

SAL Response to Consultation on A303 around Stonehenge Submitted April 2018

1. The viaduct crossing of the River Till Valley [N of Winterbourne Stoke]

We note that a northern by-pass for Winterbourne Stoke has been chosen and appreciate the positive benefits that it will bring to the settlement. The scheme will require a suitable crossing of the River Till, where the footprint of the proposed viaduct, representing a sizeable area, will almost certainly need to be stripped of topsoil before embanking material can be placed. This area needs to be fully surveyed and examined to ensure that there are no adverse impacts on important heritage assets. We support the inclusion of screens which will limit glare at night and the visibility of some traffic by day, despite the fact that the mass of the viaduct will be more evident visually.

2. The A303/A360 Longbarrow junction [now moved westwards, outside the WHS]

We note that the repositioning of the proposed western portal of the tunnel will necessitate a different alignment for the A303 to that proposed in the earlier consultation, and we welcome the fact that the revised design has no direct impact on any statutorily-protected sites. Moving the line of the A303 south, and the line of the A360 west, from their current positions would bring some positive benefits to the setting of the visible ancient monuments within the World Heritage Site (WHS) north-east of the existing junction.

There are caveats, however. Highways England (HE) are devising, and consultees are invited to comment on, a scheme ahead of archaeological evaluation of its impacts on buried archaeology, both during construction and as finally built, in areas which have not previously been adequately investigated.

The Stonehenge WHS itself has a setting, which may contribute to its outstanding universal value (OUV). Emerging understanding is revealing that the area west of the A360, which is a more or less arbitrary boundary to the WHS, also contributes to the OUV of Stonehenge overall, one of the attributes of which is cited as 'The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel'.

From preliminary investigations, there is a complex of archaeological sites surrounding the current A303/A360 junction. There are visible long and round barrows to the north-east of the junction and to the south-east, on Wilsford Down, as well as the known remains of other circular and rectilinear monuments to the south, south-west and north-west. Recent archaeological work to the south of the junction has apparently proved the presence of two hitherto-unknown long barrows, while geophysical survey west of the junction has identified an interrupted-ditch enclosure, which may well be a Neolithic monument of similar date. The placing of four or five ceremonial monuments in one location at this period is unprecedented in Britain, and undoubtedly marks a place of particular importance to the Neolithic community. The importance of this place clearly continued into the Bronze Age and was emphasized by the addition of various circular monuments, some of which are clearly visible while others have been traced through surveys. The axis of the linear barrow cemetery visible to the north-east of the junction seems to have continued originally to the south-west (to the S of the A303). The significance of any other traces of ancient activity, such as pits, post holes, gullies or anthropogenic deposits, within the complex must assume a far greater value for the interpretation of the Stonehenge complex than might be the case if they were located elsewhere.

The results of geophysical survey suggest that buried archaeological remains also exist to the north-west of the present junction, but the extent of these is not fully known. No interpretation of these anomalies has been presented and their significance has yet to be fully evaluated: they may relate to

the funerary monuments to the east, or they may relate to the later Bronze Age house structures recorded at the current roundabout. The latter are the only Bronze Age houses which have so far been identified within the World Heritage Site and hence are particularly significant. Until the extent and nature of the features has been demonstrated by archaeological investigation, it is not possible accurately to judge the impact of the proposed realignment of the A360. The current design drawings suggest that the interrupted-ditch enclosure will be destroyed by the A360 and a slip road.

Some, but not all, of the archaeological remains surrounding Longbarrow Crossroads are depicted in the Consultation Booklet. The integrity of the complex has already been degraded by the loss of the visible (upstanding) parts of some of these monuments and by the historic construction of the roads. Nonetheless, the landform which supports them, and forms their physical context, remains largely unaltered. Therefore, a visitor to the site is able to appreciate the relationship between the various elements of the complex (both within the WHS and adjacent to it) without difficulty.

The case for sinking the A303 into a cutting west of the proposed western portal ramp needs to be considered more fully in the light of its impact on the archaeological remains in this area, briefly outlined above. If the archaeological complex at Longbarrow Crossroads cannot be avoided altogether, there is a choice to be made between lessening the impact on the archaeology by bringing the A303 to the surface, or destroying more archaeological remains by sinking it in the proposed cutting. We can see the benefit in sinking the A303 out of sight and hearing from the WHS, but need to understand what impact this would have on archaeological remains in the area of the Crossroads.

3. Winterbourne Stoke bypass to Longbarrow junction

Large areas are reserved for contractor's site compounds. The westernmost area (by green bridge no 2) would be for a facility that treats the arisings from the tunnelling (a mixture of ground chalk and Bentonite) pumped from the tunnelling machines before it is further pumped (presumably after recovery of much of the Bentonite) on to a generous area about 1km square to the west (notated 'new chalk grassland'). This is proposed to be stripped of topsoil, the dry valley 'recreated' at a higher level, and the topsoil reinstated. No results from the geophysical survey/ walkover or from evaluation trenches of this area are yet available. This is outside the WHS but a large area of potential archaeological interest, never before examined in detail; it is worrying that there will be so great an impact on this area, just outside the WHS boundary but still part of the Stonehenge landscape, and that the success of the scheme relies on this area being archaeologically sterile.

4. Green bridge 4 (on the line of the current A360) on the W boundary of the WHS

We are aware that Historic England are suggesting strongly that Green Bridge 4 should be widened to around 150m so as to give a better corridor of green access across the sunken A303 at this point, thus linking more effectively between the Winterbourne Stoke barrow group and other monuments to the south of the road. We support this proposal.

5. The cutting on the western approach to the tunnel

See above under the A303/A360 Longbarrow Junction for discussion of the cutting, with which the positioning and design of the junction is closely linked. The case for sinking the A303 into a cutting west of the proposed western portal ramp needs to be considered more fully in the light of its impact on the archaeological remains in this area.

The necessarily 'unclimbable' fencing around the deep cutting, tunnel mouth, and protecting the sides of the green bridge no 4 beyond the western approach nowhere appears in the images supplied to date. Logic dictates that this fencing must either stand up 2m in the landscape, or the width of the cutting is widened to put it on a shallow terrace, ha-ha fashion, which increases the

land take/ archaeological obliteration; this issue is most acute here but may be relevant elsewhere. Similarly Fig 5.33 shows 'grassed over canopy with ventilation outlets,' the latter as holes in the grass when serious security fencing would be essential.

6. The Western entrance to the tunnel

We welcome the Highways Agency's continuing efforts to find the best alignment for the A303 and welcome the fact that proposals have been adjusted in the light of public comment. We favour the design which minimizes land take within the WHS, and hence prefer a design with vertical walls. We appreciate the suggestion of a canopy over the approach to the tunnel, so as to distance the sight and sound of traffic from monuments to its east. However, the position and scale of the proposed layby for service buildings is not indicated in the Consultation Booklet: doubtless, it would widen the cutting.

7. The central section of the scheme within the WHS

We welcome the provision of a canopy beyond the eastern tunnel portal. As with the western portal, the scale and position of the layby needed for service equipment is not indicated in the Consultation Booklet.

We remain concerned that any movement in the subsoils that may result from tunnelling operations directly beneath important monuments (a long barrow, New King Barrows and the Avenue) would have a catastrophic effect on their integrity. Consequently, appropriate safeguards will be imperative during the construction process.

The indicative DCO (Development Consent Order) boundary runs through the whole of the central section, in a corridor to the south of the present A303 which varies in width to a maximum of around 200m just south-east of Stonehenge. Within this generous corridor there are at least six scheduled monuments, in whole or in part. The limited information which has been presented so far on the timing and phasing of the construction works (p 59-61 of the Public Consultation Booklet) does not indicate any detail about how this area will be used during the works, nor how the 6 scheduled monuments and other archaeology within the proposed boundary of the works will be protected. We drew attention to our concerns about the significant impacts from the infrastructure associated with the construction works when making our comments in early 2017. Experience elsewhere with large (airport) developments is that contractors' compounds and haul roads, spoil heaps etc form a significant part of the overall impact of the scheme. Boring a tunnel of this magnitude would require a very large logistical set up with corresponding impacts. Ecological mitigation can also have a large-scale damaging impact on archaeology, and the full implications of this, as proposed at the western end of the scheme, must be foreseen and fully managed.

If it is intended during the works to maintain both the A303 highway and a haul/ access road for the works so that plant and equipment can reach both ends of the tunnel without becoming traffic-bound on the A303 itself, much more detail on the use of this corridor and the logistics of how the tunnel will be constructed must be a major consideration, supported by a detailed method statement, when Highways England apply for the DCO. We question whether it will prove practicable for all site traffic to stay within the narrow confines of the planned new route of the tunnelled A303 throughout its length, including through the new tunnel itself: if this is really what is intended, it means that there will be no end-to-end site access until at least one of the twin tunnels has been bored. We are also concerned that the contractors eventually engaged by Highways England may have the ability to make different or other arrangements with landowners by agreement. The sensitivity of this scheme, and the prospect of significant earthmoving and works becoming visible within such a high-profile area for a worldwide audience means that there must be a works contract where such arrangements are ruled out before tender stage.

We also question the need for the link between byways 11 and 12, shown to the SSE of Stonehenge. The logic of the scheme as a whole is to remove wheeled traffic so far as possible from within the WHS and the Stonehenge landscape in particular. This link seems to provide a through-route which may become a “rat-run” for drivers who still wish to get close to Stonehenge.

8. The A303 flyover at the Countess Roundabout

No comment on this

9. The eastern section of the scheme (Countess junction to beyond the Solstice Park junction)

Whilst we appreciate the need to close the entries onto the A303 east of Solstice Park for reasons of safety, the creation of a new link immediately north of a group of scheduled round barrows will undoubtedly have a significant adverse impact upon their settings, and potentially a direct impact on any related buried archaeological deposits close to them.

This will add to the incremental deterioration that the important group of round barrows on Earl's Barn Down has seen over the last half century. The implications of the proposal need to be assessed more fully, and the possibility of re-siting the link road further away from the barrows should be explored. The current proposal looks like a ‘quick fix’ rather than a fully thought-through plan.

10. The preliminary environmental information

We are aware that several organisations have undertaken archaeological work specifically to assess the potential impacts of a realignment of the A303. Bearing in mind the deadline for responses to the current proposals, we are disappointed that the nature and results of all these field evaluations are not in the public domain. More specifically (as noted under Q2), we have insufficient information on the evaluation of buried monuments on the west side of the WHS, and no information about the survey and evaluation of known archaeological remains west of Longbarrow Crossroads. The results of these surveys have a direct bearing on the assessment of impacts of the current proposals.

11. Any other comments

On the planning for the A303 itself, Highways England have listened carefully to the points that we and others made about the tunnel in the consultation of 2017. We welcome the fact that the tunnel respects the line of the cursus at the eastern end, and that it now quite closely follows the line of the existing A303, running under it just to its south through the WHS, and exits, still on the south side of the A303, and around 75m from it, to the SE of the Winterbourne Stoke group of barrows. The proposed cutting at the western end of the new tunnel would mean that traffic would be shielded from view within almost all of the WHS, and the alignment allows the sightlines for the solstice to be unimpeded, and previous concerns about the proximity of the tunnel mouth to the Normanton/Bell barrows have been met.

All this is good news, but the details of how the scheme will actually be delivered need a great deal more careful thought. We do not think that the DCO should be applied for until a detailed assessment of the archaeological significance of all areas that would be affected by the works, within the WHS as well as its setting, is in the public domain for scrutiny, and a method statement on all of these matters has been satisfactorily completed and tested.