

# Amesbury to Berwick Down Improvements Planning Act 2008 – Section 89

## Written Representation

### 1. Introduction

1.1 The Council for British Archaeology (CBA) Wessex is a regional group of the Council for British Archaeology (CBA) which includes the Stonehenge and Avebury World Heritage Site within its area of responsibility. Although we work closely with the national body of the Council for British Archaeology, we are a separately registered charity (No 291902). CBA Wessex has been involved in discussions about proposals for the Stonehenge visitor centre and the A303 for many years and was one of the parties invited to produce the Management Plan for the Stonehenge and Avebury World Heritage Site (WHS).

1.2 This written submission sets out the views of CBA Wessex on the proposals for upgrading that stretch of the A303 that crosses the Stonehenge World Heritage Site (WHS) and sets out our OBJECTIONS to the proposals.

You will have also received a Written Representation from the Council for British Archaeology which we fully support. Part of the text of the CBA submission has been repeated in this submission.

### 2. Source Documentation consulted for this Representation.

2.1 We have used the various documents issued by Highways England in both 2017 and 2018 as part of the public consultation exercise on the proposed scheme.

2.2 CBA Wessex, as a member of the Stonehenge World Heritage Site Advisory Forum, was involved in the preparation of the Management Plan for the Stonehenge and Avebury World Heritage Site and we have referred to both the most recent edition of the Management Plan (dated 2015) and also the earlier editions (dated 2000 and 2009).

2.3 CBA Wessex was represented on the Stonehenge and Avebury Revised Research Framework Project Board and has made use of the Research Framework issued by the Board in 2016.

2.4 A key source of archaeological information has been The Stonehenge Environs Project produced by Julian Richards on behalf of English Heritage. More recent information on the Stonehenge landscape has been uncovered by the Hidden Landscape Project which identified a number of previously unknown site within the WHS and also the results of the first complete airborne laser scanning (LIDAR) survey of the WHS which, in particular, demonstrated the complexity of the Bronze Age field systems and linear boundaries just south of the Longbarrow roundabout.

2.5 CBA Wessex participated in “The Great Debate” in 1994 and the subsequent Planning Conference in 1995 which advocated a “long bored tunnel” as the solution to the problem of the A303 as it crosses the Stonehenge landscape. Many of the points made by delegates to this “Debate” are still relevant today. We have also reviewed the documentation issued as part of numerous road schemes issued since the 1995 Planning conference and especially the submission submitted by the CBA as part of the 2004 Public Enquiry.

2.6 A number of key documents were not made available prior to the deadline for Written Representations, including the Draft Detailed Archaeological Management Strategy and the results of hydrology tests at the Blick Mead site. In addition a number of other documents including details of the archaeological fieldwork were only submitted as part of the Deadline 1 documentation. As a result, we have not yet fully considered the archaeological implications of the scheme for the Outstanding Universal Value of the World Heritage Site, and how this relates to setting issues and alternative options.

### **3. Key Issues and policy tests**

3.1 The national body of the CBA, in conjunction with CBA Wessex, drew up a set of Cardinal Principles against which any proposed construction within the World Heritage Site should be judged. These include :-

- Minimum damage to known or potential archaeological remains.
- Minimum visual intrusion on monuments and landscapes
- Maximum tranquility
- To protect and conserve Stonehenge itself and its landscape of inter-related documents.
- To manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now being increasingly clearly understood.
- To further public understanding of that increased significance.

3.2 Four major sources of harm to the WHS Outstanding Universal Value (OUV) arise:

- Physical loss of archaeological sites features and antiquities
- Degradation of the setting of monuments and sites contributing to the OUV of the WHS.
- Harm to the landscape of the WHS.
- Undue focus on the ‘star attraction’ of Stonehenge itself at the expense of the wider WHS

3.3 It is worth repeating the statement made by Dr Geoffrey Wainright at the 1994 “Great Debate” when he was the Chief Archaeologist of English Heritage :-

*It is important when considering appropriate management solutions for this multi-phase landscape that attention is not focused solely on the monuments themselves but on the landscape as a totality and the understanding of the use of space within the landscape at different times.*

3.4 Both the CBA and CBA Wessex have significant concerns that the ES coverage of Cultural Heritage effects does NOT adequately reflect the relevant policy framework of the National Policy Statement for National Networks (2014) and the WHS Management Plan (2015) which is the UKs commitment to its international obligations under the UNESCO World Heritage Convention.

3.5 This has resulted in flaws in the approach to assessment; insufficient attention to limitations and uncertainties; underestimating the significance of adverse effects tending

to belittle harm to the OUV of the Stonehenge WHS and exaggerate benefits of the Scheme.

#### **4. The Impact of the Proposed Scheme**

4.1 We recognize that the latest Scheme represents a significant improvement on anything seen previously but feel that we are still unable to support the proposals as they would cause considerable damage to the surviving archaeological remains within the WHS and also have a negative impact on the setting of key monuments in the landscape. Many of the objectors to the Scheme have proposed that the tunnel should be extended so that both ends are outside the WHS, but this ignores the fact that the WHS boundaries are quite arbitrary and there is a significant amount of archaeology outside the boundaries.

4.2 It is clear that within the WHS, both in the east and the west tunnel approaches, there are significant archaeological remains that would be destroyed by the Scheme. It is worth quoting the comment made by ICOMOS to the previous 2017 proposals :-

*“The 2.9km tunnel options presented in the public consultation would cause adverse impact on the OUV of the property from their approach roads and associated portals. Both portals would have visual impact, but the extent of new roads beyond, within the property, is of greater concern. The potential impact of some 2.2km of four lane approach roads in cuttings on the Stonehenge landscape could fundamentally compromise the OUV of the property.”*

Although the latest scheme proposes a slightly longer tunnel and therefore a shorter length of approach roads, the above comment still stands.

4.3 Only a handful of monuments close to the current A303 would benefit from the Scheme, though we accept that this would include Stonehenge itself.

4.4 The Environmental Statement does not give enough weight to the loss of setting of monuments in the landscape and the harm to the Outstanding Universal Value (OUV) of the landscape as too much emphasis is placed on Stonehenge itself at the expense of the entire WHS landscape.

4.5 Until the results of hydrology tests at Blick Mead are available it is impossible to assume that this scheme will not cause permanent damage to this important site.

4.6 CBA Wessex’s OBJECTION to the Scheme (as it was at the time of the 2004 Enquiry) is that it will cause permanent harm to the OUV or the WHS without delivering the full benefits of removing the A303 altogether.

#### **5. Alternatives**

5.1 The justification for the proposed scheme over other options is not sound, including its unique, highly selective and logically flawed reliance on a controversial heritage monetisation study.

5.2 The reconsideration of alternatives needs to re-examine the need to upgrade the A303 while also reducing and if possible, removing its damaging intrusion to the WHS while avoiding any additional physical loss of OUV, also avoiding other nationally or internationally protected landscapes or harm to designated heritage and habitats.

5.3 CBA Wessex maintains its position that a **long-bored tunnel** is the solution that potentially best removes the A303 from the WHS (and its setting) without causing harm to its OUV and avoiding some extra impacts of a new surface route. However we do recognize that this comes at a far greater cost both monetarily and in terms of carbon emissions and spoil disposal.

5.4 In response to previous public enquiries, CBA Wessex supported the concept of a surface route to the south, similar to option F010, which would have been cheaper than any of the various tunnel proposals. We recognize that this would have involved crossing areas of unknown archaeological significance and there would be problems in crossing the Till and Avon valleys but we were disappointed that no further work was done with this option.