

Planning Inspectorate Consultation – Development Control Order A303 Stonehenge

Response by the Wiltshire Archaeological and Natural History Society

Background

About the Society

- Founded in 1853 to “educate the public by promoting, fostering interest in, exploration, research and publication on the archaeology, art, history and natural history of Wiltshire for the public benefit”
- The Society runs the Wiltshire Museum which holds many important collections from the Stonehenge and Avebury World Heritage Site (WHS). The collection is Designated by Government as being of national significance
- We work in partnership with Salisbury Museum which acts as the archaeological repository for archaeological archives from the Stonehenge part of the WHS
- The Society commenced the purchase of land around Stonehenge to protect it in perpetuity. The land was later transferred to the National Trust
- The Society took an active role in commenting on previous schemes for the A303
- The Society supported the development of the Stonehenge Visitor Centre and the closure of the A344
- The Society has endorsed the 2015 Stonehenge and Avebury World Heritage Site Management Plan
- We responded to the Highways England consultation process and gave oral evidence at a DCO Issue Specific Hearing in June 2019. Our response to the Highways England consultation was agreed by our Board of Trustees and incorporated the results of a consultation with our members.

General Principles

In commenting on previous schemes for the A303, the Society identified key principles that guided its response. These were that any scheme should:-

- Minimise damage to known or potential archaeological remains
- Minimise physical impact or visual intrusion on open landscape
- Maximise the efficient use of existing infrastructure
- Maximise the reversibility of any new works

The evidence presented to the Public Inquiry in 2004 also highlighted that there were a number of issues that should be considered:-

- The possibility of one day uniting the Avenue in its full length from the River Avon to Stonehenge
- Reducing the severance of the northern and southern parts of the WHS
- Improving the setting of the barrow cemeteries in and around the WHS
- Improving access and circulation to key archaeological sites within the WHS landscape

Consultation Questions

The current consultation seeks views on

- implications of the archaeological find for the Development and any harm it may cause to the World Heritage; and
- implications for the Applicant’s Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy

Our Response

- We support the views expressed in the report prepared submitted to the Planning Inspectorate by Paul Garwood, prepared on behalf of the Consortium of Archaeologists and the Blick Mead Project Team.
- The Highways England proposal will damage archaeological remains, have a significant physical impact and visually intrude into the open landscape of the Stonehenge part of the World Heritage Site.
- We note that while the Neolithic Pit Structure associated with Durrington Walls is not in the immediate vicinity of the proposed location of the Eastern portal of the A303 tunnel, the portal is located between the Stonehenge Avenue and the Pit Structure. Initial viewshed analysis by Simon Banton has established the potential significance of the visual relationship between these elements of the Stonehenge landscape, and this relationship should be preserved and enhanced.
- There are currently 21 pits that have been identified in the Neolithic Pit Structure. Of these, 9 have now been affected by recent development, including 7 by the recently completed housing development for the Army Rebasing project to the East of Larkhill, in the buffer zone just to the North of the World Heritage Site boundary. The unexpected discovery of the Pit Structure emphasises that the Stonehenge landscape contains monuments that are not well understood and demonstrates the fragility of the archaeological record. Several of the pits were excavated, but their significance was not recognised, supporting Garwood's view (paragraph 4) that the evaluation process that has been undertaken may not be adequate within the World Heritage Site.
- We have particular concerns about the location of the Western portal and the negative impact that this will have upon the setting of the Winterbourne Stoke barrow cemetery. Garwood identifies the large pit/solution hollow 24105 as being of potential importance and that there is a not a good match between the geophysical surveys and the archaeological evaluations that have been carried out. This is a particularly sensitive area, given the proximity of the Wilsford shaft. We feel that this supports our statement in 2018, that :-
 - *We would prefer the tunnel to be extended beyond the western boundary of the WHS so that there would be no requirement for a damaging cutting within the WHS.*
 - *We are particularly disappointed that the results of the Stonehenge Hidden Landscapes project were not used to inform the development of the current scheme.*
- If the Scheme is to go ahead, then it is essential that a full field-walking and excavation programme is carried out across all the areas where archaeology will be destroyed or damaged. Swallow holes, tree holes and other aspects of the natural landscape are now considered crucial if we are to understand the Neolithic world that gave stimulus to monument creation. Vince Gaffney's paper gave some good examples including, incidentally, the flint mines at Durrington that were more than simply economic in nature. There are others, the Mesolithic pits at Farnham, Mesolithic use of swallets on Portsdown, barrow cemeteries at Tynings Farm (Somerset) and Poor Lot (Dorset), swallets in the Mendips with cultural deposits at depth and the modified solution hollow at Fir Tree Field, Down Farm, Sixpenny Handley, alongside the Dorset Cursus. If the scheme goes ahead it is essential that unhindered archaeological investigation is fully funded and allowed to proceed.

Conclusion

We repeat our conclusion in our response to the 2018 DCO Consultation:-

We feel that the current Scheme will have a significant impact on the OUV of the WHS. Our view remains that the tunnel should be extended beyond the boundaries of the WHS and we feel that it is especially important that the western tunnel portal is located outside the WHS. We do not endorse the current Scheme and our responses to the questions in the consultation are given with the aim of minimising its impact on the WHS.

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