

The A303 Expressway proposal: The Cultural Value of Stonehenge

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Introduction

1. I am Dr Suzanne Keene, Reader Emeritus at University College London. I worked in archaeology and in museums for 36 years, and thereafter in UCL as an academic. My particular recent research focus was on the cultural significance and social values of heritage materials. For the past 10 years I have worked on a voluntary basis for the CPRE, assessing and responding to planning applications. I am currently the Hon. Chair of the CPRE South Wiltshire Group.
2. I oppose the proposed construction of the tunnel for the A303 and the design and siting of the interchanges. Would the monument have such worldwide fame if it were close to a town or city? Why should it be accepted that a setting of gigantic engineered tunnel portals (even if partially covered in fake grassland “green bridges”) and motorway scale interchanges will make no difference to, or even enhance, the experience of the Stones? The proposal does not comply with local, national and international policy and legislation.
3.
 - The whole Stonehenge landscape has a cultural, visual and spiritual value for many people which would be destroyed by the enormity of the tunnel portals and the interchanges.
 - There is intense public interest, UK and worldwide, in the archaeology of the whole landscape, not just the monument.
 - Public opinion, as expressed in Highways England’s consultations and in the Relevant Representations, is overwhelmingly against the proposal.
 - The proposal is not legal. It does not comply with international, national and local legislation.
 - The benefits claimed by Highways England are few, misleading and are overwhelmed by very serious damage that would be created to landscape and archaeological evidence. Moreover, there is no analysis of the risks that the tunnel would create, some of which could be catastrophic.

The cultural and spiritual value of the Stonehenge landscape

4. The idea of Stonehenge set in Salisbury Plain is part of the national consciousness of being British¹. Many of those making Relevant Representations say that Stonehenge is part of the identity of Britishness to the wider world as well as to them personally, and many are proud that we are custodians of such an important and unique place, valued globally (1200, 35%, used the word “world”, often but not always as part of “World Heritage Site”). “Place, as distinct from space, provides a profound centre of human

existence to which people have deep emotional and psychological ties and is part of the complex processes through which individuals and groups define themselves.”²

5. The perceived importance of Stonehenge *in its remote setting* is not confined to the specifics of archaeology. Many Relevant Representations use terms denoting cultural or spiritual values³: cultural, 134; also sacred, 156; druids, 39; even ceremonial was used by 11 respondents⁴.
6. Places that are very ancient, very rare and visually striking generate a strong *sense of place*. That concept has been well researched⁵. In 2009 English Heritage (as it then was) commissioned research into sense of place that people attach to the historic built environment, and found many social benefits from identifying with place⁶.
7. Many artists have depicted Stonehenge set within its remote, brooding landscape, including Constable, Turner and William Turner of Oxford in paintings such as *Stonehenge at Sunset*, *Stonehenge at Daybreak* and *Stonehenge - Twilight*⁷. Many show a road or roads nearby (see Images 2-4 below). The Environmental Statement (ES) review *Influences on Artists* does not discuss these wider views⁸.
8. In 2007, analysis of a large sample of the tourist marketing literature for Stonehenge found that it was the landscape that the five terms most frequently used referred to, not solely the monument⁹:
 - Prehistoric cultural landscape, ceremonial and domestic
 - Iconic World Heritage Site
 - Natural landscape (chalk downs / flowers)
 - One of world’s greatest prehistoric monuments / Wonder of the ancient world
 - Druids and ancient beliefs
9. For example, “Stonehenge stands impressively as a prehistoric monument of unique importance, a World Heritage Site, surrounded by remains of ceremonial and domestic structures - some older than the monument itself. Many of these features - earthworks, burial mounds and other circular ‘henge’ monuments - are accessible by road or public footpath.”¹⁰.

Public interest in the archaeology of the Stonehenge landscape

10. The benefits claimed for the proposal focus on the experience of the monument itself. Yet there is intense public interest in the UK and internationally in the emerging archaeology of Stonehenge’s surrounding landscape¹¹. For example the report in March 2019 that pigs were brought from long distances to be eaten at feasts in the Durrington Walls henge (nearby, not even in Stonehenge) was reported in newspapers worldwide (342,000 Google search results for “pigs Stonehenge” including the National Geographic, the USA – for example CNN, MSN, USA Today, the Washington Post, the New York Times – and Australia as well as every English national and many local and regional papers).
11. There have been numerous television productions on Stonehenge and its surrounding landscape: at least seventeen recent examples from a BBC iPlayer search, 122 from the Internet Movie Database (IMDB) and several hundred, in many languages, in a YouTube search. Recent publicity has focused on evidence of how features in the wider landscape

were constructed for ritual and social purposes to focus on the monument: for example, the BBC's recently reshowed programme on the important Hidden Landscape research project, *What lies beneath* (see Image 1, below).

12. There is a high level of public awareness of the Stonehenge landscape, not solely the monument. The term "landscape" was used by 837 (35%) of the 2,370 Relevant Representations (Appendix 1, below), whether objecting to the plan or (a mere 29) supporting it. A plethora, literally hundreds, of aerial views, in television programmes, presentations (including those by Highways England) and informal videos on YouTube promote awareness of the whole landscape (below, Image 1).
13. The landscape features are well described in the Environmental Statement (ES) *Astronomy and Archaeoastronomy* review¹². This review deals with views of and from significant monuments, taking a wide perspective on the WHS, comparable to the way the landscape is perceived. It demonstrates that very many of the archaeological features in the WHS are designed and located to relate to each other. These relationships are likely to have been not only through sightlines but also for people physically visiting related monuments in prehistoric times, as they do now.

The opinions of the public

14. The Relevant Representations to the Inspectorate (2,370 in total) were analysed as described below in the Appendix. Only 29 (1.2%) Representations were in support of the proposal, 16 individuals and 13 organisations. Even those organisations supporting the proposal had many serious concerns about aspects of it.
15. *Concern* (-ed, -s, -ing) was expected to indicate concern about the effects on archaeology but in fact most major organisations making representations, some in support or guardedly neutral¹³, also expressed concerns about aspects of it and about the lack of necessary or statutory information. Many representations included negative terms: *damage* - 1311; *destr* (-oy, -uction) - 477; *irreparable* - 433. A number of representations expressed incredulity and even horror that such serious damage to the Stonehenge landscape could even be contemplated. Several fishing and rivers organisations oppose the scheme or are very doubtful because of probable damage to the chalk streams and rivers.
16. Positive reasons for objecting include, as well as the value of the archaeological evidence, *world* - 1200 (importance of the site as world heritage); that it is *unique* - 330; the *sacred* nature of the site - 156; that it is *precious* - 89; concerns for *culture* - 34.

Legal protections

21. International, national and local planning legislation and policy protects the public interest in the non-economic values of landscapes and the settings of monuments. How can the truly colossal destruction to the archaeology and damage to the settings from the proposed tunnel portals, slip roads and interchanges be permitted in the face of this?
22. The UK, in signing the European Landscape Convention and the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO 1972), accepted the

obligation to protect, conserve, present and transmit its World Heritage Sites for future generations. The Stonehenge WHS is the entire landscape, not just the monument:

“There is an exceptional survival of prehistoric monuments and sites within the [Stonehenge and Avebury] World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, **together with their settings**, they form landscapes without parallel.” (from UNESCO [Statement of Outstanding Universal Value](#))

17. The value of landscapes for beauty and nature is also recognised in UK legislation. The Environment Act 1995 set out the primary purpose of national parks as to: “Conserve and enhance natural beauty, wildlife and cultural heritage”, while the Countryside and Rights of Way Act (2000) places “a duty on ‘relevant authorities’ ... to have regard to the purpose of conserving and enhancing the natural beauty of the AONB.”. The National Planning Policy Framework (NPPF) defines the protection of heritage assets, including their settings¹⁴. The National Policy Statement - National Networks (NPSNN) unequivocally states under *Historic environment*, p.71, that legislation protecting heritage assets and their settings (such as the NPPF) must be observed in these projects. Under Decision making: “representations made by third parties should be taken into account and ... used to avoid or minimise conflict between their conservation and any aspect of the proposal” (para. 5.129). In para. 5.131, “the Secretary of State should give great weight to the asset’s conservation. The more important the asset, the greater the weight should be.” It is impossible to see how the proposal under examination can comply with this policy.
18. Locally to Stonehenge, Wiltshire Council’s Local Plan complies with the legislation in Policies 51, 58 and 59¹⁵. Core Policy (CP) 51, Landscape, states clearly that “Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact ...”. CP 58, Ensuring the conservation of the historic environment: “... Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:
 - i. Nationally significant archaeological remains
 - ii. World Heritage Sites within and adjacent to Wiltshire. ...”
23. CP 59 deals specifically with the Stonehenge and Avebury WHS. Para 6.147 protects the setting of the WHS beyond its boundary. The proposal to create massive tunnel portals and interchanges within the WHS boundary and immediately outside it does not comply with CP 59 nor with CPs 51 and 58.
19. Highways England can only claim that its proposal meets these legislative requirements, that the public benefit must outweigh harm, because it downgrades the value of the Stonehenge landscape and elevates any asserted benefit to the monument itself in its assessment tables. In the Contingency Valuation survey used in the initial consultation to claim that the total population placed a certain financial value on the proposal the interviewees were not shown any visual presentation of the appearances of the tunnel cuttings and portals within the WHS^{16, 17} (see Images 5 - 7 below).
20. A recent appeal decision demonstrates that the Inspectorate takes these policies seriously and agrees that a sense of place is a material consideration¹⁸: “... benefits have to be weighed against the harm to the landscape character of the area and the conflict with development plan policy that would arise. They also need to be considered against the very significant levels of harm to the setting of Mere Conservation Area and to Mere

Castle, both designated heritage assets and the latter a scheduled ancient monument, the highest order of heritage designation. The latter, conflicting with the policies of the Revised Framework, provides a clear reason for refusing the development proposed.”

Benefits, damage and mitigation

24. It is argued that the busy A303 road as it is now interferes with the appreciation of Stonehenge. Even were that true, it is not a reason to wreak more destruction on a colossal and unprecedented scale. Many Representations say that it is a public benefit to be able to view Stonehenge from the road. There have been roads past Stonehenge for centuries, as many artists have illustrated (see images below). The archaeological evidence that was beneath the present A303 cannot be restored.
21. The Stonehenge landscape is so rich in archaeological evidence that any disturbance will be destructive of it. The Planning Inspectorate required Highways England to take certain measures in assessing heritage assets, including setting out how value is determined in assessing known and potential buried archaeological resources as well as landscape character, and how setting influences value: “The ES assessment methodology should take this into account in establishing the value of assets and should not be limited by the approach set out in DMRB. In particular the Inspectorate considers that the value criteria presented in Table 6.5 of the Scoping Report should be amended to better reflect the value of assets such as the OUV¹⁹.” It is not clear that this has been done.
25. Mitigation of ill effects is mentioned many times in Highways England’s proposal yet it is not possible to mitigate destroyed archaeology, lost opportunities for future investigations and the sheer size and scale of tunnel portals and cuttings and interchanges. Hasty excavation during pre construction surveys is no way to systematically research this unparalleled landscape. Highways England’s own proposal documents admit: “Archaeological technology is rapidly developing and both non destructive surveys and sample excavations will be carried out ... [but] Archaeologists contributing to the consultations on this project argue that any disturbance of the ground within the WHS, and indeed large areas around it, will destroy evidence of the history and use of the monument”^{20, 21}.

Risks of catastrophe

26. The tunnel’s design life is only 120 years. Highways England has decided that the cost and measures for decommissioning are out of scope for their proposal²². Yet the tunnel is scarcely likely to last as long as Stonehenge. Would it last 500 years? Less? Longer? What engineering measures will be necessary to ensure the tunnel does not collapse, if it is no longer needed? What would happen to Stonehenge if it did collapsed? What if transport needs change so greatly that it becomes redundant?
27. There is the potential for a truly catastrophic event. There could be an explosion in the tunnel, possibly one large enough to cause its collapse. This could be unintentional but the possibility of an intentional attack on the tunnel cannot be ruled out, in pursuit of worldwide publicity.

28. The only risks that Highways England considers are economic ones. Already a totally avoidable mistake has been made that has damaged the Blick Mead site, before the main work has even begun.
29. It is unacceptable that risk analysis and consideration of necessary measures after the design life of the tunnel have been dismissed as out of scope.

Conclusion

30. “Stonehenge is more than a circle of stones. It is the central element in a wider area of ritual landscape peppered with prehistoric monuments. It was clearly a symbol of power and prestige when it was built, and this aura of power colours perceptions of it in the present. It is still capable of evoking awe in those who visit it. From its very beginning, it has been a place where authority has been expressed”²³.
31. The value of the monument to the public lies in the whole experience of the stones and the setting, as a large number of those making Relevant Representations say. The significance of Stonehenge rests on the monument *in its setting* in an extensive remote rural, largely uncultivated, landscape of other prehistoric monuments, a place where it is well known that people have for millennia gathered and met to celebrate life, death and the changing seasons.
32. For the UK to wreak permanent and serious damage on Stonehenge, recognised as one of the greatest sites of prehistory and ancient spiritual value in the world, would result in international horror and condemnation for the UK’s poor guardianship of a site of universal value. Stonehenge is of worldwide renown and this appalling damage would be viewed with incredulity.

¹ for example, a description of Arthur Mee’s Wiltshire: Cradle of our civilization: “This is English, this is ours.” This and other references are reviewed in Robinson 2007, *op.cit.*, Appendix C.

² Convery, I., Corsane, G. and Davis, P. 2012. *Making sense of place: multidisciplinary perspectives*. Boydell & Brewer, Inc., p. 1.

³ See below, Appendix 1

⁴ See below, Appendix 1

⁵ Reviewed in Robinson, Emma-J., 2007. *Making sense of place identity: characterisation approaches*. PhD thesis, University of London. Appendix C. Also Beidler, K. and Morrison, J. 2016. Sense of place: inquiry and application, *Journal of Urbanism* 9:3, Ch.1.

⁶ Bradley, D. et al. 2009. *Sense of place and social capital and the historic built environment: report of research for English Heritage*. Centre for Urban & Regional Development Studies, Newcastle University.

⁷ E.g. Lucas after Constable, *Stonehenge* (1855), Tate; Constable, *Stonehenge* (1835), V&A; Turner, *Stonehenge at sunset* (1811), The Athenium; William Turner of Oxford, *Stonehenge – Twilight*, Getty Museum. William Turner of Oxford, in particular, depicted views of Stonehenge within the landscape.

⁸ 6-3_ES-Appendix_6.1_HIA_Annex 7_InfluencesOnArtists.pdf

⁹ Robinson 2007, *op. cit.*, p. 131.

¹⁰ Visit Wiltshire 2019. www.visitwiltshire.co.uk, 15-04-2019.

¹¹ 6-3 ES Appendix 4.1 Scoping Opinion Response)

¹² 6-3_ES-Appendix_6.1_HIA_Annex 5_AstronomyArchaeoastronomy.pdf

¹³ Including Wiltshire Council, the Environment Agency, the NFU, Wiltshire Fisheries Association, Salmon & Trout Conservation, Stonehenge & Avebury WHS, The National Trust, ICOMOS, Royal Mail (opposing), Soc. Of Antiquaries of London, Freeths LLP on behalf of English Heritage, Esso Petroleum Co.Ltd..

¹⁴ Ministry of Housing, Communities & Local Government 2019. *National Planning Policy Framework*, Paras 172, 173 and note 55; Paras 189-192; 193-199.

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- ¹⁵ *Wiltshire Council Adopted Core Strategy*, 2015. <http://www.wiltshire.gov.uk/wiltshirecorestrategy.htm>.
- ¹⁶ A303 Stonehenge Amesbury to Berwick Down, Valuing Heritage Impacts. HE551506-AA-GEN-SWI-RP-JX000025. 06/02/2017. Also Appendices.
- ¹⁷ HE551506-AA-GEN-SWI-RP-JX-000026. Valuing heritage impacts: Appendices.
- ¹⁸ Appeal Decision APP/Y3940/W/17/3182598, Land at Castle Street, Mere, Wiltshire BA12 6JS.
- ¹⁹ ES 6-3_ES-Appendix_4.1_ScopingOpinionResponse.pdf p. 24, Table row 8.
- ²⁰ Prof. M. Parker Pearson Relevant Representation on behalf of Consortium of 22 Stonehenge experts
- ²¹ Highways England, Environmental Survey, Ch. 6, *Cultural heritage*, Appendix 6.10, Annexe 4, Historical investigations.
- ²² EIA Scoping Report, 2017, Para. 5.4.3
- ²³ English, P. 2002. Disputing Stonehenge: law and access to a national symbol. *Entertainment Law*, Vol 1, 2, pp 1-22.

Appendix: Analysis of Relevant Representations received by the Planning Inspectorate

A full analysis of the complete text of the Relevant Representations on the PINS website was outside the scope of this submission. The *filter by content* facility combined with selecting appropriate numbers of representations to list per page was adequate for an informal analysis.

Total representations = 2370

support was counted from reading the representations that from the search summary results appeared to be supporting the proposal.

Total supporting the proposal: 29 (individuals, 16; organisations, 13).

Individuals all supported on the grounds of traffic, not of benefit to Stonehenge. Organisations included County Councils, some parish councils, some business organisations, and English Heritage, Historic England and the National Trust. A number of other organisations raised serious concerns with aspects of the scheme.

Term used in Representations	No. of occurrences
<i>damage (-ed)</i>	1311
<i>world</i>	1200
<i>landscape</i>	837
(Landscape is a neutral term used by supporters of the scheme as well as objectors)	
<i>concern(-ed, -s)</i>	805
(including a number of supporters who expressed concern about aspects of the scheme)	
<i>destr (-oy, -uction)</i>	477
<i>object (-tion)</i>	450
<i>irreparable</i>	433
<i>unique</i>	330
<i>sacred</i>	156
<i>cultural</i>	134
<i>precious</i>	89
<i>desecrate</i>	50
<i>druid</i>	39
<i>pollution</i>	151
<i>emissions</i>	38

17 individuals opposed the scheme even though they regularly drove past Stonehenge but considered the damage from the proposed improvements was not justified nor necessary.

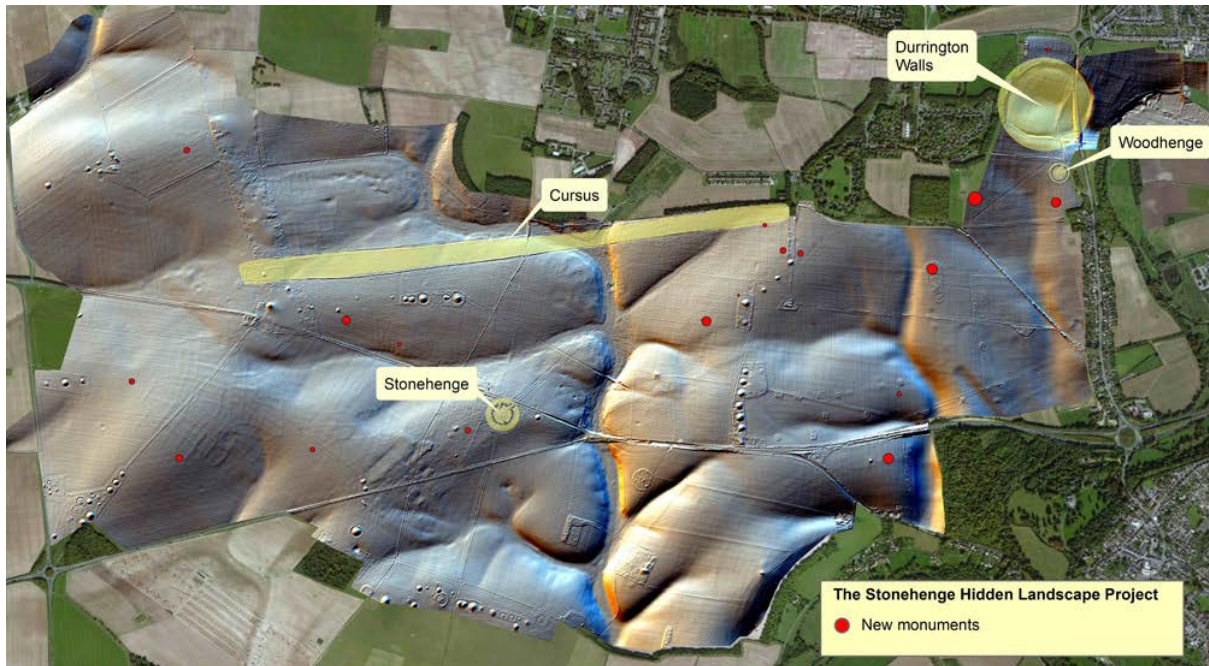


Image 1. Graphic from the Stonehenge Hidden Landscape Project that illustrates the importance of the surrounding landscape to the monument.



Image 2. Stonehenge within its remote landscape setting. Joseph Mallord William Turner, Stonehenge at Daybreak c.1811–12



Image 3. Stonehenge in the landscape with roads. John Constable, David Lucas. Stonehenge. published 1855. Tate Gallery.



Image 4. Stonehenge in a landscape of barrows and tracks. *Stonehenge - Twilight* by William Turner of Oxford. Getty Museum.



Image 5. Highways England Contingency Valuation survey graphic: map, A303 at present



Image 6. Highways England Contingency Valuation survey graphic: map, A303 with the tunnel



Image 7. Graphics shown to respondents during the contingency valuation survey.



Image 8. *Not shown to Contingent Valuation survey interviewees*: Tunnel portal graphic from consultation booklet, A303 Stonehenge – Amesbury to Berwick Down. Public consultation booklet, February 2018.