

***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

MAIN TEXT

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INTRODUCTION

The CBA

1. The Council for British Archaeology is a national umbrella body for archaeology, founded in 1944. One of its original objectives – that has been an ongoing issue ever since – was to secure the improved management of and research into Stonehenge.
2. This written submission sets out the CBA's views on these proposals for upgrading the A303, setting out our reasons for OBJECTION.
3. These representations are also made jointly with CBA Wessex, one of the Council's autonomous regional groups.

General Caveat

4. The details of the key archaeological fieldwork and important details about alternatives and the reasons for selection of the proposed scheme were only submitted as part of the Deadline 1 documentation. As explained below, we have not yet fully considered the implications of the scheme, especially for the World Heritage Site, including how this relates to setting issues and alternative options.

The conclusions presented here are therefore somewhat provisional.

Structure and Content of the Statement

5. The overall structure of this submission is divided into four Parts, each of several sections, and a set of Appendices as follows:

Part 1

- A statement as required of the documentary and other material and expertise relied upon in preparing this submission

¹ This statement has been compiled on behalf of the CBA by George Lambrick MA FSA MCIfA, Honorary Vice-President and formerly Director of the CBA and the CBA's expert witness at the 2004 A303 Inquiry, with input from the current Chair, Ken Smith FSA MCIfA and Director Dr Mike Heyworth MBE PhD FSA. It has been approved by the CBA's Board of Trustees. Mr Lambrick's relevant experience is set out in **Appendix H**.

- A brief outline of key stages in the search for a solution to the ongoing traffic problems and intrusiveness of the A303 crossing the Stonehenge WHS (including CBA's involvement) and the perspective and lessons learnt from that experience
- A summary of the key heritage and landscape issues and policy tests presented by the proposed scheme

Part 2

- Comments on baseline data and its interpretation, including its likely evolution without the development
- The adequacy or otherwise of the EIA assessment of effects in relation to loss of archaeological sites, and remains
- The adequacy or otherwise of the EIA assessment of effects in relation to issues of setting
- Measures that have been or are still to be adopted to avoid, reduce or offset harm and to enhance benefits.

Part 3

- A consideration of alternatives considered, and the adequacy or otherwise of their appraisal – bearing in mind the key heritage and landscape issues - including consistency of approach in relation to relative environmental impact, heritage valuation and value for money considerations.
- A consideration of the wider strategic context of decision making, especially with regard to the deployment of major sums of public money in relation to recent, planned, exploratory and ruled out tunnel options in (or avoiding) nationally and internationally protected landscapes

Part 4

- An overall conclusion summarising the CBA's OBJECTION, and recommendations for finding a better solution, including the CBA's preferred options based on current understanding.

Appendices A to H providing additional detail concerning the above as referred to in the text.

6. In each of these sections material is referred to or presented to address the matters which the CBA considers pertinent to the decision-making process, including several of the Examination Panel's preliminary questions (**DOC PD-008**).

PART 1

Material relied upon in the preparation of this submission

7. This statement is rooted in the CBA's current position statement on Stonehenge, formally adopted by its membership in 2016, which forms the core criteria for our reaching the views and conclusions set out below.
8. Details of the sources relied upon in preparing this statement are detailed in **Appendix A**, and cross-referenced in the text.²
 - For contextual information: our own 'Stonehenge Saga' A303³ and the Applicant's ES and other documents
 - For the policy framework: published policy documents
 - For baseline heritage and other environmental information and assessment of effects: the Applicant's ES and our own professional judgement
 - For alternatives considered and their comparison applicant documents and our own suggestions
 - For the wider strategic context and need for SEA, DfT and Highways England documents, 2015 Infrastructure Act, SEA Regulations, key case law, and a tabulation of other highways tunnels based of Road Tunnel Association data (<http://www.rtoa.org.uk/Directory.html>).

Background and the CBA's previous involvement with the A303 at Stonehenge⁴

9. The CBA's adopted position statement on Stonehenge (**Appendix C**) has evolved over 26 years from an initial statement of principles (1999, 2008, 2015)
10. At the Public Inquiry into the 2.1km scheme in 2004, the CBA recommended a staged approach consistent with the 1999 WHS Management Plan, which, by default, is effectively what has happened in the last 15 years, but is incomplete.

² **Please note:** Because so many documents relevant to our case were only submitted for Deadline 1, much of the assessment needed to inform our comments is preliminary and has NOT been completed for this initial Statement.

³ <http://new.archaeologyuk.org/stonehenge>

⁴ 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>

11. The CBA's involvement with the development of the current proposals has been to hold a forum discussion at its Winter General Meeting in 2015; to update and formally adopt its position Statement on Stonehenge 2016 (**Appendix C**); to organise two CBA trustees' visits to the WHS over the last three years to view the landscape on the ground in the light of emerging proposals for the A303; hold a Trustees' meeting to receive a consultative briefing by Highways England; submit comments on scheme consultations in 2017 and August 2018 and its expression of interest for the current Examination.
12. In the 23 years since the 1995 Planning Conference consensus for a long bored tunnel, the official Government view on what is required to address the A303 issues has progressed in fits and starts from a 2km cut-and-cover solution to the current 3.3km bored tunnel with revetted cuttings and a 'canopied' half-tunnel western approach currently proposed. It is almost half as much again as the 2003/4 proposals, and now 73% rather than 46% of the 1995 consensus vision of a c.4.5km tunnel.
13. This is a reflection of how official values (value for money judgements) related to the OUV of the WHS have very gradually shifted towards, but still not yet reached what, much less than a generation ago,⁵ was a consensus that the A303 should be removed altogether from the WHS without causing new damage. This is an important consideration in how the UK fulfils not only its national commitments to conserve heritage for future generations, but its international obligations to do so.

Key heritage and landscape issues, policy tests and EIA requirements

14. The CBA's Cardinal Principles for Stonehenge are:
 - To protect and conserve Stonehenge itself and its landscape of inter-related monuments
 - To manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now becoming increasingly clearly understood
 - To further public understanding of that increasing significance
15. With respect to the A303, the CBA's position includes in particular the following considerations:

⁵ Eg in the context of NPSNN para 5.129

- *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*
 - *The strong attractions of a long-bored tunnel do not necessarily outweigh the case for a different solution*
 - *A growing body of research suggests 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.*
16. These suggest a particular need to adopt a very precautionary, long term approach to the scheme under examination, especially where significant benefits in one part of the WHS are offset by significant harm in other parts.
17. When viewed against the proposed scheme, five key sources of harm to the WHS Outstanding Universal Value 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.
 - Insertion of major structures and earthworks that will come to symbolise Britain's current obsession with an economy built on road transport.
18. In addition, there are key benefits of the scheme in terms of the setting of some monuments (including Stonehenge itself) and public access to the central part of the WHS.
19. These considerations relate to the assessment of NEED, which for a 'heritage led' scheme entails whether and how heritage benefits are delivered relative to other objectives. In a WHS this requires an especially careful, precautionary approach not only in balancing conservation of irreplaceable fabric and enhancing public appreciation and amenity, but also whether both can be achieved without unduly compromising other environmental, economic and social objectives.
20. The CBA's view is that there has been a strategic failing in approach in this respect, to such an extent that far from being 'heritage led' maximising the economic objectives of the scheme has been the overriding consideration – not just at a national level but also locally. As a result the starting point seems to have been

seeking to strike a net balance of benefit over harm for the OUV of the WHS on the most direct possible route (ie greatest economic benefit).

21. Instead, the principal objective should have been to deliver a scheme that caused NO harm and MAXIMUM benefit for the OUV of the WHS – *then* weighing what that entails against any adverse effects in non-protected landscapes or shortcomings in other scheme objectives; and *then* what it would take to avoid harm in non-protected open countryside as well. Only at the point of demonstrating that this was unachievable without substantial (ie nationally and internationally significant harm to the environment, society, economy or public purse should that principal objective be compromised for the current heavily compromised approach).
22. In addition, the CBA has 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 WH Convention 1972. This is reflected in several shortcomings:
 - lack of clarity of the relative strength of the WHS management plan compared with NPSNN in respect of the WHS.
 - flaws in the criteria used in 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
23. These are further explained in a detailed commentary on key policy provisions in **Appendix D.**

PART 2

24. In PART 2 of the Statement we carry these considerations forward in terms of their practical implications for our substantive comments of the proposals presented in the following sections, covering in turn

- Baseline data, sampling criteria, limitations and uncertainties and its evolution without the proposed scheme
- Identification and assessment of positive and negative impacts on heritage and landscape and their significance for decision-making
- Consideration of alternatives and justification of choices made
- Wider strategic context; and
- Conclusions and Recommendations

[NOTE: this section is incomplete pending completion of our assessment of the Applicant's Deadline 1 documents (cf Q CH1.1) What follows concerns general principles]

EIA baseline considerations

25. S.14(3)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the Environmental Statements must include

'the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'

26. Schedule 4 of the Regulations requires that an Environmental Statement shall contain

'3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.'

27. This requirement to consider the likely evolution of the baseline scenario without implementation of the development is of great importance, but the ES for these proposals is more or less silent about the factors that would shape the evolution of

the historic environment and OUV of the WHS without the development. The whole area affected by these proposals represent a highly managed landscape in which very little change is purely 'natural' (ie independent of human interference). The 'natural' evolution is thus that human interference will play a major role.

28. Within the WHS and in its environs the WHS Management Plan represents (in Wiltshire CC's words in the Plan) 'a golden thread'. Since the UK is obliged by an international treaty to implement the Management Plan, its provisions – especially the 'Actions' attached to the policies should be treated as the most reliably foreseeable evolution of the baseline. More generally, Highways England is statutorily bound to develop proposals for improvements for the A303 under the Road Investment Strategy 2015-2020 (RIS 1) and the draft Strategy for 2020-2025 (RIS 2) while also meeting heritage conservation objectives, especially in the WHS. These set a powerful and time limited framework within which priorities are to be delivered, as explained more fully in PART 3 of the statement.
29. Any 'forecast' of the evolution of the baseline scenario therefore must arise from the formal 'do-something' objectives set out in the WHS Management Plan 2015-2021 and the national and regional Road Investment Strategy 2015-19 and draft Road Investment Strategy 2020-25 (which have international and national legal requirements for delivery).
30. These set a clear framework in terms of conserving and enhancing the WHS OUV and reducing the negative impacts of the A303. This 'forecast' is not just a theoretical position: it is well rooted in the background history of the scheme as exemplified by what happened after the 2004 Public Inquiry (see paras 8, 9 above and **Appendix C** especially paras C.5 – C.6). The fact that of all those steps nothing was done about the A303 reflects the problems of delivering road schemes that led to the much more stringent requirements of the 2015 Infrastructure Act.
31. In the light of the CBA's direct experience of previous involvement in the background to this scheme; how the baseline scenario without the 2004 scheme actually did evolve; and the statutory context that now prevails; we consider the following 'scenario' to be the most plausible.
32. It is framed largely by the measures which, in the absence of a more comprehensive solution, would plausibly contribute most substantively to the objectives of the WHS Management Plan and draft Road Investment Strategy 2 and their relevant timeframes (2021 within the WHS and 2025 beyond the WHS and its environs) without compromising future delivery of a more comprehensive solution.

By 2021 within the WHS and its environs to meet key WHS Management Plan priorities:

- The OUV of the WHS would be conserved and enhanced but not harmed, within the current WHS boundary
- The WHS boundary revised (probably extended west of the A360)
- Large areas of the WHS S of the A303 would be converted to grassland with extensive public access
- Improved means of pedestrian crossing of the A303 would be established (for example this might be by a non-damaging underpass inserted through the embankment in Stonehenge Bottom)
- Measures to reduce noise from the A303 (such as noise reducing running surface and mounding removable mounding placed on the present ground surface alongside the road)
- A variable speed limit over the length of the A303 needed for management congestion.

By 2025 beyond the limits of the WHS and its environs, further measures would be taken to deliver highways and economic objectives for the Amesbury to Berwick Down section of the A303 without harming the WHS and its environs (approaching Expressway standards for a single carriageway road within the WHS and its environs and dual carriageway beyond):

- Grade separated junctions at Countess Roundabout and for the A360 east of Winterbourne Stoke
- A bypass for Winterbourne Stoke
- Updated smart traffic calming measures

33. The most challenging aspect of this scenario would be

- To ensure capability to upgrade to a more complete solution for the A303 without harming the WHS and environs (eg long tunnel or surface route outside WHS) if these preliminary measures failed to make a significant difference to highways issues

- To ensure that a grade separated junction for the A360 did not harm the OUV of the WHS and environs – especially if the WHS boundary is extended westwards.

EIA considerations for forecasting baseline conditions and effects of the development

34. Another important regulatory requirement for Environmental Statements is that they must contain:

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

35. It will be noted that the 'required' information in this sense must mean what is *required* to form as far as possible a fully informed understanding of the effects of the proposals – especially in respect of those effects most likely to be significant in terms of nationally and internationally protected areas and assets and policies to which great weight must be given.

36. Another element in terms of ensuring the quality of the information on which decisions are based is set out in Regulation 14(4) which requires that:

(4) In order to ensure the completeness and quality of the environmental statement—

(a) the applicant must ensure that the environmental statement is prepared by competent experts; and

(b) the environmental statement must be accompanied by a statement from the applicant outlining the relevant expertise or qualifications of such experts.

37. All archaeological information and methods of enhancing it through recovery of more data, and all subsequent action to conduct research or investigate and record remains prior to destruction are fundamentally rooted in a myriad of sampling strategies. This applies at all levels and all aspects of archaeological endeavour, and is a cyclical process as past discoveries inform new inquiry. This includes:

- What sampling techniques are inherent in standard scientific analyses of artefacts of dating methods

- What characteristics of archaeological artefacts and remains are worth recording
 - What proportion of material recovered needs detailed or less detailed analysis
 - What percentage volume of deposits should be excavated and what proportion left (in research-led investigations for future generations; in development led work, for unrecorded loss)
 - What percentage of areas earmarked for intrusive investigation should be excavated, test pitted, boreholed etc
 - What areas are earmarked for non-intrusive surveys
 - What types of survey are applied (different forms of geophysics at what survey intervals; what methods and percentage area coverage surface collection surveys; what forms of soil chemistry (eg phosphates) and at what spatial intervals; what satellite and airborne remote sensing, including pre-existing and new surveys and choices of methods and inherent sampling – eg Lidar and what wavelength imaging)
38. The fundamental purpose of these myriad choices is to provide a reasonably reliable basis for establishing what NSPNN para 5.124 refers to as:
- 'the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.'*
39. As applied to non-intrusive surveys and evaluation work of various forms, their deployment does establish a preliminary *'source of evidence,'* but the prime purpose is to *forecast* the full potential of what evidence is available to investigate and understand *the substance and evolution of places, and of the people and cultures that made them*. The nature range, quality, state of preservation, location and extent of such evidence determines how far this goal can be achieved. It is also the basis for forecasting (especially in the light of past experience) the limitations that current approaches pose and the scale of evidence that might be lost if not retained for future generations (NSPNN para 5.129)
40. The CBA has yet to complete its review of the recently deposited (Deadline 1) raft of archaeological reports, and the following remarks represent our preliminary

overall assessment of their adequacy to inform the decision, and the extent to which EIA requirements have been fulfilled.

- The range of non-intrusive surveys deployed (or drawn upon) is thorough, relative to standard EIA pre-determination fieldwork, but not exemplarily so (as compared with the range of techniques deployed in past investigations of the Stonehenge landscape).
- Methods that appear not to have been applied for areas not previously covered (or only to a limited extent) appear to include Lidar, satellite imagery (especially multi-spectral imaging), soil chemistry, and ground-penetrating radar.
- The range of methods deployed to establish the archaeological baseline has involved a wide range of techniques demanding a very wide range of competencies. Contrary to the Regulatory requirement to report the competencies of the experts who have prepared the information presented in the ES (including supporting appendices and reports) this ES gives the name and qualifications of only one individual. It is perfectly obvious that this person could not and has not carried out all the work involved. The CBA assumes (on internal evidence of the archaeological reports) that they have been compiled by a range of competent experts, but it is contrary to the Regulations that they appear to have been deliberately anonymised. This matters because it is plain that the individual cited as the sole competent expert cited does not appear have all the technical expertise required to comment meaningfully on all the *details of difficulties .. encountered compiling the required information and the main uncertainties involved in forecasting the full potential of what evidence is available to investigate and understand the substance and evolution of places, and of the people and cultures that made them.* This is evident from the clear shortcomings in how this has been addressed.
- Although the methods applied are quite thorough, and very helpfully have been reported in terms of potential contribution to research (ie part of the contribution to OUV as set out in the WHS Management Plan paras. 2.3.10 and p.28 as noted in **Appendix D**), there has been insufficient consideration of the inherent limitations and uncertainties they entail in terms of the physical TOTALITY of the *'primary source of evidence about*

the substance and evolution of places, and of the people and cultures that made them.'

- Put crudely and subject to further comment in the light of a more thorough review, there are two obvious potential approaches to addressing this: firstly, technical analysis rooted in the inherent sampling methodologies employed in the work; secondly, experiential analysis examining (especially in respect of Stonehenge) how the methods applied have in the past related to what was actually found.
- It is deeply unsatisfactory that neither has been applied. What is worse, for several of the technical methodologies (especially trench evaluation) the sample investigated – in this case the percentage area excavated – is not given and/or not readily ascertained from the account of what was done.
- Thus where test pitting is reported as being done as 1m square pits on a 10m grid, it is readily ascertained that the results obtained might, *prima facie* be forecast to indicate a totality - based on the sieving method employed for recovery – to forecast a several order of magnitude increase in terms of the TOTAL evidence available (in crude terms a 100 fold increase, but in spatial terms requiring a far more nuanced calculation using shifting averages). From this, when compared with past results it would be possible to tell whether or not the absence of some rarer types of artefact (eg stone tools, or perhaps most obviously pieces of imported stone axes) is significant; or whether the multiperiod character of surface scatters and their composition would be capable of revealing far more about past life and activities in the area (and for example, how the areas sampled might differ from or be similar to those closer to Stonehenge).
- But in the more important case of trenched evaluations (and associated topsoil sampling) the evidence is not even given to enable such analysis, but this is fundamentally important to forecasting the totality of the evidence available. Unlike recovery of artefacts, this makes a very big difference in terms of the types of monument and deposits likely to be found. Thus if (say) a five percent sample of an area was investigated using c.1.8m wide trenches 25m long, it would be very unlikely that a complete ring ditch (typically round a burial mound) would have been missed; such confidence that important monuments and deposits are

absent, diminishes with type and scale and state of survival. Thus it would be much less certain in this scenario that a shallow segmented ring ditch 10m in diameter would definitely be found. Likewise, the chances of finding a smallish pit 1m across or a human burial 1.5 to 2m across would be much smaller, with perhaps a 90-95% chance of them being missed. If, as in this case, examples of such small but critical deposits ARE found, it is highly likely that more will be present, and may well be of substantial interest.

- The whole of this is further dependent on how far the same areas have been covered by geophysics, what the sampling spacing was and how far (is how reliably) the results predicted what is found in evaluation, AND importantly, to what extent seemingly 'blank' areas really are blank as compared with surface/test pit finds and trenched evaluation.
41. While there is some commentary on a few of these issues in the ES, it is only in very vague terms, and is NOT a reliable basis for the EIA requirements as set out in paragraphs 26 to 28 above being met fully. Instead the approach has been to take the results of the fieldwork at face value, as if they reflect the full archaeological potential of the areas examined, leading to the conclusion that nothing much of relevance to WHS OUV is present.
 42. This approach is not only flawed in terms of the TOTALITY of what may very well exist, but is also extremely dismissive of the relevance to OUV of what HAS ALREADY been found. By not setting the results firmly in the history of remarkable discoveries within the WHS and within its environs, the conclusions appear to be extremely complacent.
 43. This is especially misleading because (subject to further review) some of the fieldwork reports within the WHS summarise their results in terms of potential contributions to research. These look to be a better guide to how OUV might be lost. They also need to be considered more fully against the Management Plan and NSPNN policies referred to above and reviewed in detail in **Appendix D**, noting in particular that the ability to record archaeology that would be lost must not be considered in the planning balance, but simply treated as irrecoverable total loss – ie 'substantial harm'.
 44. Another major area of uncertainty surrounds the issue of assumptions being made about preserving archaeological remains in situ beneath construction work areas, and their subsequent restoration (cf **Q Ag.1.3; CH.1.3**). Despite a growing body

of scientific literature on this – including relating it to different types of deposits and different kinds of artefact, bones etc., - there is no indication that any analysis has been undertaken to forecast what compression, crushing and distortion impacts on deposits, skeletal remains and artefacts is likely to occur, and while it is acknowledged as a potential impact, its scale extent and character are hardly discussed.

45. There appears to have been no detailed consideration of the likely scale of problems and needs to prevent the effects arising from use of different types of machinery, the wheel pressure weight and speed of fully loaded trucks used to transport vast quantities of tunnelling spoil; nor other effects such as slewing of large tracked machines etc., or what damage could arise from installation of services for compounds. In an internationally important prehistoric landscape and its environs, where for example human burials with fragile bones, complete Beakers, extremely fragile, very early metal and bone tools are often found, this is a further major uncertainty.
46. The restoration of such areas to agricultural use is a further issue: the potential need for subsoiling or deeper ploughing to remedy compaction effects (or perceived effects) is a significant possibility, that is not within the effective control of the project unless by formal agreements with landowners.
47. The burial of archaeological remains beneath spoil or landscape mounding is a further negative effect that warrants more consideration in terms of potential areas and archaeology affected.

Significant effects in loss of archaeological remains [Subject to revision and expansion in light of Deadline 1 documents]

48. From our preliminary consideration, it is clear that there are highly significant remains in the W tunnel approach in the vicinity of the 'Diamond' group and S side of Crossroads Barrow Group; also in the general area of the A360 junction W and SW of the Crossroads Barrow Group; and in the W tunnel approach, and potentially the Avon valley at Countess Roundabout. An issue that does not seem to have been considered (pending more complete review) is the survival of waterlogged deposit in the Wilsford shaft⁶ and hydrological implications of the tunnel passing just to the N (cf **Q CH.1.2**).

⁶ The Wilsford Shaft is a highly unusual middle Bronze Age ritual well. Past sampling of its waterlogged deposits yielded amongst much else fragments of beetles that represent species now present mainly in S

49. The growing discovery of archaeological remains very relevant to the OUV of the WHS and the Winterbourne Stoke Crossroads barrow group and its ridgetop setting is of such significance that it should be considered not just in WHS Management Plan terms of remains within the environs the contribute to OUV; but reinforcing the case for extending the WHS boundary to the W to encompass this key ridgetop barrow cemetery and its setting in a w The CBA's provisional view is that the loss of archaeological remains within the WHS is a far more serious impact in terms of loss of OUV than the ES claims. A properly and more fully precautionary approach would place far greater weight on their contribution of OUV in terms of being saved for future generations when questions and research techniques will have advanced, thereby potentially offering even more for contributing to future understanding *the substance and evolution of places, and of the people and cultures that made them.*

Significant effects on setting of remains, monuments and landscape areas

[Subject to revision and expansion in light of Deadline 1 documents]

50. Part of the significance of the loss of archaeological material is not just for their intrinsic potential for better understanding, but also as part of the setting of monuments and sites that contribute to OUV. In the 2004 Inquiry it was argued by the CBA and other objectors that buried archaeology not only itself could have a setting but could also contribute to the setting of other monuments – the classic case being the Avenue. This was fiercely resisted by both the then Highways Agency and their advisors and the then English Heritage. Now the view presented by non-government bodies then has been mainstream, and is included in Historic England's Guidance. This has two distinct elements:
- Entirely buried monuments themselves have a setting (which entails many different factors as indicated below) which will often make a major contribution to understanding and appreciating their significance.
 - Entirely buried separate remains and subsurface parts of upstanding monuments can contribute very substantially to their significance.
51. The approach adopted in the ES does not properly distinguish between these, or discuss the significance of buried remains in relation to setting in these terms. As a result, the contribution to OUV that buried archaeology makes in terms of setting has been further misunderstood or underestimated.

France, which has been taken (together with similar evidence of the same date in Oxfordshire) as evidence of a brief climatic warm spell when temperatures might have been 2 degrees warmer than now.

52. The approach to 'Archaeological Setting' (para 3.6.8 ff) and monument inter-visibility issues (para 3.6.5-3.6.10 ff) correctly notes the difficulty of being sure of the original form and appearance of subsurface monuments or what the prehistoric landscape was like (it was certainly very different from today). But a long history of management (dating back to the 1930s and before demonstrates) how subsurface remains can be understood, interpreted and displayed in relation to others. This is well exemplified in the Stonehenge and Avebury WHS by Woodhenge and The Sanctuary which illustrate how some subsoil monuments may have been far more significant over far greater distances than others, whether or not they were inter-visible. This issue is correctly seen as being subject to significant uncertainty, but the precautionary inference to be drawn is to assume that with better understanding the effects could turn out to be worse in future than may seem the case now.
53. Because of this, the need to relate the results of the archaeological fieldwork to the issues of setting, and the submission of relevant reports in the Deadline 1 window this section of our statement is also somewhat provisional in its observations.
54. The approach adopted for the analysis of setting is based on Historic England's guidance on setting. This sets out 5 steps which are outlined at para 2.3.2 of *Appendix 6.9 Cultural Heritage Setting Assessment (DOC AP-218)*. These are:
- Step 1: Identify which heritage assets and their settings are affected;*
 - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;*
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;*
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and*
 - Step 5: Make and document the decision and monitor outcomes.*
55. From a methodological perspective a shortcoming in the approach to Step 2 stage of assessment has been a failure to consider fully the many different factors that can contribute to setting: ie the physical, relational and perceptual characteristics of the surroundings of assets and economic and landuse characteristics that can contribute to their heritage significance; how that is appreciated and understood; and how issues such as landownership and management contribute to the dynamics of those factors and how indirect effects may arise. The matrix presented in **Appendix E** indicates a means by which the relevance of such

factors, their contribution to or detracting from significance, and how they are affected can be considered in an ordered manner. It is also an approach that can be used to audit the focus and objectivity of an assessment of setting issues in terms of factors that matter.

56. The CBA notes the scoping out of many heritage assets not affected or only minimally so (ES Appendix 6.9); if anything the still extremely extensive coverage of assets at some distance of the proposals (which have some cumulative relevance) appears to have diluted the much greater attention that should have been paid to those that matter most.
57. In reviewing the EIA and HIA assessments, the CBA's attention is focussed largely on the assets most affected (for good or ill) that clearly contribute to various aspects of the WHS OUV – not because others do not also contribute to the overall effects, but due to resources available. Comments on such assets are principally concerned with testing the validity of the approach and conclusions on the likely effects and their significance.
58. The EIA and HIA approach is based on spatial clusters of assets that are not recognised in the WHS Management Plan. Their identification and rationale is outlined but not fully discussed or justified in relation to key issues of OUV and the evolution of the Stonehenge landscape (cf **Q CH.1.8**). A whole treatise could be written on this topic (indeed several have been), but the key point with regard to tests set by the WHS Management Plan and NSPNN, is that all current research indicates that the location and distribution of monuments through the landscape over time is the product of changing ideas and perceptions over millennia of prehistory, not static intentions to create the distributions and clusters that are perceived now – in this case often just for the convenience of assessment.
59. An approach more firmly attuned to the OUV of the WHS as set out in the WHS Management Plan would examine how the setting and interrelationships of monuments contribute to OUV, and only then treat as groups those that have arisen from real interrelationships of function and locality (such as linear barrow cemeteries on ridge lines). This also needs to recognise that the monuments from which such clusters sprang typically had very different inter-relationships (such as the observation that all the long barrows in and adjacent to the WHS are oriented on one or other end of the Great Cursus, with one of them actually occupying the E end).⁷

⁷ We are grateful to Dr GT Meaden for this observation.

60. The way that setting assessment Step 2 has been approached in respect of prehistoric assets is set out at para 3.6.4 of Appendix 6.9 Cultural Heritage Setting Assessment p18 (**DOC APP-218**). It is noticeable that 'significance' of assets is not specifically correlated to issues of OUV policies, or whether all those designated and undesignated assets that contribute to international OUV are given any more weight than those which do not. Although this is considered in the separate Heritage Impact Assessment (**DOC APP-195**) it is not related to the policy tests that apply and which carry most weight (cf **Q CH.1.4**).
61. An especially significant flaw in the approach has been to treat setting as a predominantly perceptual issue, not a predominantly physical issue in which substantial physical changes to the surroundings of monuments directly alter those surroundings, not just the visible or non-visible, audible or non-audible presence of the proposals and how they impinge on the human senses. The result is that a key aspect of OUV – the effect of the proposals on relationships between monuments and the landscape – have not been fully identified or adequately assessed and as a consequence the effects (especially adverse ones) are badly underestimated.
62. The assessment baseline is taken as the 'present situation' (para 3.5.1), and specifically, *for the purposes of the EIA existing trees are treated as permanent landscape elements for the purpose of this Setting Assessment; whilst a different approach to existing trees in the landscape is taken in the Heritage Impact Assessment (see Appendix 6.1 5.3.29 – 5.3.30)*. There is no discussion of why the baseline is different from the 'bare earth baseline referred to in para 5.3.30-5.3.31 or what difference it makes, but it is a requirement of EIA that cumulative effects are considered, and that includes reasonably foreseeable change even if not yet formally approved. This potentially makes a significant difference, especially in respect of trees that even without a WHS woodland management policy cannot be regraded 'permanent landscape elements' (especially when they are relatively recent plantations). Quite apart from the issue that setting issues are not reliant on inter-visibility, this has direct implications for whether the assessment adequately informs how the value that heritage assets including their settings hold for this and future generations is to be judged. From the evidence presented this makes an especially big difference to the assessment at Vespasian's Camp and Amesbury Park and the Wintebourne Stoke Crossroads Barrow suggesting that the significance of adverse effects have been underestimated (cf **Q CH.1.6**).
63. The description of the proposals (**DOC APP-040**) and Outline Environmental Management Plan (**DOC APP-187**) do not describe the arrangements for

ventilating the proposed tunnel, though the Air Quality impact assessment (ES Chapter 5) says it would be *'likely based on a longitudinal jet fan strategy.'* It is very unsatisfactory that what is proposed for ventilation is being left to detailed design, because provision of upstanding ventilation shafts over the tunnel within the limits of deviation would potentially raise substantial issues for OUV of the WHS, both in respect of the addition of extra structures in the landscape and the extent and potential impact of disturbance over the tunnel. If, as assumed a longitudinal jet fan strategy is adopted it would concentrate emissions around both tunnel portals, the issue is not loss of archaeology or additional intrusive structures, but the concentration of emissions and additional noise in the vicinity of monuments (especially those that may be visited) close to the tunnel portals (especially any within 200m). This issue has not been examined, but is clearly relevant for example to the impacts on the Avenue.

64. A further flaw in the approach is that no clear distinction is made between nationally important assets and internationally important ones – ie those that contribute to or have potential to contribute to the OUV of the WHS. This is an area where the relationship between the EIA and HIA lacks clarity (cf **Q CH.1.4**).
65. The CBA considers the key significant **beneficial** effects in relation to setting can be summarised as follows:

Nature of effect	Outcome
<ul style="list-style-type: none"> - Removal of visual and noise intrusion; - Removal of highway as physical barrier dividing cultural and functional interrelationships between monuments; - Reversal of physical changes to topography (W side King Barrow Ridge and Stonehenge Bottom) 	<p>Important benefit: (including restoration of landform):</p> <ul style="list-style-type: none"> - Stonehenge itself; - W half of Avenue; - Round barrows SE and S of Stonehenge especially those closest to A303; - other monuments in similar proximity to A303 and similar distance from tunnel portals <p>Significant benefit:</p> <ul style="list-style-type: none"> - Other monuments and sites in the central part of the WHS where the A303 is sufficiently visible and audible to detract noticeably from understanding and appreciating their contribution to OUV

- Reversal of physical severance of individual monument	Important benefit: - E half of Avenue
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66. The CBA considers the key significant **adverse** effects in relation to setting can be summarised as follows:

Nature of effect	Outcome
- Increase of visual, or air quality intrusion; loss of visual benefits	Significant harm: - E half of Avenue adjacent to E tunnel portal; - Monuments adjacent to W tunnel portal - Monuments sites part of or associated with Winterbourne Stoke barrow group - Loss of Stonehenge view from the road
- Insertion or exacerbation of highway as physical barrier dividing or isolating cultural and functional interrelationships between monuments;	Significant harm: - Monuments adjacent to W tunnel portal - Monuments sites potentially associated with or part of Winterbourne Stoke barrow group - Monuments in the vicinity of the so-called Diamond
- Significant physical changes to landform topography (Cutting and tunnel portal on E side King Barrow Ridge; cutting through Winterbourne Stoke Ridge and cut and fill for A360 junction; spoil disposal Parsonage Down)	Important harm: - The W environs and setting of the WHS - Winterbourne Stoke Barrow Group - Monuments adjacent to W tunnel portal - Monuments sites potentially associated with or part of Winterbourne Stoke barrow group - Barrow groups on Parsonage Down Significant harm: - Vespasians Camp - Monuments in the vicinity of the so-called Diamond
- Physical severance of individual monument	Significant harm:

	- Northward (non-scheduled) continuation of schedule linear earthwork crossed by W tunnel approach (cf Q CH 1.42)
- Introduction of major new earthworks and structures not contributing to OUV	Important harm: - The whole WHS and its W environs and setting

Overall Heritage Effects and Interactions

67. Overall, the CBA recognises the **beneficial effect** of significantly enhancing the setting of Stonehenge, and of other monuments in its vicinity, especially those close to the current A303. For this central part of the WHS and its world-famous central focal monument the removal of the A303 from the surface and opening up of that part of the WHS to greater visitor access would be an undoubted benefit of some magnitude. The scale of this benefit needs to be carefully judged: for example it would be less substantial than the closure of the A344 and closure, down-sizing and re landscaping of the old visitor centre and car park. It would be at the expense of the not insignificant 'view from the road', which for the vast majority of travellers travelling to the SW when traffic is not congested is a very widely recognised landmark moment (for some the sign of arriving in South West England).
68. These benefits are not as great when compared with the do-something evolution of the baseline scenario as described above. This scenario – or something like it – which is most likely to arise without the proposed scheme would still reduce the intrusiveness of the A303 in the central part of the WHS, albeit to a much lesser extent than the tunnel; the impact of the road on monuments immediately adjacent would not be reduced, nor would the modifications to the landform on the W side of King Barrow Ridge and Stonehenge Bottom which exacerbate the harm to the setting of adjacent monuments be reversed. There would be no change to the remaining intrusion of the former visitor centre and access road on the setting of Stonehenge; the view from the road would remain. Importantly, the opportunity to deliver additional benefits without harm to OUV would substantially remain.
69. In respect of **adverse effects** the cumulative loss of archaeological sites and remains that contribute to OUV would be irreversible and in NSPNN terms would be substantial harm to significant parts of the internationally designated WHS (cf **Q CH.1.37**). The physical creation of the cutting earthworks, retaining walls,

canopies and tunnel portals, together with the reconfigured A360 grade-separated junction as proposed would result in cumulatively very significant harm to the WHS OUV of the relationships between monuments and landscape, which as far as the Applicant's proposals indicate, would not be reversible in the foreseeable future. This especially serious for the Winterbourne Stoke Crossroads Barrows, where there are multiple cumulative effects, especially when considered from the kinetic experience of their presence in the landscape, the setting of the WHS, and the potential to revise the WHS boundary to extend west of the A360 (**cf Q CH.1.41; CH.1.32; CH.1.35; CH.1.15; CH.1.6**).

70. The CBA recognises that the proposals for decommissioning the present surface A303, like the A344 and former carpark and visitor centre have and would go some way to restore original topography that was far less badly harmed than the present proposals in the 1960s onwards, within half a generation; the construction lifetime of the scheme (120 years) represents 4 generations and while it might be envisaged that the proposals might become redundant – or more likely be seen as a mistake – within that time frame, it seems very unlikely that any reversal would go further than infilling cuttings and removing above ground embankments and structures, the legacy of structures as 21st century monuments would be permanent, just as the infinitely smaller 20th century visitor centre looks set to become.
71. Overall, even the ES with all its flaws and weaknesses sees only a slight net benefit for the WHS; given how little weight seems to have been given to the loss of setting and harm to the OUV relationship of monuments to landscape at the tunnel approaches and on Winterbourne Crossroads ridge, the CBA's view is that there would be significant net harm.
72. The ES cultural heritage baseline does not fully address the EIA requirement to consider the likely evolution of the site without the development, or considers this neutral. But if delivery of the WHS Management Plan is taken to set the framework (most likely including areas of boundary change) the expected evolving baseline would see more modest but potentially significant reduction of problems with the A303.

Indirect and cumulative effects

73. The EIA requirement to consider indirect and cumulative effects need to be considered at three distinct levels:

- *First*, in terms of impact interactions and their cumulative effect on major characteristics of the environment – especially those aspects that are afforded high level of protection or are especially sensitive and vulnerable to change
- *Second*, in terms of the accumulation and interaction of effects of these proposals directly in tandem with or indirectly facilitating other development associated with the project in its overall route context
- *Third*, as part of an overall highways programme at national and regional level, how it contributes to, or indirectly prevents or adversely affects the achievement of national and international environmental objectives at national and regional level.

74. With respect to the first of these levels, our provisional assessment of the effects of the scheme on cultural heritage summarised above (paras 61 to 62) set out what we believe to be the key environmental effects of the scheme in **cumulative** terms, including some impact interactions (there are more in respect of landscape and visual effects).
75. We have also set out, though not exhaustively presented some key indirect effects, such as the hydrological interaction with waterlogged archaeological deposits – Blickmead and other sites being one identified in the ES; the Wilsford shaft not identified or assessed.
76. The other two levels of assessment of cumulative and indirect effects are best considered below in the context of alternative options and the wider context set by the RIS framework (see **Part 3** below).

Measures adopted to avoid, reduce or offset harm and to enhance benefits.

77. The measures that have been adopted to avoid, reduce or offset harm and to enhance benefits are a mixture of engineering design, landscaping and construction management measures. Some of these are not fully defined and their effectiveness is not certain
78. While the bored tunnel is the major feature of engineering design to REDUCE harmful effects on the WHS impacts, it does not (despite its extension by 400m) AVOID causing serious damage to the OUV beyond the ends of the bored section.

79. The design mitigation for a major dual carriageway in cutting across a landscape that is open and highly reliant on topography for its character presents significant challenges: the approach taken to minimise visual intrusion and landtake, may be correct in some respects but retained steep sided and relatively deep cuttings with canopies are especially alien structures and forms within the landscape, significantly diminishing the effectiveness. Green bridges are useful means of reducing severance, and intrusion for wildlife and people crossing the highway, and are effective beyond the WHS and its environs, within the internationally valued landscape they are distinctly a very poor substitute for a more complete tunnel.
80. Overall these measures are of doubtful effectualness, in some cases emphasising as much as reducing harm to OUV.
81. Uncertainty attaches to the measures proposed to protect archaeological remains beneath construction compounds haul roads etc. (ES Chapter 6, para 6.8.4). There is a growing scientific literature on crushing, distorting and compression effects on archaeological deposits, artefacts and human remains. While the idea of avoiding damage by temporary burial beneath a protective layer of hardcore running surface may seem simple, the enormous scale and repetitious runs to and from spoil disposal sites and heavy use of very large compounds imperative speed and efficiency of spoil disposal requires a far clearer basis of analysis to demonstrate that no harm would arise, especially given the uncertainties about the full archaeological content of such areas.

Overall effect of the proposed scheme for cultural heritage and landscape

82. Assessed against the CBA's adopted criteria for judging outcomes of new infrastructure and landuse for the Stonehenge WHS and its environs, that –

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*

-- the proposed scheme meets none of these fully; some not even partially. For several key contributors to WHS OUV in the eastern, and more especially,

western parts of the WHS and its environs, the proposals would prevent the achievement of these criteria on a foreseeable and for several, irreversible basis.

83. The CBA's OBJECTION is – as it was in the 2004 inquiry – that the proposed scheme causes undue harm to the OUV of the WHS without delivering the full benefits of removing the A303 altogether – for which there are alternative solutions including one at far less cost. Moreover, this is not just a Stonehenge issue: if such savings were expended elsewhere in the RIS2 programme, this could ALSO deliver additional net environmental gain where substantial impacts on protected landscape are currently projected to be unavoidable directly because of the cost of this scheme. We explore this further in the next Part of the Statement.

PART 3

Approach Adopted in Considering Alternative Solutions

84. Consideration of any alternative solutions that have been assessed or are proposed for this 'heritage led' scheme must be based on the need to achieve a clear and logical understanding of the balance between positive and adverse heritage effects and the need for 'clear and convincing evidence' that any harm is clearly outweighed by other public benefits (cf **Q AL.1.4**) Importantly, the WHS Management Plan sets a very high bar in this respect, and in effect means that harm to the WHS OUV should only be countenanced if there is no alternative that would avoid it AND the public need is of a very high order (eg international or very high national) imperatives.
85. The WHS Management Plan does not include an objective or policy of achieving any form of net balance of enhancement over harm, but has very clear priorities to avoid harm to OUV while promoting benefits. This means it is NOT appropriate to consider the balance of harm versus benefits just in terms of the net balance within the scheme, but far more importantly to consider the scheme proposed with any alternative means of upgrading the A303 and removing its damaging intrusion while entirely avoiding additional physical impact on OUV.
86. Of particular significance are any options where all three of the following objectives that meet all the following objectives
- The WHS international Management Plan imperatives can be fully delivered
 - The highways and socio-economic objectives which are of strategic national (not necessarily highest national), imperative can be fully delivered or met to a substantial extent, and any local disbenefits minimised if possible
 - The above to be delivered without unduly harming other areas of countryside – especially nationally or internationally protected landscapes sites and areas.
87. In addition, the above suite of objectives become especially important if all of them can be achieved at substantially lower cost to the public purse. However, we do not regard this as an imperative of the same order.

88. There clearly are exceptional circumstances in terms of the possible costs and value for money issues arising from removal (or partial removal) of a road from an internationally designated landscape. But in the light of the history of the scheme and the fits-and-starts escalation of official view towards, but not reached the 1995 planning conference consensus, there is no need to ascertain by one-off questionable contingent valuation study what good public value for money is. IF there really is no cheaper alternative to removing the road entirely from the WHS, then doing so by bearing the cost of a long bored tunnel is, by virtue of meeting UK international treaty obligations and national policy targets good value for money (as was already realised in 1995) – especially in the context of the proposals under active consideration to avoid harm to the nationally protected landscape of the Peak District National Park a tunnel six times as long (see below).
89. A major problem with the way that alternatives are considered by Highways England’s standard methodology means that the pros and cons of shortlisted options are not fairly weighted in the balance through all relevant stages. Once a shortlist – typically nowadays a very short list of two - options have been identified as the best strategically different solutions, one is chosen after consultation with the pros and cons appraised. But these lines-on-a-map appraisals seldom include junctions and other major items of land-take; nor do they consider the possible means of avoiding impacts or achieving better highways or economic performance by introducing significant design features of equivalent cost to the preferred option – in this case an entirely exceptional major tunnel that if built would be by far the longest in the UK (see **Appendix F**)
90. Thus when the preferred option is significantly refined and developed involving substantial further costs (in this case another 400m of tunnel), without the alternative being brought (even at a generic level) to an equivalent level of mitigation the balance is not evenly poised.
91. 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. What this demonstrates more than anything is that standard methods can be supplemented and enhanced where the case demands (as in the case of enhancing internationally and nationally protected landscapes); but also it should be done by a fully informed assessment on a properly like-for-like basis, as required by NSPNN and the EIA regulation that emphasises the need to provide information and forecasts of effects *required* to make informed judgements (see paragraph 34 above).

92. The whole approach appears to have started from the wrong premise: far from being a heritage led scheme, the whole approach can be seen as:
- Assuming (consciously or not) that a tunnel is the default starting point because of past history
 - Adopting as a fundamental goal maximisation of economic growth (ie minimising journey time and delays) by adopting the most direct strategic route option (ie through/under the WHS rather than round it)
 - Interpreting WHS and national heritage policy as only needing to achieve a bare net balance of enhancement over harm to OUV, not avoid harm and maximise enhancement of OUV.
 - Having found that to achieve such a net balance involves a uniquely long tunnel (by UK standards) at enormous cost, the only way to justify this is by applying the sticking plaster value for money booster of a controversial heritage monetisation assessment that is neither standard practice nor ever used for any other scheme.
93. None of this accords with the UK's obligations under 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".*
94. By contrast, applying the approach we would advocate as set out in paragraphs 75 and 76 above, would be fully aligned on UK international treaty commitments as well as national policy.

Alternatives Considered

95. To achieve a more logical and more sound approach, the CBA recommends reconsideration of three strategically very different options:
- **a long-bored tunnel**
 - **a surface route to the south** like option F010

And as an interim measure representing the evolution of the baseline environment without the proposed scheme, on a properly planned basis,

- **a retained single carriageway plus Winterbourne Stoke bypass**

96. Our review of Deadline 1 documents concerning alternatives has yet to be completed (especially in respect of any longer tunnel avoiding impacting the WHS altogether) but what follows represents our provisional view.
97. In the light of the proposals now under examination, our review of their heritage, landscape and other environmental effects and the possible effects of other options within the relevant international and national legal obligations and policies we consider that the logic set out above in paras 75-76 should apply.

A Long Bored Tunnel⁸

98. The CBA's general position is 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.*

In very broad-brush terms such a tunnel would be the solution that potentially best removes the A303 from the WHS (and its setting) without causing harm to its OUV or extensive extra impacts of a new surface route.

99. But the Council's explicit caveat is that

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.

100. Amongst the reasons why *the strong attractions of a long-bored tunnel do not necessarily outweigh the case for a different solution.* there are significant challenges (several rehearsed in the CBA Position Statement in **Appendix B**). In the light of the present proposals we acknowledge that amongst these are

- The length required to avoid damage to the WHS and its environs – especially relative to the Avon and Till valleys and the issues surrounding the case for extending the western boundary of the WHS beyond the A360 (especially in the vicinity of the Winterbourne Stoke Crossroads barrow group and recently discovered remains in the vicinity).

⁸ This means a bored tunnel that avoids surface intrusion within the WHS and its environs where these contribute to its OUV.

- Challenges of portal locations and integration with road intersections
- The even greater challenges of spoil disposal and landscaping
- Significantly higher carbon cost
- Monetary cost, not in terms of whether the WHS is 'worth it', but whether objectives could be substantively met at much lower cost (as per paragraphs 75 to 76 above, AND also whether any saved costs in achieving those outcomes could be used on other schemes elsewhere in the National Road Network to deliver substantial environmental net gains that in current allocations of budget are not achievable.

101. In summary, it is clear that while such a tunnel would have major benefits for the WHS, this still comes with some significant challenges to avoid harm the environs of the WHS, and at a far greater cost both monetarily and in terms of carbon emissions and spoil disposal. Within limited resources this also undoubtedly denies the achievement of major environmental net gains elsewhere. Nonetheless, in the context of serious consideration being given to a far longer tunnel beneath the Peak District National Park, and the emerging (increasingly explicit) national commitment to delivering net environmental gain, this is nothing like as unthinkable as it was 15 years ago. The steady trend towards reverting to the 1995 consensus is even more evident now than before.

Surface Route to the South

102. The CBA believes that a surface route to the south like option F010 – but potentially a shorter optimised version enabled by a retained cutting and short tunnel passing round the S edge of Amesbury and under N edge of Boscombe Down airfield – is a sensible, affordable and on balance, environmentally beneficial option.

103. A key consideration is that it does not affect a nationally protected landscape; while it would cross part of the Salisbury District Special Landscape Area, the Wiltshire County Council planning policy website states that

Special Landscape Areas (SLA) are landscapes of County Importance. SLA is a non-statutory designation protected through County Structure Plan and Local Plan policy. Much of Wiltshire's countryside outside the AONBs is designated as SLA.

104. Compared with F010 an optimised alignment would not only avoid significant harm to internationally and nationally protected habitats, species and landscapes, but

also reduce the length of new road in open countryside and in particular cause less harm to the Salisbury District SLA on the N side of the Bourne valley where apart from its general landscape impact it would pass close to several villages and sever some distinctive historic landscape field patterns. Its significant saving in journey times would improve its economic performance.

105. Problems crossing the Till and Avon valleys and negotiating Boscombe Down Airfield are key technical design challenges, but given the substantial gains for the WHS (including reconsideration of the impact of the A360 on monuments close to its current W boundary) and prospects of creating an archaeological park of truly global significance, this is an option worthy of much closer scrutiny.
106. Contrary to national and international policy, it appears that no serious attempt has been made to optimise this alternative to best deliver the major objective of removing the A303 entirely from the WHS, while ALSO avoiding significant effects on nationally or internationally protected landscapes, sites, habitats, species; AND minimising new infrastructure in open countryside; AND achieving economic and social objectives.
107. The case for dismissing this option was deeply questionable, broadly reaching a conclusion that because of added journey times that would be significant for the LOCAL economy it was unacceptable, despite costing £400m less (or with the extended tunnel much more). There are issues to be teased out as to whether the logic applied in reaching this conclusion was rational, including
 - Whether an added heritage benefit of removing the A303 entirely from the WHS rather than just its central area was added to the contingent valuation calculation used to justify the proposed scheme which even the Applicant say only achieves a small net benefit.
 - Whether the cost comparison included the added 400m tunnel and canopies and green bridges.
108. The CBA's provisional view is that in respect of the local economy issues (which in reality is the only relatively substantive objection provided national landscapes, wildlife heritage and water quality assets can be protected or adequately mitigated) consideration should be given to the feasibility of a relatively short tunnel and retained cutting through and under the S edge of Amesbury and N side of Boscombe Down Airfield. *Prima facie*, in terms of monetary cost, optimising the crossings of the Till and Avon valleys to avoid or minimise harm and negotiating

Boscombe Down Airfield to reduce the circuitousness of the F010 option would potentially be far less costly than the proposed scheme involving the 3.3 km tunnel.

109. Not only would this achieve the full benefits for the WHS – with potentially substantial benefits from its creation as a major archaeological park, thereby increasing benefits to the local economy as well as safeguarding it for future generations at relatively modest local environmental cost; but the saved costs would potentially enable one or more other schemes to incorporate shorter much shorter tunnels to achieve substantial net gains to protected landscapes, where otherwise substantial harm is unavoidable within current resources allocations.

Do-Something Alternative (Baseline Evolution without the Scheme Proposed)

110. This scenario has already been described in above in paragraphs 31 to 33, and need not be repeated in detail, but it is important to add some important further considerations to make this work while also facilitating more comprehensive solution in the future.
111. The CBA's previous experience (being the only organisation to recommend what by default actually happened – albeit incompletely – after the 2004 Inquiry) has highlighted how the Baseline Evolution without the Scheme Proposed – as predicated by policy and statute (as explained in para 31-32) – does not just happen fortuitously. Most of the contributory measures are capable of being delivered independently of each other, and they do not all fall under the same legislative basis for authorising them. This means that as an overall scenario the components are quite hit-and-miss. It also means that the way they are implemented does not necessarily plan for a future scheme completely removing the A303 from the WHS.
112. The CBA does NOT wish to wait another 15 years for such a step-wise approach to stall yet again, still leaving the situation no better off than it was in 1995.
113. For this reason, we believe that this needs to be treated not just as the likely default outcome but as an alternative interim solution if no clear decision is made to adopt an alternative scheme that removes the A303 entirely from the surface of the WHS. Key additional considerations in making this a coherent alternative in the absence of a more comprehensive solution are:

- Integrated planning as a whole joint project for WHS and A303

- Choosing a S route for the Winterbourne Stoke Bypass to facilitate a better connection to a potential S surface route avoiding the WHS or a possible long tunnel emerging S of the present A360 junction.
- Designing an improved current A303 and A360 junction further from the WHS and its environs to avoid impacts on WHS OUV.

Comparison with the Proposed Scheme

114. Having outlined the issues related to these alternatives, the CBA thus concludes that three strategically different solutions merit much closer scrutiny to a level not yet achieved. Such scrutiny and optimisation needs to achieve a generically comparable level of detail – including junction locations and layouts, optimised horizontal and vertical alignments, major structures, general landscaping, key construction requirements, and disposal of surplus material – that allows a sound overall understanding of how they would perform against highways, economic social and environmental objectives.

115. Pending such a review, and subject to closer review of Deadline 1 documents, the following are the salient features and key aspects of how these alternatives compare with the proposed scheme

Option A: a c. 4.5km Long Bored tunnel under the WHS (cf Q AL.1.6)

116. The salient features of this option are that

- Tunnel portals and approach cuttings would be outside the WHS, with the tunnel extending from the east side of King Barrow ridge to the west side of the Winterbourne Stoke Crossroads ridge.
- The Countess Roundabout and Winterbourne Stoke Crossroads junctions would potentially be completely reconfigured and potentially spatially staggered to make use of tunnel portals as over bridges while also facilitating safe distances for 'on' slip roads approaching the tunnel at each end.
- It would incorporate the Winterbourne Stoke bypass, whether N or S dependent on location of W tunnel portal – a southern route best allowing for strategic choices from the evolved baseline scenario.

117. As compared with the proposed scheme this would result in:

- Substantially increased cost – and was rejected for comparison purely on the basis of its costs not being within the budget for the scheme (ES Ch3 Table 3.1), seemingly without reference to environmental issues or the Government's commitment that scheme should clearly demonstrate environmental net gain, or international obligations and strong national policy that should not compromise conservation of the historic environment for future generations
- Substantially less loss of OUV significance in terms of both archaeology and the setting of key monument groups at the western edge of the WHS as per its current boundaries
- Substantial additional gain of reunification of WHS and facilitation of wide roaming public access especially when land management issues at west end are addressed.
- Improvement (possibly significant) in noise tranquillity and air quality in Western side of WHS
- Similar environmental issues in respect of major construction sites to the proposed scheme
- Greater issues for disposal of surplus spoil
- Uncertain pros and cons regarding impacts of junctions at E and W
- Effects assessed by Applicant for N and S options for Winterbourne Stoke by pass very similar to each other, so no immediately obvious difference.

*Option B: A surface route bypassing the WHS to the S similar to F010 (cf **Q AL.1.11 AL.1.12**)*

118. The salient features of this option are largely as set out in **Doc REF REP1-037**, but with significant potential optimisation

- Its west end would be the same as the proposed scheme; its east end significantly further east.
- The junction with the A360 would be further away from the WHS and possibly reconfigured to reduce environmental effects.
- There would be an architect-designed viaduct over (or possibly tunnel under) the R. Avon SAC, including construction methods designed to avoid any significant effects on the habitats, species and water quality
- It would include junctions S/SW of Amesbury and

- There would potentially be a short tunnel (up to 1km long) at Boscombe Down to improve journey times and reduce the adverse effects on the locally protected landscape and historic landscape character of the Bourne Valley and the setting of the historic villages there
- Potential realignment of A360 west of Winterbourne Stoke barrow group

119. As compared with the proposed scheme this would result in:

- Substantially less loss of OUV significance in terms of both archaeology and the setting of key monument groups at the western edge of the WHS as per its current boundaries
- Substantial additional gain of reunification of WHS and facilitation of wide roaming public access especially when land management issues at west end are addressed.
- Improvement (possibly significant) in noise tranquillity and air quality in Western side of WHS
- Less need for major construction sites close to the WHS
- Less major landscape issues for disposal of surplus spoil (overall scheme to balance cut and fill)
- Key landscape design and structure issues for crossing R. Avon and R Till avoiding/minimising key ecological effects; and in relation to Amesbury Boscombe Down airfield (potentially needing retained cuttings and c.1km tunnel) would be substantially less costly and any residual adverse effect on local economy could be outweighed by gains from more complete enhancement of WHS encouraging longer or repeated visits.
- No adverse impact on international or national protected landscape; major gains for international WHS, effects on R Avon SAC capable of being mitigated/avoided. Optimised version would significantly reduce impact on locally designated landscape Bourne Valley
- No designated heritage or wildlife sites lost; some impacts on heritage settings but less significant than preferred scheme; potentially significant (but not out of the ordinary loss of archaeology; some scope to adjust horizontal and vertical alignment to avoid worst effects.
- Substantially reduced cost though potentially less substantial depending on needs related to viaduct and/or tunnels

- Any residual local economic detriment potentially off set by other measures to support affected businesses.

Option C: A retained single carriageway with junction improvements and Winterbourne Stoke bypass (as completion of a staged approach prior to adoption of either c.4.5km Long Bored tunnel under the WHS or surface route to S)

120. The salient features of this option would be:

- Leaving the present A303 on surface across WHS with no dualling but noise reduction surface, earthen noise embankments placed on present ground surface (both with no physical impact and reversible)
- Including (in line with WHS MP action 134) a pedestrian underpass bored through the embankment fill at Stonehenge Bottom (no physical impact and reversible) and ongoing closure of the w end of Byway 12 onto the A303.
- Incorporating a Countess Roundabout flyover and grade separated Winterbourne Stoke Crossroads junction to mesh in with longer term strategic alternatives.
- Incorporating a Winterbourne Stoke bypass to the S to mesh in with longer term strategic alternatives.
- Introducing variable speed limits to help manage congestion at busy times

121. As compared with the proposed scheme this would result in:

- No loss of OUV significance in terms of archaeology
- Some improvement in noise tranquillity and reduction of intrusion on setting of Stonehenge and other monuments while retaining view-from-the-road appreciation of Stonehenge
- Some improvement in visitor access to areas S of A303
- Minimal harm from construction sites to the proposed scheme; no need for major spoil disposal
- Same environmental pros and cons regarding impacts of Countess Roundabout junction
- Potentially reduced effects on WHS OUV from differently configured junction with A360 and link into Winterbourne Stoke bypass

- Significant reduction in traffic congestion and some resultant improvement in air quality in WHS

Summary

122. On balance, in the light of the evidence now available, the CBA considers that the S surface route similar to F010, potentially optimised in the manner outlined above would represent (in the words of our position statement **Appendix B**) *'the case for a different solution'* which, subject to proper development to allow closer comparison DO appear to outweigh *'the strong attractions of a long-bored tunnel'*.
123. Those 'strong attractions' still outweigh the serious shortcomings of the proposed scheme, but would further delay any solution – potentially even more than the S surface route. If such a review does not proceed in a timely manner one of these or some other better solution entirely avoiding the WHS, the CBA urges that, as explained above, the evolution of the baseline scenario be treated as a serious, beneficial, and pending a fuller solution, deliverable alternative.

Wider strategic context of decision making

124. The problems of how alternatives are considered and appraised – often nailing colours to the mast of one option before sensible comparison can be made of strategically optimised alternatives on a level playing field.
125. This part of a much larger issue of strategic context in decision-making. In particular this concerns whether and how the balance of environmental, social and economic pros and cons of different schemes within the Road Investment Strategy have been considered, and if the approach adopted conforms with statutory and regulatory requirements for having regard to the environmental effects of the Road Investment Strategy at national, regional, Strategic Route and scheme packages levels.
126. We believe the necessity for RIS and associated strategic routes to be subject to SEA is indisputable because the Infrastructure Act 2015 imposes statutory duties on both the Secretary of State and Highways England to have regard for the environmental effects of their strategies, and they are not just budgetary or financial plans but show how a series of socio economic, road safety and environmental objectives will be delivered as a Programme of identified projects subject to EIA. That 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 is written into the Act. Our detailed analysis of this is presented in (**Appendix G**).

127. But it is for the Examination to consider whether it is lawful for a scheme that is part of such a strategy which so clearly 'sets the framework' for decision making to be put forward without that framework having been subject to strategic environmental assessment as required by UK law.
128. The legal requirement for SEA derives from UK secondary legislation (SI 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations*) which apply to strategic plans and programmes of development, though not policies or budgets.
129. The A303 Amesbury to Winterbourne Stoke Improvement Scheme is only one (though much the most costly) of several highways schemes in the SW Region at various stages of development. These form part of a national programme of highways infrastructure development consisting of numerous specifically identified stretches of the National Road Network. These come within the Government's national Roads Investment Strategy (RIS) with two programmes RIS1 (2015-19) and draft RIS2 (2020-2024).
130. As a number of other objectors have noted, these strategic programmes have never been subject to Strategic Environmental Assessment. In February 2019, Andy MacDonald MP asked the Roads Minister:

'Whether his Department undertook a Strategic Environmental Assessment of the draft road investment strategy 2?'

The Minister, Jesse Norman MP responded:

'Every project proposed through the next Road Investment Strategy will go through the appropriate sections of the planning process, and this process usually includes multiple opportunities for consultation. As such, RIS proposals are subject to Environmental Impact Assessment regulations, rather than to those leading to a Strategic Environmental Assessment. The Department will ensure that every project is assessed in line with applicable law, and aims to provide additional opportunities for people with wider environmental interests and

concerns to get involved when possible.' (Written Question 217075, February 5th 2019⁹)

131. When the key tests for whether SEA is required are applied to the nature and purposes of RIS1 and RIS2 the approach of relying ONLY on project-by-project EIA appears to be unlawful, for the following reasons as explained in more detail in

Appendix F:

- The scheme is not exempt from SEA because its authorisation is not through a direct Parliamentary approval (which was the only legal reason why HS2 was exempted from SEA)
- The scheme is one of many specifically identified in RIS 1 and RIS 2 for delivery against stated objective and thus forms part of a national plan and programme of road infrastructure developments.
- RIS1 and RIS2 are required by Government under the 2015 Infrastructure Act and are official reports to ministers laid before Parliament.
- RIS1 and RIS2 are NOT exempted from SEA by virtue of fulfilling only (or largely) policy or budgetary purposes, or concerning national security development. Specifically:
 - The overall budgets for the programmes have been set by successive Budgets and Public Expenditure Statements by HM Treasury
 - The overall policies governing the programmes are set by several policy statements, both specific and more general, including the DfT *National Policy Statement for National Networks*; DEFRA *25 Year Environment Plan*.
- RIS1 and RIS2 clearly represent a Programme of specifically identified developments within an overall strategic plan for highways infrastructure developments that have clearly stated overall economic, social and environmental objectives.
- As their documentation clearly indicates, these strategies clearly 'set the framework' for future decision-making, not only being clearly stated as implementing Government policy, but also being the basis on which Highways England as a statutory company under the Infrastructure Act

⁹ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2019-02-05/217075/>

2015 is accountable to Government and subject to formal scrutiny for delivering the programme of schemes in a way that meets specified economic, social and environmental objectives.

- All the development schemes identified in RIS1 and RIS2 are 'schedule 1' projects for which EIA is compulsory, and being included in a Plan or Programme that sets the framework for decision-making means that Plan/Programme must have been subject to SEA, not just EIA.

132. DfT's *Road Investment Strategy: for the 2015/16 – 2019/20 Road Period RIS 1 Report* stated:

The Hindhead Tunnel demonstrates how a well-designed road scheme does not have to choose between helping the environment and helping the economy. In addition to greatly improving journey times between London and Portsmouth and removing one of the network's accident blackspots, the ambitious design of the scheme meant that an AONB once blighted by traffic is now returning to its natural state.

We want to build on this example. As part of this investment plan, we are committing to a new tunnel at Stonehenge, together with the removal of the existing A303 from the landscape around the stones. We are also commissioning a study into the feasibility of a new tunnel under the Peak District which could provide a high performance road link between the great Northern cities of Manchester and Sheffield. More than £300m is being made available across the Roads Period to improve hundreds of sites nationwide, and start the process of retrofitting modern environment standards to the rest of the network.

133. The report on the consultation on RIS2 states that

'The Government takes the protection of environmentally sensitive areas seriously. Amongst other things, the National Networks National Policy Statement sets out a presumption against major developments in National Parks, the Broads and Areas of Outstanding Natural Beauty. They are only permitted in exceptional circumstances and where it can be demonstrated they are in the public interest. The Government's 25 Year Environment Plan (A Green Future: Our 25 Year Plan to Improve the Environment) will embed an 'environmental net gain' principle for development, including infrastructure. RIS2 investments will comply fully with the Government's existing and developing environmental programme.'

134. But since neither RIS1 nor RIS2 have been subject to SEA and these comments are purely aspirational with no actual analysis of whether these standards are being achieved – or if better results against these standards could be secured within the resources available.
135. The CBA therefore agrees with representations from other organisations that this is a fundamental flaw in procedures. The courts typically refuse to overturn decisions that breach procedural rules unless there are demonstrable reasons why they have substantive real-world effects. In this case the lack of SEA is not just a legal issue of procedural niceties, but a highly practical problem of how failure to consider the overall environmental impacts of RIS1 and draft RIS2 and their subsidiary regional and route strategies and scheme packages the Strategy programme are to be addressed.
136. In particular, despite statutory duties to have regard to the environmental effects of their Strategies, there appears to be no rational, objectively assessed basis for how key environmental effects on nationally and internationally important landscapes have been assessed, what means exist for avoiding, reducing or offsetting them, and how environmental benefits can most effectively be secured across ALL schemes in balance with also meeting national socio economic objectives and good value for money.
137. Because there is no overall assessment of how environmental losses and gains are balanced against overall strategic economic benefits there is no indication of where, within overall cost limits set by HM Treasury (The Budget 2018 para 4.9) are best distributed in terms of the sections of the Network identified for improvement. Fundamental to this is whether substantial environmental benefits in nationally and internationally protected landscape are not just avoided, but actually removed by the choice of a less costly alternatives that do not (or need not) result in substantial economic harm (as in this case); or in the case of the A417 the achievement of an overall '*environmental net gain*' is being precluded by a budget that has not taken account of there being no alternative surface route that would avoid the protected landscape.
138. The inconsistency of approach that has been adopted at the strategic level is all too apparent from simple comparison of Stonehenge and four other schemes affecting nationally and internationally protected landscapes, some involving the longest tunnels in the UK others with tunnels ruled out as being 'unaffordable.'

- At c. 18km long the possible Sheffield to Manchester road link currently under consideration would substantially avoid harm to the Peak District National Park. Potential to remove existing road and deliver other additional benefits for nationally and internationally designated areas are as yet unclear. **PDNP is UNAVOIDABLE**
- At 3.3 km long, the proposed tunnel at Stonehenge at c. one sixth of the length would nonetheless be the next longest road tunnel in the UK by a substantial margin, provides a mixture of reduction in harm and significant enhancement of WHS OU (which could be obtained by other alternative means) and significant irreversible less and harm to OUV – at best of slight and questionable net benefit; and at worst significant harm. **Stonehenge WHS is wholly AVOIDABLE** with alternatives routes round or under the WHS, one substantially cheaper, that would avoid harm and greatly increase benefit to the WHS OUV without causing overriding harm to the environment elsewhere or preventing national socio economic objectives being substantively delivered.
- The next longest tunnel at 1.83km (little more than half the length) is the already built A3 Hindhead tunnel removed the former A3 route from a Hindhead common SPA and SSI, NT inalienable land and a key part of the Surrey Hills AONB. It delivered substantial net benefits at little harm. and there was no viable alternative to achieve these outcomes. **Hindhead Common was UNAVOIDABLE without causing major harm elsewhere**
- The preferred **surface** route for the A27 cutting through the edge of the South Downs National Park was withdrawn by Highways England (under threat Judicial Review) for reconsideration of alternatives outside the National Park. **SDNP is AVOIDABLE**
- The preferred **surface** route for the A417 'missing link' scheme crossing the scarp of the Cotswolds at Crickley Hill within the Cotswolds AONB involves a retained cutting the length and depth of the Twyford Down cutting on the M3 at Winchester, but although no alternative route is available outside the nationally protected landscape, all tunnel options were ruled out from public consultation (and further consideration) on cost grounds, so far including other shorter or more environmentally beneficial options. Despite scheme objectives to achieve substantial net benefits for

the AONB, the preferred scheme promises severe harm **The Cotswolds AONB is UNAVOIDABLE**

139. The process by which highways schemes are assessed for what potentially costly measures might be needed to address key environmental effects seems to pay little or no attention to past practice. Thus when UK road tunnels are reviewed more widely, some idea of past value for money decisions and environmental imperatives can be gauged from comparing their length (a very rough surrogate for cost) in relation to traffic throughput (a very rough surrogate for economic benefit), as set out in **Appendix F**.
140. On this broad measure of economic value for money the PDNP, Stonehenge and Hindhead tunnels perform very badly in terms of traffic through-put (economic benefit) per length (cost). Their justification is environmental, based on international and national landscape-scale designations. But while PDNP and Hindhead Common and A417 at Crickley Hill are **unavoidable** with surface routes Stonehenge and SDNP are avoidable.
141. The A27 is under review, but the exceptional and seemingly avoidable extra cost of the Stonehenge tunnel can be seen as indirectly ensuring that the measures needed to deliver significant net benefit for the Cotswolds AONB, which could be achieved by an A417 tunnel are currently ruled out. This despite BOTH schemes potentially achieving far greater overall environmental benefit.
142. This this shows the real world effects of the lack of strategic rationale – that ought to come from SEA – for the choices made in terms of where overall the greatest environmental gain can be achieved at the same time as meeting other national and international imperatives. The current approach is a text book example of why relying on individual EIAs to address cumulative effects is too little too late. As the preamble of the EU SEA Directive explains this was the whole reason why SEA was introduced, and will remain UK law.
143. From this perspective and the Roads minister’s response on 13th February, the only alternative to an SEA being carried out before decisions are set in stone, would be to ensure the EIA requirement to assess cumulative and indirect effects filled the gap.
144. The ES is very weak on this and focussed only on the immediate locality and context of the scheme, NOT the overall objectives used to justify it within a national, strategic route, and package of projects. When viewed within the context

of RIS, SW programme of schemes and the SW Strategic Route the cumulative effects of this scheme in conjunction with others that are explicitly planned should have been examined. As indicated above, one of the clear indirect effects is that the drain on the resources in the overall RIS budget arising from the Stonehenge Tunnel – along with other major tunnel schemes in the national RIS programme like the Lower Thames Crossing and Peak District National Park schemes – has been to deny resources that would otherwise be available to secure major benefits in other protected landscapes, notable the Cotswolds. Unlike other schemes such as Hindhead, PDNP and Crickley Hill where protected landscapes cannot be avoided by viable surface routes, Stonehenge not only has a route available avoiding the WHS and avoiding significant harm to other nationally and internationally protected landscapes and sites, but could achieve much greater international environmental benefit at much less cost.

145. Seen at this national level, the adverse effects on the LOCAL economy – which is why the S surface route was rejected – pale into insignificance.
146. The resolute focus, only at the individual scheme level, on delivering maximum economic benefit not just nationally, but also locally has ensured that the Applicant has been blinkered from any overall objective consideration of wider public benefit – not just nationally but internationally.
147. 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.

PART 4

Conclusions

148. The Applicant's proposals fall far short of delivering what the CBA has for years consistently promulgated for Stonehenge and its surroundings; more importantly, they fall far short of what legal and policy framework for decision-making requires.
149. The assessment of the cultural heritage effects of the scheme, despite involving some thorough archaeological fieldwork, is deeply flawed, not properly seeking to forecast likely effects, not taking account properly of key aspects and tests of WHS OUV, and not properly assessing harm against the international as well as national policy. As a result, the harm to the WHS and its environs are badly underestimated; the assessment of benefit, although significant, is over-played.
150. The consideration of alternatives has been approached on the basis of flawed logic set in a strategically blinkered approach to the overall effects on and opportunities to enhance nationally and internationally protected landscapes.
151. As in 2004, we once again suggest that the proposed scheme be rejected.
152. A surface route to the South like F010, but much more effectively optimised, must be very seriously considered, and failing that a long bored tunnel, to remove the A303 from the WHS without unduly harming other objectives. If within the current timescales it is not possible to put such an alternative scheme in motion, we recommend that in its absence, our 'do-something' scheme, based on how the baseline scenario is likely to evolve, should – this time – be properly planned and delivered, leaving flexibility to adopt a more comprehensive solution in future.
153. Taking 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 a Globally iconic landscape of prehistoric human culture, Stonehenge is the last place on earth to create a memorial to Britain's current obsession with economics built on road transport.
154. We urge the Examination Panel to take an equally long view and reflect deeply on the physical legacy that, if the proposed scheme is approved, 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.