The Planning Act 2008 - Chapter 2 Examination TR010025

A303 Amesbury to Berwick Down Improvements

Written Submission by the Council for British Archaeology

May 2019

Appendix B: Stonehenge: a Statement

(Council for British Archaeology November 2016)

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This updated position statement amplifies and amends those of 1998 and 2008, responding to recent research which has substantially developed our understanding of the archaeology of Stonehenge and its environs. Like its predecessors, it identifies principles and criteria towards formulation of a worthy strategy and offers Council a basis from which to respond to emerging Government proposals.

Summary

The CBA remains committed to its principal objectives for Stonehenge, articulated and expressed over many years. The Council has reviewed its position in the light of recent research and re-visited the management issues (the boundary of the World Heritage Site (WHS), the traffic issues raised by the A303, land-use and sustainable tourism) in the light of change since 1998 and 2008. We call for an integrated approach to the resolution of long-standing concerns, most notably the future of the A303 which is the current focus of attention. Harm to archaeological significance already inflicted on the WHS cannot be reversed, and burial of the A303 in a tunnel would itself cause some damage; that solution could eliminate current sources of degradation elsewhere in the WHS and improve public experience of the monument in its landscape setting.

In the forthcoming debate we shall use the framework of our cardinal aims and principal management issues to devise detailed responses to emerging specific schemes.

1 Background

Since the early 1980s much effort, thought and money have been dedicated to the search for a solution to 'the problem' of Stonehenge. Identified concerns arose from a combination of factors:

- *the proximity of modern roads severing Stonehenge from its landscape*
- *growing appreciation of the significance of the wider landscape of which Stonehenge forms a part*
- *traffic which generates pollution (noise, fumes, light) and damaging vibration*
- *inadequacy of the present A303 trunk road for traffic flows*
- *inadequate visitor facilities*
- *damage to the Stones and their immediate surroundings resulting from visitor pressure*
- *agricultural degradation and fragmentation of the open landscape of the WHS.*

The search for solutions has been frustrated by multi-party (sometimes conflicting) interests, such as divided landholding, inadequate funding, diversity of opinion, and complexities of implementation. It has been exacerbated by the absence of a single source of strategic control, notwithstanding shared recognition of the importance of the issues and the need for a shared solution. Nonetheless, significant achievements have been made – notably the closure of the A344 and improved conservation of the landscape. Since 1998, there have been substantial changes in archaeological research, policy (at national, European and International levels), and specific site management.

2 New for 2016

***New research** has provided a much stronger understanding of the articulation of the various sites in the Stonehenge WHS (and beyond it) in the Mesolithic, Neolithic and Bronze Age. Archaeological interest has confirmed a wider field of vision, which now encompasses not only the immediate environs of Stonehenge (the 'Stonehenge bowl') but also a broader landscape inside and outside the current WHS boundary, and is*

cognisant of major changes to the landscape in prehistoric times. The enormous increase in knowledge about the diversity, extent and significance of the archaeological remains and their interrelationships potentially exacerbates the adverse impact of inappropriate development affecting the WHS and strengthens the justification for beneficial change and investment.

***Internationally,** UNESCO policy regarding World Heritage Sites (WHSs) has changed, particularly over the understanding and articulation of the complex concept of Outstanding Universal Value (OUV) and the adoption of a Statement of OUV for the WHS. Furthermore, UNESCO policy now advises that WHS management should 'embrace initiatives that deliver mutual benefits to the property and its surroundings that may not seem essential to the protection of the OUV, but may prove important in the long run because they tie the property into its context in a positive and enduring way, thus favouring its long-term survival' (UNESCO (2013) Managing Cultural World Heritage).*

***The European Landscape Convention** (adopted 2000) seeks to promote the protection, management and planning of all landscapes, whether ordinary or of special interest. It lays particular emphasis on the importance of the quality of life for local populations and the need to manage but not to 'freeze' landscapes which are dynamic temporal entities.*

***The National Planning Policy Framework** for England is generally regarded as having maintained the strength of heritage protection, but this is affected by the resource problems of planning authorities, national agencies and other interested bodies in ensuring that policy is followed in individual cases. It also lays emphasis on the importance of local decision-making.*

***The Wiltshire Core Strategy (adopted 2015)** Core Policy 59 commits to sustaining the OUV of the WHS through giving precedence to the protection of the World Heritage Site and its setting, avoiding development with adverse impacts, seeking opportunities for positive management and requiring full assessment of new proposals.*

*On **site management**, the A344 has been closed to through traffic, allowing the stones to be approached on foot from the north along the Avenue. Southern approaches remain compromised by the presence of the A303. The pivotal contemporary economic role played by this road was highlighted during the closure of the main railway line to the south-west at Dawlish following storms in February 2014. This strengthened the political imperative for solving perceived problems of the A303 which reduces to a single-carriageway passing Stonehenge. Part of the argument for a tunnel therefore rests on traffic issues, in the light of which some regard archaeological concerns for reuniting the landscape as a secondary argument. As traffic flow can fluctuate it is important that future proposals should be based on accurate and up to date figures.*

*Three iterations of the **World Heritage Management Plan** have progressively moved towards a broad strategy for the management of the monuments, the archaeological landscape, visitor pressures and other economic uses of the surrounding area. They have strengthened the case for beneficial changes to land-use in the WHS, such as reversion to grassland. They have encouraged stronger governance arrangements through the Stonehenge and Avebury WHS Partnership Panel which has a significant local membership, and more integrated planning through the Management Plan process.*

*A new distant **Visitor Centre** built at Airman's Corner has replaced now demolished 1960s on-site visitor facilities. The debates that led to this outcome and opinions about the new arrangements illustrate continuing multi-party interests that can engender conflict or consensus. Undoubtedly, the new arrangements have enabled public interpretation and presentation to develop a four-dimensional matrix of the whole*

landscape, three of them spatial and one of chronological change. Concerns have however been raised about impact, particularly of parking, flagging up issues about setting and cumulative development.

3 Cardinal Principles

The CBA's primary objectives are:

> *1. to protect and conserve Stonehenge itself and its landscape of inter-related monuments*
>
> *2. to manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now becoming increasingly clearly understood*
>
> *3. to further public understanding of that increasing significance*

Principles for assessing proposed change

The siting and design of new infrastructure and land-use, (and, where relevant, the removal or alteration of the existing) should ensure:

i. minimum damage to known or potential archaeological remains
ii. minimum visual intrusion on monuments and landscape
iii. maximum benefit to the visitor in terms of enhanced presentation and understanding of the archaeological significance
iv. maximum tranquillity
v. maximum reversibility at the end of use-life
vi. efficient use of previously-developed areas

A. Managing the Stonehenge landscape – priorities and issues

1. Incorporating changing significance: management and research are mutually informing and must develop hand in hand.

2. Recognising the current local social and economic context: improved interpretation and management are intertwined with transport issues, the future of the Defence estate, and the lives of local people, all of which shape the contemporary economic climate of the locality. Successive Management Plans have reflected this, an approach the CBA strongly supports.

3. Taking the long view: the strategy set out in the Management Plan should continue to be long-term, a defined programme of progressive amelioration throughout the WHS, working from what is either fundamental or immediately attainable, towards objectives that may only be achievable many years hence. Ascertaining viability may require a staged approach including some experimental steps.

4. Recognising the current existing policy framework: emerging proposals should be consonant with English planning policy, with UNESCO's WHS policies (in particular regarding the management of serial sites and the specific protection and management issues set out in the Statement of OUV (2013)) and with the advice which Historic England itself gives to others.

5. Boundary Review: The present boundaries of the Stonehenge WHS conform broadly with the area defined by Colt Hoare almost two hundred years ago as the Stonehenge Environs. This reflection of past archaeological views valid in their time should not preclude incorporation of research results from the last two decades, nor the influences of evolving management and conservation policy for the Stonehenge landscape. In the

light of new discoveries in the last two decades, there is a clear case for reviewing the WHS boundaries and grappling with the issues arising.

B. Traffic

The government has announced its intention to build a tunnel of at least 2.9km length. The CBA maintains its view that, in terms of conventional traffic solutions, a long bored tunnel for the A303 is the best means of achieving greatest environmental gain while reconciling a majority of all demands and needs. If it proposes other solutions it is for the Government to explain why such a solution is held to be unaffordable, how other solutions relate to its policy on conservation in an area for which it has accepted, and recently reaffirmed[1], global trusteeship, and the wider implications for precedent. Any solution impacting upon the WHS must be fully assessed in the context of a number of related factors, and, above all, with adequate information.

The CBA also notes the growing body of research suggesting that more radical approaches to transport policy, including a long term strategy to encourage a shift away from car-dependence, may well provide greater long-term sustainability than would any solution based on individual road building or improvement, and would welcome the opportunity to engage in discussions on this basis.

Archaeological aspects of upgrading the A303 (or indeed any other public infrastructure) must be handled holistically, on the basis of an evolving research agenda for the landscape at large, to assist comprehension of its complexity as a landscape and inform its long-term management and public explanation.

Part of the case for any tunnel rests on the need to reunite the Stonehenge landscape, so attempts to justify a scheme simply on the basis of its impact upon a series of individual sites or monuments would not be acceptable. Relevant research requirements include:

- *fully considering relevant research issues and opportunities inside or outside the WHS, and accepting extension of the 'research envelope' to the obvious natural topographic zone framed by the valleys of the Till and Avon*
- *being explicit about relevant kinds of evidence, whether already visible or potentially locatable by proper evaluation*
- *acknowledging that the potential research gain and/or enhancement of public experience and understanding arising from mitigation of archaeological impacts caused by tunnel construction can be a legitimate ground for countenancing the physical destruction of archaeological evidence provided that damage to the WHS and its attributes of OUV is minimised*
- *recognising that 'value for money' generally and useful archaeological outputs from public infrastructure projects require a fully integrated research and management programme at the beginning of the project. Participants should be identified and involved at an early stage, not appointed at the last minute as sub-contractors to a construction programme which is already decided.*
- *The positioning of portals is a key issue. There are issues of archaeological detriment such as the disruption of the WHS, and the adverse impact on the visual and aural setting of the landscape at either end of the tunnel.*

[1] Hansard, Answer to Written question HL2384, September 2015) (http://www.parliament.uk/business/publications/written-questions-answersstatements/written-question/Lords/2015-09-17/HL2384)

- *There are also issues of archaeological enhancement such as reunification of the southern part of the landscape with the northerly monuments and increased knowledge from pre-construction excavation. These may be overshadowed by the overall costs of any detailed scheme that comes forward.*

C. Alternative solutions and other issues

The strong attractions of a long-bored tunnel do not necessarily outweigh the case for a different solution. Despite its widely-acknowledged benefits, there may be elements of a reasoned case against it, for which in turn there are counter-arguments. Some of the issues, and CBA's current thinking, are set out below.

***Infrastructure Issues**:*

- *Uncertainty attaches to the relative weighting of the commitments under the World Heritage Convention to identify, protect, conserve, and present and transmit to future generations a WHS. The CBA recognises that circumstances will arise in which these aims cannot be co-equal, but in the case of this WHS, and from the perspective of the CBA, two of our cardinal aims objectives – conservation and public understanding – should be prioritised.*
- *The UNESCO Medium Term Strategy (2014-21) has updated overarching objectives in contributing to Peace and Sustainable Development. Its Strategic Objective 7, the protection, promotion and transmission of heritage, has a key outcome in the use of cultural and natural heritage as a driver for sustainable development. In the case of Stonehenge and its environs, the balance between sustainable development, heritage protection and the transmission of cultural heritage value to the visiting public and to future generations require careful attention.*
- *The CBA believes there is a higher threshold for the cost of sustainability at this particular WHS than at most others in the UK affected by developments, so calculations of cost should be adapted accordingly. The case for large expenditure on a bored tunnel is largely justified by the avoidance of surface landscape violation within a WHS, enhanced transmission of cultural heritage value at the site and the need to balance tensions for long-term WHS benefit, as identified in current UNESCO policy.*
- *Removal of the existing road from the surface adjacent to Stonehenge would deprive the passing tourist or resident of a fleeting but significant sensation in glimpsing the Stones from a car or bus. Preference for one kind of access can deny others, and in the final analysis a hard choice may have to be made, for which high-level concepts such as inclusiveness may be too generalised to be helpful.*
- *The greatly enhanced significance of Stonehenge deriving from recent research into its landscape context can benefit far wider public understanding and potentially give access to a much wider experience*
- *The costs of public infrastructure, particularly where this is designed to address environmental needs, are properly a matter of public responsibility, at a difficult time for public expenditure. The CBA expects the full costs of road improvement here to be met out of public expenditure, in accord with Article 4 of the World Heritage Convention. "Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and*

transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources".

Agri-environmental and bio-diversity issues

- *Archaeological disturbance is already taking place across a large part of the WHS (including some land which would be required for a tunnel) as a result of agricultural operations such as ploughing and intensive animal rearing, whose physical impacts are archaeologically and environmentally harmful. The CBA supports schemes to hasten conversion of arable to pasture across the WHS, and the extension of this initiative to a full WHS Chalk Grassland Strategy.*
- *It also supports the aims of the WHS Woodland Strategy 4.*
- *Sustainable, inclusive, managed public access Stonehenge should be seen not as a disembodied object but as a structure (one of the oldest in the world) with architectural attributes, and a critical element in a landscape of complex ritual sites.*
- *Its calculated location should be understood as embodying meaningful visibility, functional characteristics, an intended path of approach, an entrance and much else. Decisions should flow from these insights.*
- *A reunited Stonehenge landscape should be recognised as a new landscape, neither prehistoric nor natural, a modern environment with sympathetic non-arable land-uses, through which prehistory can be contemplated.*
- *Management of access must always recognise and seek to satisfy, as far as practicable, all its different manifestations: intellectual, physical, emotional, occasional, regular, casual. Much has been achieved in the past half decade.*
- *Furthermore, the popularity of the WHS raises issues of traffic congestion beyond the A303, overcrowding of sites and over-burdening of surrounding communities with visitor pressure. The CBA supports maximum access, within the bounds of sustainability, for as wide a proportion of the community as possible.*
- *We continue to urge DCMS and its advisers to address the issues of sustainability and inclusion.*

With these points registered, we believe that a WHS Sustainable Tourism Strategy should be developed and implemented by the key partners, both locally and in national agencies. Conclusion Stonehenge continues to challenge us, as a sector. The CBA looks forward to continuing dialogue in the interests of achieving a worthy solution. The eyes of the world are upon us – we will be measured by the quality of the solution and the process of getting there.

Agreed by members at the CBA AGM, 7 November 2016.