

A303 Amesbury to Berwick Down Project, Development Consent Order Application - Scheme Reference TR010025

Written Representation Personal observations with special reference to Principal Issues 10, 12 and 13

By Kate Freeman MSc - Reference 20018942

Personal details

I have lived for 40 years in and around the Pewsey Vale, located midway between the two principal sites of Avebury and Stonehenge that make up the World Heritage Site. I have had a longstanding interest in sustainable transport and gained a MSc in Transport Policy and Planning from Oxford Brookes in 2004 following many years working as transport campaigner for Wiltshire Friends of the Earth Network on rural transport policy, principally from 1994 to 1999. This work led directly to a suite of national rural transport funds in 1998 and subsequent establishment of an award-winning innovative bus scheme known as the Wiltshire Wigglybus, one of the country's earliest examples of a demand responsive bus scheme. The purpose of the scheme was to address poor accessibility in the Pewsey Vale villages that offered a realistic alternative to the motorcar for those living in dispersed areas. The scheme was rolled out across the county and is currently operated by Wiltshire Council as a family of rural buses now known as Connect to Wiltshire. My experience in community involvement in transport planning for areas of sparse demand was deployed professionally elsewhere in the country until my retirement.

I was first involved in Stonehenge developments about 26 years ago and participated in the Great Stonehenge Debate in 1994, various planning conferences and public enquiries. I have represented local and regional FOE interests since the formation of the Stonehenge Alliance in 2002. I am responsible for social media for the Stonehenge Alliance and their communications with supporters of the Stonehenge Alliance on a voluntary basis.

I have also participated in World Heritage Watch seminars in Krakow and Paris. My involvement with the A303 road scheme and visitor centre proposals over the last 25 years has given me a unique and privileged insight into the extraordinary heritage and spiritual value of Stonehenge WHS to professionals and amateurs. My written representation has been informed by that close involvement.

1. Introduction

The purpose of this representation is to explain why, as a Wiltshire resident, regular visitor to Stonehenge WHS and my experience as a user of the A303 past Stonehenge throughout the year, I believe that the Stonehenge Expressway cannot fulfil its objectives for the A303 Amesbury to Berwick Down project, hereafter

referred to as the **Stonehenge Expressway**.¹ My particular concern is the scheme's claim "to help conserve and enhance the World Heritage Site and to make it easier to reach and explore".

It has been accepted by proposers and scheme supporters that the tunnel, portals, bridges, flyover and new roadway in a deep cutting will permanently damage this special and sensitive landscape. The question posed here: *Will the Stonehenge Expressway scheme enhance the experience of visiting Stonehenge WHS, will the quality of access (both within and to the site) be improved, and finally, is it worth it?*

2. The scale of the problem: a layman's perspective

The bottleneck on the A303 past Stonehenge is the driving force behind the scheme. There is intermittent peak and seasonal congestion, but the congestion suffered on this stretch of road is not the worst in England. My concern is that the problem has been overstated and that the solution proposed by Highways England is elaborate and unnecessary to benefit the Stonehenge WHS. By Highways England's own analysis, it is but one of hundreds of bottlenecks across the country and that many are considerably far worse.

The reasons why Stonehenge is one of the most well-known traffic hot spots is first because of where it is: an ancient site that is so famous that most people can recognise it in a trice. The second reason that Stonehenge is well-known for its traffic jam is because Stonehenge is associated with the loss of precious peak holiday time sitting in a car if you do not enjoy viewing the Stones stuck in traffic. The notoriety of the 'Stonehenge traffic problem' has achieved a status of such magnitude that 'something must be done' and that the something must be a dual carriageway, has become today's received wisdom of politicians, archaeologists and a suite of armchair traffic engineers. The problem is where to put the widened road. This perception was politically exploited by Prime Minister David Cameron and Deputy Prime Minister Nick Clegg who separately chose to launch the UK government's £15bn road programme in December 2014 prior to the 2015 general election.²

To place the Stonehenge bottleneck in a national context: Highways England calculated the amount of additional time it would take to travel between every junction on England's strategic road network, compared it to the time it would have taken in "free-flowing traffic" and mapped the additional time to reach a destination. The map on page 6 of the Department for Transport's report (Figure 1) shows that

¹ Stated and restated throughout consultations and DCO documents

² <https://www.dailymail.co.uk/news/article-2856413/Cameron-Clegg-accused-faintly-ridiculous-political-stunt-doing-Obama-Stonehenge-photo-op.html>

the traffic jam at Stonehenge is a relatively minor player in England's congestion stakes.^{3,4}

Figure 5: Average additional time needed between junctions to achieve on time arrival on the Strategic Road Network in 2014

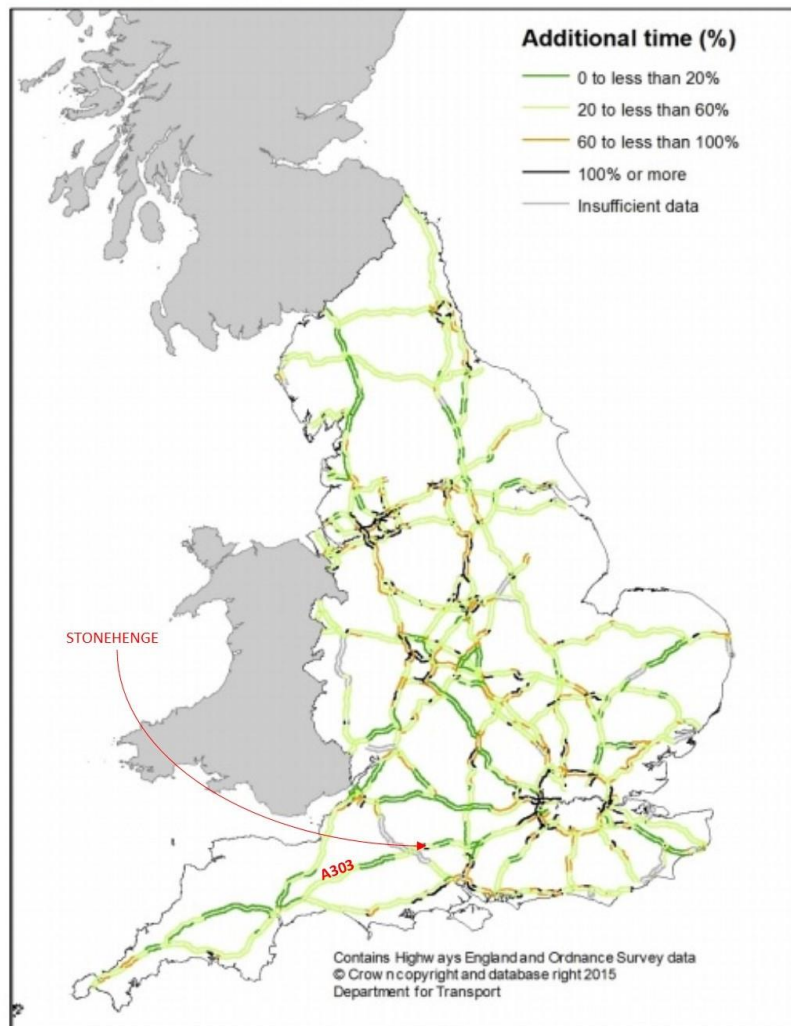


Figure 1 Map showing A303 by Stonehenge in context of average additional time needed between junctions – author's labels in red

The question is, how frequently does the problem occur? To better understand the traffic problem along the section of the A303 past Stonehenge, the following statement in Highways England's booklet 'Preliminary Local traffic Information needed to be quantified':⁵

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/449162/analysis-of-travel-times-on-srn.pdf

⁴ Report by Daniel Capurro with map, Daily Telegraph dated 12 September 2017 <https://www.telegraph.co.uk/news/2017/09/13/now-stonehenge-tunnel-has-green-light-britains-worst-traffic/>

⁵ Page 2, Highways England, February 2018 <https://highwaysengland.citizenspace.com/he/a303-stonehenge->

“substantial delays of up to an hour for traffic travelling along the A303 on Fridays, Saturdays and Sundays”.

A question was put to Highways England through a Freedom of Information question on 1st October 2018:

“Your booklet entitled “Preliminary Local Traffic Information” for the scheme A303 Stonehenge Amesbury to Berwick Down states the following:

“During the summer school holiday period there are substantial delays of up to an hour for traffic travelling along the A303 on Fridays, Saturdays and Sundays.”

What is the frequency of these occurrences in each of for the last 10 years ie from 2008 to 2018 where traffic was delayed between Countess Roundabout and Longbarrow Roundabout for the following durations:

5 minutes

6-15 minutes

16-30 minutes

31-45 minutes

46-60 minutes.”⁶

Instead of explaining the scale and frequency of the traffic problem, Highways England directed me to a list of technical data, especially chapter 3 of Application Document 7.5 Appendix A, which compared two 3-day surveys in October and August. Unlike congestion elsewhere in the country, the surveys simply confirmed summer peak congestion without answering my question above, one that should have been quantified during the public consultation to aid better understanding of the scope of the problem pivotal to this scheme.⁷

On behalf of the Stonehenge Alliance Dr Simon Temple analysed Highways England’s data in their written representation entitled ‘Transport Planning and Economics Issues, reference 2001870’ and concluded in paragraph 5.3.1 that significant delays occur *“mainly on a relatively small number of weekends annually.”*

3. Is an approximately 2.9km tunnel required to ‘conserve and enhance’ the Stonehenge WHS visitor experience?

National heritage bodies, English Heritage, Historic England and the National Trust support the scheme for its potential to “reunite the landscape” expressed on Historic England’s webpage ‘Stonehenge A303 Road Improvement Scheme’ thus:

[2018/supporting_documents/A303%20Stonehenge%20Preliminary%20Local%20Traffic%20Information.pdf](https://www.whatdotheyknow.com/request/duration_of_delays_on_a303_by_st#outgoing-822017)

⁶ https://www.whatdotheyknow.com/request/duration_of_delays_on_a303_by_st#outgoing-822017

⁷ 29 October 2018

https://www.whatdotheyknow.com/request/523123/response/1256573/attach/3/EIR%20766%20345%20Response.pdf?cookie_passthrough=1

“This is a once-in-a generation opportunity to reunite this ancient landscape, giving people the opportunity to tread pathways used by our ancestors who built the monuments, to visit and appreciate the monuments and see and hear wildlife without the intrusion of the traffic and noise from the road.”⁸

The point is made in a promotional video on the same page, comparing the noise from “thundering traffic” at present with “people exploring the landscape” and the sounds of “nature thriving” after removal of “over 3km of the current surface of A303”.^{9 10}

The question is whether the problem has been overstated and whether it is worth damaging one part of the WHS in favour of another part. With this question in mind I visited Stonehenge WHS accompanied by three others, two of whom had never visited Stonehenge before. I entered free of charge as a National Trust member, with my three guests: a concession entry and a young couple, which cost me £61.20.

We chose to visit on Easter Saturday (20 April 2019), arriving just after 11am and were directed to park in the overflow car park on the grass. The weather was sunny with a slight north easterly wind. The landscape beyond the car park was very fine but the sea of cars, coaches and tarmac dominated the scene on arrival.

The Visitor Centre (VC) was busy and the informative exhibition areas crowded, making viewing the displays awkward and the film and videos difficult to listen to.

The Neolithic houses were closed. Instead of taking the shuttle bus we took the ticket vendor’s suggestion and walked across the undulating landscape past the cursus and other monuments towards the Stone monument. The majority of visitors did not linger in the landscape but walked briskly following the wide mown path towards the Stones. The first sight of the Stones on the horizon was thrilling and people’s pace visibly quickened. It was not long before the fine view was replaced by a dominating expanse of tarmac bus turning circle, four coaches shuttling between the Site and the VC, the fenced off remnants of the old Visitor Centre (Old VC) in the distance, an assortment of cars parked along byway 12 and a couple of colourful umbrellas that belonged to strawberry vendors. As we neared the Stone Monument we could only glimpse Stonehenge between the modern infrastructure in the foreground and the crowd building up from the buses. (Figure 2)

We were ushered past the ticket warden along a wide sweeping tarmac pavement onto a path lined with fencing, glimpsing the Stones in the distance as the crowds meandered slowly past the Heel Stone towards the north east quadrant of the circular path around the Stone Monument, making photography very difficult. Only well past the heel stone could one become aware of a short length of the A303 and

⁸ <https://historicensland.org.uk/whats-new/statements/stonehenge-a303/#Section2Text> retrieved 3 May 2019

⁹ <https://www.youtube.com/watch?v=e8duLILwmyw&feature=youtu.be> retrieved 3 May 2018

¹⁰ <https://historicensland.org.uk/content/docs/a303-stonehenge-public-onsultation-response-200418-pdf/>

its traffic. The wind blew the sound towards us but it was not particularly intrusive and we could clearly hear bird song.



Figure 2 As we neared the Stone Monument we could only glimpse Stonehenge between the modern infrastructure in the foreground and the crowd building up from the buses. Photo credit: Author

We all enjoyed the walk towards the stones, but my young companions did not notice the A303 road and its traffic at all. They only became aware of it when I asked them to turn around and pointed it out to them. I asked what they thought of the road.

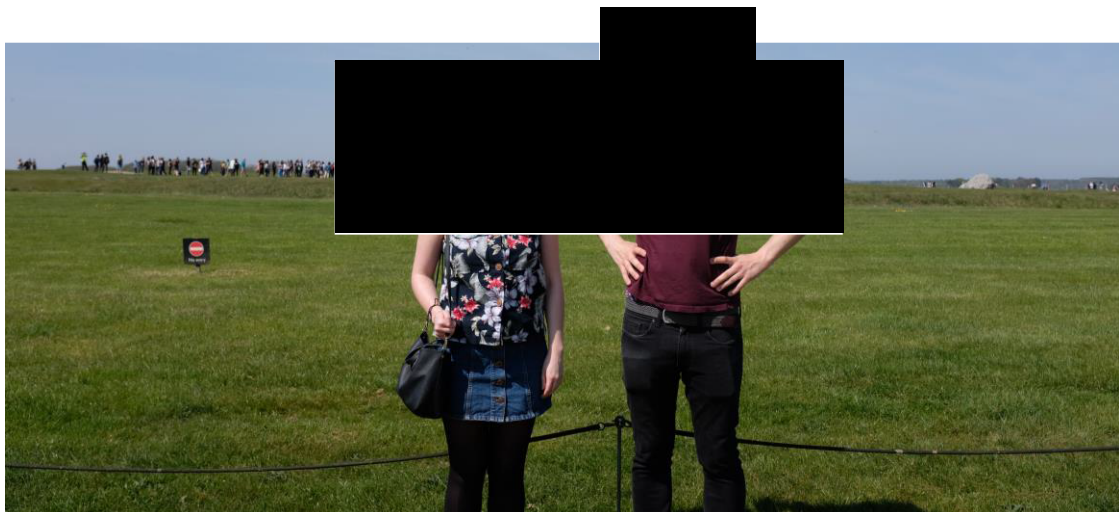


Figure 3 The couple were asked to turn around to look at the view behind them and encouraged to notice the traffic. Photo credit: Author



Figure 4 "It would be nice not to have the road in the view, but the cost is out of all proportion to the potential benefit to the Stone Monument's setting." Photo credit: Author

Yes, they thought it was invasive up to a point. They also thought it would be nice not to have the road in the view. Did they think it was worth spending £1.7bn by

burying the road out of sight of the Stone Monument? (Figures 3 and 4) No, they thought the cost was out of all proportion to any potential benefit to the setting. They then set off to enjoy the rest of their visit to the monument, distracted by the sight of a wandering young Great Bustard and reading the interpretation boards.

Walking along the wide path at its closest point to the Stones we became acutely aware of too many people. The noise from excited chattering visitors and children was unpleasant.

I asked the custodian on duty at that location whether visitors complained about the noise from the road. "All the time," she replied. I asked how many times they had complained that morning. "None." In fact, it emerged that complaints were "occasional", hardly any when the site was busy. When exploring the field to the north with the Mesolithic post holes I asked the same question of another custodian I met coming out of the Old VC. "Yes, there are complaints but they are very occasional," he said. I also asked the person who checked the tickets at the site's entrance whether there were many complaints about the noise of traffic. Instead of answering the question he encouraged me to send a complaint via the feedback link printed at the bottom of my receipt. When he realized that I was not intending to make a complaint he eventually answered the question: there had not been any complaints that day, they were occasional.

Wandering north towards the Avenue the peace, tranquility and skylarks with an impressive view of the Stones were striking: something the crowds could not spoil. The fencing around the bunker however was a prominent blot as one neared the monument from the National Trust's field.



Figures 5 and 6 The fencing around the redundant Visitor Centre in the landscape around the Stonehenge field. Photo credit: Author

My guests were not asked what they felt about the gash in the landscape that the new Stonehenge Expressway would cause at the extremities of the landscape. This would have entailed a further 2-hour exploration of the WHS or a second visit. Back at the VC we bought lunch that generated a large amount of plastic packaging. By the time we were ready to return home at 3pm two queues had formed outside the VC that stretched beyond the newly planted copse into the field. By this time the cars were being parked in a newly acquired overflow car park in a neighbouring farmer's field.

Overall impression from a 4-hour visit to Stonehenge

The high turnover of visitors meant that visitors were part of a highly managed, mechanical operation. The most positive aspect of the 4-hour visit for my three guests was the walk across the landscape from the VC towards the Stone Monument. Twenty first century infrastructure had spoilt the initial view of Stonehenge, and too many people had spoilt the experience.

The most striking aspect of the visit was that visitors were so focused on what they had come to see that the traffic in the distance did not dominate or spoil the experience and our guests could not think that the high expenditure could be justified in order to improve their experience on this occasion.



Figures 7 and 8 Hard engineering, permanent surfaces and buses in the immediate vicinity of the Stonehenge field were intrusive.

To conserve the property and enhance the experience of a typical 4-hour visit, the following would need to be removed from the immediate vicinity of the Stonehenge field:

- hard infrastructure of tarmac,

- the wide foot paths,
- pavement edging,
- temporary and permanent fencing, buses, cars along the byway would need to be removed from the immediate vicinity of the Stonehenge field.

The vast car park and large number of visitors would also need to be addressed such as providing several points of access in dispersed locations.

Whilst it is acknowledged that the traffic was a continuing presence, it was not as intrusive nor as dominating as the problems described above in the immediate vicinity of Stonehenge.

4. Fences and access within the site

For visitors to move freely around a WHS is a worthy ambition that cannot be fully realised without highly managed access routes, with a selection of fencing that would be a matter for the landowners rather than Highways England. There is also the matter of segregating areas that require an entrance fee and those that do not. Gates and their management might intrude, but this is also a matter for the National Trust, English Heritage and farmers. Fencing that is likely to be a matter for Highways England is fencing either side of the old A303 (the new byway) and the protective fencing across the green bridges and the cutting. However, these are vitally important details that are lacking in proposal that seeks to conserve and enhance the Stonehenge WHS.

5. Value of Stonehenge World Heritage Site by other people in the UK and abroad

The conclusions drawn from the short visit described above are very focused on the narrow perspective of a visit to the Stonehenge Monument. People from around the UK and abroad do not agree with the vision and aims of the national heritage bodies that are promoting the Stonehenge Expressway scheme and have since 2014 commented on the Stonehenge Alliance petition annexed below about the damage inflicted to the Stonehenge World Heritage Site as a whole. A small sample of their views are copied in Annex A below.

ANNEX A of written representation - Reference 20018942

There are two petitions for ‘Save Stonehenge World Heritage Site’. One version for UK addresses and one for Non-UK addresses. Nearly 45,000 have signed the petitions for Stonehenge Alliance. The following is a typical selection of comments.

SELECTION OF REASONS FOR SIGNING THE STONEHENGE ALLIANCE PETITION – VERSION FOR UK ADDRESSES 38 DEGREES ¹¹

Nick C. This is a terrible idea. To even contemplate doing this is a disgrace.

Patrick K. The 'greenest government ever' wants a vote-winner for the autumn - dualling the A303 trunk road to the SW. Stonehenge is in the way. Building a tunnel long enough to start and finish outside the World Heritage Site would cost too much. What to do? Obvious – build short tunnel and honour the tin inheritance of Thatcher's Roads for Prosperity rather than this emblem of our national heritage. Such genius - to treat both the past and the future of humanity with such contempt!

Peter W. I live near the site and avoid the worst times (summer Fridays/Saturdays & some Sundays). Anything other than a long tunnel would be disastrous for the WHS & its OUV. The problem is mainly caused by the merging of 2 lanes into 1 at the top of the hill west of Countess (Amesbury) roundabout, so either a long tunnel or a means of reducing traffic to the site or further west would address the problem.

Heath L. Those who live nearby know best about how the historical and much loved site will be affected by the making of that tunnel etc. I support their view (having visited the place myself) that it would be a shame to let a road get any nearer than at present.

Victoria C. we have destroyed so much of our prehistoric landscape already. enough now

Roshni R. 18 minutes ago. It is beautiful and belongs in this country.

G. 45 minutes ago. The stonehenge site is much more than just the stone circle. It is about the wider context of this relic in the countryside in which it sits. Building any new 21st Century development within site or earshot of the henge will lose forever the wider meaning of why stonehenge was placed here.

Philip M. about 13 hours ago. This is where I was born. It is a sacred landscape which mankind has already violated with a road either side of the Stones. And now this, it is an absolute outrage!

¹¹ <https://you.38degrees.org.uk/petitions/save-stonehenge-world-heritage-site>

Jessica F. about 10 hours ago. No roads or other damage to a site of special archeological importance and no more traffic to spoil a beautiful place that is a part of our history and as such needs protecting.

Bil I. about 3 hours ago. This would be an act of sheer vandalism and barbarism.

Julia S. 5 days ago. The ridiculous road situation around Stonehenge needs to be improved ASAP but not done in a rush without real thought as the recent changes were. This site is probably the most important in Britain and should be cherished and treated with respect and imagination. Thought must be given to any work in the vicinity.

Lynne F. 6 days ago. What price our heritage? What is the point of any designation if it is to be ignored every time someone decides a bit more tarmac would look good??

Elizabeth K. 6 days ago. Our history is the way we learn, and the amount of history we ruin explains why we don't seem to have learnt much in the last 5 thousand years.

Hamish S. 16 minutes ago. I took part in the Stonehenge round table conference in 1995. All options were considered and the long bored tunnel was the only one not to do major damage to the WHS. The government should either accept this or do as they did in 1996 and drop the whole thing.

Martin N. about an hour ago. Our economic desperation is no justification for the harm we've already done to this World. Let's keep this bit sacred.

steve c. This site is as important as the pyramids.....no way should its preservation be put at risk

Mel G. about 7 hours ago. We are no longer allowed to have a hands on experience with Stonehenge but it seems the authorities can ruin the site and it shouldn't happen

Simon B. about an hour ago. This extraordinary and unique site needs to be totally protected and separated from traffic and roads

Ralph S. a day ago. Future generations would be shocked how we skimmed in protecting such important heritage

Suzanne S. 5 minutes ago. Our heritage. We are trustees not owners of this land. Archaeological significance and interest. Too many people living on too small an island. We will be a spaghetti junction of concrete before long. If access to the south west is so difficult by car get a train.

Charlotte T. 2 days ago. I see no need for a tunnel as I see no reason why people should not be able to get a glimpse of Stonehenge in passing. There are far more important things to spend that sort of money on and there would inevitably be risks

to our most famous and special World Heritage Site. It needs to be protected for all future generations.

Philip S. 2 days ago. This place is being turned into a Neolithic theme park. Soon it won't be possible to even view it from a distance without paying an arm and a leg. It's all about money, not traffic jams.

Ute C. 2 days ago. The current amount of car use is unsustainable however you look at it. For a temporary convenience the damage is not worth it,

Holland T about 10 hours ago. I'm signing because I do not think the chance to understand the most significant prehistoric site in Britain should be sacrificed on the altar of political expediency.

SELECTION OF REASONS FOR SIGNING THE STONEHENGE ALLIANCE PETITION – VERSION FOR NON-UK ADDRESSES CHANGE.ORG ¹²

James Vinson, CANTON VC. As a former resident of Dorset and ex employee of Salisbury District Council I hold the nation's heritage and Stonehenge in particular in the highest regard. The idea that a road would take precedence over a national and world heritage treasure is appalling!

Michiel Hegener, NETHERLANDS. Because Stonehenge belongs to us all.

Neil Wiseman, HYANNIS, MA. Stonehenge and its environs must be protected!

Vicent Salafia, DUBLIN, IRELAND. If you're going to do something, do it right, or don't do it at all.

Ellen Waff MIDDLEFIELD, CT. about 1 hour ago. Stonehenge must be preserved for future generations to examine and admire.

gabriela visan TULCEA, ROMANIA. about 1 hour ago. we don't have to put into slightest danger unique monuments like this one.

Lisbeth Wällberg STOCKHOLM, SWEDEN. 1 day ago. Stonehenge is one if the most fascinating and historically interesting archeological sites in the whole world. It would be a crime to damage it. Future generations would never forgive it.

Ronald Hicks MUNCIE, IN. about 4 hours ago. Sacred/ritual complexes like Stonehenge typically cover several square kilometers. Construction anywhere within that area will inevitably have a negative affect on irreplaceable resources.

¹² <https://www.change.org/p/save-stonehenge-world-heritage-site-to-the-secretary-of-state-for-transport-secretary-of-state-for-culture-media-sport-uk-government-save-stonehenge-world-heritage-site>

Nicoloeschja Kniese SCHILDWOLDE, NETHERLANDS. about 5 hours ago. I do agree with it!

Finbar O' Connor DRUMSHANBO, IRELAND. about 6 hours ago. The madness has to end

Maurice Kruijk LELYSTAD, NETHERLANDS. about 7 hours ago. I'am signing because Stonehenge is to important to mess with. You should not disturb this historical site as a solution for today's problems which will be regretted in the near future.

Mary Kenneally CLIFTON HILL, AUSTRALIA. about 7 hours ago. The trashing of World Heritage is insupportable.

christian belenger FRANCE. 2 months ago. je respecte l'héritage européen

Martin Mayland CEDAR CREEK, TX. about 2 hours ago. Don't mess with Stonehenge!

Nicolás Suárez de Urbina Chapma ALMERÍA, SPAIN. about 11 hours ago. basta ya de obras destructivas cuando hay otras soluciones

Dianna Smith FLYNN ACT, AUSTRALIA. about 1 hour ago. this is one of the most beautiful, spiritual sites in the world, please don't mess it up with modern day conveniences just to save a little money

Marc Gijsemans SLANE, IRELAND. about 6 hours ago. absolutly NO roads should be visible in and around this World Heritage Site

Matt Brady, KUALA LUMPUR, MALAYSIA. 4 months ago. I'm a British expat based in Asia. Stonehenge should remain untouched for the reasons cited. Important to consider also the impact on tourism - high-spending Chinese visitors are coming to the UK in greater numbers, and sites like Stonehenge are of great appeal.

Paal Svensson SANDVIKA, NORWAY. 3 days ago. Why not go underground with a tunnel and restore the landscape as it was.

Robert Kenny ITALY. about 11 hours ago. the damage cannot be undone!

Jutta Gabriel, GERMANY. 2 weeks ago. Stonehenge should be respected and is untouchabel - a holy historical place from the past...the basic inspiration for the future.

Lisa Michael RALEIGH, NC. about 20 hours ago. I want to see it some day. Unchanged.

Mary Minshall N LAS VEGAS, UNITED STATES. about 23 hours ago. Stonehenge is a precious heritage of our culture. Please do not damage it any further.

[Sandra Nicht](#) BALTIMORE, UNITED STATES. about 24 hours ago. How could you? Roads are a dime a dozen, Stonehenge is priceless!

[Grant Dillon](#) AUCKLAND, NEW ZEALAND. about 1 hour ago. I'm signing because I have visited Stonehenge a number of times, during every visit to the UK, and have been astonished at the increase in high-value archaeological work being done in the environs in recent years. This must not be compromised.

[Sandra Ferguson](#) BRIDGEHAMPTON, NY. 1 day ago. Please, dear UK, spend your money to reduce everyone's reliance on personal automobiles. That's what our future needs, not more roadways and tunnels. Save the stones. Save your heritage. Save the world's heritage.

[Bernadette Thomas](#) RÄÄKKYLÄ, FINLAND. 8 days ago. It is part of our heritage .

[Jiri Neuzil](#) BUCOVICE, CZECH REPUBLIC. 26 days ago. I am signing because I do not want to see this place destructed. It should be preserved for future generations.