



National
Trust

**Written Representation
Summary**

TR010025

Amesbury to Berwick Down (Stonehenge)



May 2019

Part A: Context

This document summarises the Written Representation of the National Trust for Places of Historic Interest or Natural Beauty (“the National Trust”). The Trust’s primary purpose is to promote the preservation of special places for the benefit of the nation, and it has the unique ability to declare its land ‘inalienable’. The Trust owns over 800 ha of the Stonehenge part of the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS). Currently, the A303 road cuts through the WHS, having a major adverse impact on its Outstanding Universal Value (OUV). We consider that the road scheme if designed and delivered well has the potential to provide an overall benefit to the WHS, as well as improving habitat connectivity and public access.

Part B: Response to proposed scheme

Issues and concerns raised in the Written Representation include:

- **Agriculture.**
Concerns in relation to the use of the Public Rights of Way network have not been resolved. Clarification is sought on the decommissioning of the old A303; new fencing; and agricultural access.
- **Air quality, dust and other emissions.**
Further mitigation should be considered and dust control during the Countess flyover construction should be clarified.
- **Biodiversity, biological environment and ecology.**
Several issues are raised including in relation to species-rich chalk grassland, land remediation, management and responsibilities, treatment of phosphatic chalk, and protection of veteran trees and bats.
- **Compulsory Acquisition.**
Negotiation is underway with Highways England with a view to the Trust being able to clarify its position in due course.
- **Flood risk, groundwater protection, geology and land contamination.**
The WHS could have a ‘very high’ sensitivity in respect of geology and soils.
- **Health and wellbeing.**
We have concerns over construction impacts on the occupants of Countess Farm and seek clarification on mitigation.
- **Heritage and historic environment.**
The Trust’s representations draw upon assessments of the impacts on OUV of various iterations of the developing road scheme. The scheme as presented has the potential to be acceptable, however if certain elements are designed or constructed inappropriately it could have a significant adverse impact on the OUV of the WHS. We require a robust mechanism to be able to participate in detailed design. The key control documents do not presently have sufficient detail or protections. We seek an appropriate balance between protection of the tunnel structure and ability to undertake archaeological excavation and adequately protect the OUV of the WHS.

- **Landscape and visual effects and design.**
Many of our heritage comments also apply. Further information and mitigation is sought regarding impacts at Countess Farm.
- **Noise and vibration.**
We are concerned that the impact of vibration at Stonehenge Cottages during construction may have been underestimated.
- **Sustainable transport.**
The overall Rights of Way strategy needs further consideration.
- **Draft Development Consent Order.**
Concerns are raised over a lack of detail in the control documents and the approval mechanisms going forwards. The powers of temporary possession and use of land for maintenance are too wide and changes are sought. Changes or specific provisions are sought in relation to Requirements and Protective Provisions.

Part C: Conclusions

The National Trust advocates a solution for the A303 that would remove a large part of the existing A303 from the WHS, reuniting the landscape, whilst protecting the integrity of this special place. At present, we have a range of issues and concerns that we consider require further consideration. We seek further provisions to be made within the DCO and in relation to working relationships going forwards.