

***The Planning Act 2008 - Chapter 2 Examination TR010025
A303 Amesbury to Berwick Down Improvements***

***Written Submission by the Council for British Archaeology
and CBA Wessex***

May 2019

SUMMARY

The Planning Act 2008 - Chapter 2 Examination TR010025

A303 Amesbury to Berwick Down Improvements

Written Submission by the Council for British Archaeology May 2019

SUMMARY

A Introduction

1. Council for British Archaeology is a national umbrella body for archaeology, founded 1944. One original objective – and subsequent ongoing issue – was securing improved management of and research into Stonehenge.
2. This submission on the proposals for upgrading the A303 at Winterbourne Stoke and the Stonehenge World Heritage Site (WHS), sets out CBA's reasons for its OBJECTION to them.

General Caveat

3. Details of the archaeological fieldwork supporting the Environmental Statement were only submitted as part of Deadline 1 documentation. We have therefore not yet fully considered the archaeological implications of the scheme for the Outstanding Universal Value of the World Heritage Site, related setting issues and alternative options. **These conclusions are therefore somewhat provisional.**

B Material used in preparing this submission

4. CBA's current position statement on Stonehenge, adopted 2016, forms the core criterion for the views and conclusions below.
5. Sources used in preparing this statement are detailed in the main statement. For contextual information: CBA's 'Stonehenge Saga' and the Applicants ES and other documents; policy framework: published policy documents; alternatives and their comparison: applicant documents and our own suggestions; wider strategic context and need for SEA: DfT and Highways England documents, Infrastructure Act 2015, SEA Regulations, key case law, and tabulation of other highways tunnels using Road Tunnel Association data (<http://www.rtoa.org.uk/Directory.html>),

C Background and CBA's previous involvement with the A303 at Stonehenge¹

6. At the 2004 Public Inquiry into the 2.1km scheme, CBA recommended a staged approach consistent with the 1999 WHS Management Plan, which, by default is effectively what has happened since then – albeit incompletely.
7. Since the 1995 Planning Conference consensus for a long-bored tunnel, official Government view has progressed from a 2km cut-and-cover solution to the current 3.3km tunnel. Official values have very gradually shifted towards, but not yet reached the 1995 consensus view.

D Key heritage and landscape issues and policy tests

8. CBA's 'Cardinal Principles' for Stonehenge are to:
 - *protect and conserve Stonehenge itself and its landscape of inter-related monuments*
 - *manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now becoming increasingly clearly understood*
 - *further public understanding of that increasing significance*
9. Five major sources of harm to the WHS Outstanding Universal Value arise:
 - Physical loss of archaeological heritage assets
 - Degradation of the setting of heritage assets contributing to the WHS OUV
 - Harm to the WHS landscape
 - Undue focus on the Stonehenge 'star attraction' at the expense of the wider WHS
 - Introduction of major structures and earthworks symbolising Britain's current obsession with an economy built on road transport.
10. CBA considers that ES coverage of Cultural Heritage effects does NOT fully adhere to some key EIA regulatory requirements; nor accurately reflect the relevant policy framework of the National Policy Statement for National Networks (2014)

¹ For a detailed account covering the period 1960 to 1999 see <http://new.archaeologyuk.org/the-stonehenge-saga-1960-1999> and for the period 2000 to 2010 see <http://new.archaeologyuk.org/the-stonehenge-saga-2000-2010>

and the WHS Management Plan (2015) - the UK's commitment to its international obligations under the UNESCO WH Convention.

11. This has resulted in: flaws in the assessment approach; insufficient attention to limitations and uncertainties; underestimating the significance of adverse effects, belittling harm to the Stonehenge WHS OUV and exaggerating benefits; lack of clarity of the relative strength of the management plan for the WHS compared with NPSNN.

E Key positive and adverse heritage and landscape effects of the proposed scheme and EIA assessment

12. Without having yet fully reviewed the Deadline 1 reports, there are highly significant (if unspectacular) remains within the WHS in the east and west tunnel approaches and on the ridge occupied by Winterbourne Stoke Crossroads barrow group contributing to the WHS OUV. These areas would also suffer significant setting impacts on the Neolithic and Bronze Age barrow cemetery and other remains as well as monuments related to the 'Diamond,'; Wilsford Shaft; and the Avenue, Vespasians Camp and potentially Blickmead at the E portal.
13. There would be some important benefits for Stonehenge and the central WHS, but even the Applicant identifies only slight net benefit for the WHS OUV; given the little weight credited to loss of setting and harm to the OUV relationship of monuments to landscape at the tunnel approaches and on Winterbourne Crossroads ridge, CBA considers there would be significant net harm.
14. The ES cultural heritage baseline inadequately addresses the EIA requirement to consider the likely evolution of the site without the development, or considers this neutral. If delivering the WHS Management Plan sets the framework (including potential boundary changes) the expected evolving baseline would see more-modest but potentially significant reduction of A303 problems.
15. The CBA's OBJECTION is – as 2004– the proposals cause undue harm to the WHS OUV without delivering the full benefits of removing the A303 – for which alternative solutions exist including one far cheaper. Such savings could deliver additional net environmental gain elsewhere in the RIS2 programme where substantial impacts on protected landscapes are unavoidable.

Alternatives:

16. Justification for the proposed scheme over other options is unsound, including its unique, highly selective and logically-flawed reliance on a controversial heritage monetisation study.
17. Reconsideration of alternatives needs to re-examine the need to upgrade the A303 while reducing and possibly removing its damaging intrusion into the WHS, avoiding additional physical loss of OUV, other protected landscapes and harm to designated heritage/habitats.
18. CBA recommends reconsideration of three strategically very different options:
 - **a long-bored tunnel;**
 - **a southern surface route** like option F010And an interim measure (baseline scenario without the proposals)
 - **a retained single carriageway and Winterbourne Stoke bypass**
19. While in principle **a long-bored tunnel** seems the best solution – removing the A303 from the WHS (and its setting) without causing OUV harm and avoiding some extra impacts of a new surface route – it presents problems. This has greater cost monetarily, in carbon emissions and spoil disposal. Within limited resources this precludes achievement of significant environmental net gains on other schemes. Nonetheless, given consideration of a far longer tunnel beneath the Peak District National Park, and commitment to delivering net environmental gain, this is eminently possible, and the trend towards the 1995 consensus becomes even more evident.
20. The CBA believes that **a southern surface route** like option F010 – potentially a shorter version with a short tunnel under the N edge of Boscombe Down airfield – is sensible, affordable and would greatly enhance the WHS OUV without any harm, while also avoiding significant harm to internationally- and nationally-protected habitats, species and landscapes. Crossing the Till and Avon valleys and negotiating Boscombe Down Airfield are key technical design challenges. The substantial WHS gains (including reconsidering A360 impact on monuments on its W boundary) and prospects of creating a truly globally significant archaeological park, make this option worth much-closer scrutiny.
21. As in 2004, CBA recognises progress needs to be made. If the proposals are rejected CBA recommends a retained single carriageway option with new grade-separated junctions at

Countess Roundabout and for the A360; noise-reduction surface, low surface-built reversible noise mounding; Stonehenge Bottom pedestrian underpass; variable speed restriction and southern Winterbourne Stoke bypass. This do-something baseline scenario without the proposals needs integrated planning, not an uncoordinated piecemeal approach.

Wider strategic context of decision making

22. Problems with considering and appraising alternatives is part of a much larger issue of strategic context in decision-making. In particular whether and how the balance of environmental, social and economic pros and cons of schemes within the Road Investment Strategy have been considered.
23. We believe RIS and associated strategic routes should, indisputably, be subject to SEA because the Infrastructure Act imposes statutory duties on both the Secretary of State and Highways England to have regard for the environmental effects of their strategies. These are programmes that set a statutory framework for decisions delivering EIA Schedule 1 road schemes that is subject to independent monitoring and potential penalties for non-delivery. We urge the Examination Panel to ensure that this scheme is reviewed in a properly objective SEA of the draft RIS 2 programme before it becomes legally set in stone.

Conclusion

24. We take the long view: it has taken c.25 years to progress to the current unsatisfactory point. This is but a moment in the 6,500 year evolution of the Stonehenge landscape. In the next decades transport needs and traffic management will likely change radically, not least because of climate issues. But any scheme built now will last for millennia. As one of the World's most iconic landscapes of prehistoric human culture, Stonehenge is the last place on earth to create a memorial to Britain's current obsession with economics built on fossil-fuelled road transport.
25. We urge the Examination Panel to take an equally long view and reflect deeply on the physical legacy that will become the permanent symbol of Britain's attitude to the world's culture and environment in the latter stages of the age of the fossil-fuelled car.