the A344 between Byway Amesbury 12 and the junction with the A360 at Airman's Corner is considered by Wiltshire County Council, and in the light of any detailed arrangements for protection of the restored Avenue against the effects of pedestrian and possible bridleway traffic. **I conclude** that this proposal should not be pursued at this time.
- 10.613 A representation was made that, **when any existing road is returned to pasture, the sites of important features, now lost, should be marked** to assist people carrying out future research [8.2.3]. I see the force of this representation, but, given the context in which it was raised (where the height of a feature as well as its precise location would be an important matter), I consider that it is an issue which would be better addressed by careful record keeping instead of (or, in appropriate circumstances, in addition to) physical marking on the site.
- 10.614 A representation was made that **the published scheme would allow the opening up of a potentially exceptional north-south walk in the area of Stonehenge** [8.5.20 to 8.5.22]. This seems to me to be a matter for the attention of the National Trust.

- 10.615 A representation was made that **immediate action should be taken on road safety grounds to install traffic lights at Longbarrow Crossroads, and to introduce additional safety measures in Winterbourne Stoke** [8.2.1]. The Highways Agency responds that traffic lights are not necessary at Longbarrow Crossroads. They would not make the existing roundabout safer, but would make accidents more likely [8.2.9]. Traffic calming has already been introduced in Winterbourne Stoke. If anything more could be done to improve road safety in the village, it would be done without awaiting a decision on the published scheme [8.2.10]. I consider that these are matters which are not strictly relevant to the road scheme before the inquiries, but I accept the Highways Agency evidence on both points.
- 10.616 Representations were also made that **the importance of archaeo-astronomy should be recognised in the planning process, and archaeologists should be encouraged to collect relevant data** [8.2.4]; that **research relating to the primary Stonehenge axis should be supported** [8.2.6]; and that **English Heritage and the National Trust should be more ready to listen to the views of their supporters or members** [8.2.7]. These do not appear to me to be matters relevant to the decisions on the schemes before the inquiries.

#### **Conclusion on the Line Order**

- 10.617 Having regard to the above considerations, I conclude that the published scheme would meet the objectives set for it which are listed in paragraph 10.61 above. Although I conclude at paragraph 10.204 that it has not been shown that road building alone has a positive economic effect on a peripheral region, I consider that the other benefits which the published scheme would deliver mean that there is a compelling case for the approval of the scheme in the public interest. I conclude that the objections made to the Orders before the inquiries and to the scheme generally (with one exception dealt with at paragraph 10.235 above and reflected in my recommendations below) cannot be sustained. I also conclude that none of the Alternative Routes proposed justifies further investigation.
- 10.618 I record at paragraph 10.99 above that I consider the published scheme complies with national, regional and Structure Plan policy on transport, together with national planning guidance on archaeology and listed buildings. In relation to Structure Plan and Local Plan policies on the historic environment, I conclude at paragraph 10.319 above that, on balance, the arguments in favour of the published scheme outweigh those against. I note at paragraph 10.170 that DEFRA does not consider that the loss of the agricultural land which would be taken for the purpose of the scheme would be an issue of concern in the location of the scheme.
- 10.619 **I conclude**, therefore, after taking into account the requirements of local and national planning, including the requirements of agriculture, that it is expedient for the purpose of improving the A303 between points A and B on the plan referred to in the Line Order for a trunk road to be provided along the route shown in the Line Order, with the centre line of the new

trunk road indicated by the heavy black line on that plan. **I conclude** that the Line Order should be made as drafted.

### **Conclusion on the Slip Roads Order**

- 10.620 The Highways Agency asks for the Slip Roads Order to be made in the modified form contained in Document HA/0/53. The modification requested is explained in Document HA/0/13. I consider that this modification to the draft Order can be made in accordance with paragraph 8 of Schedule 1 to the Highways Act 1980. No party raised any objection to the proposed modification.
- 10.621 The same considerations regarding national and local planning and the requirements of agriculture apply in relation to the Slip Roads Order as apply in relation to the Line Order. There is no specific objection which challenges the Slip Roads Order on a reasoned basis [6.30.1].
- 10.622 **I conclude** that it is expedient for the purpose of improving the A303 between points A and B on the plan referred to in the Line Order, for the routes of the slip roads listed in the Schedule to the Slip Roads Order to become trunk roads, with the centre lines indicated by heavy black lines on the plan referred to in the Slip Roads Order. **I conclude** that, in the modified form included in Document HA/0/53, the Slip Roads Order should be made.

### **Conclusion on the Detrunking Order**

- 10.623 The same considerations regarding national and local planning and the requirements of agriculture apply in relation to the Detrunking Order as apply in relation to the Line Order. There is no specific objection which challenges the Detrunking Order on a reasoned basis [6.30.1].
- 10.624 **I conclude** that it is expedient for the purpose of improving the A303 between points A and B on the plan referred to in the Line Order, for the routes of the trunk roads listed in Schedule 1 and Schedule 2 to the Detrunking Order to cease to be trunk roads from the date on which the new trunk road and slip roads provided for in the Line Order and the Slip Roads Order are open to traffic and (in relation to the length of trunk road referred to in Schedule 2 to the Detrunking Order) the Secretary of State notifies Wiltshire County Council to that effect. **I conclude**, therefore, that the Detrunking Order should be made as drafted.

### **Conclusion on the Side Roads Order**

- 10.625 The Highways Agency asks for the Side Roads Order to be made in the modified form contained in Document HA/0/53. The modifications requested are explained in Documents HA/0/2, HA/0/13 and HA/0/42. I consider that these modifications to the Order could be made in accordance with paragraph 8 of Schedule 1 to the Highways Act 1980. No party raised any objection to the proposed modifications.
- 10.626 The only reasoned challenge to the Side Roads Order is that made by the BBT, which I deal with at paragraphs 10.241 and 10.488 above,

concluding that the objection cannot be sustained.

- 10.627 I am satisfied that in all cases reasonably convenient alternative routes would be provided for highways proposed to be stopped up by the Order. Where private means of access are proposed to be stopped up, I am satisfied that reasonably convenient alternative means of access would be provided under the Order in all cases where such an alternative is necessary.
- 10.628 **I conclude** that the Side Roads Order should be made, subject to the modifications requested by the Highways Agency which are set out in Document HA/0/53.

### **Conclusion on the Compulsory Purchase Order**

- 10.629 The Highways Agency asks for the Compulsory Purchase Order to be made in the modified form contained in Document HA/0/53. The modifications requested are explained in Documents HA/0/2 and HA/0/42. I consider that these modifications to the Order could be made in accordance with paragraph 8 of Schedule 1 to the Highways Act 1980 and paragraphs 4 and 5 of Schedule 1 to the Acquisition of Land Act 1981. No party raised any objection to the proposed modifications as such, although there are outstanding objections to the Compulsory Purchase Order.
- 10.630 As indicated at paragraphs 10.276 to 10.288 above, I conclude that all the land included in the Compulsory Purchase Order in its modified form is required to carry out the proposals contained in the published scheme. I consider that none of the objections to the Compulsory Purchase Order should be sustained. In the light of those conclusions and my conclusions at paragraph 10.617 above on the scheme generally, I consider that there is a compelling case for the compulsory acquisition of the land affected by the Compulsory Purchase Order in the public interest. I consider that the purposes for which the Compulsory Purchase Order is promoted justify interfering with the human rights of those with an interest in the land affected, having regard to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights.
- 10.631 I consider that the Highways Agency has a clear idea of how the land sought to be acquired would be used. I also consider that the Agency has a reasonable expectation that the necessary resources would be available to carry out its plans [5.2.12, 9.24].
- 10.632 I consider that there would be no inhibition to prevent the Highways Agency proceeding to carry out its plans, other than the possibility that the National Trust would seek to invoke the special Parliamentary procedure, given that inalienable land held by the National Trust would be affected by the Compulsory Purchase Order. The National Trust indicated at the inquiries that no decision had been taken as to whether the Trust would seek to invoke the special Parliamentary procedure in the event of the Compulsory Purchase Order being made [6.1.66].
- 10.633 Subject to that point, I conclude that, if the Compulsory Purchase Order

were to be made, the Highways Agency would be in a position to carry out the published scheme.

- 10.634 With the modifications requested by the Highways Agency, which are set out in the form of the Order contained in Document HA/0/53, **I conclude** that the Compulsory Purchase Order should be made.

#### **Conclusion on the Tunnel Regulation Order**

- 10.635 The Highways Agency asks for the Tunnel Regulation Order to be made in the modified form contained in Document HA/0/53. The modifications suggested are set out in Document HA/0/13. I consider that these modifications could be made in accordance with Regulation 11 of the Secretary of State's Traffic Orders (Procedure) (England and Wales) Regulations 1990. No party raised any objection to the proposed modifications at the inquiries.

- 10.636 No specific point of objection has been raised to the Tunnel Regulation Order [6.30.1]. I consider that the types of vehicular traffic listed in the Order would be unsuitable to use the tunnel, having regard to the character of the road it would provide. I consider that it is expedient to impose the restrictions contained in the Order, and **I conclude** that the Tunnel Regulation Order should be made in the modified form contained in Document HA/0/53.

#### **Conclusion on the Byway Regulation Order**

- 10.637 The Highways Agency asks for the Byway Regulation Order to be made in the modified form contained in Document HA/0/53. The modification suggested is set out in Document HA/0/38. I consider that this modification could be made in accordance with Regulation 11 of the Secretary of State's Traffic Orders (Procedure) (England and Wales) Regulations 1990. The modification (and indeed the original proposal which it replaced) was the subject of objection by Amesbury Town Council [6.22.8]. For the reasons given in paragraph 10.233 above, I conclude that the objection should not be sustained, and that the Order should not be amended in that respect.

- 10.638 In relation to the objection of the National Trust to the provisions of the Byway Regulation Order, for the reasons given at paragraph 10.231 above, I conclude at paragraph 10.232 that the objection should not be sustained.

- 10.639 For the reasons set out in paragraph 10.235, however, I consider that the Byway Regulation Order should be amended to remove the exemption which would deny access to motor vehicles to the distance of approximately 400m of the proposed Stonehenge Byway which separates the junction of Byway Amesbury 11 from Byway Amesbury 12. Without that modification, I do not consider that the scheme would make reasonable provision for users in motor vehicles of the Byway Amesbury 11. I do not consider that it can be said that this traffic is unsuitable having regard to the other vehicles which would be exempted from the prohibition on the use of the proposed Byway and to the fact that such



vehicles would in any event be able to travel lawfully to a point just as close to Stonehenge on the existing Byway.

- 10.640 **I conclude** that this Order should be modified to accord with the draft form of the Order contained in Document HA/0/53, and, in addition, to remove the exemption on the use by motor vehicles of the length of the proposed Byway between the junctions with Byways Amesbury 11 and 12. A consolidated amended version of the Order and plan is attached to this report as Appendix C.

### **Environmental Statement**

- 10.641 The Environmental Statement produced on behalf of the Highways Agency (Document DD8 to DD/11/9 inclusive) together with the Statement to Inform the Appropriate Assessment (Document DD132), the responses of the statutory consultees, and all the evidence provided at the inquiries on environmental matters on behalf of the Highways Agency, supporters, objectors and those who made representations have been taken into account in reaching these conclusions.

### **Conclusion regarding the request to delay a decision pending the removal of the Stonehenge Visitor Centre**

- 10.642 The Salisbury Green Party argues that, since the benefits claimed for the published scheme cannot be achieved by the scheme alone, but rely in part on the Stonehenge Visitor Centre being moved from its present location, any decision to proceed with the published scheme should be subject to assurance that the Visitor Centre can be relocated. The Green Party contends the likely extent of public objection to the new location for the Visitor Centre presently favoured by English Heritage at Countess East is such that there can be no assurance that it will be approved [6.8.16].
- 10.643 The Highways Agency responds that, while the relocation of the Visitor Centre is partly dependent on the approval of an improvement scheme for the A303 for its funding [4.30], the same is not true in reverse. The published scheme is promoted as a stand alone scheme, which does not rely on the Stonehenge Visitor Centre being moved [4.31]. Approval of an A303 Stonehenge Improvement scheme would, however, facilitate the removal of the Visitor Centre, regardless of whether the relocation was to Countess East or elsewhere.
- 10.644 I consider that, while the retention of the Visitor Centre and its car park in their existing locations would prevent the specific area which those facilities take up being restored to open grassland, it would not prevent the improvement of the A303 to dual two lane standard. Nor would it prevent the placing of the A303 in tunnel as envisaged by the published scheme, with the attendant benefits of the removal of major traffic impacts from Stonehenge and the opening up of the immediate area of the Stonehenge monument which the creation of the tunnel would facilitate. It would not prevent the closure of the existing A303/A344 junction, and the removal of the current severance of The Avenue by the A344. It would not prevent the provision of a bypass for Winterbourne

Stoke, and it would not prejudice the road safety benefits which the published scheme would deliver.

10.645 **I conclude** that, should the Secretaries of State be minded to make the Orders considered at the inquiries, there is no case for delaying the making of those Orders until the relocation of the Stonehenge Visitor Centre is assured.

## **11. RECOMMENDATIONS**

I recommend that

THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) ORDER 200

be made as drafted.

I recommend that

THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) SLIP ROADS ORDER 200

be modified as indicated in paragraph 10.622 above, and that the Order so modified be made.

I recommend that

THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) (DETRUNKING) ORDER 200

be made as drafted.

I recommend that

THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) SIDE ROADS ORDER 200

be modified as indicated in paragraph 10.628 above, and that the Order so modified be made.

I recommend that

THE A303 TRUNK ROAD (STONEHENGE IMPROVEMENT) COMPULSORY PURCHASE ORDER (NO.) 200

be modified as indicated in paragraph 10.634 above, and that the Order so modified be made.

I recommend that

THE A303 TRUNK ROAD STONEHENGE IMPROVEMENT (COUNTLESS ROUNDABOUT TO LONGBARROW CROSSROADS) (PROHIBITION OF CERTAIN CLASSES OF TRAFFIC AND PEDESTRIANS) ORDER 200

be modified as indicated in paragraph 10.636 above, and that the Order so modified be made.

I recommend that

THE A303 TRUNK ROAD STONEHENGE IMPROVEMENT (STONEHENGE BYWAY) (PROHIBITION OF MOTOR VEHICLES) ORDER 200

be modified as indicated in paragraph 10.640 above and in accordance with Appendix C attached, and the Order so modified be made.



INSPECTOR

HA61/4/3

APPENDIX A

### **STONEHENGE - LIST OF APPEARANCES**

#### **For the promoters**

Mr C Calvert of Counsel, instructed by the Treasury Solicitor, Queen Anne's Chambers, 28 Broadway, London, SW1H 9JS

He called

Mr C Jones, BSc, CEng, MICE, Project Director, Highways Agency

Mr J A C Startin, BSc, CEng, MICE, Associate Director, Halcrow Group Ltd

Mr T W A Arnold, BSc, CEng, MICE, Market Sector Manager, Halcrow Group Ltd

Mr M N Ranft, CEng, MIHT, Senior Manager, Highways Division, Balfour Beatty Civil Engineering Ltd

Ms R K Fox, Dip LA(Glos), MLI, Principal Landscape Architect, Halcrow Group Ltd

Mr R Whiteman, BSc, CEng, Dip Ac, MICE, MIA, Principal Acoustic Consultant, Southdowns Environmental Consultants Ltd

Mr A J Lawson, BSc, MSc, FSA, MIFA, Consultant, Wessex Archaeology Ltd

Mr K J Harries, BSc, MSc, CGeol, FGS, Principal Hydrogeologist, Halcrow Group Ltd

Mr P J Taylor, BSc, MSc, MIHT, MNSCAEP, MIEAM, Associate, Halcrow Group Ltd

Dr M J Wells, BA, MA, PhD, CBiol, MIEEM, MCIWEM, Associate Director, Nicholas Pearson Associates Ltd

Mr P Williams, BSc, OND Agriculture, MBIAC, Associate, Reading Agricultural Consultants

Mr M Parsons, BA, MA, MRTPI, Associate, Halcrow Group Ltd

#### **For the supporters**

For English Heritage, Mr R McCracken QC, instructed by Wragge & Co, Solicitors, 55 Colmore Row, Birmingham, B3 2AS

He called

Dr C Young, MA DPhil, FSA, Head of World Heritage and International Policy, English Heritage

Mr D Batchelor, BSc, MIFA, Stonehenge Curatorial Unit, English Heritage

For Wiltshire County Council, Mr J Burns of Counsel and Mr T Ward of Counsel, both instructed by Mr S Gerard, Solicitor to Wiltshire County Council, County Hall, Trowbridge, Wiltshire BA14 8JN

They called

Mr T Jones, BA (Eng), CEng, MICE, Highway Improvement Manager, Wiltshire County Council

For Winterbourne Stoke Parish Council, Councillor J Horne, Chairman, Manor Cottage, New Street, Winterbourne Stoke, SP3 4SP

Mr H Colthurst, Asserton House, Berwick St James, Salisbury, SP3 4TZ

Councillor C Mills, Wessex Bourne, Salisbury Road, Shrewton, Salisbury, Wiltshire, SP3 4HZ

Councillor I West, 3 Church Street, Winterbourne Stoke, Salisbury, Wiltshire, SP3 4SW

For the (International) Pagan Pride Project - UK Division and for TechnoPagans Unlimited, Ms K Connolly, The Growing Space, 1 Butts Green, Lockerley, Hampshire, SO51 0JG

### **For the objectors**

For the National Trust, Mr K Lindblom QC and Mr S Lahiri of Counsel, instructed by Burges Salmon, Solicitors, Narrow Quay House, Narrow Quay, Bristol, BS1 4AH

They called

Ms J Teasdale, BSc, MA, MSc, DipIAA, MLI, Principal, Teasdale Environmental Design

Mr D F Sharps, CEng, FIMechE, FIOA, Senior Partner, Sharps Redmore Partnership

Dr G Hey, BA, PhD, MIFA, FSA, Director, Oxford Archaeology

For ICOMOS (UK), Ms S Denyer, BSc, FSA, Secretary, 70 Cowcross Street, London EC1M 6EJ

For the Prehistoric Society, the Council for British Archaeology and the Wiltshire Archaeological and Natural History Society, Mr B K Davison, 41 Long Street, Devizes, SN10 1NS

He called

Dr M Parker-Pearson, BA, PhD, FSA, MIFA

Dr C Chippindale, BA, PhD, MIFA, FSA, Reader in Archaeology,  
Cambridge University

Prof A Whittle, FBA, School of History and Archaeology, Cardiff  
University

Mr G Lambrick, MA, FSA, MIFA, Director, Council for British  
Archaeology

Dr C Shell, MA, MMet, PhD, FSA, Senior Assistant in Research,  
Department of Archaeology, Cambridge University

For the Association of Council Taxpayers (South Wiltshire), Mr J A M Ellis,  
MIExpE, Hill Croft, Pennys Lane, Farley, Salisbury, SP5 1AR

gave evidence and called

Lt Col G W Parker, OBE

Dr G D d'Mello, BSc, PhD

For the Stonehenge Alliance, Dr K Fielden, BA, DPhil, 1 The Old Smithy, Alton  
Priors, Marlborough, SN8 4JX and Ms D Carlo

gave evidence and called

Mr G McDonic, PPRTPI, Dipl TP, DPA, PPF0B, Barrister at Law

Mr A Norfolk, MSc, DipLA, MIL

Mr G M Reeves, CGeol, MSc, FGS, Lecturer in Engineering  
Geology, Newcastle University

Mr M Birkin, South West Regional Campaigns Co-ordinator,  
Friends of Earth

Mr S Joseph, OBE, Executive Director, Transport 2000

Prof P Goodwin, Professor of Transport Policy, University College,  
London

For Friends of the Earth (Wiltshire), Mrs K Freeman, The Old Dairy, Wayside  
Farm, Etchilhampton, Devizes, Wiltshire, SN10 3JT and Ms M Willmot

For Salisbury Green Party, Mr H Soutar, 1 Nadder Vale Cottage, Ugford, Wilton,  
Salisbury, SP2 0ED

Mr R Wort, TD, MA, Dip Ed, FRAS, Knole Cottage, 69 Murray Road, Wimbledon,  
SW19 5PJ

For the Trail Riders' Fellowship and the Wiltshire Bridleways Association, Mr B  
Riley, 141 Bath Road, Bradford on Avon, Wiltshire BA15 1SS

For the South and West Transport Action Group, Mr J Jackson, BSc, DipTP, 37  
Cromwell Road, Devizes, SN10 3EN

Dr C Gillham, 16 Upper High Street, Winchester

Mrs J Robertson, Glebe House, Chitterne, Warminster, Wiltshire, BA12 0LJ

For the Amesbury Link Road Action Group, Mr I Mitchell, 3 Beyer Road,  
Amesbury, Salisbury, SP4 7XG

For the Amesbury Society, R Ware, Secretary, 14 Stonehenge Road, Amesbury,  
Wiltshire SP4 7BA

For the Avebury Society, Mr E Holmes, The Forge, High Street, Avebury,  
Wiltshire, SN8 1RF

For the Byways and Bridleways Trust, Mr D Tilbury, Oakbank Cottage, Oakbank  
Road, Eastleigh, SO50 6PA

For the Countess Road Residents' Group, Major G du Pré, 103 Countess Road,  
Amesbury, SP4 7AT

For Stapleford Parish Council, Mrs A V Neal, Grants, Chapel Lane, Stapleford,  
SP3 4LL

For East Amesbury Residents, Mr R Maguire, BEng, MSc, CEng, MIME, 17 Pilots  
View, Amesbury

Dr J R Moon, PhD, CPhys, CMath, Norfolk House, Abbots Ann, Andover, SP11  
7AY (on his own behalf and on behalf of Mrs J Moon, MSc, CEng, CStat of the  
same address)

Mr R Harvey, 6 Folkestone Road, Salisbury, SP2 8JP

Mr G V Cowmeadow, 12 The Downlands, Warminster, Wiltshire, BA12 0BD

For Amesbury Town Council, Mr R Fisher, 89 Countess Road, Amesbury, SP4  
7AT

Mr P Matthews 71 Shaftesbury Road, Wilton, Salisbury, SP2 0DU

Councillor A J Brown-Hovelt, 101 North Street, Wilton, Salisbury, Wiltshire, SP2  
0HP

Mr T Mayer, Fortyacres Farm, South Barrow, Yeovil, BA22 7LE

Mr P Corp, 5 Devonshire Road, Salisbury, SP1 5NN

## **REPRESENTATIONS**

For the British Druid Order and the British Druid Network, Mrs E R Orr, 28  
Roman Row, Whichford, Shipston on Stour, CV36 5PJ

Mr G Randall, 176 Salisbury Road, Amesbury, SP4 7HW

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Mr J Stewart, 74 The Common, Parbold, Lancashire, WN8 7EA

Col S J D Bush, Cockspur Thorns, Berwick St James, Salisbury, SP3 4TS

Mr K Garland, 130 Bouverie Street South, Salisbury, SP2 8EA

Mrs R Wyeth, The Old Police Station, Chitterne Road, Codford, Nr Warminster, Wiltshire, BA12 0PG

For the Save Bourne Valley Group, Mr D Nicolle, Mr M Ashley and Ms S Borrett, The Grange, Idmiston, Salisbury, SP4 0AP

Mrs S J Parrett, Pear Tree Cottage, Upper Woodford, Salisbury, SP4 6PA

Prof D Maddison, Economics Institute, University of Southern Denmark, Campusvej 55, DK-5230, Odense M, Denmark

Mr M Aubrey, 12A Bungalow Park, Holders Road, Amesbury, Salisbury, Wiltshire, SP4 7PJ (on his own behalf and on behalf of Mrs S Aubrey)

Mr P J Lawrence, 7 Chapel Meadow, Yetminster, Sherbourne, Dorset, DT9 6NT

Mr J Berkley-Matthews, The Old Manse, Tisbury, Wiltshire, SP3 6LG

Mr G T Heath, 14 Clarke Drive, Shaw, Swindon, Wiltshire, SN5 5SH

Mr R Moykopf, Mill Cottage, Milston, Durrington, Salisbury, SP4 8HS



**STONEHENGE - LIST OF DOCUMENTS**

**Deposit Documents**

DD	1	1	The A303 Trunk Road (Stonehenge Improvement) Order 200
DD	1	2	The A303 Trunk Road (Stonehenge Improvement) Order 200 Plans
DD	1	3	Notice of A303 Trunk Road (Stonehenge Improvement) Order, Slip Roads Order, Detrunking Order and Side Roads Order
DD	2	1	The A303 Trunk Road (Stonehenge Improvement) Slip Roads Order 200
DD	2	2	The A303 Trunk Road (Stonehenge Improvement) Slip Roads Order 200 Plan
DD	3	1	The A303 Trunk Road (Stonehenge Improvement) Detrunking Order 200
DD	3	2	The A303 Trunk Road (Stonehenge Improvement) Detrunking Order 200 Plan
DD	4	1	The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200
DD	4	2	The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200 Plan
DD	4	3	The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200 - FORM ORD1
DD	4	4	The A303 Trunk Road (Stonehenge Improvement) Side Roads Order 200 - FORM ORD2
DD	5	1	Notice of the A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200
DD	5	2	The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200
DD	5	3	The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200 Land Reference Schedules
DD	5	4	The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200 Plans
DD	5	5	The A303 Trunk Road (Stonehenge Improvement) Compulsory Purchase Order 200 Land Reference Plans
DD	6	1	The A303 Trunk Road (Longbarrow Crossroads to Countess Roundabout) (Prohibition of Certain Classes of Traffic and Pedestrians) Order
DD	6	2	The A303 Trunk Road (Longbarrow Crossroads to Countess Roundabout) (Prohibition of Certain Classes of Traffic and Pedestrians) Order Plan
DD	7	1	The A303 Stonehenge Improvement (Stonehenge Byway) (Prohibition of Motor Vehicles) Order
DD	7	2	The A303 Stonehenge Improvement (Stonehenge Byway) (Prohibition of Motor Vehicles) Order - Plan
DD	8		Environmental Statement - Non Technical Summary
DD	9		Environmental Statement Vol 1
DD	10		Environmental Statement Vol 1A (Figures)

DD	11	1	Environmental Statement Vol 2. Part 1 (Cultural Heritage)
DD	11	2	Environmental Statement Vol 2. Part 2 (Landscape)
DD	11	3	Environmental Statement Vol 2. Part 3 (Nature Conservation)
DD	11	4	Environmental Statement Vol 2. Part 4 (Water)
DD	11	5	Environmental Statement Vol 2. Part 5 (Noise & Vibration)
DD	11	6	Environmental Statement Vol 2. Part 6 (Air Quality)
DD	11	7	Environmental Statement Vol 2. Part 7 (Pedestrian, Cyclists, Equestrians & Community Effects)
DD	11	8	Environmental Statement Vol 2. Part 8 (Vehicle Travellers)
DD	11	9	Environmental Statement Vol 2. Part 9 (Land Use)
DD	12		Statement of Case Figures
DD	13		The Highways (Inquiries Procedure) Rules SI 1994 No 3263
DD	14		The Compulsory Purchase by Ministers (Inquiries Procedure) Rules SI 1994 No 3264
DD	15		Secretary of State's Traffic Orders (Procedure) (England and Wales) Regulations 1990 SI 1990 No 1656
DD	16		The Highways Act 1980
DD	17		The Acquisition of Land Act 1981
DD	18		The Land Compensation Act 1973
DD	19		The Compulsory Purchase Act 1965
DD	20		The Highways (Assessment of Environmental Effect) Regulations 1998 SI 1999 No 369
DD	21		EC Directive 97/11/EC, amending Directive 85/337/EC on the Assessment of Certain Public and Private Projects on the Environment
DD	22		The Town and Country Planning Act 1990
DD	23		The Town and Country Planning Environmental Impact Assessment (England and Wales) Regulations 1999 SI 1999 No 293
DD	24		The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990
DD	25		The Road Traffic Regulation Act 1984, as amended
DD	26		The Environment Act 1995, as amended
DD	27		The Environmental Protection Act 1990, as amended
DD	28		The Control of Pollution Act 1974
DD	29		The Wildlife and Countryside Act 1981, as amended
DD	30		The Countryside and Rights of Way Act 2000
DD	31		The Conservation (Natural Habitats Etc) Regulations 1994 SI 1994 No 2716
DD	32		A New Deal For Transport: Better for Everyone. HMSO, 1998
DD	33		A New Deal For Trunk Roads in England. DETR, 1998
DD	34		Transport 2010: The Ten Year Plan. DETR, 2000
DD	35		Tomorrow's Roads: Safer for Everyone
DD	36		A New Deal for Trunk Roads in England: Guidance on the New Approach to Appraisal
DD	37		A New Deal for Trunk Roads in England: Understanding the New Approach to Appraisal
DD	38		Design Manual for Roads and Bridges (DMRB) Volume 1: Approval Procedures and General Design.
DD	39		Design Manual for Roads and Bridges (DMRB) Volume 2: Highway Structures.
DD	40		Design Manual for Roads and Bridges (DMRB) Volume 3:

			Inspection and Maintenance
DD	41		Design Manual for Roads and Bridges (DMRB) Volume 4: Geotechnics and Drainage
DD	42		Design Manual for Roads and Bridges (DMRB) Volume 5: Assessment of Preparation of Road Schemes
DD	43		Design Manual for Roads and Bridges (DMRB) Volume 6: Road Geometry.
DD	44		Design Manual for Roads and Bridges (DMRB) Volume 7: Pavement Design and Maintenance
DD	45		Design Manual for Roads and Bridges (DMRB) Volume 8: Traffic Signs and Lighting
DD	46		Design Manual for Roads and Bridges (DMRB) Volume 9: Network - Traffic Control and Communications
DD	47		Design Manual for Roads and Bridges (DMRB) Volume 10: Environmental Design and Management.
DD	48		Design Manual for Roads and Bridges (DMRB) Volume 11: Environmental Assessment.
DD	49		Design Manual for Roads and Bridges (DMRB) Volume 12: Traffic Appraisal of Road Schemes
DD	50		Design Manual for Roads and Bridges (DMRB) Volume 13: Economic Assessment of Road Schemes (COBA Manual).
DD	51		Design Manual for Roads and Bridges (DMRB) Volume 14: Economic Assessment of Road Maintenance (QUADRO Manual).
DD	52		Traffic Appraisal Manual. HMSO, 1997
DD	53		Guidance on the Methodology for Multi-Modal Studies (GOMMMS). DETR, 2000
DD	54		London to South West and South Wales Multi-Modal Study Corridor Plan: London-Exeter, Final Report. (SWARMMS). Government Office South West 2002
DD	55		Building Better Roads: Towards Sustainable Construction, July 2003
DD	56		Highways Agency Press Release HA 489/02, 10 December 2002
DD	57	1	Report on Public Exhibition and Consultation. Highways Agency, January 1999 (Volume 1 - Main Text)
DD	57	2	Report on Public Exhibition and Consultation. Highways Agency, January 1999 (Volume 2 - Official Letters)
DD	58		A303 Stonehenge Improvement Environmental Assessment Scoping Report. Mott MacDonald, 2001
DD	59		A303 Stonehenge Improvement Preferred Route Announcement. ( <a href="http://www.highways.gov.uk/roads/area/02/works/a303stone/index.htm">http://www.highways.gov.uk/roads/area/02/works/a303stone/index.htm</a> )
DD	60		A303 Stonehenge Improvement: Summary of Tunnel Comparisons (October 2002).
DD	61		World Heritage Convention, Stonehenge, Avebury and Associated Sites. Cultural Properties: UK Nomination
DD	62		Stonehenge Master Plan. Publicity Leaflet. English Heritage and National Trust, 1999
DD	63		Stonehenge Project Mission Statement in the Stonehenge Master Plan Newsletter Issue 1, Summer 1999. English Heritage, National Trust & Wiltshire County Council

DD	64		Stonehenge World Heritage Site Management Plan Summary. English Heritage and National Trust, 2000
DD	65		Stonehenge World Heritage Site Management Plan, English Heritage and National Trust, 2000
DD	66		Operational Guidelines for the Implementation of the World Heritage Convention. UNESCO, 1999 Replaced by updated guidelines dated July 2002
DD	67		Protecting and Managing England's Heritage Property. House of Commons Committee of Public Accounts. HMSO, 1993
DD	68		Stonehenge Estate Land Use Plan. National Trust, 2001
DD	69		Interim Advice Note 44/02 Revision 1 Interim Requirements for Road Restraint Systems (Vehicle and Pedestrian). Highways Agency, July 2003
DD	70		Interim Requirements for Road Restraint Systems (Vehicle and Pedestrian) (IRRRS). Highways Agency, July 2002
DD	71	1	Traffic Signs Manual, Chapter 1 - Introduction. The Stationery Office Ltd, 1991
DD	71	2	Traffic Signs Manual, Chapter 3 - Regulatory Signs. The Stationery Office Ltd, 1991
DD	71	3	Traffic Signs Manual, Chapter 4 - Warning Signs. The Stationery Office Ltd, 1991
DD	71	4	Traffic Signs Manual, Chapter 7 - The Design of Traffic Signs. The Stationery Office Ltd, 1991
DD	71	5	Traffic Signs Manual, Chapter 8 - Traffic Safety Measures and Signs for Road Works and Temporary Situations. The Stationery Office Ltd, 1991
DD	72		The Design and Use of Directional Informatory Signs (VMS), 2002
DD	73		Lighting in the Countryside: Towards Good Practice. HMSO, 1997
DD	74		BS5489 Part 4: Code of practice for lighting for single level junctions including roundabouts
DD	75		BS5489 Part 5: Code of Practice for lighting for grade separated junctions
DD	76		BS5489 Part 6: Code of Practice for lighting for bridges and elevated roads
DD	77		BS5489 Part 7: Code of Practice for lighting for tunnels and underpasses
DD	78		Technical Report No. 24. A Practical Guide to the Development of a Public Lighting Policy for Local Authorities. (The ILE Guide)
DD	79		Survey Results of Classified Vehicle Counts on the A303. Balfour Beatty, Costain JV, 2002
DD	80		Interim Advice note (43/02) Cantilever and Portal Gantry Variable Message Signs (VMS). Highways Agency
DD	81		Proposal for a Directive of the European Parliament and of the Council on minimum safety requirements for tunnels in the Trans-European Road Network - General Approach
DD	82		A303 Stonehenge, Local Model Validation Report. Mott MacDonald, August 2001
DD	83		A303 Stonehenge Improvement Forecasting Report. BBCJV, May 2003
DD	84		National Road Traffic Forecasts (Great Britain), 1997

DD	85	Tempo Guidance Note. DfT, April 2003
DD	86	A303 Stonehenge Improvement Economic Assessment Report. Balfour Beatty Costain JV, 2003 (Updated by HA/0/6)
DD	87	Construction Methods Including Environmental Considerations. BBCJV
DD	88	Character of England Study - Countryside Character Vol 8 South West. Countryside Agency, English Nature and English Heritage, 1997
DD	89	Stonehenge in its Landscape: Twentieth Century Excavations. Cleal et al, 1995. English Heritage
DD	90	A303 Trunk Road Amesbury to Berwick Down: Planning Conference, 6-10 November 1995: Chairman's Report. Wilson, 1995
DD	91	The Noise Insulation Regulations, as amended 1998
DD	92	Calculation of Road Traffic Noise (CRTN). HMSO, 1988
DD	93	BS5228 Part 1: Code of Practice for Basic Information and Procedures for Noise and Vibration Control. HMSO, 1997
DD	94	BS5228 Part 4: Code of Practice for Noise and Vibration Control on Construction and Open Sites. HMSO, 1992
DD	95	BS8233: Sound insulation and noise reduction for buildings - code of practice. 1999
DD	96	BS6472: Guide to evaluation of human exposure to vibration in buildings (1Hz to 80Hz). 1992
DD	97	TRRL Supplementary Report 425, Rural Traffic Noise - An Approximation
DD	98	TRRL LR 770 Noise and road traffic outside homes in England
DD	99	The Ancient Monuments and Archaeological Areas Act 1979
DD	100	UNESCO Convention Concerning the Protection of World Cultural and Natural Heritage. UNESCO, 1972
DD	101	European Convention on the Protection of the Archaeological Heritage (the Valetta Convention). Council of Europe, 1992
DD	102	Extracts from Minutes Provided by DCMS regarding ICOMOS and UNESCO. Department for Culture, Media and Sport.
DD	103	A303 Stonehenge Archaeological Appraisal. Highways Agency, 2001
DD	104	The Stonehenge Environs Project (Historic Buildings and Monuments Commission for England Archaeological). Richards, 1990
DD	105	Stonehenge and its Environs: Monuments and Land Use. Royal Commission on the Historical Monuments of England, 1979. Edinburgh UP.
DD	106	CD of HA Commissioned Archaeology Reports on the A303 Stonehenge Improvement Project. Wessex Archaeology, 2003
DD	107	The Water Resources Act 1991, as amended
DD	108	The EC Groundwater Directive 80/68/EC. European Union Council
DD	109	The Groundwater Regulations SI 1998 No 2746, as amended
DD	110	Policy and Practice for the Protection of Groundwater. Environment Agency (formerly National Rivers Authority) 1992
DD	111	The Local Environment Agency Plan for the Hampshire Avon.

			Environment Agency, 2000
DD	112		The Land Drainage Act 1991, as amended
DD	113		Extracts from Flood Estimation Handbook. Procedures for Flood Frequency Estimation
DD	114	1	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, January 2000. DETR, Scottish Executive, NAW and DENI
DD	114	2	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Addendum 2003. DETR, Scottish Executive, NAW and DENI
DD	115	1	The Air Quality Framework Directive 92/67/EC. Official Journal of the European Communities, 29.6.1999
DD	115	2	EC Directive 1999/30/EC. Official Journal of the European Communities, 29.6.1999
DD	116	1	The Air Quality (England) Regulations 2000 SI 2000 No 928, amended 2002
DD	116	2	The Air Quality (England) Amendment Regulations SI 2002 No 3043
DD	117		The Air Quality Limit Value Regulations 2001, SI 2001 No 2315
DD	118		ADMS 3 User Guide Version 3.1. Cambridge Environmental Research Consultants Ltd, September 2001
DD	119		EC Directive 79/409/EEC on the Conservation of Wild Birds as amended (Birds Directive)
DD	120		EC Directive 92/43/EEC on the Conservation of Wild Flora and Fauna as amended (Habitats Directive)
DD	121		The National Parks and Access to the Countryside Act 1949, as amended
DD	122		The Salmon and Freshwater Fisheries Act 1975, as amended
DD	123		The Deer Act 1996
DD	124		The Wild Mammals Protection Act 1996
DD	125		The Protection of Badgers Act 1992, as amended
DD	126		The Hedgerow Regulations 1997, as amended
DD	127		The UK Biodiversity Action Plan. DOE, 1994
DD	128		Highways Agency Biodiversity Action Plan
DD	129		Wiltshire Biodiversity Action Plan
DD	130		River Avon cSAC Conservation Strategy. Wheeldon. English Nature
DD	131		River Avon cSAC Conservation Strategy: Executive Summary. Wheeldon. English Nature
DD	132		Statement to Inform the Appropriate Assessment. BBCJV
DD	133		Agricultural Land Classification of England and Wales (Revised Guidelines and Criteria for Grading the Quality of Agricultural Land) MAFF, 1988.
DD	134		Planning Policy Guidance 1: General Policies and Principles
DD	135		Planning Policy Guidance 7: The Countryside - Environmental Quality and Economic and Social Development
DD	136		Planning Policy Guidance 9: Nature Conservation.
DD	137		Planning Policy Guidance 10: Planning and Waste Management.
DD	138		Planning Policy Guidance 13: Transport.
DD	139		Planning Policy Guidance 15: Planning and the Historic Environment.

DD	140		Planning Policy Guidance 16: Archaeology and Planning.
DD	141		Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation.
DD	142		Planning Policy Guidance 21: Tourism.
DD	143		Planning Policy Guidance 23: Planning and Pollution Control
DD	144		Planning Policy Guidance 24: Planning and Noise.
DD	145		Planning Policy Guidance 25: Development and Flood Risk.
DD	146		Regional Planning Guidance For The South West (RPG 10).
DD	147		Wiltshire Structure Plan 2011. Wiltshire County Council, 2001
DD	148		Wiltshire Local Transport Plan: 2001/02-2005/06 Final Draft. Wiltshire County Council, 2001
DD	149	1	Adopted Salisbury District Local Plan. Salisbury District Council 2003
DD	149	2	Adopted Salisbury District Local Plan. Salisbury District Council 2003 - Maps
DD	150		Adopted Wiltshire and Swindon Minerals Local Plan. Wiltshire County Council and Swindon Borough Council, 2001
DD	151		Wiltshire and Swindon Waste Local Plan - Revised Deposit Draft. Wiltshire County Council and Swindon Borough Council, 2001
DD	152		A Better Quality of Life - A Strategy for Sustainable Development for the United Kingdom. HMSO, 1999
DD	153		Our Countryside: The Future - A Fair Deal for Rural England. HMSO, 2000

**Core Documents**

CD	ACTP	1	Review and Assessment of Air Quality Stage 4. Salisbury District Council
CD	CBA	1	Chairman's Report - 1995 Planning Conference
CD	CBA	2	Tunnel Vision: The Future Role of Tunnels in Transport Infrastructure. Parliamentary Office of Science and Technology, January 1997
CD	CBA	3	Not used
CD	CBA	4	Stonehenge Agrienvironment Scheme
CD	CBA	5	Not used
CD	CBA	6	CBA Position Papers Relating to the Stonehenge A303 Road Scheme
CD	CBA	7	Letter of 19 December from Royal Archaeological Institute to CBA
CD	EH	1	Power of Place - The Future of the Historic Environment. English Heritage, 2000
CD	EH	2	The Stonehenge Study Group Report. English Heritage, 1985
CD	EH	3	Research Framework for the Stonehenge World Heritage Site. Compiled for English Heritage by Bournemouth University
CD	HA	1	Engineering Plan and Profile Drawings
CD	ICOM	1	The Historic Environment - A Force For Our Future. DCMS 2001
CD	INQ	1	Notes for the Guidance of Inspectors Holding Inquiries into Orders and Special Road Schemes. Planning Inspectorate, November 2003
CD	INQ	2	Correspondence submitted by the National Trust regarding the adequacy of the Environmental Statement
CD	INQ	3	Letter of 3 October 2002 about advice English Heritage gave

			to DCMS regarding various tunnel construction methods and tunnel lengths
CD	INQ	4	Letter of 6 March 2004 and enclosures from English Heritage about the scheduling of Stonehenge as a monument
CD	NT	1	The National Trust, January 2004. Stonehenge Spirit of Place Statement. Contribution to Statement of Significance Draft
CD	NT	2	Balfour Beatty / Costain JV. Minutes of site meeting held 9 January 2004 to discuss A344 reinstatement
CD	NT	3	Balfour Beatty/Costain JV, Nov. 2003. A303 Stonehenge Improvement: External Lighting Strategy Working Paper
CD	NT	4	Highways Agency, Sept 2003. A303 Stonehenge Improvement. Briefing Paper: Longer Tunnels Assessment
CD	NT	5	Balfour Beatty Costain JV. Tunnel Options Report, 2002. Drg. no. P1A/ENV/TOR/D011, rev. A
CD	NT	6	Balfour Beatty / Costain JV. June 2003. A303 Stonehenge Improvement. Report on Cutting Slopes within the World Heritage Site
CD	NT	7	The Council for the Protection of Rural England (CPRE) Policy Position Statement - Tranquility, November 2002
CD	NT	8	CPRE and Countryside Commission Tranquil Areas maps, October 1995
CD	NT	9	Guidelines for Community Noise published by the World Health Organisation (WHO) in 1999
CD	NT	10	National Physical Laboratory Health Effect - Based Noise Assessment Methodology: A Review and Feasibility Study, September 1998
CD	NT	11	Barclay, A and Halpin, C 1999 Excavations at Barrow Hills, Radley, Oxfordshire. Volume 1: the Neolithic and Bronze Age monument complex, Thames Valley Landscapes, Oxford
CD	NT	12	Bennett, P, and Williams, J, 1998 Monkton, Current Archaeology 151, 258-64
CD	NT	13	Burl, A, 1993 From Carnac to Callanish: the prehistoric stone rows and avenues of Britain, Ireland and Brittany, Yale University Press
CD	NT	14	Clark, A, 1990 Seeing beneath the soil: prospecting methods in archaeology, Batsford, London
CD	NT	15	Crawford, O G S, 1923 Stonehenge from the air, The Observer, 22 July 1923, 11-12
CD	NT	16	David, A, 1994 The role of geophysical survey in early medieval archaeology, Anglo-Saxon Studies in Archaeology and History 7, 1-26
CD	NT	17	Exon, S, Gaffney, V, Woodward, A, and Yorston, R, 2000 Stonehenge landscapes: journeys through real and imagined worlds, Archaeopress Oxford
CD	NT	18	Hey, G, and Lacey, M, 2001 Evaluation of archaeological decision-making processes and sampling strategies, Oxford Archaeological Unit
CD	NT	19	Hey, G, Mulville, J and Robinson, M, 2003 Neolithic diet and culture in southern Britain: the evidence from Yarnton. Food, Culture and Identity in the Neolithic and Early Bronze Age
CD	NT	20	Parker Pearson, M, and Ramilisonina, 1998 Stonehenge for the ancestors: the stones pass on the message, Antiquity 72, 308-26



CD	NT	21		Union Railways Ltd, 1994. Channel Tunnel Rail Link: assessment of historical and cultural effects. Final Report, Vol. 1 of 4
CD	NT	22		Wessex Archaeology, 1993. Stonehenge Visitor Centre, Wiltshire. Site 12: A303 footbed archaeological evaluation, client report November 1993
CD	NT	23		Woodward, A B, Woodward, P J, 1996. The topography of some barrow cemeteries in Bronze Age Wessex, Proceedings of the Prehistoric Society 62 275-291
CD	NT	24		Composite Index - Policy, Guidance and Advice - Cultural Heritage, Archaeology and Landscape
CD	NT	25		Schedule Entry Copy and Map - National Monument Number 10390 - Stonehenge, the Avenue and three barrows adjacent to the Avenue
CD	NT	26		World Heritage Committee: Report of 10th Session, Paris 24-28 November 1986
CD	NT	27		Wessex Archaeology, A303 Stonehenge Archaeological Surveys. Archaeological Evaluation Report: Areas R&T (Ref 50527.1b), July 2003
CD	NT	28		Wessex Archaeology, A303 Stonehenge Archaeological Surveys, Archaeological Evaluation Report: Area P (Ref 50538), July 2003
CD	NT	29		Wessex Archaeology, A303 Stonehenge, Geotechnical Site Investigation: Archaeological Watching Brief (ref 48067.1) September 2002
CD	NT	30		The Setting of Cultural Heritage Features. Simon Colcutt. Journal of Planning Law 1999 (499-513)
CD	NT	31		Stonehenge World Heritage Site: Landscape and Planning Study. Land Use Consultants 1995
CD	NT	32		A303 Stonehenge Working Paper 14 - Longer Tunnel Alternatives September 2002
CD	NT	33		Extract from the book Gaze J., Figures in a Landscape, A History of the National Trust. 1988, pp81-84
CD	NT	34		Extract from the minutes of The Stonehenge Management Committee Meeting 15 April 1940
CD	PS	1		Extract from Bronze Age Landscapes. Tradition and Transformation - Editor Joanna Bruck. Oxbow Books, 2001
CD	PS	2		A Phenomenology of Landscape Places, Paths and Monuments - C Tilley - BERG 1994
CD	PS	3		Extract from The Perception of the Environment. Essays on Livelihood, Dwelling and Skill. Tim Ingold. Routledge, 2000.
CD	PS	4		Extract from Landscape Politics and Perspectives. Barbara Bender (editor). Berg, 1993
CD	RW	1	1	Stonehenge and its Future. Richard Wort
CD	RW	1	2	Stonehenge and its Future - Part II. Richard Wort, 1993
CD	SAWT	1		Snowflake. The blueprint to develop new and reopen existing railways in Britain. Lyndon I Elias.
CD	WANS	1		Extracts from Science and Stonehenge. Edited by B Cunliffe & C Renfrew. British Academy & OUP, 1997. ISBN 0197261744
CD	WANS	1	A	Science and Stonehenge. Edited by B Cunliffe & C Renfrew. British Academy & OUP, 1997. ISBN 0197261744 - page 213

**Inquiry Documents**

AA	0	1		Attendance Sheets from Inquiry proceedings
AA	0	2		Transcript of the inquiry proceedings
AAG	1	1		Proof of Evidence - Ian Mitchell
AAG	1	2		Summary of Proof of Evidence - Ian Mitchell
AAG	1	3		Appendices to Proof of Evidence (Copies of PowerPoint slides) - Ian Mitchell
AAG	1	4		Appendices to Proof of Evidence - Ian Mitchell
ABH	1	1		Proof A303 Realignment/Tunnel - Mr A Brown-Hovelt
ABH	1	2		A303 Realignment/Tunnel Proof - Mr A Brown-Hovelt
ACTP	0	1		South Wiltshire Structure Plan - Transport Alteration EIP. Daily summary, 9 November 1983 - am
ACTP	0	2		South Wiltshire Structure Plan - Transport Alteration EIP. Daily summary, 9 November 1983 - pm
ACTP	0	3		South Wiltshire Structure Plan - Transport Alteration EIP. Daily Summary Day 2, Thursday 10 November 1983 - am
ACTP	0	4		South Wiltshire Structure Plan - Transport Alteration EIP. Daily Summary Day 2, Thursday 10 November 1983 - pm
ACTP	0	5		Stonehenge Indenture 28 October 1918
ACTP	0	6		Methodology for Multi-Model Studies - The Appraisal Process
ACTP	0	7		Poster on Salisbury/Stonehenge Roads Seminar October 2001
ACTP	0	8		Note on Salisbury/Stonehenge Road Seminar October 2001
ACTP	0	9		Press release 04/01 on Salisbury/Stonehenge Roads Seminar
ACTP	0	10		Leaflet titled - Vote for a Democratic Decision July 2000
ACTP	0	11		Recent Salisbury Transport Surveys 2000
ACTP	0	12		Note of a presentation of the ACT Parker Plan May 2001
ACTP	0	13		Correspondence between ACT and HA re COBA data
ACTP	0	14		Supplementary Document Evidence re Save Bourne Valley submissions
ACTP	0	15		Figure 2.14 Traffic Movement at A303/A360 Longbarrow Roundabout
ACTP	0	16		ACTP Closing Statement - John Ellis
ACTP	0	17		Supplementary Document Submission John Ellis
ACTP	0	18		Results of Salisbury/Stonehenge Roads Seminar 3rd Oct 2001
ACTP	1	1		Proof of Evidence - John Ellis
ACTP	1	1	A	Amendments to Proof of Evidence - John Ellis
ACTP	1	2		Summary of Proof of Evidence - John Ellis
ACTP	1	3		Opening statement on behalf of the Association of Council Tax Payers (South Wiltshire)
ACTP	2	1		Proof of Evidence - Lt Col G Parker
ACTP	2	2		Document replaced by ACTP/2/7
ACTP	2	3		Appendices to Proof of Evidence - Lt Col G Parker
ACTP	2	4		Amendments to ACTP/2/3
ACTP	2	5		Supplementary Proof of Evidence - Lt Col G Parker
ACTP	2	6	1	Supplementary Appendices - Lt Col G Parker
ACTP	2	6	2	Supplementary Appendices - Lt Col G Parker
ACTP	2	7		Revised Summary of Proof of Evidence - Lt Col G Parker
ACTP	2	8		Opening remarks - Lt Col G Parker
ACTP	3	1		Proof of Evidence - Dr G d'Mello
AMS	1	1		Proof of Evidence - Mr R Ware
AMS	1	2		Proof of Evidence - Mr R Ware
AMS	1	3		Supplementary evidence - Mr R Ware
AMS	1	4		Comments on Document HA/13/25

ATC	1	1	Proof for Amesbury Town Council - Mr R Fisher
AVS	1	1	Proof of Evidence - Ewart Holmes (Document originally numbered AVS/1)
AVS	1	2	Summary of Proof of Evidence - Ewart Holmes (Document originally numbered AVS/2)
AVS	1	3	Appendices to Proof of Evidence - Ewart Holmes (Document originally numbered AVS/3-16)
BBT	1	1	Proof of Evidence - Dave Tilbury
BBT	1	2	Summary of Proof of Evidence - Dave Tilbury
BBT	1	3	Supplementary Proof of Evidence - Dave Tilbury
BDO	1	1	Proof of Evidence - Philip Shallcrass
CBA	0	1	Extracts from Stonehenge World Heritage Site Management Plan Consultation Draft
CBA	0	2	Comments on Environmental Scoping Report
CBA	0	3	Matrix for assessing setting used by Highways Agency in A2 (T) Worthing to Lancing Improvement Inquiry
CBA	0	4	Extract from Chapter 13, Volume 10, Section I, Part 2, DMRB - Soils
CBA	0	5	Closing Statement George Lambrick
CBA	1	1	Proof of Evidence - George Lambrick
CBA	1	2	Summary of Proof of Evidence - George Lambrick
CBA	1	3	Appendices to Proof of Evidence - George Lambrick
CBA	1	4	Supplementary Proof of Evidence - George Lambrick
CBA	1	5	Written Submission - Mr G Lambrick
CCD	1	1	Statement to the A303 Stonehenge Inquiry on behalf of TechnoPagans Unlimited
CG	1	1	Proof of Evidence - Dr C Gillham
CG	1	2	Summary of Proof of Evidence - Dr C Gillham
CG	1	3	1 Supplementary evidence - Peripherality (Part 1 of 3)
CG	1	3	2 Supplementary evidence - Peripherality (Part 2 of 3)
CG	1	3	3 Supplementary evidence - Peripherality (Part 3 of 3)
CG	1	4	Promised and undelivered factors at Twyford Down
CG	1	5	Final Written Statement - Dr C Gillham
CM	1	1	Proof of Evidence - Cllr Colin Mills
CRRG	0	1	Details of those being represented by CRRG
CRRG	1	1	Proof of Evidence - Major G du Pré
CRRG	1	2	Appendix to Proof of Evidence - Major G du Pré
DCMS	1	1	Written Statement on behalf of DCMS
DCMS	1	2	Not used
DCMS	1	3	Appendices to Written Statement
DCMS	1	4	Appendices to Supplementary Written Statement (DCMS/1/5)
DCMS	1	5	Supplementary Written Statement
DCMS	1	6	Letter of 22 March 2004 seeking to clarify paragraph 33 of DCMS/1/1
DCMS	1	7	Letter of 19 March 2004 re Operational Guidelines
DCMS	1	8	Letter of 20 April 2004 on issue about deed of gift between Cecil and Mary Chubb & Commissioners of Works, with attached deeds
DCMS	1	9	Letter of clarification on letter dated 19 March 04
DCMS	1	10	Letter of 20 April 2004 on issue that arose on 11 March 04
DCMS	1	11	Operational Guidelines letter 21 April 2004
DCMS	1	12	Operational Guidance further letter 22 April 2004
DCMS	1	13	Letter about European Landscape Convention 6 May 2004

DM	1	1	Valuing Different Options for the A303
DM	1	2	Valuing Different Options for Stonehenge
DM	1	3	Valuing Different Road Options for the A303 (PowerPoint presentation)
DN	1	1	Proof of Evidence - Ms E Restall Orr
DN	1	2	Proof of Evidence - Ms E Restall Orr
DN	1	3	Update letter from The Druid Network 23 April 2004
EAR	1	1	Proof of Evidence - Richard Maguire (Value Objection)
EAR	1	2	Proof of Evidence - Richard Maguire (Heritage)
EAR	1	3	Proof of Evidence - Richard Maguire (Noise)
EH	0	1	Letter of 20 April 2004 from EH on matter raised at Inquiry
EH	0	2	Historic Settlements and Landscape Advisory Committee Agenda Items
EH	0	3	Letter of withdrawal of objection dated 23 April 2004
EH	0	4	Closing Statement
EH	0	5	The cases referred to in the Closing Statement
EH	1	1	Proof of Evidence - Christopher Young
EH	1	2	Summary of Proof of Evidence - Christopher Young
EH	1	3	Supplementary Proof of Evidence - Christopher Young
EH	2	1	Proof of Evidence - David Batchelor
EH	2	2	Summary of Proof of Evidence - David Batchelor
EH	2	3	Supplementary Proof of Evidence - David Batchelor
FOEW	0	1	Article: Driven by dogma. Geographical, October 1993.
FOEW	0	2	Extract from Local Transport Today, Issue 388 25 March 2004
FOEW	0	3	Table: estimated uninhibited free flow vehicle capacity of a single lane as a function of speed
FOEW	0	4	Table from draft AST
FOEW	0	5	Exchange of correspondence between FOE Wiltshire and Chairman of A303 Amesbury-Berwick Down (Stonehenge Section) Planning Conference
FOEW	0	6	Letter requesting Information from HA 8th April 2004
FOEW	0	7	Further letter to HA on noise as further impact 8 April 2004
FOEW	0	8	Transport Statistics Bulletin
FOEW	0	9	Working draft table - Environmental Statement - Noise measurements
FOEW	0	10	Letter to HA on follow up points 20 April 2004
FOEW	0	11	Closing Statement
FOEW	1	1	Proof of Evidence - Mrs K Freeman
FOEW	1	2	Supplementary Evidence - Mrs K Freeman
GC	1	1	Proof of Evidence - Mr G Cowmeadow
GC	1	2	Supplementary evidence - Mr G Cowmeadow
GH	0	1	Map of Alternative route suggested by Mr G Heath
GH	0	2	Large scale map of small map GH/0/1 (only in Secretary of State box as too big to copy)
GH	1	1	Further comments by Mr G Heath on alternative route
GR	1	1	Proof of Evidence - G Randall
HA	0	0	A303 Stonehenge Improvement - Engineering Plan and Profile Drawings (originally numbered CD/HA/1)
HA	0	1	Opening Statement
HA	0	2	Explanatory Statement - Published Scheme Amendments
HA	0	3	Questions of clarification - 17 February 2004
HA	0	4	Deposit Draft Alternation to the Wiltshire and Swindon Structure Plan, October 2003

HA	0	5	Questions of clarification - 19 February 2004
HA	0	6	Economic Assessment Report - February 2004 (Replaces and updates DD/86)
HA	0	7	Figure LAN 7.3 as amended 17 February 2004 (HA/5/3)
HA	0	8	A303 Stonehenge Improvement Longer Tunnels Scheme Assessment Report. Highways Agency, 2003 (originally numbered CD/CBA/5)
HA	0	9	Objectors' Alternative Routes - February 2004
HA	0	10	Published Scheme Amendment Ref.2 (HA/0/2) Amendment to Length of Stopping Up of A344 - Noise Implications
HA	0	11	Corrections to HA/13/8
HA	0	12	Deposit Documents - Draft Orders
HA	0	13	Corrections to the Published Orders
HA	0	14	Stonehenge Estate. Sketch Proposals for Access Tracks and Visitor and Staff Facilities within the Stonehenge Landscape. Plan S
HA	0	15	Letter of 4 October 2002 from Director General of National Trust to Secretary of State for Transport.
HA	0	16	Not used
HA	0	17	Extracts from The Earthen Long Barrow in Britain. Paul Ashbee
HA	0	18	Schedule Entry Copy - Linear Boundary within Normanton Gorse. National Monument number: 10492
HA	0	19	Response to Prehistoric Society
HA	0	20	Extracts from Stonehenge in its Landscape. Twentieth-century excavations. Rosamund M J Cleal, K E Walker, R Montague
HA	0	21	Prehistoric Land Divisions on Salisbury Plain - The work of Wessex Linear Ditches Project. Richard Bradley, Roy Entwistle, Frances Raymond - 1994
HA	0	22	Archaeological Mitigation Design (Draft). March 2004
HA	0	23	Boundary of the Stonehenge World Heritage Site
HA	0	24	Note: Consideration of Below Ground Monuments
HA	0	25	Supplementary Evidence: Answers to Assistant Inspector's Questions to Michael Parsons (Day 2 morning)
HA	0	26	Response to Legal Submission from the Stonehenge Alliance
HA	0	27	National Transport Model - Working Paper 3
HA	0	28	Appraisal Summary Table
HA	0	29	Map: Article 4 Direction. Stonehenge
HA	0	30	Table: Determination of value. Extract from Guidelines for Landscape and Visual Impact Assessment (Second Edition, 2002), page 144
HA	0	31	Response to NT/0/7
HA	0	32	Alternative routes location plan
HA	0	33	Correspondence between HA and ACT South Wiltshire regarding requests for information
HA	0	34	Corrections to ES, Cultural Heritage proof & Longer Tunnel Scheme
HA	0	35	Salisbury Transport Study - Exhibition Leaflet
HA	0	36	The Salisbury Transport Study - Response Form
HA	0	37	Salisbury Transport Study - Public Exhibition leaflet
HA	0	38	Proposed modification of the A303 Trunk Road Stonehenge Improvement (Stonehenge Byway) (Prohibition of Motor

			Vehicles) Order.
HA	0	39	Explorer OS 130 Map
HA	0	40	Salisbury & The Plain OS 184 Map
HA	0	41	Review of A360 Traffic Figures
HA	0	42	Proposed modifications to the draft orders
HA	0	43	Documentation in connection with withdrawal of objections by Roger Upfold and Sue Coles (CTC Hampshire Cycling)
HA	0	44	Proposed Offsite Ecological Mitigation and Enhancements
HA	0	45	Agreed statement between the HA and English Nature
HA	0	46	HA, Environment Agency and English Nature schedule of understanding and undertakings
HA	0	47	Press Advertisement for Alternative Routes 1-6
HA	0	48	Press Advertisement for Alternative Routes 7-9
HA	0	49	Review of Objections to, Representations on, and letters of Support for, the Published Scheme
HA	0	50	Changes to the Published draft Orders - DD5, 1, 2 and 3 of 5
HA	0	51	Draft Compulsory Purchase Order - areas of land to be acquired that are disputed by owners
HA	0	52	Draft Compulsory Purchase Order and draft Side Roads Order Rights of Way and Private Means of Access disputed
HA	0	53	Proposed Modified Draft Orders
HA	0	54	Area of land required to construct and operate the Published Scheme
HA	0	55	Highways Agency Closing Submissions
HA	1	1	Proof of Evidence - Chris Jones
HA	1	2	Summary of Proof of Evidence - Chris Jones
HA	1	3	Appendices to Proof of Evidence - Chris Jones
HA	2	1	Proof of Evidence - J A C Startin
HA	2	2	Summary of Proof of Evidence - J A C Startin
HA	2	3	Appendices to Proof of Evidence - J A C Startin
HA	3	1	Proof of Evidence - T W A Arnold
HA	3	2	Summary of Proof of Evidence - T W A Arnold
HA	3	3	Appendices to Proof of Evidence - T W A Arnold
HA	3	4	Appendices to Proof of Evidence - T W A Arnold
HA	4	1	Proof of Evidence - M N Ranft
HA	4	2	Summary of Proof of Evidence - M N Ranft
HA	4	3	Appendices to Proof of Evidence - M N Ranft
HA	5	1	Proof of Evidence - R K Fox
HA	5	2	Summary of Proof of Evidence - R K Fox
HA	5	3	Appendices to Proof of Evidence - R K Fox
HA	5	4	Appendices to Proof of Evidence - R K Fox
HA	6	1	Proof of Evidence - R Whiteman
HA	6	2	Summary of Proof of Evidence - R Whiteman
HA	6	3	Appendices to Proof of Evidence - R Whiteman
HA	6	4	Appendices to Proof of Evidence - R Whiteman
HA	7	1	Proof of Evidence - A J Lawson
HA	7	2	Summary of Proof of Evidence - A J Lawson
HA	7	3	Appendices to Proof of Evidence - A J Lawson
HA	7	4	Appendices to Proof of Evidence - A J Lawson
HA	8	1	Proof of Evidence - K J Harries
HA	8	2	Summary of Proof of Evidence - K J Harries
HA	8	3	Appendices to Proof of Evidence - K J Harries
HA	8	4	Appendices to Proof of Evidence - K J Harries

HA	9	1	Proof of Evidence - P J Taylor
HA	9	2	Summary of Proof of Evidence - P J Taylor
HA	9	3	Appendices to Proof of Evidence - P J Taylor
HA	9	4	Appendices to Proof of Evidence - P J Taylor
HA	10	1	Proof of Evidence - M J Wells
HA	10	2	Summary of Proof of Evidence - M J Wells
HA	10	3	Appendices to Proof of Evidence - M J Wells
HA	10	4	Appendices to Proof of Evidence - M J Wells
HA	11	1	Proof of Evidence - P Williams
HA	11	2	Summary of Proof of Evidence - P Williams
HA	11	3	Appendices to Proof of Evidence - P Williams
HA	11	4	Appendices to Proof of Evidence - P Williams
HA	12	1	Proof of Evidence - M Parsons
HA	12	2	Summary of Proof of Evidence - M Parsons
HA	13	1	Response evidence to Mr R Harvey (originally numbered HA/RH/1)
HA	13	2	Response evidence to East Amesbury Residents (originally numbered HA/EAR/1)
HA	13	3	Response evidence to East Amesbury Residents (originally numbered HA/EAR/2)
HA	13	4	Response evidence to East Amesbury Residents (originally numbered HA/EAR/3)
HA	13	5	Response evidence to British Druid Order (originally numbered HA/BDO/1)
HA	13	6	Response evidence to Druid Network (originally numbered HA/DN/1)
HA	13	7	Response evidence to Stapleford Parish Council (originally numbered HA/SPC/1)
HA	13	8	Response to National Trust (see also HA/0/11)
HA	13	9	Response proof of evidence to ICOMOS (UK)
HA	13	10	Response Proof of Evidence to Prehistoric Society
HA	13	11	Response Proof of Evidence for Council for British Archaeology
HA	13	12	Response to Wiltshire Archaeological and Natural History Society (Obj 108)
HA	13	13	Response Proof of Evidence to Avebury Society
HA	13	14	1 Response to Association of Council Taxpayers
HA	13	14	2 The 'Parker Route' (AR4) Assessment Report - Volume 1
HA	13	14	3 The 'Parker Route' (AR4) Assessment Report - Volume 2 (Figures)
HA	13	14	4 Minutes - Salisbury District Council
HA	13	15	Response to Wiltshire Friends of the Earth (Kate Freeman)
HA	13	15	A Letter dated 13 April 2004 from HA to Kate Freeman FOE
HA	13	16	Response to Stonehenge Alliance (Mr G McDonic)
HA	13	17	Response to Stonehenge Alliance (Dr K Fielden)
HA	13	18	Response to Stonehenge Alliance (Andrew Norfolk)
HA	13	19	Response to Stonehenge Alliance (G M Reeves)
HA	13	20	Response to Stonehenge Alliance (Mike Birkin)
HA	13	21	Response to Stonehenge Alliance (Stephen Joseph)
HA	13	22	Response to Stonehenge Alliance (Professor Goodwin)
HA	13	23	Response to Royal Astronomical Society
HA	13	24	Response to Salisbury Green Party (Mr H Soutar). Part 2: Response to Objections

HA	13	25		Response to Amesbury Society. Assessment of AR1
HA	13	25	A	Amended page 29 to HA/13/25
HA	13	26		Response to Mrs Robertson (AR9)
HA	13	27		Response to Dr C Gillham
HA	13	28		Response to Countess Road Residents' Group (Major G du Pré)
HA	13	29		Response to Dr & Mrs Moon (Traffic Noise Assessments)
HA	13	30		Response to Salisbury Green Party (Mr H Soutar). AR5 Assessment
HA	13	31		Response to AR8
HA	13	32		Response to Mr I Mitchell (Amesbury Action Group)
HA	13	33		Response to Mr Richard Wort (rep 23)
HA	13	34		Response to Supplementary Evidence from Dr Moon
HA	13	35		Response to Mr J Jackson SAWTAG
HA	13	36		Response to Mr P Lawrence
HA	13	36	A	Additional information on P Lawrence proof
HA	13	37		Response to R J Moore & Sons
HA	13	38		Response to Mr & Mrs R L Turner (Rep 6A) and J & M Turner & Son and Mrs M J Turner (Rep 6B)
HA	13	39		Response proof to Mr T Tilbury (obj 248)
HA	13	40		Response to Bill Riley (obj 145)
HA	13	41		Response to Dr Christopher Gillham (obj 1063) Twyford Down
HA	13	42		Response to Mr Aubrey
HA	13	42	1	Response letter from HA on Chainage
HA	13	43		Response to Salisbury District Council
HA	13	44		Response to Mrs Stephenson AR3
HA	13	45		Response to Professor Maddison
HA	13	46		Response to Mr Case Obj 1268
HA	13	47		Response to TechnoPagans Unlimited
HA	13	48		Supplementary Response to Stonehenge Alliance
HA	13	49		Supplementary Response to Mr & Mrs R L Turner and J & M Turner & Son and Mrs M J Turner
HA	13	50		Response to R J Moore & Sons
HA	13	51		Response to New Evidence - Stonehenge Alliance
HA	13	52		Supplementary Response to Wiltshire Archaeological and Natural History Society
HA	13	53		Response to new evidence - Stonehenge Alliance
HC	1	1		Proof of Evidence - Sue Coles
HC	1	2		Appendices to Proof of Evidence - Sue Coles
HC	1	3		Letter of 16 April 2004 withdrawing objection
HNC	1	1		Proof of Evidence - Mr H Colthurst
ICOM	0	1		Rebuttal proof to DCMS written submission
ICOM	0	2		Opening Statement
ICOM	0	3		Examples of landscape World Heritage Sites
ICOM	0	4		Extract from Bath Society v Sec of State for Environment
ICOM	0	5		Examples of use of the word Integrity in relation to cultural World Heritage Sites
ICOM	0	6		Closing Statement with amended foot notes
ICOM	0	7		Note on conversations between Francis Golding and Susan Denyer
ICOM	0	8		Clarification of comments made by Dr Fielden on the Stonehenge Management Plan
ICOM	0	9		European Landscape Convention



ICOM	1	1	Proof of Evidence - Susan Denyer
ICOM	1	2	Summary of Proof of Evidence - Susan Denyer
ICOM	1	3	Supplementary Proof of Evidence - Susan Denyer
ICOM	1	4	Response to HA/13/9 - Susan Denyer
IS	1	1	Proof of Evidence - I F Sandell
IS	1	2	Objection to National Trust alternative proposal NT/0/07
IS	1	3	Withdrawal of objection
IS	1	4	The Heath Plan objection
IW	0	1	Petition from Winterbourne Stoke in support of the Highways Agency's published scheme
IW	0	2	Petition from children of Winterbourne Stoke in support of the Highways Agency's published scheme
IW	1	1	Proof of Evidence - Cllr Ian West
IW	1	2	Supplementary evidence
JBM	1	1	The Stonehenge Road - Mr J Berkley-Matthews
JM	0	1	Closing Statement - Dr J Moon
JM	1	1	Proof of Evidence - Dr & Mrs J Moon
JM	1	2	Proof of Evidence - Dr & Mrs J Moon
JM	1	3	Supplementary Proof of Evidence - Dr J Moon
JM	1	4	Abandonment of junction at Longbarrow - Dr J Moon
JM	1	5	Objection to Traffic Noise Assessments - Summary
JR	0	1	Letter of 16 April 2004 from Environment Agency about groundwater levels
JR	0	2	Letter of 19 April 2004 from Environment Agency further letter on ground water
JR	0	3	Letter of 22 April 2004 from Mrs Robertson to EA
JR	0	4	Closing statement - Mrs J Robertson
JR	0	4	A Additional map to Closing Statement
JR	0	5	Not used
JR	0	6	Not used
JR	0	7	Letter of 6 May 2004 from Environment Agency to Mrs Robertson
JR	1	1	Proof of Evidence - Mrs J Robertson
JR	1	2	Supplementary Proof of Evidence - Mrs J Robertson
JR	1	3	Appendices to JR/1/2 - Mrs J Robertson
JR	1	4	Supplementary Proof of Evidence - Mrs J Robertson
JS	0	1	Save Stonehenge leaflet with map
JS	0	2	HA Trunk Road Improvement Scheme leaflet with map
JS	0	3	Stonehenge World Heritage Site Management Plan Summary
JS	0	4	A303 Amesbury to Berwick Down Planning Conference-Chairman's Report
JS	0	5	Newsletter Wiltshire Archaeological & Natural History Society February 2001
JS	0	6	Extract from The New Observer Liverpool Astronomy Society
JS	0	7	Extract from Bronze Age Pottery
JS	0	8	World Heritage Site Management Plan Consultation Draft Sept 99
JS	0	9	A303 Amesbury Berwick Down Planning Conference - information for delegates
JS	0	10	Map on the ACT Stonehenge A303 Realignment Plan
JS	0	11	Copy of projector slides
JS	0	12	View of Stonehenge Fig 79
JS	0	13	Extract from Antiquity, A Quarterly Review of Archaeology vol

			III 1929
JS	0	14	Stones, pits and Stonehenge - M W Pitts 1981
JS	1	1	Proof of evidence of Mr J S S Stewart
JS	1	2	Summary proof of evidence Mr J S S Stewart
KG	1	1	Proof of Evidence - Mr K Garland
MA	1	1	Proof of Evidence - Mr & Mrs M Aubrey
MA	1	2	Appendices to Proof of Evidence - Mr & Mrs M Aubrey
MA	1	3	Amendment to MA/1/1 - Height of Fences
MA	1	4	Supplementary Evidence regarding the depth of road cutting etc
MA	1	4	A Additions to MA/1/4
MA	1	5	Introduction presentation
MA	1	6	Response proof to HA
MCB	1	1	Written submission - Mark Cuthbert-Brown
MR	1	1	Objection to alternative routes M Rowland & Co
NT	0	1	Letter of 23 August 2002 from National Trust to Highways Agency: A303 Stonehenge Tunnel Options Report - July 2002 Early Draft
NT	0	2	CRTN predictions of noise levels at 1000 metres from a road carrying 10000 vehicles per 18 hour day
NT	0	3	Note of document references to be included in proof of Douglas Sharps (NT/2/1)
NT	0	4	Note of document references to be included in proof of Dr Gill Hey (NT/3/1)
NT	0	5	Note: National Trust's response to the Highways Agency on the draft Environmental Statement
NT	0	6	Note: National Trust's attempted acquisition of Park Farm
NT	0	7	Note on modifications to the draft Statutory Orders that would be required should the additional works indicated by the National Trust's evidence be carried out
NT	0	8	Opening Statement
NT	0	9	Minutes of Meeting of The Council of the National Trust - Thursday 18 March 2004
NT	0	10	Closing Statement
NT	0	11	Further note on Restrictive Covenants
NT	1	1	Proof of Evidence - Judith Teasdale
NT	1	2	Summary of Proof of Evidence - Judith Teasdale
NT	1	3	Appendices to Proof of Evidence - Judith Teasdale
NT	1	4	Appendices to Proof of Evidence - Judith Teasdale
NT	2	1	Proof of Evidence - Doug Sharps
NT	2	2	Summary of Proof of Evidence - Doug Sharps
NT	3	1	Proof of Evidence - Gill Hey
NT	3	2	Summary of Proof of Evidence - Gill Hey
NT	3	3	Revised Figure 3 (NT/3/1)
PC	1	1	Oral Representation - Mr P Corp
PL	0	1	Map with proposed alternative put forward by Mr P Lawrance
PL	1	1	Original objection with outline statement - Mr P Lawrence
PL	1	2	Proof of Evidence
PL	1	2	A Amendment to proof document
PL	1	3	Letter of 28 April 2004 on further points
PM	1	1	Proof of Evidence - Mr P Matthews
PS	0	1	Letter dated 14 February 2004 from World Archaeological Congress to Prehistoric Society

PS	0	2	Letter of 20 April 2004 about The Setting of non-visible scheduled monuments
PS	1	1	Proof of Evidence - Dr M Parker-Pearson (includes summary PS/1/2)
PS	1	3	Supplementary Proof of Evidence - Dr M Parker-Pearson
PS	2	1	Proof of Evidence (includes Summary PS/2/2) - Dr C Chippindale
PS	2	3	Supplementary Proof of Evidence - Dr C
PS	2	4	Supplementary Proof of Evidence - Dr C Chippindale
PS	2	5	Supplementary note Dr C Chippindale and others
PS	3	1	Proof of Evidence - Dr A Whittle
PS	3	2	Supplementary Proof of Evidence - Dr A Whittle
RH	1	1	Proof of Evidence - Richard Harvey
RU	1	1	Proof of Evidence - Roger Upfold
RU	1	2	Appendices to Proof of Evidence - Roger Upfold
RU	1	3	Supplementary proof of evidence withdrawing objection
RW	0	1	Classic Work on astronomy - Book review
RW	0	2	Map of Composite Visibility Analysis
RW	0	3	Introductory remarks - Mr R Wort
RW	0	4	Copy letter of Ken Thornber - Hampshire CC dated 22 April 2004 to Mr R Wort
RW	0	5	Neolithic & Early Bronze Age Sky-watchers and the Precession of the Equinox - Journal of British Astronomical Association 2004
RW	1	1	Proof of Evidence - Mr R Wort
RW	1	2	Supplementary proof of Mr Wort
RW	1	3	Supplementary proof of Mr Wort
RW	1	4	Supplementary proof of Mr Wort
RW	1	5	Letter dated 28 April 2004 on Hierarchical Organisations
RW	1	6	Letter of 28 April 2004 dealing with points on Prof D Hughes article 'Neolithic and Early Bronze Age Sky-watchers and the Precession'
RYW	0	1	Map of A36 Salisbury bypass
RYW	0	2	Minutes of meeting of Codford Parish Council 27 September 1999
RYW	1	1	Objection to Parker Plan AR4
SA	0	1	Extracts from Managing Our Roads
SA	0	2	Errata Sheet (SA/5/1 and SA/6/1)
SA	0	3	Rebuttal of DCMS Written Submission - Kate Fielden
SA	0	4	Legal Submission
SA	0	4	A World heritage status point made - Planning Law, 11 March 1994, 1059
SA	0	4	B High Court Judgment - Coal Contractors Ltd v Secretary of State for Environment & Northumberland County Council
SA	0	5	Progress report on Stonehenge, Avebury and associated sites World Heritage Site, 31 January 2003
SA	0	6	Extract from Roads for Prosperity. Department of Transport, 1989.
SA	0	7	Letter dated 8 December 2003 from ICOMOS to UNESCO
SA	0	8	Terms of reference for the Stonehenge World Heritage Site Management Plan Advisory Forum. English Heritage, December 2000.
SA	0	9	Stonehenge. The Master Plan, September 1998

SA	0	10	Extracts from What Role for Trunk Roads in England? Volume I. DETR, 1997
SA	0	11	Opening Statement Stonehenge Alliance
SA	0	12	World Heritage Convention Cultural Properties: UK Nomination Hadrian's Wall Military Zone
SA	0	13	Closing Statement Part 1
SA	0	14	Closing Statement Part 2
SA	1	1	Proof of Evidence - George McDonic
SA	1	2	Summary of Proof of Evidence - George McDonic
SA	1	3	Letter dated 28 April 2004 about response from HA on Site Plan 4A of the Side Roads Order
SA	1	4	Letter dated 5 May 2004 from Mr G McDonic on further matters
SA	1	5	Letter dated 10 May 2004 about HA response HA/13/53 from George McDonic with response from HA dated 11 May 2004
SA	2	1	Proof of Evidence - Dr K Fielden
SA	2	2	Summary of Proof of Evidence - Dr K Fielden
SA	2	3	Appendices to Proof of Evidence - Dr K Fielden (Document originally numbered SA/2/3 to SA/2/17)
SA	2	18	Response to DCMS' Supplementary Written Submission (DCMS/1/5) (Originally numbered SA/2/4)
SA	2	19	Stonehenge World Heritage Site Management Plan. Pre-consultation Draft, July 1999 (Originally numbered SA/2/5)
SA	2	20	Response to HA concerning legal and other matters - Kate Fielden
SA	3	1	Proof of Evidence - Andy Norfolk
SA	3	2	Summary of Proof of Evidence - Andy Norfolk
SA	3	3	Further comments by Andy Norfolk
SA	4	1	Proof of Evidence - George Reeves
SA	4	2	Summary of Proof of Evidence - George Reeves
SA	4	3	Extract from Field Hydrogeology. R Brassington Geological Society of London Professional Handbook Series.
SA	4	4	Geoscientist, Volume 1, No 4, August/September 1991(extract)
SA	5	1	Proof of Evidence - Mike Birkin
SA	5	2	Summary of Proof of Evidence - Mike Birkin
SA	5	3	Appendices to Proof of Evidence - Mike Birkin - Review of the Role of the A303/A30 within the London to South West and South Wales Multi Modal Study
SA	5	4	DfT Response to the London to South West and Wales Multi Modal Study
SA	5	5	Preliminary Draft Appraisal Summary Table re A303 Stonehenge Improvement
SA	5	6	Accumulating Environmental Impacts - GOMMMS Supplement
SA	6	1	Proof of Evidence - Stephen Joseph
SA	6	2	Summary of Proof of Evidence - Stephen Joseph
SA	6	3	Appendices to Proof of Evidence - Stephen Joseph (Document originally numbered SA/6/3-SA/6/4)
SA	7	1	Proof of Evidence - Professor P Goodwin
SA	7	2	Supplementary Proof of Evidence - Professor P Goodwin
SA	7	3	The dark at the beginning of the tunnels - Professor P Goodwin
SA	8	1	Supplementary note: matters relating to Transport Policy

SA	8	2	Background by Denise Carlo Extract from DETR Report: What Role for trunk roads in England
SAWT	0	1	Local Waste planning for the future
SAWT	0	2	Transport Times and Telegraph booklet
SAWT	0	3	Newspaper article: Rail rises signalled 13 April 2004
SAWT	0	4	Summary statement re AR2
SAWT	0	5	Extract from Inspector's Report on Filton Airfield: use for commercial air traffic
SAWT	0	6	Devizes Community Area Plan
SAWT	0	7	National cycle network leaflet
SAWT	0	8	National cycle route map
SAWT	0	9	Tentative List of UK World Heritage Sites book: pages 58-61
SAWT	0	10	Letter from Val Lucas to Mr L Elias 2 February 2004
SAWT	0	11	Community & Civic Resources Committee - minutes of meeting 26 August 2003
SAWT	0	12	Stonehenge pamphlet World Heritage Site
SAWT	0	13	Kennet District Council Press Release (undated)
SAWT	0	14	Financial Times article 20 April 2004
SAWT	0	15	Letter from Programme Officer on Transcript 19 February 2004
SAWT	0	16	Closing Statement
SAWT	0	17	Letter to Tony McNulty with attachments 7 May 2004
SAWT	1	1	Proof of Evidence - Mr J Jackson
SAWT	1	2	Appendices to Proof of Evidence - Mr J Jackson
SAWT	1	3	Appendices to Proof of Evidence - Mr J Jackson
SAWT	2	1	Proof of Evidence - Mr L Elias
SAWT	2	2	Amended version of Mr L Elias Proof SAWT/2/1
SB	1	1	Proof of Evidence - Mr S J D Bush
SBV	0	1	Save Bourne Valley Leaflet
SBV	0	2	Save Bourne Valley website doc
SBV	0	3	Northern Area Committee Minutes Salisbury District Council 5 February 2004
SBV	0	4	Petition of Save Bourne Valley
SBV	0	5	Letter dated 20/4/04 from Allington Parish Council to Salisbury DC re AR4
SBV	0	6	Letter to HA from Allington Parish Council dated 10 February 2004 objection to AR4
SBV	1	1	Proof for Save Bourne Valley
SGP	0	1	Department of Transport press notice: Bypass for Winterbourne Stoke agreed at planning conference 27 September 1996
SGP	0	2	Closing Statement Salisbury Green Party
SGP	1	1	Proof of Evidence - Hamish Soutar
SGP	1	2	Summary of Proof of Evidence - Hamish Soutar
SGP	1	3	Appendix to Proof of Evidence - Hamish Soutar
SP	1	1	SAWTAG AR2 proposal - Proof of evidence of Mrs S Parrett
SPC	1	1	Proof of Evidence - Mrs A V Neal Stapleford Parish Council
SPC	1	2	Appendices to Proof of Evidence - Mrs A V Neal
SPC	1	3	Supplementary evidence - Mrs A V Neal
SPC	1	4	Written Submission about Alternative Routes 2 & 7 - Mrs A V Neal
TM	1	1	Proof of Evidence - Mr T Mayer

TRF	0	1	2 letters from Wiltshire CC dated 30 March 2000 and 25 January 2002
TRF	0	2	Decision Letter, Helen Slade dated 15 April 2004 re Amesbury Bridleway 11
TRF	0	3	Closing Statement
TRF	1	1	Proof of Evidence - Bill Riley (also representing Wiltshire Bridleways Association)
TRF	1	2	Appendices to Proof of Evidence - Bill Riley (also representing Wiltshire Bridleways Association)
TRF	1	3	Proof of Evidence - Bill Riley
WANS	0	1	Opening Statement on behalf of the Prehistoric Society, Council for British Archaeology and Wiltshire Archaeological and Natural History Society
WANS	0	2	Joint closing statement with The Prehistoric Society
WANS	0	3	Supplementary Information on special nature of Neolithic Long Barrow
WANS	1	1	Proof of Evidence - Dr Colin Shell
WANS	1	2	Summary of Proof of Evidence - Dr Colin Shell
WANS	1	3	Stonehenge World Heritage Site Airborne Lidar Survey
WCC	0	1	Closing Statement
WCC	1	1	Proof of Evidence - Tim Jones
WCC	1	2	Appendix to Proof of Evidence - Tim Jones
WCC	1	3	Appendix to Proof of Evidence - Tim Jones
WCC	1	4	Appendix to Proof of Evidence - Tim Jones
WCC	1	5	Appendix to Proof of Evidence - Tim Jones
WCC	1	6	Appendix to Proof of Evidence - Tim Jones
WCC	1	7	Appendix to Proof of Evidence - Tim Jones
WCC	1	8	Supplementary evidence
WCC	1	9	Written submission (Objection to AR1)
WCC	1	10	Written submission (Objection to AR2)
WCC	1	11	Written submission (Objection to AR3)
WCC	1	12	Proof of Evidence (Objection to AR4) - Tim Jones
WCC	1	13	Note: Wiltshire County Council - The Travel Report 2000
WCC	1	14	Proof of Evidence (Objection to AR5) - Tim Jones
WCC	1	15	Proof of Evidence (Objection to AR6) - Tim Jones
WCC	1	16	Supplementary Evidence
WCC	1	17	Minutes of Wiltshire County Council Cabinet Meeting held on Friday 26 March 2004
WCC	1	18	Supplement to counter objection to AR4 - Wylve Valley Relief Road
WCC	1	19	Letter on Amesbury Bridleway ROW Order
WSPC	1	1	Proof of Evidence - Mrs J Horne