A303 Stonehenge
Amesbury to Berwick Down

Report on Public Consultation

Appendix C

Volume 4

September 2017

Responses from:

A303/A358/A30 Steering Group
AC Archaeology Ltd
Agrii Limited
Amesbury Museum and Heritage Trust
Amesbury Stonehenge Druids
Aspire Defence
Avebury and Stonehenge Archaeological and Historical Research Group (ASAHRG)
Avebury Society
Barn Owl Conservation Network
Berengaria Order of Druids
British Motorcyclists Federation
Campaign for Better Transport
Campaign for the Preservation of the Southern Till Valley
Campaign to Protect Rural England (CPRE) South West
Campaign to Protect Rural England (CPRE) Wiltshire
Chris Hudson Designs
Commission C4 (World Heritage and Astronomy) of the International Astronomical Union
Consortium of Stonehenge experts
Council for British Archaeology
Council for British Archaeology (Wessex Region)
Cross Plain Surgery
Cycling Opportunities Groups for Salisbury (COGS)
Devon and Cornwall Business Council
Downland Walking
Eleanor Scott Archaeology
English Heritage Trust
Exmoor Tourist Association
Freight Transport Association
Friends of Wiltshire's Rights-of-way (FoWRoW)
GLASS (Green Lane Association)
Go South Coast

Heart of the South West Local Enterprise Partnership (LEP)
Home Front
Honouring the Ancient Dead (HAD)
Inside Out Art Group
International Council on Monuments and Sites (ICOMOS) UK
Jacked Structures Ltd.
JSP Consultants
Le Visionaire Vegan and Yoga Society, Mauritius
Lodmore Farm
Mere and District Railway Modellers
National Farmers' Union West of England
Open Access to Stonehenge
RAC Motoring Services
Rescue - The British Archaeological Trust
RGV. Engineering (Netheravon) Ltd
Road Haulage Association
Rob Beale Ltd
Royal Astronomical Society
Royal Society for the Protection of Birds (RSPB)
Rudler Car Transportation & Storage Ltd
Sacred Grove Western Isles
Salisbury & District Angling Club
Salisbury & District Value Cars Ltd
Salisbury Motorcycle Action Group
Sarum Bikers
Snake Bend Syndicate
Society of Antiquaries of London
South West FoE
South Wiltshire Ramblers Association Group
Stonehenge Alliance
Stonehenge and Avebury World Heritage Site Partnership
Stonehenge Campsite
Stonehenge Grove L.A.W. (Druid)
Stonehenge Traffic Action Group

Swindon and Wiltshire Local Enterprise Partnership (LEP)
The Amesbury Abbey Group
The British Horse Society
The Hill Brush Company Ltd
The Loyal Arthurian Warband (LAW)
The National Trust
The Prehistoric Society
The Ramblers
The Salisbury Museum
The Secular Order of Druids
Trail Riders Federation (TRF)
Trail Riders Federation (TRF) - Oxford
Trail Riders Fellowship (TRF)
Transwilts Community Interest Company
Travel Watch South West CIC
Trf
University of Buckingham and Blick Mead Project
Vale Coaches
Wadworth and Co Ltd
Waves training Solutions
West Amesbury Residents Group
Wilton Fly Fishing Club
Wiltshire Archaeological & Natural History Society (WANHS)
Wiltshire Fishery Association
Wiltshire Trail Riders' Fellowship (TRF)
Wiltshire Wildlife Trust
World Heritage Centre/ International Council on Monuments and Sites (ICOMOS)

A303/A358/A30 Steering Group

From:	Mike O'Dowd-Jones <MODowdJones@somerset.gov.uk>
Sent:	05 March 2017 18:41
To:	A303Stonehenge; Alcorn, Andrew; DAMREL, JEREMY; Page-Dove, Andrew; Llewellyn, Rob
Subject:	A303 Steering Group Response to Amesbury to Berwick Down Improvement Public Consultation
Attachments:	A303 Amesbury to Berwick Down Consultation Response A303 Steering Group.pdf

Please see a response to the Stonehenge consultation on behalf of the A303/A358/A30 Steering Group (Somerset, Devon, Wiltshire, Dorset and associated LEP's).

Kind Regards

Mike O'Dowd-Jones

Strategic Commissioning Manager – Highways and Transport
Somerset County Council

Phone: 01823 356238
Mobile: 07977 412097 (New phone number)
E-mail: modowdjones@somerset.gov.uk

Live travel information from across Somerset: https://www.travelsomerset.co.uk/
Travel safely: www.somersetroadsafety.org

WWW.SOMERSET.GOV.UK

David Hall
Cabinet Member for Business, Inward Investment and Policy

Somerset County Council
County Hall
Taunton
Somerset
TA1 4DY

Tel: 01823 359025
Email: dhall@somerset.gov.uk

5 March 2017

To Highways England
email:A303Stonehenge@highwaysengland.co.uk

A303 Amesbury to Berwick-Down Public Consultation on Proposed Options

This is a response to the consultation on proposed options from the A303/A358/A30 Steering Group comprising representatives of Somerset County Council, Devon, County Council, Wiltshire Council, Dorset County Council, the Heart of the South West Local Enterprise Partnership and Swindon & Wiltshire Local Enterprise Partnership.

We are pleased that the Government is following through on commitments within the Road Investment Strategy to upgrade all remaining sections of the A303 between the M3 and the A358 to dual carriageway standard, together with creating a dual carriageway link from M5 at Taunton to the A303, as part of a long-term commitment to creating a new Expressway to the South West. The Government has also committed to set aside funding for smaller-scale improvements to the A303/A30 section between Southfields and Honiton to improve safety and journey quality for road users.

These investments are vitally important to the UK and South West economy as demonstrated by our independent economic assessment, validated by DfT, which demonstrates that improving the whole A303/A30/A358 corridor would:

- create 21,400 jobs and deliver a £41.6bn boost to the economy
- deliver £21.2bn of taxation, welfare savings, disposable income and tourism benefits
- create £1.9bn in transport benefits from reduced journey times and greater resilience
- save 1807 fatal or serious casualties
- reduce carbon emissions by 9%

In our view it is vital that the Government delivers these improvements on the ground at the earliest opportunity, and that the detailed design of the schemes is such that the full potential of the improvements in delivering economic growth and productivity benefits for the region and the UK can be realised.

The Steering Group believes that commentary on the choice of route for the Amesbury-Berwick Down Improvement, and details of junction and portal locations is primarily a matter for the local communities and the locally elected authorities.

The Steering Group's desire is for the improvement scheme to maximise both the transport economic benefits and safety benefits by gaining the greatest possible reduction in journey times and collisions; providing junctions with adequate capacity

to accommodate peak traffic flows at strategic points of access to other key road links; and ensuring there are good strategic connections with economic growth centres to maximise the wider economic benefits of the scheme for business productivity.

The economic assessment produced by the Steering Group demonstrates that the full economic benefit of the improvements can only be achieved by providing an 'end-to-end' dual carriageway standard route linking the M3 with the M5 and urges the Government to provide sufficient resource within the road investment strategy to deliver this outcome.

The Amesbury to Berwick Down scheme along with the other schemes currently being progressed at Sparkford- Ilchester and Ilminster to M5 at Taunton are vital first steps towards achieving a whole route improvement, and as such are strongly supported by the Steering Group.

Yours sincerely

Cllr David Hall
Deputy Leader of Somerset County Council and Cabinet Member for Business, Inward Investment and Policy

Cllr Andrew Leadbetter
Cabinet Member for Economy. Devon County Council

Cllr Fluer De Rhe-Philipe
Cabinet Member for Economy, Transport and Skills. Wiltshire Council

Cllr Peter Finney
Deputy Leader of Dorset County Council and Cabinet Member for Environment

help improve services, deal with complaints and comments, and prevent and detect fraud or crime.

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Somerset County Council.

AC Archaeology Ltd

Response ID ANON-BABJ-X3WK-V

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 13:27:13**

Introduction

Name

Name:
Peter Cox

Postcode

Postcode:
SP3 5SU

Email

Email address:
Pcox@acarchaeology.co.uk

Postal address

Address:
AC archaeology Ltd
Manor Farm Stables
Chicklade
Hindon
Salisbury
Wiltshire

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
AC archaeology Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
We strongly object to the location of the west portal. It lies within a world heritage site and will adversely affect the setting of the Normanton Down Barrow group, an important part of this unique landscape. We consider this aspect alone requires further review as it does not achieve objective 3.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
See previous comment.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Agrii Limited

Response ID ANON-BABJ-X6SR-2

Submitted to **A303 Stonehenge**
Submitted on **2017-02-22 09:13:17**

Introduction

Name

Name:
Antonia Jeffers

Postcode

Postcode:
SO21 3BG

Email

Email address:
antonia.jeffers@agrii.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Agrii Limtited

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
I am both a resident of this area and have been for 20 years and I now work for a local company where distribution is key and this route causes chaos and loss of time and money to our business. My parents have also lived in this area for 20 years and this needs to resolved once and for all.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Amesbury Museum and Heritage Trust

Response ID ANON-BABJ-X3EE-4

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 16:57:04**

Introduction

Name

Name:
Amesbury Museum and heritage Trust

Postcode

Postcode:
SP4 0AA

Email

Email address:
amht1@uwclub.net

Postal address

Address:
Amesbury Museum and Heritage Trust
c/o Tutthill House
Allington
Wiltshire

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Amesbury Museum and Heritage Trust

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
A Tunnel would become an environmental disaster, a self destructing time bomb, that will cost more to maintain than to build in a matter of very few years. The geology is such that there are large fissures shifting water from aquifers, the chalk is believed to have a high register of radon radiation, be phosphatic and unstable with weak and poorly banded sand, and silt. Removal of this will be an intense costly process and where it ends up will also need careful consideration. The hydrology element is also critically important as the flow of water affecting Amesbury and the Salisbury Avon must be maintained. It was suggested that the tunnel structure can be designed to 125 years and during its working life it will require lighting, air conditioning, water pumping, water removal, fire proofing, ventilating as well as CCTV, emergency services, policing, structural surveys, maintenance, repairs and resurfacing. Over 2.9km, the annual costs for this would be astronomical, however these will be overshadowed by the burden of dealing with the tunnel once it ceases to serve its design purpose. Whilst most of the maintenance related work can cease, the need to remove the portals and address the ongoing hydrology issues will become a major headache and a massive cost burden that will have to be dealt with and monitored for ever, unless the tunnel is removed in its entirety. Our Descendants will name you as those who destroyed Stonehenge and Britain’s history.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Alongside and under the A303 at Amesbury sits the evidence of the oldest continuous settlement in Britain, a Roman hill fort, a grade one listed abbey mansion and parkland sitting on the site of a Benedictine nunnery (founded in 979) and Fontevrault priory built in 1177. Today the garden of Amesbury Abbey is the final resting place of Her Majesty the Queen's 20 x great grandmother Queen Eleanor of Provence, Henry III’s Queen, who was laid to rest before the high altar of the conventual church (less than 200m from the proposed A303) with a Royal funeral led by her son King Edward 1st on 11th September 1291. In the grounds of the Abbey near to Blick Mead sits a warm spring, where the extremely unusual Hildenbrandia Rivularus algae enjoys alkaline PH, clean, hard water and has created magenta colour changing flints through millennia’s of undisturbed water conditions (a phenomena that would have made the stones quite magical in Mesolithic Britain). The parkland itself enjoys peace and tranquillity and is the garden of what is now a most eloquent private nursing home (sitting on the same foundations

as the Royal priory). The untouched wood with its own cave and river setting has created a natural habitat since the end of the Ice Age. Evidence of the yellow necked mouse, the mighty aurochs as well as wild boar, wild salmon, trout, frogs and toads along with juniper trees and a warm spring suggest a clean flowing water supply (when most rivers would still be frozen in winter) made this the obvious place for our ancestors to settle as they returned to Britain more than 10,000 year ago and is now considered the cradle of Stonehenge. Any agreement to build a 7m raised dual carriageway alongside this setting, (which sits within the World Heritage Site), which is unbelievably supported by Local Government, English Heritage and the National Trust makes a complete mockery of the Government's planning rules and purpose regarding conservation and if unsuccessfully challenged would create a disastrous precedent across Britain as well as destroy the Outstanding Universal Value of this part of the site.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
It has been stated in the documents that there would be no requirement for road lighting on the new sections of road. This is incorrect because to contraflow the tunnel in the event of emergencies and planned maintenance will require a lane change outside of the tunnel and these temporary lane changes will require floodlighting, CCTV and signage. Again the consultation has been flawed where lighting has been discussed, because the public have been told there will be none. In particular at both proposed portal entrances, the use of temporary lighting would create visible sky glow from Stonehenge and have a severe detrimental effect on the OUV's. and solstitial alignments.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
No works whatsoever to be undertaken within the World Heritage site

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
No works whatsoever to be undertaken within the World Heritage site

7. Do you have any other comments?

Q7:
No highway works whatsoever should be undertaken within the World Heritage site

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Would appreciate more communication please? We have had to find details of what you are doing ourselves, not from you.

Amesbury Stonehenge Druids

Response ID ANON-BABJ-XG97-X

Submitted to **A303 Stonehenge**
Submitted on **2017-02-17 12:46:17**

Introduction

Name

Name:
frank somers

Postcode

Postcode:
po8 0pu

Email

Email address:
frank_m_somers@hotmail.com

Postal address

Address:
21 Blackberry Close
Clanfield
Hampshire

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Amesbury Stonehenge Druids

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The idea of improving traffic flow on the A303 is understood, however the short tunnel proposal raises a number concerns. We would rather have no tunnel than the wrong tunnel. The proposed tunnel is wrong because its eastern entry point is disruptive to Amesbury Abbey, it Threatens the archaeology of Mesolithic Blickmead and would limit further research, it could damage the water supply to the sacred spring, it would gobble up lots more virgin land for flyover cuttings and other works, it would highly disrupt Amesbury life whilst under construction, there is possible water supply contamination risk, the chalk may be unsuitable, the western entrance obstructs the winter solstice sunset alignment visually and potentially energetically. The design doesn't reflect the Neolithic architecture principles and so is not harmonious or adding value aesthetically or spiritually to the landscape. It could further limit free and unfettered access to Stonehenge for the local population and lacks detail about access from Amesbury.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
The origin point of British Neolithic spiritual practices are most likely beside the existing A303 at Blickmead. The Archaeology here is world class Mesolithic to early Neolithic covering the overlap and transition period so little understood. This opportunity to learn more, and to visit 'the place where it all began' could be lost. Amesbury community identity and cultural practices have embraced and included Blickmead and the nearby spring in recent years. The winter solstice lantern parade terminates there on Solstice eve with a Druid led community ceremony, re-establishing tradition and culture to the archaeology and geographic locale of the 'ancestors' and deriving huge value from doing so. The construction could interfere with the water supply to the spring which is rare both scientifically and spiritually for the Druid religion.

3. To what extent do you agree with our proposed locationof the western portal?

Not Answered

Please provide any comments to support your answer for question 3:
Placing a major node of the tunnel in alignment with the Mid-Winter Solstice Sunset raises the concern of light pollution from the infrastructure, and from vehicles entering and exiting. It also will expand the footprint of the road system in a zone we regard as sacred, within the WHS.

We urgently need to survey the 'energy flows' into and out of Stonehenge to understand where and if the construction might interfere in any way with these. We recognise that conventional stakeholders may treat such concerns with ridicule but the spiritual community regard Stonehenge as a hub of such energies and need to understand risks and mitigations

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
This is a matter for the people of Winterbourne Stoke

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
A flyover here would create a visual and noise pollution problem effecting the retired people resident at Amesbury Abbey, and their enjoyment of the currently peaceful grounds as observed from their bridge over the river Avon.

It is less likely to directly effect our spiritual practices at the sacred spring, but once the cuttings and tunnel foundations are factored in the package of changes could be catastrophic.

It should also be pointed out that our access to the spring is by the generosity and goodwill of the current owners and the Abbey residents. Should the Countess Junction adversely effect their business / peaceful home that could endanger the harmony currently enjoyed by all.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
You simply should not put the tunnel opening in challenge to the architecture of Stonehenge itself. That would be an act of vandalism to be condemned by future generations and to invite global criticism. It could distract from the experience of observing the mid winter solstice sunset, putting an unnatural glow in the sky and it could effect the spiritual energies of place that are reputed to flow through Stonehenge.
In Druid belief, these energies give rise to the health of the land and community, and effectively supercharge Stonehenge as a very special sacred place.

7. Do you have any other comments?

Q7:
Nothing in the current proposal addresses the need for non vehicular access to Stonehenge via Amesbury without a detour to the Visitor Centre. The current plan does not include any use of materials or design elements that would reflect and enhance the Neolithic sacred landscape. Any design should include sacred geometry and dimensions harmonious with the henge design. The longevity of any tunnel is a concern, as is how it would decommission, the A303 will leave a scar on the landscape anyway, a tunnel in 200 years time will look like what? Perhaps a collapsing trench full of stagnant water. It is not just the NOW we must preserve, but also the future state. The radioactive chalk and water course issues pose a threat to the budget and indicate that the landscape itself really doesn't want or favour a tunnel. Most of the traffic flow problems could be resolved by creating better flow at the A303 Longbarrow roundabout. Is £1Billion on this proposed scheme just a waste of capital investment and creating a legacy problem for the future? In Celtic Pagan beliefs, Iron is considered anathema to spiritual energy and is taboo at ancient sites for that reason. Placing a steel reinforced tube right across this landscape is really worrying those who believe in the old religions, as it might in the worst case scenario, completely cut us off from those energies we seek out specifically as part of our worship at Stonehenge.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
We offered a year ago to engage in order to find solutions and solve issues jointly. Then nothing was heard until a proposal was presented this year that sadly we cannot support because it ignored all of our primary concerns. This could have been avoided. Is there any evidence that local stakeholders are being listened to and that plans can adapt to accommodate feedback. We hope to see that as a result of this consultation. It feels like a futile exercise and that all the decisions have already been taken, requiring only a show of consultation before proceeding with a rubber stamp. We want better outcomes, worthy of one of the worlds finest ancient sacred places, that can only follow meaningful and equitable dialogue between all stakeholders.

Aspire Defence

Response ID ANON-BABJ-XGK5-E

Submitted to **A303 Stonehenge**
Submitted on **2017-02-14 16:39:03**

Introduction

Name

Name:
Allan Thomson

Postcode

Postcode:
SP9 7QD

Email

Email address:
allan.thomson@aspiredefence.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Aspire Defence Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
ADL are strongly supportive of the proposals to build a tunnel and bypass in line with the proposals. We operate the PFI contract for the Army/MOD that operates the Larkhill, Bulford and Tidworth sites in the near vicinity to the A303.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:
It will ensure the Avenue is no longer cut by a surface road. It also helps minimize the tunnel length.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:
Sufficiently distant from Stonehenge.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
This is a key junction in the area and is a frequent site of traffic backlog and delays. The priority should go to ensuring the rapid transit of vehicles from east to west along the A303. Nevertheless, there must be an ability to transit north onto the A345. The southern access could be blocked as there is the ability to come

off earlier into Amesbury via the services.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
This project is much needed and will improve the transport links east/west and remove a problematic traffic junction/hot spot. As a significant employer in the area (Larkhill, Bulford & Tidworth) this would broaden our recruiting base further West down the A3030. In addition the announcement of the Boeing investment into Boscombe Down further increases the urgent need for this infrastructure development.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Newspapers or magazines

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
The Amesbury event was well attended and run. There may be value in engaging with local industry such as Aspire Defence to understand the implications of the proposed works on our long term contract - which runs to 2041.

Avebury and Stonehenge Archaeological and Historical Research Group (ASAHRG)

From: Dr C.A. Shell <cas4@cam.ac.uk>
Sent: 05 March 2017 21:12
To: A303Stonehenge
Subject: Re: A303 Consultation submission from Dr C.A .Shell
Attachments: A303consultation-CASforDoT.pdf

Please find attached my pdf file A303consultation-CASforDoT.pdf as my submission for the consultation on the proposedA303 Scheme in the Stonehenge World Heritage Site.

If there is any problem with the file or queries about it please do not hesitate to contact me on the above email address.

Colin Shell

Avebury Archaeological and Historical Research Group representative on the Stonehenge and Avebury WHS Steering Committees and Partnership Panel

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C.A. Shell MA MMet PhD FSA cas4@cam.ac.uk
Senior Fellow
McDonald Institute for Archaeological Research
University of Cambridge
Downing Street
Cambridge
GB - CB2 3ER

mobile: +44 (0)771 890 9279

Highways England Consultation on the proposed Road Scheme for the A303 in the Stonehenge World Heritage Site

The complexes of monuments at Stonehenge and Avebury provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. Together with their settings and associated sites, they form landscapes without parallel. (Criterion (iii) Statement of Outstanding Universal Value,WHC-13-37.com/8E)

A good understanding of the historic environment is fundamental to ensuring people appreciate and enjoy their heritage and provides the essential first step towards its effective preservation. (from Historic England Research and the Historic Environment, rear page of Historic England Research Reports 2015-)

***

The writer has had a long standing interest in and contribution to the understanding of both halves of the World Heritage Site, its monuments and their landscape setting, principally through remote sensing. This includes for Stonehenge the analysis of the first complete airborne laser scanning (lidar) survey of any World Heritage Site. I represent the Avebury and Stonehenge Archaeological Research Group (ASAHRG) on the Avebury and Stonehenge Steering Committees and the WHS Partnership Panel.

The following comments are my personal view, but take into account views expressed by members of ASAHRG at their recent meeting, at which presentations were given by Historic England and Arup Atkins representatives on the research and evaluation undertaken in areas currently impacted by the proposed A303 Road Scheme, and subsequent discussion at the Highways' consultation of a Joint Steering Committees meeting at Antrobus House, Amesbury.

My comments are given in the hope that they will help to underpin understanding of the true impact on the monuments and landscape of the Stonehenge World Heritage Site (WHS) of the A303 Expressway Scheme as proposed for Consultation, and which, at present, entrains irreversible destruction of the natural, topographic and cultural integrity of the central western part of the World Heritage Site through the siting of a western dual-tunnel portal and its associated dual carriageway within the World Heritage Site.

I do not agree with the Option proposed for Consultation.

A failure to acknowledge the full importance of the Sites and their Setting, individually and collectively, in the area impacted by the Scheme's western proposals is perhaps not surprising given that a full Environmental Impact Assessment (EIA) has yet to be prepared. As the Scheme essentially has only one proposal and the Consultation has no other options to consider (cf. the consultation just announced for the A428 scheme West of Cambridge that has three options available) at least a movement towards a full EIA would have seemed appropriate before settling on the single option with one tunnel and comparatively minor carriageway variations. A more valid Consultation would at least have included fully the much less costly (£500M less) F010 option to the south of Amesbury, a route which avoids the WHS and has no need for the complicated and

locally disruptive A303 traffic management necessary during construction of the Scheme as proposed.

I found it discouraging at the Antrobus House meeting that apparently no-one, including the major conservation bodies who have associated themselves with the Scheme, had raised the full impact of the road scheme in the area of the proposed Western Portal and dual carriageway options on all the major sites and their setting there that contribute to the attributes of OUV. In this the HMAG advisors and the Agency's consultants appear to have had access neither to all the necessary data nor the facilities to handle them that were suggested by the WHC/ICOMOS Advisory Mission in their first Report (in *2.4 Management and institutional cooperation and framework*, p21-22). Part of the problem may have been over reliance on the Wiltshire Council HER as the principal (?sole) source of information when it is clearly acknowledged in the Management Plan (p16-17): *'There is work to be done to ensure that this resource is comprehensive, up to date and maintained. In principle, the Historic Environment Record (HER) held by Wiltshire Council should be the repository for all data related to the WHS. Further work is required to understand the extent of the resource and ensure that data held by Historic England is transferred to the HER. This issue is discussed in Section 12.0 (Research)'.*

In landscape terms the western section of the road scheme, both the portal and the alternative westward dual carriageways, as given in the consultation plans, directly affects the, at present, undisturbed open landscape of the upper western arm of the Stonehenge Bottom dry valley system between Wilsford and Lake Downs. Located in this area are monuments, including the unique cluster of Neolithic Long Barrow and Mortuary sites, that appear to have been overlooked, or considered unimportant, in the Highways England evaluation of the route. This seems to be still also the case for the National Trust, English Heritage and Historic England, who in their recent press statement on the Scheme just seek adjustment of the western portal further away from the Normanton Down Barrow cemetery. As such this would appear to be a perpetuation of a ‘Big Monuments’ view, regretted at the recent ASAHRG meeting, that takes less note of the less visible monuments and perpetuates the focus on the central site of Stonehenge and visibility therefrom, a focus considered inappropriate in the current Management Plan.

The grouping of the early Neolithic Long Barrow monuments, both long mounds and oval barrows, and their particular setting (Bewley, Crutchley and Shell 2005, *New Light on an Ancient Landscape*, Antiquity 79, p642) around the upper part of the western dry valley system, is unique in the WHS (Figure 1). The concentration of nine monuments (out of the twelve in the WHS), including the Mortuary Structure and a further long barrow revealed south of Winterbourne Stoke Cross Roads and west of Lake Long Barrow in the current evaluation (ArupAtkins ASAHRG presentation), is clearly the dominant focus of early Neolithic human activity (3700-3000 BCE) in the WHS. Its density of monuments at 2 per sq.km, in less than 10% of the area of the WHS is unique both in its concentration and monument disposition. (Figures 1-3).

Thomas (1999, *Understanding the Neolithic*, p170) observed:

> In the immediate area of Stonehenge a particularly tight cluster of six long mounds and a mortuary enclosure was gathered around the dry valley defined by Wilsford and Normanton Downs. … As Bradley (1993, 53) implies , it is very probable that the Wilsford/Normanton mounds defined their setting as a particular type of place, even if the straightforward distinction between an area of the dead and an area of the living does not repay scrutiny.

The early dating (3500 BCE) by Parker Pearson of bluestone quarrying and Cunnington's record of a bluestone being encountered in Boles Barrow on Salisbury Plain suggests the association of the people of these monuments with the first stage of the Stonehenge monument itself. The mounds retain their significance into the Early Bronze Age as an enduring focus for round barrow cemeteries, both the long linear 'display' cemeteries of Winterbourne Stoke and Normanton Down and the grouped burials of Lake and Wilsford 34 (Figure 4).

It is axiomatic that any monument involving significant expenditure of effort in its construction is not randomly placed in the landscape, and the decision of its placement will have taken into account local topography as well as the position of monuments already present in the landscape. Severing of the monument spatial relationships by the proposed Scheme, which brings an irreversible modification of the landscape, removes for future generations the opportunity to physically understand and experience their setting by moving between them, something the principal conservation bodies profess a desire to expand in the WHS. There is a growing interest in prehistoric mobility (Neolithic Studies Group Seminar Papers 14, 2016), which includes local movement as well as long distance for access to resources and interaction with other communities.

In this regard we should note Kelly's pertinent observation of monuments and their locations acting as landscape references used as memory markers in the oral tradition of prehistoric peoples, being available as mnemonics for pre-literate oral societies' mental maps and through them retaining in their oral tradition spatial knowledge of the wider context of their lives (Kelly, L. 2015 *Knowledge and Power in Prehistoric Societies: Orality, Memory and the Transmission of Culture,* Cambridge)

Whilst the Long Barrows chart the beginning of the story of the Neolithic and Bronze Age history of the Stonehenge landscape, other monuments in this western area are linked to the Middle Bronze period of decline in the ritual and social influence of Stonehenge. These, a Bronze Age Linear and a Droveway system, are directly affected by the proposed Road Scheme.

The presently proposed road cuts through the Bronze Age linear that runs SE from Long Barrow Cross Roads. This monument, which survives as an earthwork, can be seen to postdate much of an underlying Bronze Age field system (Figure 5). The field system itself survives as vestigial shallow topography, visible in the lidar survey (Bewley et al, above) and recent geophysics. An integral part of the field system is the droveway or trackway which proceeds north eastward along the dry valley bottom and expands to encompass a presumed grazing area on Normanton Down, "neatly bounded by linear ditches following the slopes of the dry valley," (Bowden et al. 2012. *Stonehenge World Heritage Site Landscape Project: Lake Barrows, The Diamond and Normanton Gorse,* HE Research Report 129-2012, p.30) that respects the Normanton Down Cemetery and more extensively the area around Stonehenge. Part of the western linear ditch survives as an earthwork in Normanton Gorse.

It is important to note that both the BA Linear and a long section of the western Droveway Linear are mapped as Associated Monuments in the UNESCO Inscription of the Stonehenge and Avebury and Associated Sites World Heritage Site (see Figure 7).

In combination these monuments, both the Early Neolithic Long Barrow concentration and the Bronze Age field system, droveway and linear contribute essential evidence for continuity and change in the Stonehenge landscape. They are the evidence for the land use in the period from which the site of Stonehenge developed at the end of the 4th millennium, and also the end of the Early Bronze Age when the ritual significance of the earlier monuments declined but still influenced use of the landscape. As such they deserve due recognition in assessing the currently proposed A303 road scheme in the WHS.

This note is intended to bring to the fore evidence of monuments that have a significant role in telling the story of the Stonehenge World Heritage Site, and which should receive due attention by all conservation bodies as well as Highways England in their assessing the currently proposed A303 Road Scheme and its irreparable impact on the monuments and their landscape setting, both physical and natural, in the west of the World Heritage Site.

C A Shell 4 March 2017

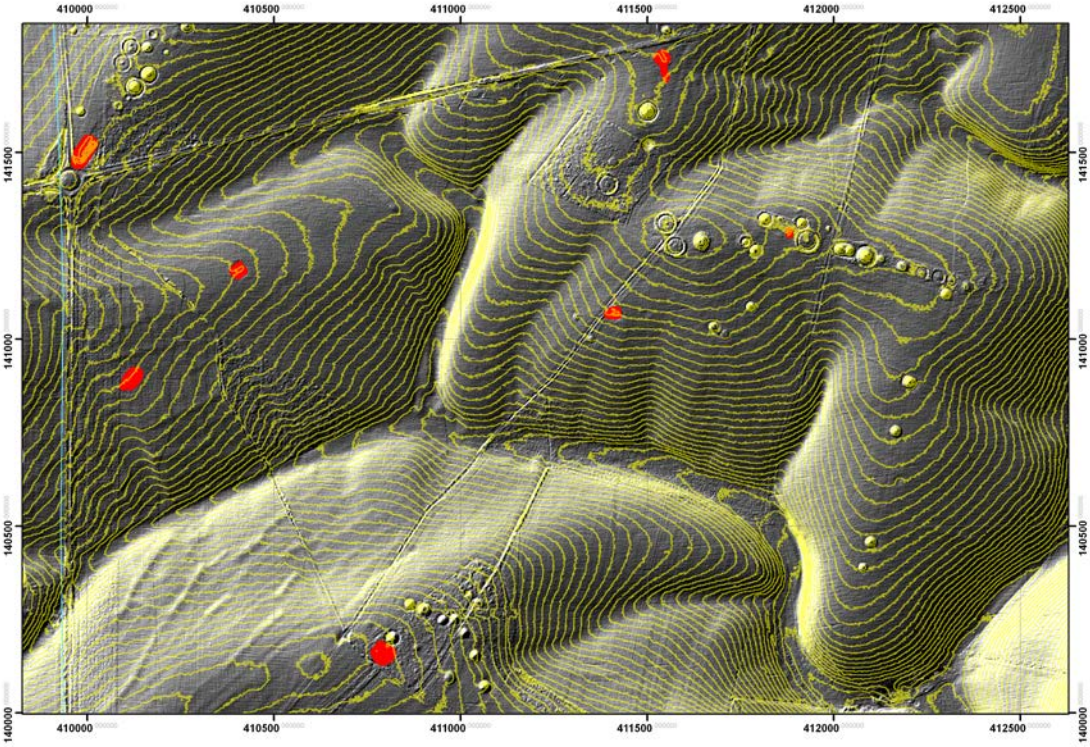

Figure 1. Long barrows located around the upper west arm of the Stonehenge Bottom dry valley system. 1m contours and shaded topography from lidar survey.

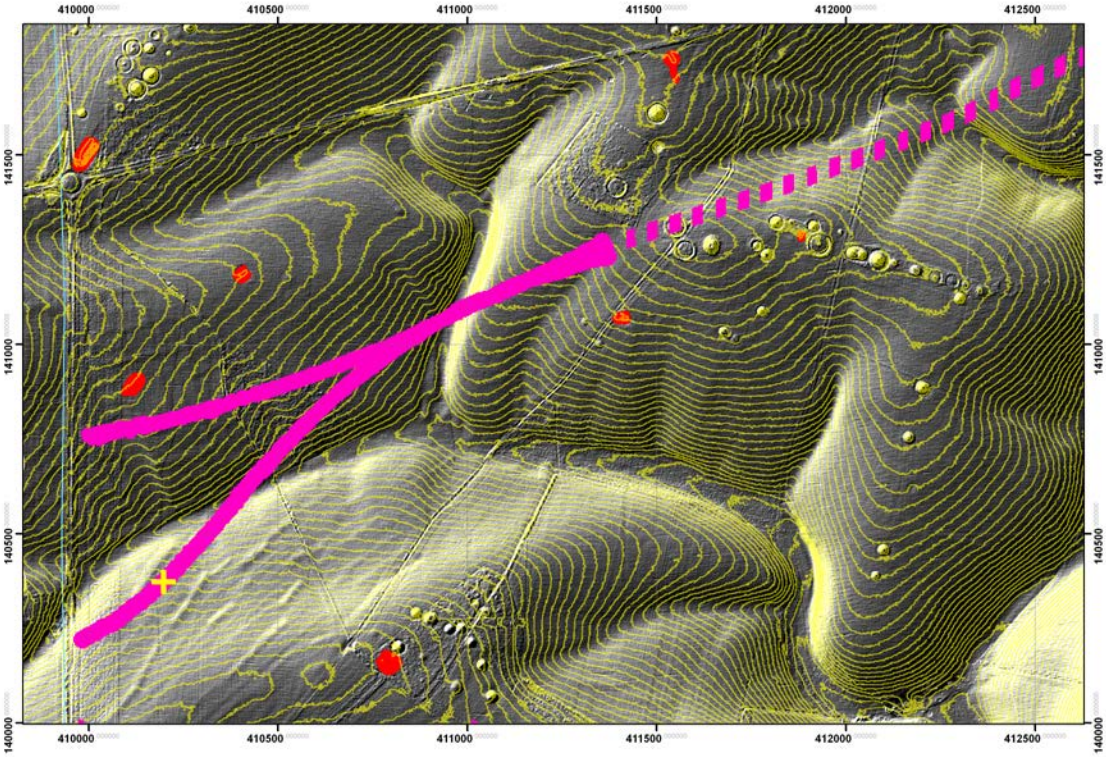

Figure 2. Long barrows located around the upper west arm of the Stonehenge Bottom dry valley system with proposed A303 route dissection of the landscape. The yellow cross is an estimated position of the newly discovered long barrow from the current route evaluation, pending the requested exact location.

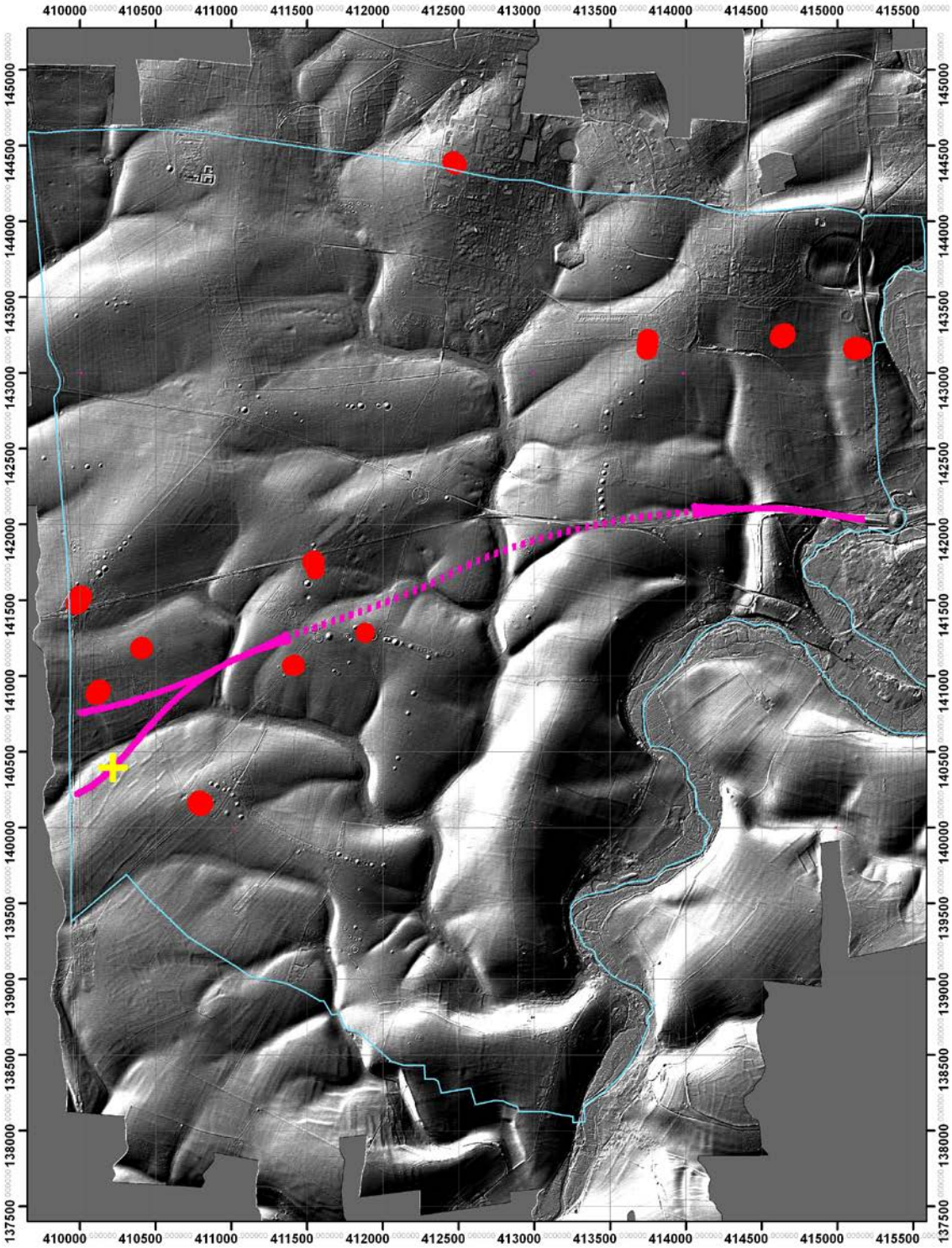

Figure 3. Distribution of Long Barrows in the Stonehenge World Heritage Site with proposed A303 route. The yellow cross is an estimated position of the newly discovered long barrow from the current route evaluation, pending the requested exact location.

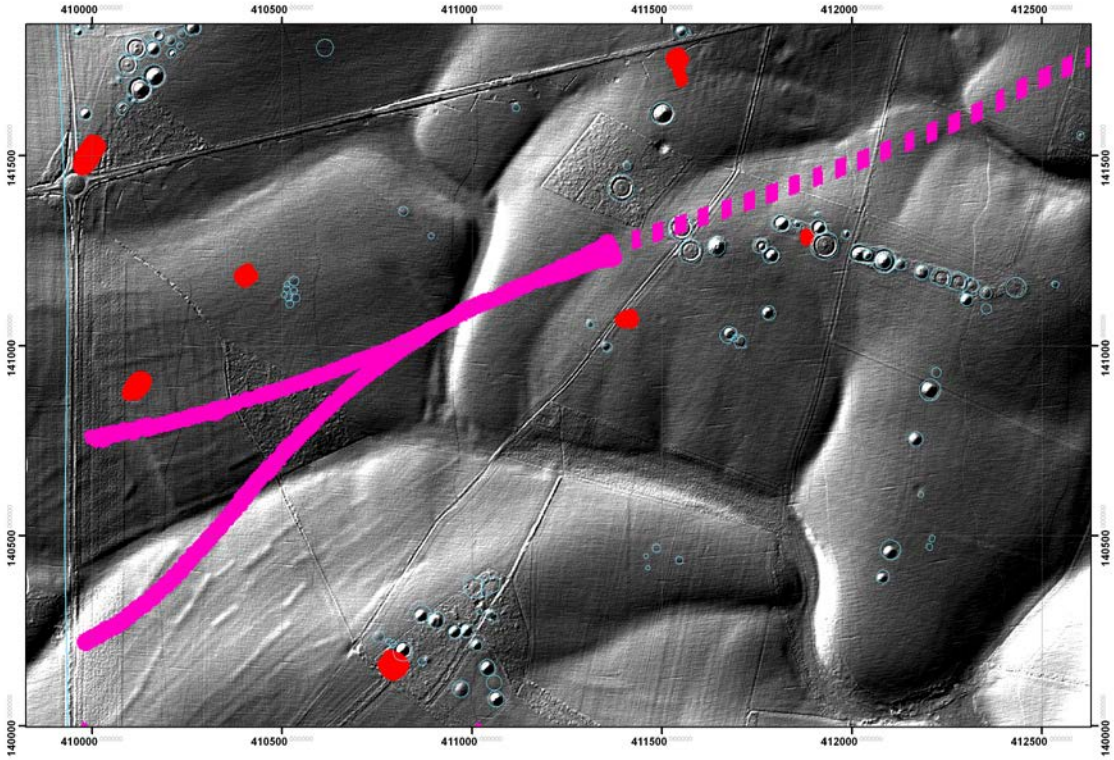

Figure 4. Association of EBA Round Barrows, outlined in blue, with Long Barrows.

Figure 5. Bronze Age field system and linear boundaries from Historic England National Mapping Programme.

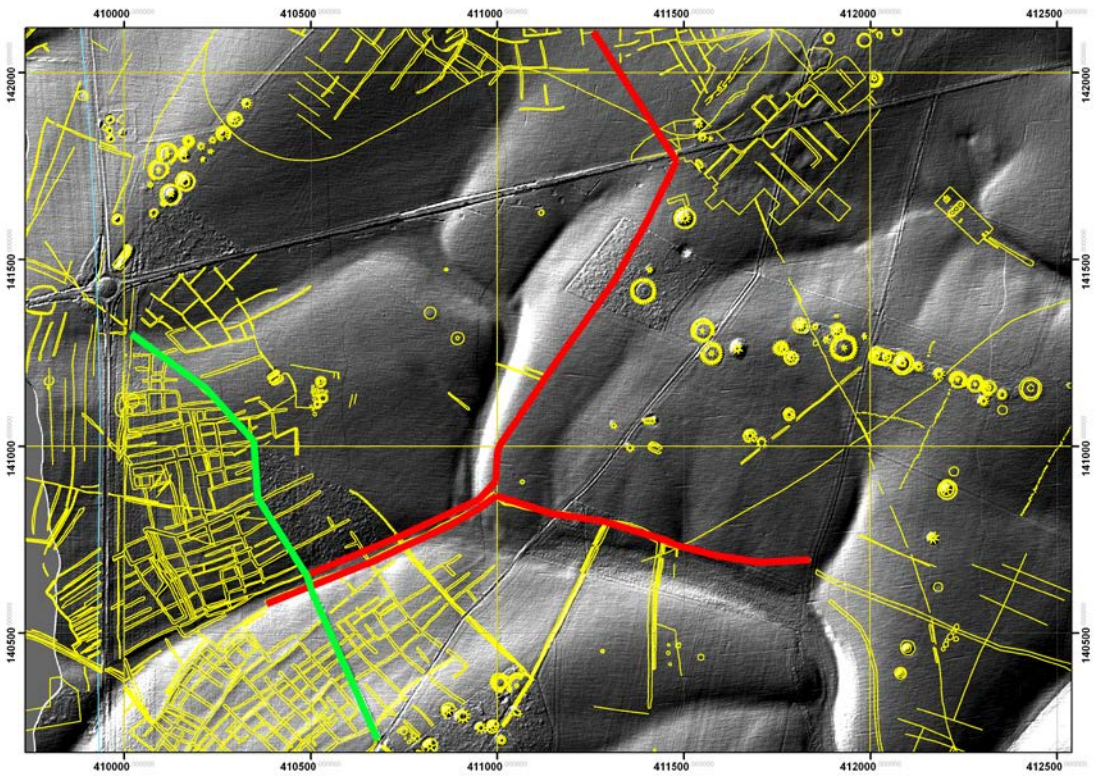

Figure 6. Bronze Age linear (green), and droveway (red) opening out to enclose a probable pasture grazing area respecting the Normanton Down Round Barrow cemetery and beyond towards Stonehenge.

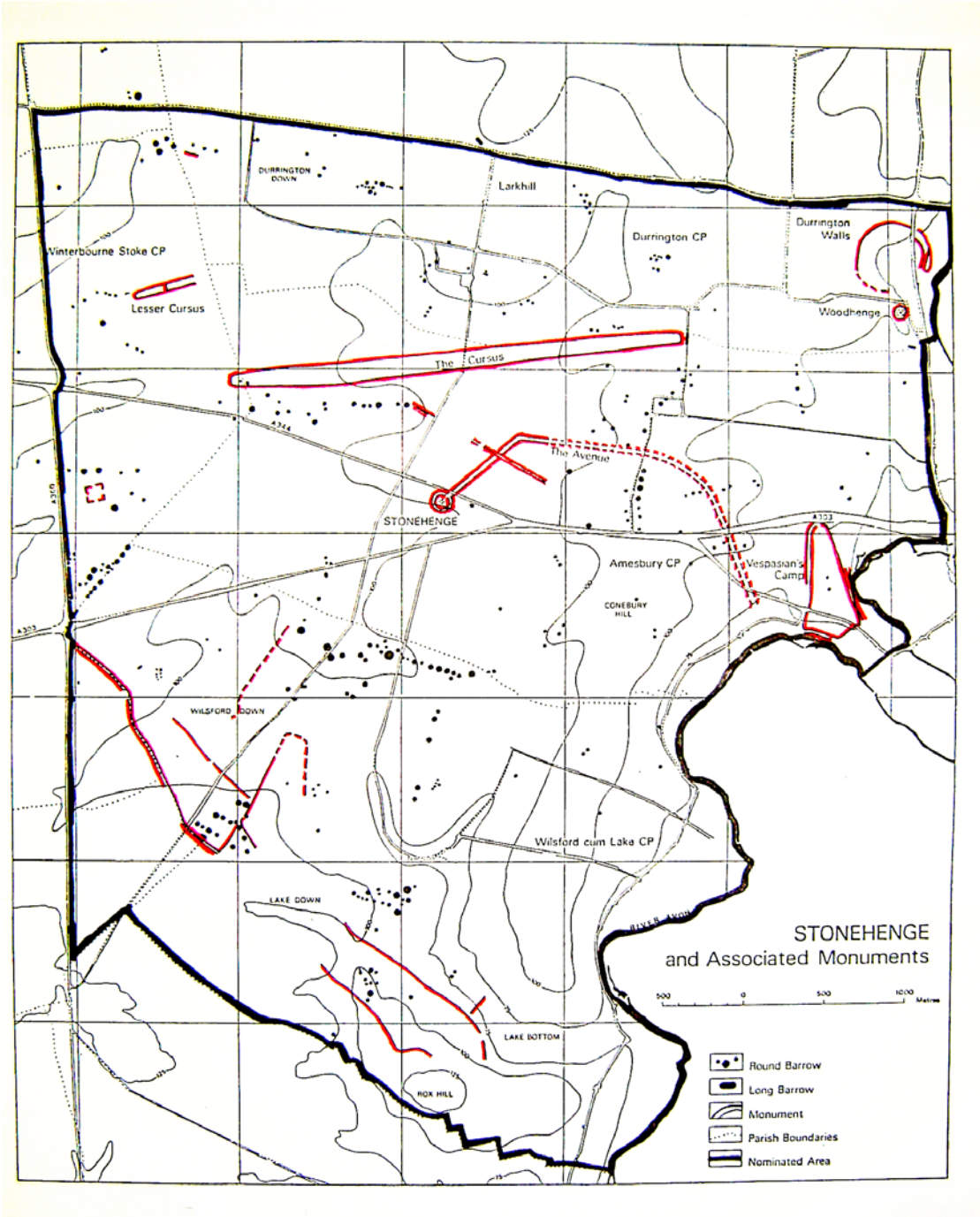

Figure 7. UNESCO WHS Inscription map of Stonehenge and Associated Monuments with Monuments outlined in red. (file UK-373-001-1.tif from http://whc.unesco.org/en/list/373/multiple=1&unique_number=1633)

Avebury Society

From: John Hayes_MP
Sent: 20 February 2017 10:40
To: Helen Mackie
Subject: FW: Avebury and Stonehenge WHS Consultation
Attachments: A Soc re A303 001.jpg; A Soc A 303 [2] 001.jpg

MC please

Ms Hong San | Diary Manager & Assistant Private Secretary to Rt. Hon. John Hayes CBE MP, Minister of State, , Department for Transport
5/23 GMH | 020 7944 8015 | 07500 033269

From: John Hayes
Sent: 20 February 2017 07:29
To: John Hayes_MP
Subject: FW: Avebury and Stonehenge WHS Consultation

From: Susan Rogers [mailto:sjrogers44@gmail.com]
Sent: 19 February 2017 17:47
To: i.anatole-gabriel@unesco.org; chris.grayling.mp@parliament.uk; John Hayes <John.Hayes@dft.gsi.gov.uk>; SusanDenyer@icomos-uk.org
Cc: Janet Polack <mandjpolack@btinternet.com>; Judith Farthing <judith.farthing@btconnect.com>; Kate Fielden <katefielden20@gmail.com>; Sara Spratt <saracollie@hotmail.com>; <michael.daley@aveburyam.com> <michael.daley@aveburyam.com>; Andrew Williamson <andrewwilliamson1000@gmail.com>
Subject: Avebury and Stonehenge WHS Consultation

Dr Anatole-Gabriel, UNESCO,
Mr Chris Grayling (Secretary of State for Transport),
Mr John Hayes (Minister for Transport),
Ms Susan Denyer (Secretary, ICOMOS-UK).

For your information, please find attached the Avebury Society's letter in answer to the consultation on the proposed A303 development.

Dr Sue Rogers (Hon Sec. the Avebury Society)
Rosemary Cottage, West Overton
SN8 4ER
UK

Rosemary Cottage, West Overton, Marlborough, SN8 4ER

17 February 2017

To whom it may concern,
Highways England consultation
re the A303 at Stonehenge

Dear Sir or Madam,

A303 Stonehenge public consultation
The Avebury Society was founded as a civic society in 1994. Its interests are those normally expected of a civic society and relate principally to the Avebury part of the WHS. We have around 100 members, most of whom live in or close to Avebury. We are represented on the Avebury WHS Steering Committee and the Avebury and Stonehenge Archaeological and Historical Research Group. We comment on planning applications and took part in consultations on the new (combined) WHS Management Plan.

Avebury Society members attended a useful presentation by Highways England's traffic consultants to Avebury Parish Council on 7 February 2017. The Society had submitted questions beforehand and it was a meeting attended by the public.
The consultants explained the projected proposal and the brief they were given which was not jointly prepared with the client. They were clearly conscientious road builders. In answering questions on archaeology and the protection of the World Heritage Site (WHS), it was explained that the brief on these aspects was provided by English Heritage (now Historic England) and the National Trust who had provided their conclusions to Government in 2014.

Examining what is known about this work undertaken by Historic England and the National Trust, it was clearly acceptable for Government but appeared to ignore or misunderstand ICOMOS guidance on Heritage Impact Assessment for WHS which reminds States Parties of their commitment under the World Heritage Convention and pays particular attention to consideration of the WHS as a whole. It reverted to standard ways of measuring benefits against disbenefits in their impact study: enhancement v damage. It also fell into previous errors of giving value to individual features, visible and unknown, without remembering that the WHS was designated as a whole and is considered to be a heritage asset of the highest significance – including the sometimes subtle historic landscape.

There are also concerns about the speed and limited nature of the archaeological evaluations undertaken in a WHS where it would be expected that more detailed and lengthy evaluation would be required, and that decisions on portal locations and a choice of route would have been based on consideration of already-known archaeology. We understand that yet more archaeological evaluation is to be undertaken. Information on which to make reliable decisions is still lacking and consultees have not been provided with any reports to assist on this matter.
We have heard, for example, that the National Trust and Historic England would like revisions to the positioning of the western portal: we would naturally like to think that this involves moving the portal and new road beyond the WHS and its setting.

Because the Government has chosen to deal with this project as a National Significant Infrastructure Project, outside the usual planning system and offering a single damaging option for the WHS, there is at present no opportunity significantly to change the current proposal which appears largely decided: this brings into question the whole issue of consultation on a pre-emptive decision and one apparently made on considerations of cost instead of environment and archaeology. We would like to see the project put on hold until such time as full information is made available and options that would not damage the WHS are fully explored and compared with the one currently offered. Consultation on what is essentially a fait accompli cannot be considered to be proper consultation.

It should be remembered that in the past, the designation of WHS and Government's ongoing responsibility were divorced from the planning system. This has largely been corrected by dint of hard work and perseverance over the last 25 years. All Wiltshire County Council planning policies and the WHS management plan are highly protective of the WHS. But Government has ignored these controls and policies and opted for a process without adequate democratic involvement.

We also find it difficult to understand why Government is not proposing a less damaging option for the WHS and, if necessary, seeking funding for it outside its own resources.

It is for these reasons we are completing the questionnaire with our views and will be sending copies of this letter to ICOMOS and UNESCO. We are most concerned about the irreparable damage the current, largely fixed, proposal would cause to the WHS and the serious implications the scheme has for Avebury. The WHS should be protected and transmitted to future generations in line with the Government's Convention undertaking.

Yours sincerely,

Michael Daley
Chairman, the Avebury Society

Barn Owl Conservation Network

Response ID ANON-BABJ-X62M-V

Submitted to **A303 Stonehenge**
Submitted on **2017-02-28 15:42:44**

Introduction

Name

Name:
Colin R Shawyer

Postcode

Postcode:
AL4 8PX

Email

Email address:
colinshawyer@aol.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Barn Owl Conservation Network

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Strongly disagree to the Southern By-pass option.
The proposed southerly route for the Winterbourne By-pass will significantly impact on the barn owl breeding population which during the last 30 years has successfully been restored on and adjacent to the proposed southerly route, an area now considered part of a successful Barn Owl Species Recovery Area (SRA) in this part of Wiltshire. As such the breeding sites in this area have been monitored annually for over 25 years and the results reported to me as UK Coordinator of the BOCN and the British Trust for Ornithology. Following the increased traffic speeds which will arise from this new section of road, breeding barn owls currently established at nest sites within 1.0-1.5 km will be lost to increased road traffic collision.
Some 12-14 years ago I was part of a professional team of ecologists who on behalf of the then HA undertook barn owl surveys within 1.5 km of the A303 between Amesbury and Mere. As part of this remit we presented a mitigation strategy for the A303 aimed at maintaining the barn owl breeding population in the Stonehenge and Winterbourne Stoke areas . Can you confirm that you currently hold comprehensive up-to-date survey data on barn owls for this area and that full consideration is being given to the two route options for Winterbourne Stoke in respect of the barn owl breeding population levels which differ considerably

along and adjacent to these two routes.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
N/A

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
N/A

7. Do you have any other comments?

Q7:
No

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:
Landowner concern for breeding barn owls in the Winterbourne Stoke area

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Berengaria Order of Druids

Response ID ANON-BABJ-XGZV-X

Submitted to **A303 Stonehenge**
Submitted on **2017-02-16 09:14:15**

Introduction

Name

Name:
Sarah Rooke

Postcode

Postcode:
PO5 1QN

Email

Email address:
sarah.rooke@ntlworld.com

Postal address

Address:
Flat 3, 20 St Davids Rd
Southsea
Hampshire

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Berengaria Order of Druids

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
This tunnel will endanger the landscape and archaelogy of this World Heritage Site

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Again, this will endanger the landscape and archaelogy of the WHS

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
This will endanger the landscape and archaelogy of the WHS

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
This will endanger the landscape and archaelogy of the WHS

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
This will endanger the landscape and archaelogy of the WHS

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
This will endanger the landscape and archaelogy of the WHS

7. Do you have any other comments?

Q7:
The whole project will endanger the landscape and archaelogy of the WHS if it goes ahead

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

British Motorcyclists Federation

Response ID ANON-BABJ-X3BA-W

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 00:28:14**

Introduction

Name

Name:
Jim Peel-Cross

Postcode

Postcode:
SN9 5NN

Email

Email address:
jimpcross@hotmail.couk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
british motorcyclists federation

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
going by all the paperwork I have reed on line it is the best out come for it

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Not Answered

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Not Answered

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
I have looked at the vidos option 1n-a northern bypass of winterbourne stoke looks to be the best of the two of them

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
to in prove it from the currant out lay

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
to in prove the currant lay out

7. Do you have any other comments?

Q7:
the safety of the tunals if the should be a fire in side them how would you be able to get in to the tunal to deal with it

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Campaign for Better Transport

From: Chris Todd <chris.todd@bettertransport.org.uk>
Sent: 03 March 2017 13:46
To: A303Stonehenge
Subject: A303 Stonehenge consultation response
Attachments: CfBT response to A303 Stonehenge Consultation.pdf

Dear Madam / Sir,

Please find attached our response to the consultation.

Yours faithfully,

Chris Todd

Roads Campaigner
Campaign for Better Transport

Mobile: 07889 302229

Please note I work 2.5 days a week, generally Mondays and Thursdays. However feel free to contact me any time if it is important or urgent.

Oppose a new road (A30) through the Blackdown Hills Area of Outstanding Natural Beauty (AONB). Sign the petition.

Sign up to our Roads to Nowhere mailing list to be kept up to date with the latest developments

Campaign for Better Transport

A303 Stonehenge (Amesbury to Berwick Down) Consultation – response from Campaign for Better Transport

Contents:

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1.2 Need to rerun the consultation 2

1.3 Rejection of both options 2

1.4 The case for a new or expanded road has not been made 3

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1.6 Other environmental impacts 3

1.7 Vulnerable road users 4

1.8 Conclusion 4

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1. Campaign for Better Transport's Response

1.1 Introduction

Campaign for Better Transport echoes the detailed objection made by the Stonehenge Alliance of which we are members: we are submitting these comments in addition to that response.

1.2 Need to rerun the consultation

We object to the way that Highways England (HE) has carried out this process. We are concerned about the lack of time for the consultation, the failure to advertise more widely, including nationally and internationally, and the lack of options for people to comment on.

While we acknowledge that the timeframe for the consultation at seven and a half weeks is slightly longer than the standard six week consultations that HE usually carries out, it is not adequate to allow full engagement with people nationally and internationally. Seven and a half weeks is an odd length of time to have chosen and it is significantly shorter than the ten week consultation that was held on the A27 at Chichester. There, nationally important assets were only marginally impacted upon by HE's proposals, unlike here where the proposals would have a significant and detrimental impact upon an internationally important site.

Given the international significance of Stonehenge World Heritage Site (WHS) and the expectation by the International Council on Monuments and Sites (ICOMOS), as expressed in their mission report published last year (April 2016), that heritage considerations should be placed at the heart of this process, we are disappointed to see little evidence that HE is following a different path to usual. This is further illustrated by the very limited options presented during the public consultation, which seemed to be based upon arbitrary cost limits, rather than heritage value.

We strongly believe that the consultation needs to be re-run with a full and proper set of options and for a longer period of time. The assumption presented in this consultation is that there has to be major roadbuilding and only as put forward by Highways England, but this has not been proven by the information provided. The growing concern among archaeologists about the impact of these proposals on the WHS should be reason enough for the process to be halted and a fresh approach to be taken.

1.3 Rejection of both options

We do not support either of the two options presented during the public consultation. Both offer the public limited chance of input as the major part of the project was fixed, with only the western end of the route, the bypass around Winterbourne Stoke, being negotiable. The position and length of the tunnel was not up for discussion. Yet the position and length of the tunnel is critical to its impact on the WHS.

A 2.9km tunnel for a road traversing a 5.4km wide WHS is clearly not long enough to avoid causing substantial damage to the landscape and archaeology there. It will result in around 1.6km of new surface dual carriageway within the WHS on its western side. This does not seem to be the product of a process that has placed heritage considerations at its heart as ICOMOS requested. Therefore, it is difficult to see how HE's proposals conform to the National Networks National Policy Statement policies on the protection of a WHS and the great weight that needs to be applied to those policies. This now places the UK Government in a compromised position given its international undertakings to UNESCO to safeguard the archaeology and landscape of Stonehenge WHS.

While technically, there was a third option of a surface bypass around the southern edge of the WHS, this was dismissed by HE and the public were steered away from commenting on it, not least because of the way the consultation questions were framed.

We believe that a full range of options, including strategic and local interventions, for both road and sustainable transport, including demand management measures, should be consulted upon.

1.4 The case for a new or expanded road has not been made

While it is accepted that there are times when the road does become congested causing delays and rat-running, this is no worse and probably a lot better than the congestion suffered by many other areas, particularly urban areas, every day. Indeed, the main congestion is around the weekends and a few weeks in the summer. The transport modelling that has been used to build the case for expanding the A303 is not fit for purpose and cannot be used to justify the proposed scheme.

We believe that strategic East-West journeys are best made on the existing motorway network, and that local journeys would be better served by a more multi-modal solution that does not impact on the WHS. Better use of travel planning information could help address predictable times of heavy traffic in a more cost effective and sustainable way than this very expensive road scheme.

1.5 Cumulative impacts not addressed

We are concerned that this scheme is being progressed at the same time as, but otherwise in isolation to, the other schemes being proposed along the A303/A30/A358 corridor. This will mean that the full impact of these schemes are likely to be severely underreported. If all these sections are expanded to dual carriageway standard, alongside junction capacity increases, this is likely to result in a big increase in traffic along this corridor, both induced and reassigned from other routes, over and above what is estimated for each scheme in isolation.

This in itself will have a negative impact on the WHS as it will likely result in a large increase in traffic through the WHS. Given that nearly half of the road through the WHS is at surface level, this will have a significant impact on air and noise pollution within the WHS and cause significant harm. Noise pollution will also increase as a result of the higher traffic speeds, particularly at the western end.

Linked to the likely large increase in traffic along this corridor, it is most probable that carbon emissions will increase significantly. This will further undermine the ability of the Department for Transport to reduce carbon emissions from transport. Given that transport emissions have been flagged as being of concern by the Committee on Climate Change in its Progress Report to Parliament in June 2016, Highways England cannot keep ignoring the fact that its road building programme is driving up emissions.

These issues should be properly spelt out and considered within any new consultation.

1.6 Other environmental impacts

While concerns about the impact on the WHS are cause enough to drop these plans, there is also the impact on the natural environment, including the nearby RSPB reserve which is a haven for endangered stone curlews. Apart from any physical disturbance to their surroundings, the noise pollution from the faster, bigger and more heavily trafficked road could also impact on breeding.

While neighbouring communities including Winterbourne Stoke could see some benefits, they could still be adversely affected by noise pollution and air pollution from any new road. To date, they have not had adequate responses to their concerns.

1.7 Vulnerable road users

If the road goes ahead either as it is, or in modified form, it is important that pedestrian and cycle facilities along and across the route are improved. New cycle facilities, for example, will need to be designed to the latest standards as laid out in Interim Advice Note: 195/16 and sealed surfaces of adequate width should be provided to ensure all cyclists can use them. In addition, consideration will need to be given to improving links into the wider area. It would be no good enhancing the infrastructure within the WHS if pedestrians and cyclists cannot easily and safely access it from all directions, particularly where they have to cross or travel along busy roads.

1.8 Conclusion

Overall, we are not happy with this consultation and the robustness of information provided. This process needs to be re-run to provide the public with a genuine range of options that cause no further harm to the WHS. To date it appears to have been artificially constrained by a budget set without any reference to what is at stake within and around Stonehenge World Heritage Site.

We strongly oppose both so-called 'options' presented during the consultation as they are virtually the same as regards their impact on the WHS. We would like to see a much more strategic approach being taken to tackle transport issues along this corridor, rather than relying almost solely on road building, which is unlikely to do anything other than increase traffic and congestion in the longer term.

3 March 2017

Chris Todd
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX

Campaign for the Preservation of the Southern Till Valley

CPSTV

Campaign for the Preservation of the Southern Till Valley

The Barn, High Street, Berwick St James, Salisbury, Wiltshire SP3 4TN

Messrs Andrew Alcorn, Derek Parody, Chris Jones
A303 Stonehenge Public Consultation
Highways England
Bristol Office
Temple Quay House
2 The Square
Temple Quay
Bristol
ES1 6HA

3 March 2017

Our unique reference number to Highways England Questionnaire:

ANON-BABJ-X63D-M

A303 Winterbourne Stoke bypass – response

Dear Messrs Alcorm, Parody and Jones

I write this letter on behalf of an informal action group working under the name of the Campaign for the Preservation of the Southern Till Valley (CPSTV). This group was formed by concerned residents living in or around the villages of Winterbourne Stoke, Berwick St James and Stapleford, plus other interested outsiders, all of whom have expressed major concerns about the proposals of Highways England to construct a bypass to the south of Winterbourne Stoke as part of the A303 upgrade proposals.

The group was formed shortly after a public meeting held in Berwick St James to discuss the proposals. Our local MP John Glen attended that meeting and was able to hear at first hand the strength of feelings expressed by all those present. That feeling was underpinned by rapid formation of a CPSTV committee including representatives from all three villages and subsequent raising of funds given on a voluntary basis by residents in the valley, in order to examine in more detail the material concerns and worries raised by the southern route option – whether for residents, businesses or local ecology and archaeology.

Even at this early stage, CPSTV has no objection in principle to the proposed tunnel. Indeed, it takes the view that if the A303 is to be dualled past the Stonehenge WHS, then a tunnel is probably the only possible option to answer the legitimate concerns of those who wish to preserve the archaeological heritage in the area. We are conscious of that history and the benefits that it can bring to the area. Nevertheless we are concerned that perhaps too much emphasis is given to the interests of those who have lived in the area, but are long dead, at the expense of those living in the area whether now or in the future.

Four technical reports were commissioned from independent specialists to review those aspects of the southern route causing the most concern. The four reports are attached to this letter or have been delivered separately to your offices. They are as follows:

1. Overall assessment of the overall consultation and proposed bypass routes by Mabbett
2. Preliminary Ecological Appraisal by EPR consultants
3. Transport consultancy report by Vector consultants
4. An acoustics report by JSP consultants

1130

There are a number of key concerns identified by these four professional consultancy companies:

Fundamental flaws and bias in the consultation
There are significant differences between the two bypass options routes in terms of ecology, landscape, hydrogeology, noise and air quality. None of these points were presented to the public. Overall there appeared to be a grave and prejudicial bias in favour of choosing the southern route

Ecological and hydrological impacts

The detrimental impacts for the River Till SAC, including that from run off, are so severe as to raise considerable questions as to the validity of any presentation of any southern option. The likely impact from a northern route crossing what is a drier valley comprising largely arable land is significantly less.

Pollution – noise, air quality and light

Given the prevailing wind direction, the impact from a southerly bypass from noise, exhaust fumes and light pollution will be severe especially on Winterbourne Stoke. A northern route option would protect every single house in both Winterbourne Stoke and Berwick St James from that risk. Furthermore nearly every house in both villages would find itself positioned further from a major road than at present.

Landscape and land take

Concerns regarding the visual impact of the southern route is likely to be higher, owing to the need for more high level structures. No formal analysis of these impacts was presented to the consultation process. Furthermore land take appears to be significantly underestimated on both routes, but particularly for the southern route

Finally, we must express our concerns about the lack of time and information given to this consultation. As mentioned by Mabbet, everything has been produced at very short notice which has resulted in a deficiency of information on which people may make an informed decision. Thanks to the generosity of a large number of individuals across the valley, we have ourselves sought to address some of that information gap by commissioning our own independent research. That should not have been necessary.

Two other areas of concern should also be mentioned.

Damage to rural links and businesses
The area should be recognised not just for the archaeological interest to the east. Local businesses benefit from visitors wishing to experience its flora, fauna and woodland walks some of them rare and protected if not unique. Shops, pubs, farms, a campsite and a dairy all face threat of closure from loss of those attractions. Conversely it is likely that businesses in Winterbourne Stoke may experience a new lease of life should a northern route provide the benefit of uninterrupted access to the southern valley with no dividing road.

Loss of community
A dividing southern expressway will form an impassable and fast moving barrier across the valley. Links between the villages which have been in place for over 600 years will be irreversibly destroyed.

Nevertheless, we do not just wish to proffer negative views. We have already suggested that a northern route might actually benefit small business in Winterbourne Stoke. In addition however, we believe that there are three **positive solutions** which would further enhance the northern route:

Re-siting the western portal
Risk to the untouched archaeological sites south of Normanton Gorse would be reduced by siting the western portal closer to the existing A303 in the area to the northwest of the same gorse.

Moving the junction east
It would make far more sense to site the A303/A360 junction to the south west of the current Longbarrow junction outside the area of archaeological interest. The result would avoid need for an awkward dog leg, create a more direct route for WHS visitor traffic and remove local concerns on rat running. The junction could be sunk into existing contours of the land to answer the concerns of those worried about impact of headlights on Stonehenge. The area appears to have minimal archaeological significance relative to the other areas.

Reduction of height of viaduct

There have been no clear reasons given for the height of the viaduct crossings. Lowering the structures will create far less visual impact and be easier hidden by sensible tree planting, so minimising the profile of any solution.

We trust that Highways England will take note of our concerns, welcome our input to their consultation, find the enclosed reports useful – and proceed to recommend both a modified western tunnel portal and an improved northern Winterbourne Stoke bypass.

Yours sincerely

H.N.A Colthurst
Chairman

Cc John Glen Esq, MP

Response ID ANON-BABJ-X63D-M

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 11:57:53**

Introduction

Name

Name:
Campaign for the Preservation of the Southern Till Valley

Postcode

Postcode:
SP3 4TN

Email

Email address:
CPSTValley@gmail.com

Postal address

Address:
The Barn, High Street, Berwick St James, Salisbury, Wiltshire, SP3 4TN

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Campaign for the Preservation of the Southern Till Valley

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
See attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
See attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M

3. To what extent do you agree with our proposed locationof the western portal?

Tend to disagree

Please provide any comments to support your answer for question 3:
See attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
See attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Listen to local opinion.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Listen to local opinion.

7. Do you have any other comments?

Q7:
Please note our very material concerns about the Western portal and proposed Winterbourne Stoke bypass as per attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:

Various

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
See attached letter dated 3rd March 2017 and technical reports.
Reference ANON-BABJ-X63D-M

From: Neil MacDougall <neil.macdougall@me.com>
Sent: 03 March 2017 10:44
To: A303Stonehenge
Cc: Till Valley
Subject: Response ID - ANON-BABJ-X6VN-1
Attachments: Final letter to Andrew Alcorn V4.pdf; EPR PEA A303 Bypass FINAL 1C 20170301 _Full.pdf; JSP A303 Acoustics report to HE.pdf; M60065.01 Mabbett Report FINAL 020317.pdf; VTC Letter 270217 (1).pdf; APPENDIX A – Requests for Information to HE from the CPSTV.pdf

Dear Sir,

Reference: Response ID - ANON-BABJ-X6VN-1

Please find attached PDF copies of the Berwick St James submission and supporting reports. These are being hand delivered in hard copy today to the Offices The Hub 500 Park Avenue, Aztec West, Bristol, BS32 4RZ. This is as per the telephone conversation between Julian Glyn-Owen and Mr Chris Jones today. May we thank Chris for his help thus far.

1) Chaimans Letter of introduction
2) Mabbett Report
3) Mabbett Appendix A
4) EPR Report
5) VEctor Transport Consultancy Report
6) JSP Consultants Report

Please may we have a reply email acknowledging receipt of this submission.

Yours faithfully

Neil MacDougall
Chairman Berwick Parish Meetings.

The Leat House
Berwick St James
Salisbury
Wilts SP3 4TL

Tel: 01722 792761
Hp: 07502 565456

Email: berwickstjames@icloud.com

Andrew Alcorn (A303 Stonehenge Public Consultation)
Highways England
Bristol Office
Temple Quay House
2 The Square
Temple Quay
Bristol
ES1 6HA

Our Reference: ANON-BABJ-X6VN-1

3 March 2017

Dear Mr Alcorn,

A303 STONEHENGE AMESBURY TO BERWICK DOWN – BERWICK ST JAMES RESPONSE

OUR SITUATION

In addition to this submission from Berwick St James, the Campaign for the Preservation of the Southern Till Valley (CPSTV) has submitted a formal report that embraces the whole of the southern Till valley. Given the seismic impact of the decision and that almost all of the proposed southern bypass runs through our parish, we, as the Trustees of the village of Berwick St James, need to impress upon you the concerns which we have with the proposals. We should stress that we support the need for the tunnel and a bypass of Winterbourne Stoke – our concerns lie in the options for providing it.

So, the top-level issues are:

COMMUNITY, ECONOMY, ECOLOGY, HYDROLOGY

We wish to raise concerns across a wide range of topics, notably significant adverse impacts on the community through permanent separation of our two historic Norman villages, permanent damage to our local businesses, and destruction of a vital part of the River Till SSSI that will have major downstream impacts through the Avon SAC.

ARCHAEOLOGICAL IMPACT

There is a site of untouched archaeological interest south of Normanton Gorse, and has remained undisturbed for many thousands of years. There is a sensible solution that avoids this location whilst ensuring smooth connectivity to the aspired route. In siting the western portal north west of Normanton Gorse parallel to the existing A303, the impact on the ancient history of the landscape is minimised and this reflects the survey work conclusions of the published 2003 scheme.

PROCEDURAL

Secondly, we also have considerable concerns relating to every stage of this consultation process. As most people have discovered, there is a paucity of information released to the public by Highways England (H-E), and it is therefore impossible to comment fully on the proposals. It is quite apparent that the amount of information supplied by Arup Atkins and H-E on which local residents are expected

to base their concerns, is at a very different level to the degree of detail that people who live here believe is necessary for them to make an informed choice. Assurances have been given by H-E that local concerns based on inadequate information would be fully addressed, but only after the decision to select one of the two bypass options had been made. An appropriate analogy might be to expect someone to jump into one of two tanks of water when blindfolded; one of which has sharks in it. The assurance given would be that the sharks would be removed the following day: this is clearly unhelpful!

WHAT WE HAVE DONE

To provide substance and support our position, the community has gone to considerable efforts since the 12th January 2017 to achieve the following:

- Formed a representative body called the 'Campaign for the Preservation of the Southern Till Valley' whose membership embraces individuals across a significantly wider section of the Till valley.
- Reached a consensus of opinion that the northern route is the clearly best option, but not as currently presented.
- Established relationships with external bodies such as Environment Agency, Natural England, World Heritage groups, Wiltshire Unitary Council and Wiltshire Wildlife Trust, JNCC and others.
- Raised a fund through voluntary donations to support the engagement of professional consultants, whose reports are enclosed with this letter.
- Delivered four public meetings relating to the consultation to inform concerned residents and wider interested parties.
- Collated individual subject matter expert (SME) research reports on a range of technical matters which have also been presented to H-E.

DISCUSSION OF KEY CONCERNS

The Parish Community is united in objecting to the southern bypass option.

The southern bypass option is a proposal that will deliver a permanent barrier both visually, socially and economically through this community. It is a huge concern to all. We are two Norman villages, of equal precedence in terms of history, contribution to the local archaeology, family history and our two churches are linked by nearly a thousand years of worship and footpaths. Design mitigation efforts will never deliver any degree of meaningful healing to the damage caused by such a severe and permanent structure through the southern Till valley. The impact of such an enormous rift on our thriving community, ecology and local businesses both now and in the future can only be devastating.

The residents cannot understand why the proposed northern bypass option around Winterbourne Stoke is not exactly the same in position and profile as was agreed back in 2005. Importantly, this was largely accepted by both the landowners and the community of Winterbourne Stoke. It is of note, however, that the new proposed northern bypass is viewed by residents as being significantly less acceptable when compared to the 2005 plan.

The late exposure to us of a southern bypass option, coupled with an unattractive and less-than-acceptable northern option - which is significantly higher in profile than the 2005 version – has been upsetting and worrying for most residents.

Communities north of Winterbourne Stoke are extremely concerned that the proposed position of the A303/A360 interchange on the northern route will do nothing to alleviate the rat-run through Shrewton and will be inconvenient to drivers from all directions. This point was raised to H-E by Shrewton's Deputy Parish Chairman, Darren Henry at a meeting on 23rd February 2017. But there is a pragmatic solution in the relocation of the junction back to the A360/Longbarrow roundabout and which adjustment is supported by us and the community of Shrewton. In detail; positioning the new round-a-bout in the south-west quadrant below the existing junction, would minimise the archaeological impact.

The ecological outlook for the Till valley is of considerable concern: we enclose a study that concludes that the overall impact on the ecology here is significantly greater than on the northern route.

We have considerable and, as yet, unanswered concerns about the hydrological impacts do not seem to have been appropriately considered: this ranges from the initial construction through to the life-long impacts of the structures and run-off on the valley.

OUR SUBMISSION

We attach 4 key reports that you will want to examine with your team: the first and most important being a report by Mabbett, who we have contracted to examine the proposals and processes. They have:

- Undertaken to deliver an independent critical review of the consultation process and quality of information presented to the public in order to make an informed choice on the route options.
- Identified concerns expressed by the CPSTV community.
- Supported the preparation of a consultation response from the CPSTV community to HE.

We have also attached the three further detailed assessments by EPR (Ecology Consultants), Vector (Road Design Consultants) and JSP (Acoustic Consultants).

Please acknowledge receipt of this letter and the enclosures.

Yours sincerely,

N. R. H. MacDougall
Chairman Berwick St James Parish Meetings

Ian West.

Councillor I. West
Wiltshire Councillor for Berwick St James

Enclosures:

1. Mabbett Report.
2. EPR.
3. Vector.
4. JSP Consultants.

Mabbett™

Environmental Planning

See a Difference.

03/03/2017

Review of A303 Winterbourne-Stoke Bypass Options

Prepared for: The Campaign for the Preservation of the Till Valley

Address: Appletree Cottage, Berwick St James, Salisbury, Wiltshire, SP3 4TX

M60065

MABBETT ENVIRONMENTAL PLANNING LTD, CORPORATE AND REGISTERED OFFICE: MABBETT HOUSE, 11 SANDYFORD PLACE, GLASGOW, U.K. G3 7NB REGISTERED IN SCOTLAND NO: SC524593
INFO@MABBETT.EU WWW.MABBETT.EU
BELFAST; CARDIFF; GLASGOW ; LIVERPOOL; ROSYTH; DUBLIN

Contents Amendment Record

This report has been issued and amended as follows:

Revision	Description	Date	Signed	
1.0	Internal Draft1	01/03/17	BW	
2.0	Draft Report to Client	01//03/17	BW	
3.0	FINAL Report	02/03/17	GC	

Executive Summary

Mabbett Environmental Planning Ltd have been commissioned by the 'Campaign for the Preservation of the Southern Till Valley' (CPSTV)[1], to undertake a critical review of the consultation and options appraisal process used by Highways England (HE) to bring forward two route options for a Winterbourne-Stoke A303 Bypass. The Bypass is required as part of a larger Scheme to develop a tunnel under Stonehenge, a World Heritage Site on the Salisbury Plain.

The CPSTV do not oppose the tunnelling beneath Stonehenge and believe in the goal of transforming the A303 into a viable strategic highway to the west of England. However, they are strongly opposed to the southern bypass of Winterbourne Stoke and in favour of the northern bypass.

The Community is concerned that the two routes have not been treated in the same way in the consultation process, and that the public (and statutory consultees) have not been informed as to the true nature of the potential impacts of the southern route.

The Study has concluded:

1 The appraisal process undertaken to compare the two bypass options is fundamentally flawed;

2 The claims by Highways England that there were 'no significant characteristics differentiating the two bypass options' are erroneous. There are significant differences between the two routes in terms of ecology, landscape, hydrogeology, noise, air quality that should have been presented to the public at this level of consultation;

3 By comparison with the northern bypass, the impacts of the southern bypass route on the River Till SAC are so severe that they cannot be mitigated, and in this report's view, given the level of supplied information, would not be consented. Legally this outweighs any concerns regarding heritage issues;

4 The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports;

---

[1] *The Till Valley community have established "The Campaign for the Preservation of the Southern Till Valley" (CPSTV) to represent their views on the bypass of Winterbourne Stoke. The CPSTV represents the views of approximately 400 residents of the community south of the A303, including Winterbourne Stoke, who would be directly impacted by the southern route bypass option. This represents from 70% to 95% of the community of the three Villages (Winterbourne Stoke, Berwick St James and Stapleford) and environs. Current estimates are that at least 400 submissions will be made the Community*

5 When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures. A formal analysis of these impacts should have been presented to the consultation process;

6 Significantly more land take will be required for both routes, but particularly for the southern route, than currently presented;

7 It can be shown that there is a distinct bias throughout the Transport Appraisal and the consultation process in favour of choosing the southern route.

8 The public have not been provided with correct or sufficient information to enable them to make an informed choice on the bypass options, and a second consultation on the bypass alternatives should be undertaken before a preferred route is announced.

Flawed Appraisal

The appraisal methodology, which is totally appropriate for high level sifting of a range of different corridor and route options, and for making the final comparison of 'tunnel' ('D' routes) vs 'not tunnel' (F route). However, this methodology should not have been used to try to distinguish the two bypass options. The main outcome of the TA process was to identify one preferred route with two alternatives. This now effectively brings the scheme into the EIA and HR process, and the difference between, 'options appraisal' vs 'assessment of alternatives' appears to have been misunderstood.

Differences between the Southern and Northern Bypass Route

Due to the refusal by Highways England to provide the Technical reports used as a basis for the options appraisal, the Community has been forced to fund the collection of its own baseline data by expanding the scope of work for this study and by engaging other specialist consultants, primarily with regard to ecology, traffic and noise.

Ecology

Studies undertaken for the purposes of this report have demonstrated that there are significant differences between the north and south bypass options, primarily due to the hydrogeological conditions and ecological quality of the River Till, which have a substantial bearing on the likely adverse impacts on its SAC objectives, the types of construction methods to be applied, the mitigation solutions required, and indeed the feasibility of the southern route as a viable option.

The footprint for the construction of the southern route viaduct is directly atop of a complex spring system and Annex I and Annex 11 habitats and species, and will permanently remove the area where up to 90% of spawning for Brown Trout occurs for the River Till and downstream.

Construction of a northern viaduct would allow over 2km separation distance from these sensitive features.

These differences are material and would have a significant influence on public perception of routes if these were published.

Given the likely failure of the southern route option to meet the Article 6.4 tests of the Habitats Directive when a better ecological option (the northern bypass route) is available, it is considered irresponsible for Highways England to proceed further without at least undertaking a screening exercise (Test of Likely Significance) for both options, in accordance with Planning Inspectorate Guidance[2], to avoid an abortive project and waste of public funds.

The information used to support these conclusions is freely accessible on public websites and easily interpreted in the hands of an experienced environmental practitioner. Therefore, there is no reason why this more detailed level of appraisal could not have been undertaken for the purposes of this consultation exercise.

Noise and Air Quality

Specialist studies indicate that if the south-west prevailing wind is taken into account. The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports.

Landscape and Visual Impact

The southern route will likely require an elevated junction over the existing embankment near the western portal, in comparison to a tunnel under the embankment for the northern route, meaning that the landscape and visual impacts of the southern route will by significantly higher than reported.

Significantly more land take will be required for both routes, but particularly for the southern route in order to address the large areas required for preventing significant the runoff of chalk slurries during the construction phase, than currently presented.

Given the importance local consultees place on the high quality of the aesthetics of the countryside, a more detailed appraisal of the comparative landscape effects should have been made available for the consultation process.

Inadequate Information

It is a conclusion of this report that there has been insufficient level of detailed technical information applied to compare the two route options. Further, it is highly suspected, given the refusal of Highways England to even provide the most easily available technical reports that this information, and being willing to accept procedural challenge under the FoIA and EIR, and censure for not doing so, that this information simply may not have been collected or applied.

Misleading Information

With regard to the SAC and impacts on the River Till, the Technical appraisal takes the precautionary principal and concludes, that due to '*the uncertainty over construction*

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[2] Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects
https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

methodology, and size / footprint of one new crossing over the River Till there *will a Large Adverse Impact on the River Till (SAC)*.

However, this is contradicted within the Public Consultation Booklet, which states that

'.both crossings could be achieved without damage to the protected status of the Till'.

This statement is false and misleading with significant consequences for public perception.

Notwithstanding the current arrangements in the Infrastructure Act 2000, Highways England still has a duty as a public authority, and is answerable to the Secretary of State.

Given that:

- An early Test of Likely Significant Effects under the Habitats Regulations, on both bypass alternatives, should be undertaken as soon as possible to establish the viability of the southern route. This is to avoid abortive work on the southern option, which will be costly, result in substantial delays, and be a waste of taxpayers money;

- Further detailed assessment of alternatives will be required for the scoping stage of the EIA; The information level requirements for this are now high but can be significantly reduced if the southern route is rejected by the screening process above;

- It can be demonstrated that the public have not been provided with sufficient information to make an informed assessment in contradiction to the Aarhus Guidelines 2000;

- Highways England, in refusing a reasonable Freedom of Information Request appear to be in clear and absolute breach of the Freedom of Information Act 2000 and the Environmental Information Regulations 2014 – allowing a complaint to the Information Commissioner and higher courts;

- The public have been provided with false and misleading information, of sufficient consequence as to allow a complaint to the Advertising Standards Agency (ASA);

- Any flaws in the consultation process will be taken into account by the Local Authority and the Planning Inspectorate during Examination for the application for DCO; and

- Within the stakeholder working group commentary, Historic England, National Trust, English Heritage and Wiltshire Council have made it clear that *'considerably more than normal design and assessment information will be required to support their decision making/position at this stage in the process and this must be resolved and evaluated before the DCO is submitted' (TAR page 273).*

There is a strong argument that a correct level assessment of the bypass options be undertaken, taking into account local level issues, to address all of the above points. This should be published for a second public consultation period before any announcement of preferred route is made.

With regard to any further information submitted to address the first thee bullet points, Highways England should provide an updated website with all available information (as is now standard practice for public authorities).

The Aarhus Convention: An Implementation Guide (United Nations, New York, 2000) states that:

> *"whether coming from consultants, the proponent, co-authorities, expert bodies, or members of the public. Such reports and advice may include, inter alia, studies of alternatives, cost/benefit analyses, technical or scientific reports, and social or health impact assessments."*

According to the guidance, the obligation to make relevant information available in terms of the Aarhus Convention, article 6(2), is a continuing obligation, and [107]:

> *"… the issuance of new reports and advice to the public authority should trigger an additional obligation to notify the public concerned. The obligation to update information is also found in the lead to this subparagraph, which requires the public authorities to give all relevant information to the public concerned 'as soon as it becomes available'."*

Any announcement of the southern bypass option as a preferred route without considering the above steps, has the potential to result in significant delays to the scheme.

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Section 1.0 Introduction

1.1 Purpose of this Report

Mabbett Environmental Planning Ltd have been commissioned by the 'Campaign for the Preservation of the Southern Till Valley' (CPSTV), to undertake a critical review of the consultation and options appraisal process used by Highways England (HE) to bring forward two route options for a Winterbourne-Stoke A303 Bypass. The Bypass is required as part of a larger Scheme to develop a tunnel under Stonehenge, a World Heritage Site on the Salisbury Plain.

The purpose of the study is:

a) to undertake an independent critical review of the consultation process and quality of information presented to the public to inform their invited preference on the route options;

b) to identify if concerns expressed by the CPSTV community are valid, and

c) to support the preparation of a consultation response from the CPSTV community to HE.

1.2 Background

The A303 Amesbury to Berwick Downs scheme one of three schemes proposed for upgrading as part of a wider A303/A358 Expressway for the South West[3].

The A303 Amesbury to Berwick Downs Scheme (Scheme 3) is intended to reduce the longstanding problem of congestion on this section of the A303, and to reduce the impact that the existing A303 has on the Stonehenge World Heritage Site. A number of options for reducing the impact on Stonehenge, including significant rerouting of the A303, or tunnelling under the Stonehenge site, have been proposed. Relief of congestion on the A303 would be achieved by increasing the road width from single to dual carriageway to provide more capacity, and moving the road away from Winterbourne Stoke. This would reduce the associated impacts on air quality, noise and severance on Winterbourne Stoke, and minimise impacts associated with increased traffic (rat running) in the adjacent villages of Shrewton, Durrington, Bulford and Larkhill.

This section of the A303 has been extensively examined on a number of previous occasions, including the option to place the A303 into a 2.1km tunnel and to build a northern bypass around Winterbourne Stoke. Many other options have been examined

[3] http://www.highways.gov.uk/roads/a303a358-work-to-create-an-expressway-to-the-south-west

at some length; many of these have been discounted for a wide variety of reasons. In 2003 a preferred route involving a northern bypass option around Winterbourne Stoke was announced, and an application, including an Environmental Impact Assessment (EIA), was submitted for public consultation and consent. However substantial objections to the preferred scheme in relation to the impacts of the Scheme on the wider archaeological setting of the Stonehenge site were upheld, and this Scheme was quashed.

A new Transport Appraisal study and report (Transport Appraisal Report (TAR)) which is currently being consulted on, has re-visited all previous feasibility studies and has reached the same conclusions as previous, namely that a tunnelling solution under Stonehenge, and a bypass around Winterbourne Stoke is the best solution. However, the main difference in the current study, is the inclusion for the first time, of a southern route bypass option being brought forward.

A comparison of the two bypass options was made using WebTAG guidance, which concluded that there were 'no significant characteristics differentiating the two bypass options'.

The public are currently being asked for their views on the current studies, including their preference for either a southern bypass option or a northern bypass option. Consultation closes on 5th March, with an announcement on the preferred route being made in Summer of 2017.

The Scheme is classed as a Nationally Significant Infrastructure Project (NSIPs) and will require a Development Consent Order (DCO) under the Planning Act 2008 before construction can start. Further consultation will be undertaken on the preferred scheme before DCO applications are submitted.

Section 2.0 Project Description

2.1 Location

The Till Valley Community ('the Community') comprises of volunteers who are residents of the Villages of Winterbourne Stoke, Berwick St James and Stapleford and other residential properties and businesses in the area, south of the A303.

The Community have established "The Campaign for the Preservation of the Southern Till Valley" (CPSTV) to represent their views on the bypass of Winterbourne Stoke. The core of the Community is the Village of Berwick St James, who have established a Village Technical Group (VTG) to coordinate all submissions and concerns. The CPSTV represents the views of approximately 400 members of the community south of the A303, including Winterbourne Stoke, who would be directly impacted by the southern route bypass option. This represents from 70% to 95% of the community of the three Villages (Winterbourne Stoke, Berwick St James and Stapleford) and environs. Current estimates are that at least 400 submissions will be made the Community.

The CPSTV do not oppose the tunnelling beneath Stonehenge and believe in the goal of transforming the A303 into a viable strategic highway to the west of England. However, they are strongly opposed to the southern bypass of Winterbourne Stoke and in favour of the northern bypass.

The Community is concerned that the two routes have not been treated in the same way in the consultation process, and that the public (and statutory consultees) have not been informed as to the true nature of the potential impacts of the southern route.

2.2 Community Concerns and Submissions

2.2.1 Key Issues

The Community is firmly of the view that:

1. the public consultation materials, as presented by Highways England is fundamentally biased towards favouring the southerly bypass route.
2. there is more highly sensitive ecology/ wildlife to the south, rather than north of Winterbourne Stoke;
3. there is protected woodland currently in the path of the southerly route;
4. that the profile, sectional views and contours of the southerly route are not accurately represented in the briefings or graphics used by Highways England; accordingly, the impact will be more obtrusive, with greater impact on the countryside, communities and aesthetic presentation;

5 that prevailing winds will expose both local wildlife and human communities to higher levels of noise and that no relevant study has been conducted to identify what this new level may be;

6 that the southerly route will result in the loss of more agricultural land than presented;

7 there will be a considerable impact caused by light pollution on local ecology;

8 that the archaeological value of area around the southern route has been ignored; there is an ancient village within the land area;

9 that the southern route will result in a significant economic loss; and

10 that the severance of these two two Norman settlement communities from one another will be permanent, leading to a breakdown of community bonds and functioning of the society so undermining the fabric of community life; sharing the churches, the footpaths and all the benefits of a close community

Section 3.0 Method

3.1 Introduction

Undertaking this study has involved the following steps:

1. A collation of publicly available data
2. Gap Analysis and requests for further information
3. Critical Review of the Technical Appraisal Report (TAR) and options appraisal process; for
    a. compliance with WebTAG and other relevant Guidance
    b. adequacy of information to inform a public consultation on bypass options.
4. Response to Community Concerns
5. Critical Review of the Consultation Process
6. Support in the preparation of a draft Consultation Response

3.2 Data Collation

3.2.1 Existing Information

All relevant documents from the HE Public Consultation website[4] were downloaded and reviewed. These are considered to be **core documents**.

Other publicly available documents were gathered and reviewed over the course of the study, these are listed in Chapter 5. References. Each document is listed with the relevant weblink.

The key government agency websites sourced included (but not limited to):

1 Legislation

a. The National Archives - www.legislation.gov.uk

- Infrastructure Act 2015

[4] Highways England Scheme 3 – Consultation website https://highwaysengland.citizenspace.com/cip/a303-stonehenge/

- Planning Act 2008 [and amendments made through the Localism Act 2011]
- Freedom of Information Act
- Environmental Information Regulations
- Conservation of Habitats and Species Regulations 2010 (S.I. 2010/490) (the “Habitats Regulations”) and amendments.
- Proposed the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

b. European Directives

- Directive 92/43/EEC (“the Habitats Directive”) and relevant Guidance.

2 GOV.UK

- 2015/2016 – 2018/2019 Road Investment Strategy (RIS1)
- A303/A30/A358 Corridor Technical Feasibility Study Reports
- Highways England License
- DfT Transport Appraisal Guidance WebTAG
- National Planning Policy Framework (NPPF)
- The Planning Inspectorate [and associated Guidance and Advisory Notes]

3 Environmental Organisations

- MAGIC – Joint Agency GIS information on the Natural Environment
- JNCC – River Avon SAC citation
- Natural England – River Till SSSI citation
- BGS – British Geological Society [Borehole Records]
- Environment Agency - Water Environment [Biodiversity | Groundwater Vulnerability | Flood Risk]

4 Other

- CIRIA – C574 [Engineering in Chalk] and PRJ PR 11 [Foundations in Chalk]
- WFD UKTAG – [Groundwater Dependent Terrestrial Ecosystems]
- Cranbourne AONB Position Statements and Management Plans

3.2.2 Gap analysis / Request for additional information

The TAR concludes that there is no significant characteristics differentiating the two bypass route options, a view that the Community disagrees with.

The environmental baseline of the northern bypass option is detailed and well known to the local communities, being the subject of multiple studies to support an EIA and concluding in an Environmental Statement (ES) in 2003. However, it is not known what level or quality of information was used to inform the TAR appraisal and conclusions for the southern bypass option.

The TAR and supporting volumes only contain summary information, however, make reference to a number of technical reports which were used to support the options appraisal studies. These documents, as well as a copy of the 2003 Environmental Statement and Technical Appendices, were requested from Highways England on 6th February 2017.

The documents requested are listed below in Table 1.

Table 1: List of Information requests to Highways England 6th February 2017

1	Background documents a. 2003 Environmental Statement (in full), including all Technical Appendices.
2	TAR Technical Reports (as listed in the TAR 1.4.1) a. Traffic Data Collection Report. b. Local Model Validation Report. c. Traffic Forecasting Report. d. Economic Assessment Report. e. Environmental Assessment Report (EAR). f. Appraisal Summary Tables and Supporting Worksheets Report. g. Initial Route Options Development – Design Fix C Environmental Report
3	Additional Information a. All monitoring/surveys/studies which support e), f) and g), above, including dates of any walkover surveys for BOTH bypass route options. In particular: • Noise reports and any monitoring information • Air Quality reports and any monitoring information • Cultural Heritage reports • Ecological reports/surveys • All landscape, ZTV's and view point studies

On the 13th February HE responded, as follows:

'the …documents requested are not being published as part of this consultation'.

The purpose of this current consultation on the A303 Stonehenge improvement is to seek the public's views on our outline proposals for the scheme at an early stage in its development. The information published is sufficient for people to understand our outline proposals, enabling views on the proposals to be expressed and for concerns and issues to be raised that we will take into consideration as part of our continuing development of the scheme.

I hope that explains the basis on which we are consulting on the scheme proposals.

The Community responded to this refusal to provide information by a) stating clearly that they believe their previous requests fall under both the Freedom of Information Act 2000 (FoIA), and the Environmental Information Regulations 2004 (EIR), and b) repeated their requests via email on 14th Feb, specifically invoking the FoIA and EIR regulations.

The Community added that a timely response to these information requests would help them avoid any request for an extension to the consultation period, however that should Highways England wish to take the full 20 days as allowed under the FOIA and EIR, or not provide the information prior to the 1st March 2017, then a strong request for an extension to the public consultation period would be made.

At the date of this report (3rd March 2017), no response has been received from Highways England.

A copy of the correspondence related to the above information requests is provided as Appendix A.

3.2.3 Additional Information

As a consequence of the above, and in the absence of relevant information, the Community has been forced to gather its own baseline data by expanding the scope of work for this study and by engaging other specialist consultants, primarily with regard to ecology, traffic and noise

Hence this report also draws on the results of three additional independent studies commissioned by the CPSTV community, namely:

1 A Preliminary Environmental Appraisal[5] (Appendix B);

[5] Ecological Planning and Research Limited (EPR) 2017. Preliminary Environmental Appraisal. A303: Winterbourne Stoke Bypass Options. Report P16/59/1A

2 Transport Engineer expert opinion on the proposed scheme[6] (Appendix C); and

3 Specialist Acoustic Study[7] (Appendix D)

The CPSTV community also includes as members, a range of qualified professionals who have also provided discussion papers on a range of topics. These have been used to support this report, where possible.

3.3 Critical Review of TAR and Supporting Documents

3.3.1 Review of 2015-2016 Roads Investment Strategy and supporting Feasibility Studies

The Secretary of State and Highways England are required under Section 3 of the Infrastructure Act 2015 to comply with a Road Investment Strategy. This document[8] and the supporting A303 Amesbury to Berwick Downs Feasibility Studies[9,10,11] were reviewed as background information.

3.3.2 Compliance with Transport Appraisal Guidance (WebTAG)

The full TAR and Volumes were reviewed to determine compliance with key DfT WebTAG documents, in particular TAG Unit 3.1 Environmental Appraisal[12].

3.3.3 Compliance with other Guidance

DRMB

WebTAG defers to the Design Manual for Roads and Bridges (DMRB) Volume 11[13] for more detailed guidance on environmental issues. This document was referred to when relevant for appropriate guidance including:

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[6] Letter Report from Mr Iain MacDonald. Vector Transport Consultancy 27th February 2017

[7] JSP Consultants (2017) Review of the Requirements and Content of the Highways England Technical Appraisal Report for the A303 Stonehenge Project

[8] Department for Transport (2015). Road Investment Strategy: 2015/16 – 2019/20 Road Period

[9] A303/A30/A358 Corridor Feasibility Study - Stage 1 Report

[10] A303/A30/A358 Corridor Feasibility Study - Stage 2 Report

[11] A303/A30/A358 Corridor Feasibility Study - Stage 3 Report

[12] TAG Unit A3 Environmental Appraisal https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487684/TAG_unit_a3_envir_imp_app_dec_15.pdf

[13] DMRB Volume 11 http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm

HD 44/09: Assessment of implications (of highways and/or roads projects) on European sites (including appropriate assessment)

TD 37/93: Scheme Assessment Reporting; and

HA 92/01: Scheme Development, Implementation & Management

3.4 Response to Community Concerns

The purpose of this section is to address community concerns, which predominantly relate to the perceived lack of information used to inform the options appraisal. Key issues are related to ecology, landscape and visual impacts, noise and air quality, land take, cultural heritage and economic loss.

The first step in testing these concerns would be to ascertain the quantity and quality of the background information used to support the options appraisal exercises. These would normally be found in the supporting technical documents to the appraisal.

As described in section 3.2.2 above, requests for these documents have been refused by Highways England, and therefore this level of information cannot be ascertained.

The review for this section therefore contain a summary of information collected from publicly available websites (see 3.2.1 above), local sources and the commissioned reports, to build up a comparative appraisal between the north and south bypass options.

This information has been appraised against the outcomes reported in the TAR to test if there has been a bias for the Southern bypass options.

3.5 The Consultation Process

The critical review of the consultation process has examined the consultation methods, presentation of information, and structure of the feedback form, against standard practice and compliance with relevant guidance, policy and legislation, particularly NPSNN, Guidance and Advisory Notes from the Planning Inspectorate, legal requirements (for example the Aarhus Convention[14]), and, where relevant, various case law.

Focus has been on appraising the following elements:

- Accuracy of information provided;

[14] The Aarhus Convention: an Implementation Guide (United Nations, New York, 2000)

- Adequacy of Information provided;
- Access to Information;
- Opportunities for participation and feedback;
- Fairness including;
    - Method of Feedback Analysis and Reporting
    - Evidence (or not) of bias; and
- Need for further consultation

Section 4.0 Review Comments

4.1 Road Investment Strategy

The legal basis for making decisions on Transport Schemes includes the Infrastructure Act 2015, which sets the framework for the creation of Highways England as a 'strategic highways company'.

Section 3 of the Act provides that each strategic highways company must have a Road Investment Strategy comprising a statement of the objectives to be achieved by the strategic highways company and the financial resources which will be provided by the Secretary of State to achieve those objectives. Under subsection (5), the Secretary of State must have regard to the effect of the Strategy on the environment and safety of users of the highway in setting or varying a Strategy. Subsection (6) requires the Secretary of State and the strategic highways company to comply with the Road Investment Strategy.

The current 2015/16 – 2019/20 Road Investment Strategy' (RIS 1) contains schemes developed from a range of feasibility studies conducted in 2014 over three stages following the WebTAG Transport Appraisal process. The studies for the A303 Amesbury to Berwick Downs section comprehensively reviewed all previously considered routes and options (Stage 1), and at Stage 2[15], identified that two options, 1) a northern bypass around Winterbourne Stoke, with tunnel, and 2) an Offline dual carriageway to the north of existing route between Amesbury and Berwick Down, were the better performing options against the best practice Treasury five case model (the strategic, economic, financial, management and commercial cases) [16].

These two options, (with two variations on the northern bypass option viz length of the tunnel) were further assessed for economic Value For Money (Stage 3). The second option (i.e. the offline dualling route) was dropped due to its longer length and potential adverse impacts on the setting of Stonehenge, leaving the recommended option for a (northern) bypass around Winterburne Stoke, with at least a 1.8 mile tunnel, being the approved scheme within the 2015/16 – 2019/20 Road Investment Strategy (RIS1), which was submitted to Parliament in compliance with section 3 of the Infrastructure Act 2015.

It is noted that none of the A303 options assessed (after Stage 1) in the relevant Feasibility Studies for the purposes of identifying schemes for RIS1, included a southern bypass route option around Winterbourne Stoke. In order for a southern

[15] The Stage 2 report functions as an Option Assessment Report (OAR) and an Appraisal Specification Report (ASR) as per the WebTAG Transport Appraisal Process

[16] Department of Transport. March 2015 'A303/A30/A358 Corridor Feasibility Study Summary'

bypass route option to be progressed as a preferred route, it is our opinion that a variation to RIS1 must be made.

4.2 Current TAR Corridor Appraisal Process

4.2.1 Overview

The 2016 Transport Appraisal (TA) undertaken for the purposes of the current consultation exercise effectively replicates the same stages, appraisal process and outcomes of the above 2014 feasibility studies, with the main difference being the late addition of a southern bypass option around Winterbourne Stoke.

Most of the TA is entirely directed at appraising corridor and route options with the primary objective of avoiding/minimising impact on the Stonehenge World Heritage Site (WHS). The assessment is high level, and is considered appropriate for the scale and stage of appraisal. However, due to the clear focus on Stonehenge and its high value, any discernible differences between options for other sections of the scheme are overwhelmed and drowned out by the focus on the benefits or not, on the WHS.

All corridor and route option appraisals simply refer to a 'bypass around Winterbourne Stoke', with only the very latter part of the TA process pulling out and naming the two bypass options. Even then, as with the 2014 studies, the objective of the appraisals, including the environmental appraisal, is on assessing a 'tunnel' option (routes D061 and D062 (the bypasses) vs a 'not tunnel' option (route F010)[17]. There is little in the way of a robust comparison between the Northern and Southern bypass options.

4.2.2 Level of Assessment / Adequacy of information to support inform the public consultation process

The level of assessment applied to this point in the appraisal process is sensitive to the distinct and obvious differences between the shorter 'tunnel' vs the longer 'not tunnel' options, but is too blunt to discern significant local variance between the northern and southern bypass options. As with the 2014 appraisal, the 'not tunnel' option is ruled out at this stage for a range of obvious reasons, related to the fact that the respective longer off line dualling routes would have greater environmental, monetary, traffic, severance and social impacts than the shorter 'tunnel' options, leaving the 'tunnel' option as the preferred option, with two alternative bypass routes around Winterbourne Stoke.

Unfortunately, the appraisal stops at this point, which is at the same level of appraisal (Stage 3) used to inform the 2015-2016 Road Investment Strategy (RIS1).

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[17] The 2014 feasibility study uses a northern route as the 'not tunnel' option, while the 2016 studies use a southern offline dualling route.

However, the TAR then goes on to apply the results of this level of filtering to conclude 'that there are no significant characteristics which distinguish either of the alternative bypass options'.

This procedure is considered to be flawed. At this point, the appraisal should have moved away from using the methodology of a multiple route options appraisal, to an assessment of alternatives in accordance with the proportionate level of scale, detail and information required by (including but not limited to) WebTAG Unit A3, DMRB, Planning Inspectorate Guidance, NPSNN, the Habitats Regulations and the proposed 2017 EIA regulations, all of which, in considering that the scheme is to progress to an EIA development, require particular standards and quality of information to be used when undertaking any assessment of alternatives.

Conclusions

It is the considered opinion of this report that while the multiple corridor and route options for the improvement of the A303 around the WHS have been appraised, that the alternatives for the southern and northern bypass around Winterbourne Stoke have not been undertaken at the appropriate level, and that this should have been done prior to the public consultation process. Asking communities to consult with a lack of comparative information concerning negative environmental effects will inevitably lead to an inbuilt bias supporting the option with the least information (i.e. the southern bypass route).

4.3 Response to Community Concerns

4.3.1 Introduction

The purpose of this section is to address the Community concerns, which predominantly relate to the perceived lack of information used to inform the bypass options appraisal. Key issues are related to ecology, landscape and visual impacts, noise and air quality, and land take. Objections on the basis of severance, cultural heritage and economic loss are provided in individual submissions to HE and are not addressed here.

The Community strongly disagrees with the conclusions of the TAR, given that there are obvious and influential differences in the environmental quality, sensitivity to impacts, and potential adverse environmental effects between the north and south bypass options.

While adverse impacts are emphasised for Winterbourne Stoke throughout the TAR, little or no adverse effects are reported for Berwick St James and the south, even though similar if not greater impacts are likely to occur. The Community believes that this is because the baseline environment and potential impacts of a northern bypass option are well known, in contrast to the southern route option, where little or no information has been used to support any of the conclusions of the TAR.

This lack of information and approach to reporting, if well founded, is highly prejudicial to the southern communities.

The first step in testing these concerns is to ascertain the quantity and quality of the background information used to support the options appraisal exercises. These would normally be found in the supporting technical documents to the appraisal. In accordance with WebTag Unit A3 Environmental Appraisal, these reports should also identify the limitations of any data as part of the appraisal process, the results of required sensitivity testing and any assumptions clearly stated. In the absence of information and, where appropriate, the reports should demonstrate that the 'precautionary principle' has been applied.

As described in section 3.2.2, requests for these documents have been refused by Highways England, and therefore this information cannot be ascertained.

The following sections therefore contain a summary of information collected from publicly available websites, local sources and commissioned reports, to build up a comparative appraisal between the north and south bypass options.

4.3.2 Ecology

Review Comments

This section is informed by a Preliminary Environmental Appraisal undertaken by EPR (provided as Appendix B).

The most important difference between the north and south bypass options relates to the hydro-ecology of the River Till, which is strikingly different at the proposed north and south viaduct locations. These differences have significant implications, particularly during the construction phase, with regard to ecological sensitivity to impacts, the potential need for different construction methodologies and mitigation solutions, buildability and construction timetable, and importantly, likely significant effects on the SAC and Habitats Regulations consent risk.

Hydrology/Hydrogeology

The citation for the SSSI[18] describes the complex hydrology/hydrogeology of the River system.

> *The River Till is a tributary of the River Wylye, itself part of the River Avon System SSSI. It is spring fed from the aquifer underlying the Chalk plateau of Salisbury Plain and flows through predominantly chalk geology. The upper part of the Till is a winterbourne, supported by water flowing from the aquifer in winter and early spring. As aquifer levels fall to a more stable level*

[18] https://necmsi.esdm.co.uk/PDFsForWeb/Citation/2000431.pdf

in summer, the river flows from a perennial head in the mid-section of the Till. The lower section, downstream from this, has the character of a chalk stream.

The citation therefore refers to three sections, classified into either Winterbourne (Upper section), or Chalk Stream (middle and lower sections) (see citation maps at https://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=S2000431&SiteName=&countyCode=19&responsiblePerson=).

The northern bypass viaduct is located in the upper winterbourne section, which is mapped to extend just to the south of the A303, approx. 6km north of the confluence with the R. Wylye. This river at this point is narrow with little or no riparian habitat, and is dry for most of the year. The flood plain is dry and wide, has a low risk of flooding from surface water, and is classed as having an intermediate level of groundwater vulnerability.

The southern bypass viaduct wold be constructed in the middle section of the River Till. There is a junction of the upper and middle chalk layers in the vicinity of Berwick St James, resulting in a number of springs arising in and around the River and forming a perennial head which is thought to typically arises in a wetland to the north of the Village. This is directly within the footprint of the Southern Viaduct. In this location, the soils of the River bed abruptly change from the gravel beds typical of the upper section, to clay based alluvium, which is likely to arrest any shallow subsurface groundwater flowing from the north, contributing to the arising springs and marshy wetlands dominant in this section (see discussion on ecology below). The middle section of the River Till effectively functions as transitional zone between the upper winterbourne and the lower perennial sections. The flood plain in the vicinity of the viaduct is therefore marshy for most of the year, has a high risk of flooding from surface water, and there is classed as having a high level of groundwater vulnerability.

Based on local knowledge (Last, 2013)[19], the lower perennial section is considered to commence in the vicinity of Asserton House and to run approx. 3km to the confluence with the R. Wylye, and almost always contains permanent running water[20].

The winterbourne signature of the River Till is provided in Figure 1. The northern bypass viaduct is located approximately 6.5km from the R. Wylye, while the southern viaduct is located approximately 2km further downstream at 4.5km from the R. Wylye.

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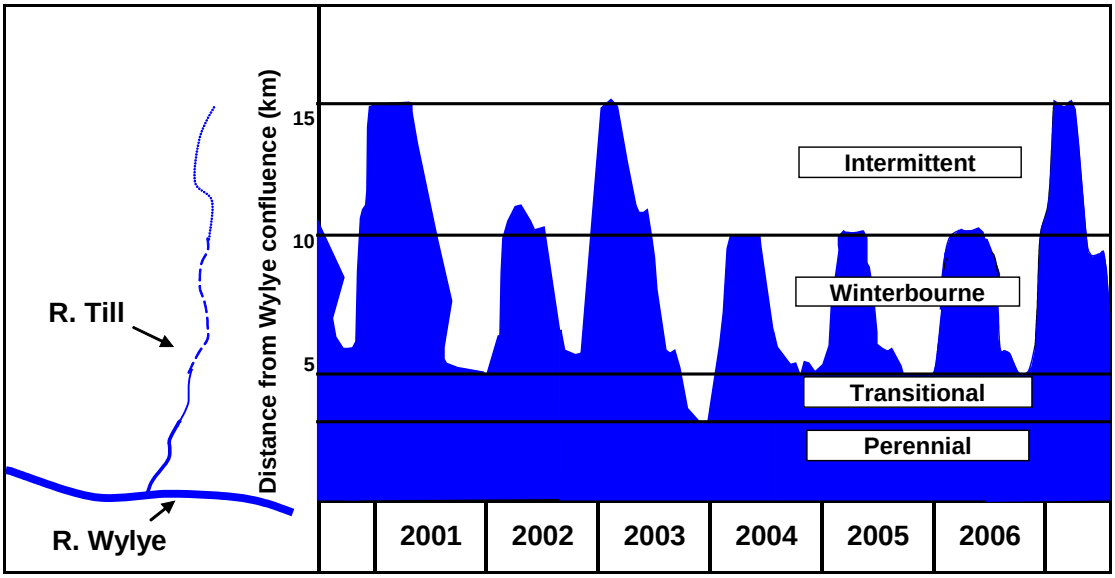
[19] Last B (2013). Portrait of a Parish, the Natural History of Berwick St James.

[20] *Ibid* P32. In December 1990 there was no flow at Berwick Bridge. There was no flow to the confluence of the Wylye in the summers of 1934 and 1976, two very dry years.

Figure 1 The winterbourne signature from the River Till*



*Extract from Preliminary Environmental Appraisal. EPR 2017 (Appendix B)

Due to the permeable nature of the chalk substrates, direct runoff of rainfall is negligible but sub-surface flow beneath dry valleys can be substantial. All sections of the Till are vulnerable to abstraction, and in particular are influenced by abstraction by Wessex Water which must be considered as a cumulative effect in any Habitats Regulations Assessment. The winterbourne section has been reported as being only marginally affected, with the middle transitional section, being greatly affected by Wessex Water abstraction, noticeably so in the late 1980s and early 1990s[21] .

Sensitivity

The complex hydrology/hydrogeology of the river is reflected by the different habitats and species present in each of the sections. A general description of these is provided in the River Till SSSI citation, and more detailed records are likely to be held by Natural England, and for the Wylye, also by the Biodiversity team of the Environment Agency. Additional information is available in Last, 2013, which is more formally reported within peer reviewed journals[22,23,24]. Hence these will not be repeated here, other than to highlight the following features and sensitive receptors.

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[21] Last, B (2013) P32.

[22] Last, B 2000. The Flora of Berwick St. James 1 *Journal of the Wiltshire Botanical Society* no 3:2-14

[23] Last, B 2001. Habitats of Berwick St. James 2 *Journal of the Wiltshire Botanical Society* no 4:16-21

[24] Punchard N and House A. 2009. Water and Wildlife of the Hampshire Avon Winterbournes. *British Wildlife 2009* 11-19

1 The Upper section of the Till in the vicinity of the proposed northern viaduct crossing is ephemeral and narrow, and has little or no riparian habitat (see Appendix B).

2 South of the A303 the River becomes more perennial and wider, supporting the several of the *Ranunculus* species which contribute to the SAC Annex 1 Habitat.

3 There is approx. 2km of riverine habitat (of which 1.5km is vegetated), between the northern and southern bypass viaduct options. *Ranunculus peltatus* (an Annex 1 habitat species) grows in the channel.

4 In the vicinity of the footprint of the southern viaduct, the river splits into several streamlets, which along with arising springs, forms a range of wetland types. These include the sweet grass *Glyceria* dominated grassland, reed canary-grass *Phalaris arundinacea* swamps and willow *Salix spp* Carr, which are referred to in the SSSI citation as functional parts of the river system. These also fall under the category of groundwater dependent terrestrial ecosystems (GWDTE) which are protected under the Water Framework Directive, and which are vulnerable to alterations in groundwater level[25].

5 As the flow become more consistent downstream, *Ranunculus peltatus* is replaced by brook water crowfoot *R penicillatus ssp pseudofluitans*, also an Annex 1 habitat species.

6 With regard to Annex II species, the internationally important Desmoulin's whorl snail *Vertigo moulinsiana* is recorded as occurring in tall sedge dominated vegetation in the middle reaches of the river. The snail is vulnerable to shading and alterations to groundwater levels.

7 Bullhead, Salmon and Brook Lamprey have been recorded in the transitional zone.

8 Although Brown Trout and one record of salmon, have been reported as spawning as far up as the first bends above the A303, just below the Northern Route crossing., the bulk of all spawning, including Bullhead, 90% of Brown Trout and 75% of known salmon spawnings, takes place below Winterbourne

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[25] The WFD requires that groundwater bodies be classified as good or poor for chemical status (in relation to a large range of pollution pressures) and for quantitative status (in relation to groundwater abstraction pressures). The deterioration of GWDTEs is one of four tests developed for groundwater body quantitative classification, based on WFD requirements and guidance provided at an EC and UK level1 . The four tests consider the impacts of groundwater abstraction both on the groundwater body itself, and also on the ecological receptors which depend on it. The worst result from all four tests is taken as the overall quantitative status result for each groundwater body.

Stoke, between Winterbourne Stoke and Berwick St James, exactly where the Southern Route viaduct would cross the river, resulting in maximum exposure to impacts from habitat destruction and siltation.

Brown Trout is not a qualifying species for the SSSI or SAC, but is highly important for recreational fishing. The Wilton Fly Fishing Club have fished the River Till throughout the reaches between W-S and B-St-J since 1990, (leased from Druid's Lodge) and records go back to the 1880s (diaries of P M Smythe). It is a first class self sustaining wild trout fishery, as long as the fry don't get smothered in the gravel redds.

As part of the SSSI Management Agreement secured with Natural England, which led on to the SAC designation, the fishing was restored with physical enhancements over a 5 year period, ending 10 years ago.

Brief Project Description – Key Issues and Potential Effects

Both Northern and southern bypass options require the construction of a high (8-10m) viaduct over the River Till, supported by deep cuttings and high embankments on either side. Ground disturbance and the construction footprint, including construction roads for the construction of viaducts can very large.

Construction in chalk substrates is particularly challenging and requires specialist engineering techniques and expertise (see CIRIA C574 [Engineering in Chalk] and PRJ PR 11 [Foundations in Chalk]

Chalk *in situ* can be highly variable over both linear distance and depth, and is characterised by fissures and high transmissivity of groundwater. Some chalks are highly fractured, meaning that groundwater and pollutants can rapidly pass though. This also means that abstraction or dewatering may have immediate drawdown effects at significant distances from the source (ie a high zone of influence). Other chalks may be hard and have tight vertical fractures, which may be expanded/opened through drilling or piling, with a risk of developing new preferential pathways and interference with natural groundwater flow. Fine sediments in chalk slurries developed at depth due to the method of piling or drilling could also clog existing fractures used as groundwater pathways.

Once excavated, compression and/or over-handling of chalk substrates due to materials transport and handling and high construction traffic movements, have a high risk of causing chalk putty and chalk slurries to be formed, resulting in the potential for chalk fine laden milky white discharge/runoff. Exposed embankments and cuttings are susceptible to runoff for several years after the construction phase ends until stabilised and exposed surfaces are reduced by establishment of vegetation or other means. Slurries would also be generated from spoil arising from the drilling/piling operations described above.

Chalk laden discharges have fine suspended sediments which do not settle easily, and are capable of being transported significant distances by surface waters, and can potentially smother wetland habitats and spawning habitats.

Any remnants of the phosphatic chalks within spoil used for the embankments could contribute to unacceptable levels of nutrient pollution.

Pollution prevention management in chalk soild can be problematic and not without risk. Chalk fines can act to clog the bottom of infiltration/settlement ponds and swales, making them ineffective and subject to catastrophic failure unless a high maintenance schedule is put in place. Settlement basins often need to be very large to manage this risk. Clogging is also a constant problem for silt buster filtering equipment.

Intrusive Investigations for the A303. Due to the variable nature of chalk substrate over distance, a significant number of intrusive boreholes are required. BGS Borehole records show the high number of existing boreholes already drilled for the Northern bypass option. A similar number of boreholes will be required for the Southern bypass option. The boreholes in the north are typically 10m deep however, in the vicinity of the Till they are 20m deep, passing into a highly fractured chalk layer at around 6-9m in depth, after which the substrate may become hard chalk with tight vertical fractures typical of the Seaford Formation.

In addition to field testing for the geotechnical and engineering properties of chalk, boreholes drilled for intrusive investigations may also be used to determine water levels, and use test pumping to assess the degree of transmissivity by generating theoretical groundwater drawdown cones (zones of influence). This type of testing is most likely in areas where dewatering will almost certainly be required (i.e. where there are known existing high water table levels).

- **Northern Bypass Option**: As discussed above, the majority of boreholes and other intrusive investigations have already completed. However, TAR Volume 1 (p154 pars 8.12.3 and 8.12.4) states that groundwater levels were NOT recorded during previous tests, and that further Ground Investigations will be required to determine the feasibility of using infiltration as a drainage solution for the completed Scheme.

- **Southern Bypass Option:** No ground investigations have been conducted along the southern route, although it is noted that these have commenced as of the date of this letter. These are likely to be substantial and involve drilling within the boundary of the River Till SSSI/SAC.

Given that:

- The proposed testing area in the footprint of the southern option viaduct is known to have a complex hydrogeology and a high sensitivity to changes in the groundwater regime;
- 'engineering works, including drilling' (Operation 23), and Vehicle Movement (Operation 26) are listed as requiring Natural England consent for the River Till SSSI (https://necmsi.esdm.co.uk/PDFsForWeb/Consent/2000431.pdf); and
- that the majority of likely drilling and off road vehicle movement for the southern route option falls within the Impact Risk Zones for the SSSI and SAC,

the Community believes that an Intrusive Investigation Strategy should be prepared which encompasses any drilling proposed within the IRZ, and that this strategy should be subject to screening under Article 6.3 of the Habitats Directive. The Intrusive Investigation Strategy should contain full details and methodology of the works proposed, including any mitigation of spoils runoff, management of any discharges, drilling fluids etc, and that this should also consider the potential cumulative effects with the current and any proposed boreholes for the northern route option.

Piling. The method of piling is likely to be through drilling and pouring of concrete foundations, rather than percussion piling. As indicated above Seaford chalk is hard chalk with vertical fractures and drilling operations for viaduct piles will pose similar but greater risks of disturbing the arising spring systems and the fractures responsible for the perennial head in the vicinity of the southern viaduct. This risk is significantly lower in the northern option.

Depending on the density of piles, and the nature of the underlying groundwater and substrates, these also have the potential to form a variable barrier to subsurface groundwater flow.

Construction of the viaducts will involve significant areas of ground disturbance and traffic over chalky substrates. These have the potential to become sludgy and difficult to work in and dewatering may be required. This activity will also require the appropriate disposal of dewatering fluids, which will be milky white, containing high concentrations of chalk fines.

- **Northern Bypass Option**: As discussed above, the groundwater is located for most of the year beneath the surface, suggesting minimal dewatering will be

required. Due to the high transmissivity of the chalk substrate however, any dewatering operations in the north could still impact on the groundwater dependent wetlands south of the A303, and monitoring will be required. There is over 2knm separation distance between the northern bypass and these sensitive wetlands, and impacts would be significantly less than for the southern route. Any permit would likely contain conditions where dewatering could be restricted, however this would be most likely in dry periods when dewatering is less needed. Construction of a viaduct in the north would allow longer construction periods without the potential for disruption. Due to the distance between the northern viaduct and the southern wetland areas, disposal of dewatering fluids may be permissible via direct infiltration.

- **Southern Bypass Option:** By contrast, construction of a viaduct for the southern route occurs over marshy ground and wetland for all of the year, and would likely require ongoing dewatering in order to create workable surfaces for traffic. This will be difficult in an area of uprising springs and a perennial head, and extensive mitigation, including artificial recharge, sheet piles etc in order for the dewatering to be successful, will be required to avoid disturbing the immediate wetland areas. This area is sensitive to drawdown in the summer months, and any permit (should it even be granted) would likely require substantial monitoring and conditions to cease dewatering/construction should thresholds be reached. Construction of a viaduct in the south would result in a high risk of disruption to construction timetables. Due to the proximity of the wetland areas, disposal of dewatering fluids may be problematic.

Runoff

All ground disturbance, drilling and the like has the potential to generate high levels of runoff if soils become wet. This is particularly so during construction of embankments and cuttings and in winter, when all sections of the River Till are running. During the summer, chalk soils can cause significant dust problems, often managed through dust suppression methods such as water sprays, which again lead to runoff and the requirement for pollution management.

As described above, chalk runoff/slurry can clog infiltration ponds and silt busting equipment, with the high risk of failure requiring the construction of large size bunded settlement ponds, and high maintenance and monitoring effort. The risk of phosphate runoff from remnant phosphatic soils will also need to be managed Pollution / drainage management over the construction period will therefore be significantly different to drainage management during the operation of the road.

The proximity of any construction to sensitive habitats, including spawning habitats will therefore dictate the level of risk.

- **Northern Bypass Option:** The northern bypass is separated from the spawning habitats of the SAC qualifying species by 2km of vegetated buffer.

The area is flatter, and there is much more room in the northern section for the installation of large settlement ponds. The northern bypass option will have a significantly reduced risk of impacting spawning habitats in the middle and lower sections of the Till due to runoff, sedimentation and catastrophic spills.

- **Southern Bypass Option:** Runoff from proposed embankments and ground disturbance during construction of the viaduct in the southern route would run directly into Annex I and Annex II sensitive habitats and species unless managed. As discussed above, chalky slurries could smother emergent vegetation and impact spawning habitat in the immediate area, and can be transported significant distances downstream to potentially impact the R. Wylye. The southern route does not have the benefit of the 2km buffer zone that the northern route would enjoy.

Abstraction

Significant quantities of water will be required for the construction of the road, and particularly for concrete batching and dust suppression in the vicinity of the SAC.

Due to the high transmissivity of the chalk, abstraction points would need to be some distance from the River Till and will require an abstraction permit for the environment Agency, with limit conditions and requirements for monitoring. Any permit will also need to consider the cumulative impacts of abstraction with Wessex Water.

Other Environmental features

In addition to the River Till, the Valley supports a range of priority woodlands and species habitats - these are described in Last, 2013 and Appendix B. The location of the Priority Woodlands can easily be accessed on Magic and other programmes such as Google Earth or OS Maps to obtain satellite views.

Climate Change Vulnerability

The proposed amendments to the EIA Regulations, due May 16th 2017, require consideration of climate change, which in the case of transport schemes is usually restricted to calculations of Greenhouse Gas Emissions, and management of flood risk. One notable feature available on MAGIC is the mapping of Climate Change Vulnerable Habitats. All areas south of the A303 are mapped as vulnerable, with most of the northern by-pass route, particularly in the vicinity of the viaduct, as not being vulnerable.

The TAR Appraisal

The TAR makes no reference to the attributes of the River Till, the SAC or SSSI. or to the specific habitats, priority woodlands or species present in either of the bypass sections. While these may be referred to in the supporting Environmental Appraisal Report (EAR), a request for this document was refused by Highways England.

The appraisal takes the precautionary principal and concludes, that due to '*the uncertainty over construction methodology, and size / footprint of one new crossing over the River Till* there *will a Large Adverse Impact on the River Till (SAC)*.

However, this is contradicted within the Public Consultation Booklet, which states that

'..both crossings could be achieved without damage to the protected status of the Till'.

Conclusions

In contrast to the conclusion of the TAR that 'no significant characteristics differentiate the two bypass options', a review of existing environmental information has determined that there are such distinct ecological differences between the northern and southern bypass options, of such importance and magnitude, as to significantly influence the outcome of any decision on preferred bypass option.

No example more illustrates the inadequacy of the methodology which has been applied by HE at this stage of the options appraisal, more so because it has been used as a basis of a consultation exercise which asks the public (and statuary consultees) to make a decision on their preferred by-pass option.

The TAR appraisal concludes that there would be a major adverse impact on both options, triggering Article 6.3 of the Habitats Directive.

The importance of any impacts on the SAC will over-ride any other issue, by virtue of the fact that there are two alternatives being considered. Unless it can be demonstrated with high scientific certainty that there will <u>not</u> be a significant effect on the qualifying features of the SAC, consent could only be granted on the bypass alternative with the least ecological impact. This is the northern bypass option. Only then, can any weighting be given to heritage or other issues.

The environmental review has demonstrated the significant impacts and risks associated with construction of a southern bypass viaduct, that cannot be mitigated. The construction footprint of the southern viaduct lies directly on top of complex spring systems, wetlands, Annex I and Annex II species and habitats, and where the bulk of all spawning in the River Till occurs, 90% of Brown Trout and 75% of known salmon spawning. These do not occur in the northern section. In contrast with the northern option, efforts to try to mitigate the construction impacts in this section will be costly and problematic, and will not remove risk to any acceptable level.

By stating to the public that 'both crossings could be achieved without damage to the protected status of the Till' is false and misleading. This statement cannot be made unless at least a Habitats Regulation screening exercise has been undertaken, which would show that the southern bypass route is simply not a viable option. This has screening exercise has not been done and is considered to be a major failing of this consultation.

Any screening exercise should be undertaken prior to any announcement of a preferred option, and in accordance with recent case law, the outcomes of this screening exercise will need to go out for a second round of public consultation.

4.3.3 Noise | Air Quality

Refer Appendix D.

4.3.4 Landscape and Visual Impact | Townscape

Requests for relevant ZTVs and landscape appraisals for the southern route option, cited as supporting the options appraisals were refused by Highways England, and therefore it is not known what information was used to make comparative appraisals between the southern bypass option with the northern bypass option, where visual impact assessments will be been carried out as part of the 2003 EIA.

The following review comments are provided by a qualified Transport Engineer, who has provided expert opinion (see Appendix C).

Review Comments

The height of the embankments and the height of the viaducts over the River Till, for the north and south bypasses are not stated explicitly in the documentation published as part of the consultation. However, earlier variants D001 (north option) and D002 (south option) were described with the anticipated maximum embankment height to the west of the tunnel portal and the height of the viaduct over the River Till. It is assumed that these remain valid for the options under consideration.

When considering the visual impact of each of the options, there is a need to consider the structures which would be required as part of the mainline road requirements, and those required to connect the new road to the existing road infrastructure.

To the west of the tunnel portal, the north and south bypass options each indicate a grade separated dumbbell junction arrangement, with the connecting roads.

The northern bypass dumbbell junction location is at a section of embankment. The height of the embankment is likely to facilitate a dumbbell junction with connecting road running below the new bypass route, through the embankment. Therefore, the roundabouts and slip roads would be below the level of the new road.

Conversely, the southern bypass dumbbell junction location is at a section of the road which is also on embankment, but lower than that in the northern bypass. Consequently, it is likely that the dumbbell junction connector road for the southern option, between the roundabouts would need to pass over the new road, rather than below. Therefore, the connecting road between the roundabouts and potentially the roundabouts themselves and slip roads, would need to be on raised structures or embankment, at a level higher than the new roadway. These components have not

been included in the appraisal and presents a significantly greater landscape and visual impact for the southern route than currently assumed.

The viaduct over the River Till, for the northern option, is estimated to be 8 metres above the river, whereas, for the southern option, the viaduct would be higher at 13 metres above the river.

As such, the southern bypass, with a higher level river viaduct and high level structures at the junction with the A360, is likely to present higher levels of visual intrusion within the local landscape.

The TAR Appraisal

The TAR only considered landscape assessment and not visual impact, but concluded that bypass options Route Option D061 (northern route) has marginally less adverse impact than Route Option D062 (southern bypass options). Nevertheless, and due to the high level of assessment, Route Options D061 and D062 were assigned the same overall assessment score of Moderate Adverse (significant effect) due to very similar impacts occurring across a similar length route and the same range of landscape character areas.

With regard to visual impact, it is noted that the while zones of theoretical visibility (ZTVs) were produced, it is unclear how these were applied in the appraisal process, in particular, the location of viewpoints and identification of sensitive receptors. Given the potential increase in visual intrusion identified above for the southern route, there is the potential for a significant margin of difference between the two bypass options. ZTVs and the background information used to support the appraisal process were requested on the 6th February 2017, with this request being refused by HE.

Conclusions

It is noted that the methodology used for the landscape and townscape appraisals in the TAR considers each route option based on its engineering design and alignment. However, important details such as heights of crossing and other structures are currently not finalised, and therefore the appraisal have underestimated the potential landscape and visual impacts for the southern route in particular.

Given the significance placed on the impact on the landscape of the other proposals in this area, and the high level on concern that this type of impact will have on the residents of both Winterbourne Stoke and Berwick St James, it is disappointing that the consultation process has not been informed by a comparative visual impact assessment between the Southern and Northern bypasses. These effects will be significantly different for the two options with regards to receptors based within these two villages.

4.3.5 Land Take

The connection to the A360 proposed with the southern bypass option would require re-alignment of the A360 in the vicinity of the junction, in order to ensure the connections and structures lie outside the World Heritage Site boundary, which runs along the edge of the existing A360 alignment in this area. The connection of the new road to the existing A303 for the northern bypass option is likely to require less re-alignment and less new road construction.

There is no indication of provision for surface water runoff from the new road surfaces or for mitigation of the impact from sediment, heavy metals and hydrocarbons from road runoff. The ground water, wetlands and spawning habitat around the southern bypass route are more highly susceptible to impact from sediment, heavy metals and hydrocarbons, than the areas around the northern bypass route.

Conclusions

Both routes would require suitable mitigation against the risk of excessive environmental impact from general runoff and from runoff following an incident or spillage. However, it is likely that given the increased sensitivity of the southern bypass route and the likelihood that more new road surface will be created for the southern bypass option, more extensive mitigation measures are likely to be required. Consequently, the mitigation measures, such as settlement ponds and containment measures are likely to take up more additional land, for the southern bypass route, than for the northern bypass route.

4.4 The Consultation Process

4.4.1 Introduction

Consultation on the A303 commenced in February 2016 with the holding of several information events to seek stakeholder response.

The information contained within the publicity leaflet produced for the events was at very high level, confirming that HE was developing 3 schemes as part of the total

A survey was produced which was claimed that it would be used to help 'shape the plans'. In addition, stakeholders could be contacted and kept informed of the progress of the scheme.

There is no evidence in the current consultation process and TA process of how any of the consultation responses have been taken into consideration.

A summary evaluation of the event and stakeholder feedback was produced[26] (undated). A total of 593 people responded to the survey, of which 298 identified they were solely interested in Scheme 3. The evaluation did not provide a full evaluation of the responses to understand what their issues and concerns were. A copy of the full evaluation response was requested from HE on the 6th of February, however this request was refused.

4.5 Adequacy of Information provided

As stated above in Section, it is considered that the current Transport Appraisal process is fundamentally flawed in the assessment of the two bypass options, and should have moved to a more detailed level of assessment before putting the conclusions out for public consultation, particularly as the public is specifically asked to give their preference on the two alternatives presented.

As it stands, the assessment concludes 'that there are no significant characteristics which distinguish either of the alternative bypass options'. This is misleading. This conclusion is reached, not because there is no difference between the bypass options, but rather, that the assessment is too blunt to discern variance at the local level. As such it does not comply with TAG Unit A3, in providing sufficient information to enable a 'robust decision' to be made at the TA level, nor for a route option which is now legally captured within the strengthened EIA process.

Studies undertaken for the purposes of this report (Section 4.3.2) have demonstrated that there are significant differences between the north and south bypass options, primarily due to the hydrogeological conditions and ecological quality of the River Till, which have a substantial bearing on the likely adverse impacts on its SAC objectives, the types of construction methods to be applied, the mitigation solutions required, and indeed the feasibility of the southern route as a viable option.

These differences are material and would have a significant influence on public perception of routes if these were published.

Given the likely failure of the southern route option to meet the Article 6.4 tests of the Habitats Directive when a better ecological option (the northern bypass route) is available, it is considered irresponsible for Highways England to proceed further without at least undertaking a screening exercise (Test of Likely Significance) for both

[26] http://assets.highways.gov.uk/roads/road-projects/A303-A358/A303+A358+Feedback+Website.pdf

options, in accordance with Planning Inspectorate Guidance[27], to avoid an abortive project and waste of public funds.

The information used to support these conclusions is freely accessible on public websites and easily interpreted in the hands of an experienced environmental practitioner. Therefore, there is no reason why this more detailed level of appraisal could not have been undertaken for the purposes of this consultation exercise.

There are circumstances in which the law insists that, **if** there is consultation by a public authority, consultation must in fairness be effective, conducted in such a manner as to afford the opportunity for informed and considered responses[28].

It is clear that the TAR produced for the current consultation process does not provide the appropriate level of information for either the public (or statutory consultees), to make an informed or considered response on their preferred alternative route.

Further discussion on the legal obligation to undertake a second consultation is provided in Section 4.4.8 below.

4.5.1 Accuracy of information provided

There are a numerous examples of non-material inaccuracies/misreporting in the TAR document which are not discussed here, however there are also a number of important areas of misreporting which have the potential to mislead the public into preferring the southern route, which could potentially prejudice the outcome against the interests of the Community.

With regard to inaccurate information, the most significant is in the traffic modelling. The following is extracted from Appendix C [full quote].

Traffic Modelling

Economic assessment was undertaken to monetise benefits of each option for comparison with the cost of each option under consideration.

For options D061 and D062, the additional journey length along the route, average journey time between the A36 and A338 and the average journey time savings, are

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[27] Habitat Regulations Assessment Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects

https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2012/10/Advice-note-10-HRA.pdf

[28] [*R* v *Secretary of State for Health* ex parte *United States Tobacco International Inc* [1992] 1 QB 353; *R (on the application of Edwards)* v *Environment Agency* [2007] Env LR 9; *Eisai Ltd* v *National Institute for Health and Clinical Excellence (NICE)* [2008] EWCA Civ 438; *R (on the application of Edwards)* v *Environment Agency (No.2)* [2008] 1 WLR 1587; *R (on the application of Moseley)* v *Haringey LBC* [2014] 1 WLR 3947 at §§ 23—25 *per* Lord Wilson, at § 36 *per* Lord Reed].

the same for both options (Table 1, p10 of the TAR). The environmental monetised benefits and scheme construction costs were deemed to be identical for both options.

For economic assessment, the sole differentiating factor between the north and south bypass options was the benefits derived using the forecast traffic model results.

The traffic model used, was developed specifically for assessment of this stage of scheme development. The model incorporated a core area broadly defined by Warminster in the West, Tidworth in the East, Salisbury in the South and Devizes in the North. Within this core, the network incorporates simulated junction modelling which ensures that junction delays vary according to the level of traffic assigned through the junctions. Outside the core simulation area, a buffer network allows traffic to assign around the simulation area and presumably facilitates alternative points of entry to the simulation area, for strategic traffic. A model of this type is suitable for estimating forecast volumes of traffic on the proposed improved options, as it will enable traffic to re-assign from other routes to take advantage of the improved journey times offered by the proposed road scheme options. The variation between the northern and southern bypass could only be the connections to the existing road network, at the A303 and A360. Other than these differences, the route length and journey times were deemed to be the same. Given the very modest differences between the north and south bypass options within the context of a relatively strategic model network, it was surprising to see the reported magnitude of difference between the options, with respect to scheme benefits.

The difference in traffic related scheme benefits between the northern and southern bypass schemes was calculated to be £85 million more benefits for the southern bypass compared with the northern bypass.

The traffic forecasts for the new road sections were presented in Tables 10-8 and 10-9 of Volume 1 of the TAR. The traffic volumes for the northern bypass scheme were higher than the southern bypass scheme, for the majority of time periods and forecast years compared. Normally, when comparing options for major road schemes, the options which attract more traffic to the new scheme, generate the greater scheme benefits. This generally holds true for modelled tests when the same demand matrix is applied to alternative scheme models, as the traffic re-assigning to the scheme under test, benefits from reduced journey times. However, in large assignment models with disaggregate demand zones, spurious benefits can be generated in remote locations, as background ‘noise’ in the model, rather than the benefits relating to the features of the scheme in question. It seems unlikely that the northern bypass scheme would attract more traffic than the southern bypass scheme yet generate lower levels of traffic related benefits. There is no information regarding the level of model assignment convergence achieved for each model run, nor regarding the principal traffic movements which derived benefits for

each option. This information would be required to check that the unexpected results are not due to model noise, rather than local traffic assignment benefits.

A further feature of the results of the traffic assignments for the northern and southern bypass schemes is the imbalance of flows over the course of the day. Roads frequently experience tidal flow over the course of a day. When the traffic volume in one direction is significantly higher than the other direction in the AM period, it would be expected to see the balance redressed and the converse true in the PM period. However, in the model results presented, the volumes over the time periods combined are consistently higher in the eastbound direction than in the westbound direction. The model is intended to represent average conditions over the course of the year. Therefore, it seems illogical that there should be a consistent imbalance of traffic in one direction. It would be expected that there be a much closer balance of traffic flows.

The final irregularity noted with the traffic model results, is the traffic volumes presented in Table 10-8, for the forecast years 2039 and 2051. The traffic volumes for each road section are identical for the AM and PM periods. Given the flow tidality, albeit imbalanced, exhibited for earlier years, it seems unlikely that exactly the same traffic assignment results would apply to each section, during different time periods in each direction. The same results could be replicated if the same demand matrix was mistakenly assigned to the model network, for both periods. i.e. if say the AM matrix was assigned to both the AM model network as well as to the PM model network. If the wrong matrix was assigned, then this would mean that the option comparisons and the scheme economic assessment would not have been made with common demand matrices for each test. This would render the tests invalid and, in addition, would explain the unexpected mis-correlation of higher scheme traffic with lower scheme benefits. If larger demand matrices were assigned to the northern bypass model than the southern bypass model, then this would lead to a mis-calculation of lower traffic related benefits for the scheme.

It is clear from the model results presented that there is further explanation of the results required and a strong possibility that mistakes have been made in the model assignments and / or background model nose in the convergence process has generated spurious and invalid benefit calculations.

Costs of the Scheme

Section 22.1.18 of the TAR states that, in regards to the scheme programme, Route Options D061 and D062 could be delivered to meet the Road Investment Strategy (RIS) programme dates and achieve a start on site by March 2020. Route Option F010 would require additional survey information leading to a 12 month delay relative to Route Options D061 and D062, and thus would achieve a later start on site date of approximately March.

This is unlikely. Little or no information has been collated for D062. For example, in orderto underpin structural integrity and buildability, significant intrusive ground investigations are required. Over 70 boreholes have been drilled in the northern route alignment, however none have commenced along the southern bypass route. Given that these investigations are costly, they are unlikely to commence before the preferred route is announced, unless of course a southern route has already been predetermined. These investigations have a significant bearing on highways structure and drainage design, which unlike the northern option which would already have finalised scheme designs which can be adapted, would need to be drawn up.

4.5.2 Access to Information

In order to do a correct and appropriate review of the options appraisal, all consultants engaged in the assessment of traffic, noise and ecology required access to the supporting technical documents. As discussed in Section 3.22, Highways England has refused to provide these documents.

In terms of Traffic, the options presented for consideration consist of two closely competing but clearly favoured options, coupled with a third choice option (F010) which is has been consistently assessed as less favoured against policy and scheme objectives.

The public are being asked to comment on a virtually finalised scheme, with limited information.

Whilst the promotor may be seeking to rely on the accuracy, impartiality and judgement of the consultants who have undertaken the scheme development and asking the public to accept the results without the need for further scrutiny, the inconsistencies in the traffic modelling results suggest that this position is not reasonable at least as far as traffic modelling work is concerned. There is a strong possibility that the traffic modelling work and the consequent economic appraisal are flawed.

The various options considered and developed were not introduced at the same time, but evolved and developed over a period of time. As such, it is not necessarily the case that the judgement used to undertake the Appraisal work and develop Appraisal Summary Tables and Environmental Assessment would have adopted a consistent approach at all times. The apparent errors in traffic forecasting and economic appraisal were to some extent masked by the means by which data was presented and the limited amount of detail available regarding model development, model calibration, assignment convergence levels and sources of calculated scheme benefits. Similarly, other aspects of the scheme development stages may contain flaws which are not evident in the data provided.

Given the relatively conclusive stage of scheme development and the relatively minor differences between the variants of the preferred route; the publication of the technical work undertaken to reach this stage is not an unreasonable expectation.

4.5.3 Opportunities for participation and feedback

It is noted that the opportunity to make submissions and provide supporting documents by email was clearly not permitted by the consultation process. The only way to provide comments on line was to fill out the simple feedback form.

Although an email address was provided, emailed attachments or supporting documents and reports have not, to date, been acknowledged as submissions. Reassurances were given in meetings that the email address could be used but there is no mechanism acknowledging receipt of submissions within the emailed format.

The public were not encouraged to ask questions. Accessibility to relevant staff was difficult. The telephone number provided was to a call centre which took messages and redirected to relevant departments. All advised that responses could take up to 15 days. Likewise emails were not responded to promptly, but again taking up to a week to obtain a response.

4.5.4 Fairness

Method of Feedback Analysis and Reporting

The feedback form/questionnaire is fundamentally flawed, particularly due to the concern that information provided is being used to determine the important question of public weight of opinion, and that would be evaluated in the simplistic way as the February 2016 consultation exercise. Key concerns are

a. There is no requirement to identify location of respondent – this means that even people who live outside the area (and the UK) could respond and it would be given the same weight as a local resident who is directly impacted by the proposals. However it is fully possible to request that respondents even mandatorily identify closest village. Further, that parts of the TAR options appraisal for the Corridor F routes recognise three distinct sections (Western, Central and Eastern), in which case this should be extended to the D routes, and that the questionnaire should also ask which of the sections they are most interested in.

b. If HE (and SoS) are just relying on numbers for and against each of the bypass options, this is decidedly an automatic bias in terms of a numbers game. There are clearly more people living in the north and which would benefit from a bypass (eg Winterbourne Stoke (250); Shrewton (1,874)..and the other villages (Larkhill and Duddington), than in Berwick St James (142) and Stapleford (264). Amesbury currently has a population of 10,724. Note numbers based on 2011 census. If only taking into account WS and Sh responses, then if only 50% of BStJ responded (71) pro the northern route, then this is equivalent to 562 submissions in the north pro the southern route. There is no way that the current questionnaire can draw out the % of respondents from each area.

Evidence (or not) of bias

Notwithstanding that the TAR report concludes that there is no discernible difference between the two bypass options, it is clear that the assessment is centred on Winterbourne Stoke, and that the comparison of the options are effectively about 'most benefit' vs 'least benefit' to Winterbourne Stoke and the northern villages.

There is discussion of some of the adverse impacts of the northern route, but little appraisal or information provided on the likely adverse impacts of the southern route, particularly on Berwick St James.

It is noted that two potential corridor options (E and F) were assessed containing elements of the southern route. Corridor E specifically identified potential traffic related impacts of noise and air quality on Berwick St James. None of these potential impacts were mentioned again or appear to be considered in any of the southern route options progressing through the appraisal process (ie Corridor F route options, nor the amended Corridor D route options.

Errors in the traffic modelling have resulted in a negative bias against the southern route.

Other inconsistencies are noted throughout the document, too numerous to recount here.

4.5.5 Need for further consultation

Given that:

- An early test of Likely Significant Effects on both bypass alternatives should be undertaken to avoid further abortive work on the southern option, which will be costly and a waste of taxpayers money;
- Further assessment of alternatives will be required for the scoping stage of the EIA;
- Within the stakeholder working group commentary, Historic England, National Trust, English Heritage and Wiltshire Council have made it clear that *'considerably more than normal design and assessment information will be required to support their decision making/position at this stage in the process and this must be resolved and evaluated before the DCO is submitted' (TAR page 273).*
- It can be demonstrated that the public have not been provided with sufficient information to make an informed assessment – allowing a JR challenge under the Aarhus Guidelines 2000;

- Highways England are in clear and absolute breach of the Freedom of Information Act 2000 and the Environmental Information Regulations 2014 – allowing a complaint to the Information Commissioner and higher courts;

- The public have been provided with false and misleading information, of sufficient consequence as to allow a complaint to the Advertising Standards Agency (ASA);

- Any flaws in the consultation process will be taken into account by the Local Authority and the Planning Inspectorate during Examination for the application for DCO.

There is a strong argument for a second public consultation period before any announcement of preferred route is made.

With regard to any further information submitted to address the first thee bullet points, Highways England breaches best practice by not providing an updated website with all available information (as is now standard practice for public authorities).

The Aarhus Convention: An Implementation Guide (United Nations, New York, 2000) states that:

> *"whether coming from consultants, the proponent, co-authorities, expert bodies, or members of the public. Such reports and advice may include, inter alia, studies of alternatives, cost/benefit analyses, technical or scientific reports, and social or health impact assessments."*

According to the guidance, the obligation to make relevant information available in terms of the Aarhus Convention, article 6(2), is a continuing obligation, and [107]:

> *"… the issuance of new reports and advice to the public authority should trigger an additional obligation to notify the public concerned. The obligation to update information is also found in the lead to this subparagraph, which requires the public authorities to give all relevant information to the public concerned 'as soon as it becomes available'."*

Section 5.0 Conclusions

It is well recognised and stated that both north and south bypass options will overwhelmingly benefit Winterbourne Stoke, Shrewton, Larkhill and Durrington. These benefits will occur no matter what route is selected and this was the original objective of the scheme. The northern bypass around Winterbourne Stoke has been well known and accepted by the community for over a decade and there has been a high level of acceptance of this route. The late introduction of a southern bypass option however, moves away from this 'win-win' situation, to a significant negative, by causing disruption impacts on another Village, when there is no apparent need to do so.

Options Appraisal Methodology

The appraisal approach appears to use the benefit to Winterbourne Stoke as a baseline, and in most cases any comparison is essentially 'most benefit' vs 'least benefit' to Winterbourne Stoke. Any potential adverse impacts to BStJ and the population to the south are only described in generic terms, and are cancelled out by the weight of 'benefits' to Winterbourne Stoke.

This is a function of the appraisal methodology, which is appropriate for high level sifting of a range of different corridor and route options, and for making the final comparison of 'tunnel' ('D' routes) vs 'not tunnel' (F route). However this methodology should not have been used to try to distinguish the two bypass options. The main outcome of the TA process was to identify one preferred route with two alternatives - This now effectively brings the scheme into the EIA and HR process, and the difference between, 'options appraisal' vs 'assessment of alternatives' appear to have been misunderstood.

WebTag requires the appraisal tools and methodology to be used proportionately – the outcome of the appraisal process should have been clear that this principal was not applied. Much was made about the guidance advising on providing too much information, in this case not enough was used.

WebTag defers to DMRB for environmental matters. DMRB recommends that both alternatives are assessed in detail for the Scoping Report, a requirement which is now strengthened by the 2017 EIA regulations.

Hence it is the conclusion of this report that there has been insufficient level of detailed technical information applied to compare the two route options. Further, it is highly suspected, given the refusal of Highways England to even provide the most easily available technical reports, and being willing to accept procedural challenge under the FoIA and EIR, and censure for not doing so, that this information simply hasn't been collected or applied.

The process is further flawed by then placing a high reliance on public route preference/ 'weight of public feeling' /quality of submissions at this stage in the process - the public do not have the correct level and quality of information available to make an informed decision thereby breaching all standards for effective public consultation.

Hence there is strong position for demanding that a second public consultation exercise occur once this information is collected, and prior to any decision on preferred option.

The main points presented in this study are:

1 The appraisal process undertaken to compare the two bypass options is fundamentally flawed;

2 The claims by Highways England that there were 'no significant characteristics differentiating the two bypass options' are erroneous. There are significant differences between the two routes in terms of ecology, landscape, hydrogeology, noise, air quality that should have been presented to the public at this level of consultation;

3 By comparison with the northern bypass, the impacts of the southern bypass route on the River Till SAC are so severe that they cannot be mitigated, and in this report's view, given the level of supplied information, would not be consented. Legally this outweighs any concerns regarding heritage issues;

4 The southern route will cause higher noise and air quality impacts on Winterbourne Stoke than reported. Likewise, any air quality impacts on Parsonage Downs will not be significant and should not have been reported as a key issue in the reports;

5 When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures. A formal analysis of these impacts should have been presented to the consultation process;

6 Significantly more land take will be required for both routes, but particularly for the southern route, than currently presented;

7 It can be shown that there is a distinct bias throughout the Transport Appraisal and the consultation process in favour of choosing the southern route.

The public have not been provided with correct or sufficient information to enable them to make an informed choice on the bypass options, and a second consultation on the bypass alternatives should be undertaken before a preferred route is announced

Section 6.0 References

By Footnote Reference

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Preliminary Ecological Appraisal

A303: Winterbourne Stoke Bypass Options D061 and D062

Final Report
March 2017

P16/59-1C

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Bypass Options

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Client:	Campaign for the Preservation of the Southern Till Valley
Main Authors:	Karen Colebourn BSc (Hons) CBiol FCIEEM Andrew Cross BSc (Hons) MSc MCIEEM
Contributors:	Ben Blowers BSc (Hons) Grad CIEEM
Report Prepared for Issue by:	…… Andrew Cross BSc (Hons) MSc MCIEEM
Report Approved for Issue by:	…… Karen Colebourn BSc CBiol FCIEEM

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Ecological Planning & Research Ltd
The Barn, Micheldever Station, Winchester, Hampshire SO21 3AR
Tel: 01962 794720 Fax: 01962 794721 email: info@epr.uk.com

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Bypass Options

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Appendix 1 Extracts from IFM Conference Paper 2008: Fish out of water- use of the River Avon winterbournes and River Till SSSI.

Appendix 2 River Avon SAC. Features Selected for.

Summary

Ecological Planning & Research Limited was commissioned in February 2017 by the Campaign for the Preservation of the Southern Till Valley to provide information for the comparative assessment of ecological impacts arising from two alternative options for the Winterbourne Stoke Bypass: D061 and D062, to the north and south of Winterbourne Stoke respectively.

The village of Winterbourne Stoke is in the River Till valley in Salisbury Plain. The River Till rises on the Plain and flows south through Winterbourne Stoke and Berwick St James, on to the River Wylye and beyond into the Avon. The River Till is a Site of Special Scientific Interest (SSSI). It is a chalk stream that is seasonally dry to the north of the Winterbourne Stoke but generally flows throughout the year (except in extreme circumstances) south of the village. The River Till is part of the River Avon system, a system that is recognised as one of the most biodiverse chalk river systems in Europe and which has been designated as the River Avon Special Area of Conservation. Part of the Salisbury Plain SAC - Parsonage Down SSSI – lies to the northwest of Winterbourne Stoke.

Features of ecological importance - European and National sites, together with other features of ecological importance on the chalk farmland either side of the Till Valley - that could be affected by the southern route, are considered in this appraisal, which has the following five elements:

- Prediction of the likely biophysical changes arising from the southern bypass;
- Review of the ecological context to identify Important Ecological Features which could be affected by the predicted changes.
- Assessment of the potential impacts that could arise from these changes;
- Summary of the legal and policy consequences; and
- Comparison of the route options.

The conclusion was that the southern route D062 is likely to generate more ecological impacts than the northern route D061. This is principally because the southern route would affect the features for which the River Avon SAC and the River Till SSSI are designated more profoundly than the northern route would. The southern route would also affect Stone-curlew, one of the species for which the Salisbury Plain SPA is designated and a range of locally important features which would either not be affected by the northern route, or would be affected less severely.

The northern route could result in air quality changes to an area of Parsonage Down SSSI, which is part of the Salisbury Plain SAC.

As there are likely to be significant effects on European Sites, the Habitats Regulations make it clear that alternative options must be compared, and the least damaging option selected. Further, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and the National Planning Policy Framework (NPPF) require the same approach to be applied to features of less than European importance.

The conclusion of this preliminary ecological appraisal is that the northern route D061 is the preferred option.

Preliminary Ecological Appraisal
A303: Winterbourne Stoke Southern Bypass Option

1. INTRODUCTION

Commission

1.1 Ecological Planning & Research Limited (EPR) was commissioned in February 2017 by the Campaign for the Preservation of the Southern Till Valley (CPSTV) to provide information for the comparative assessment of ecological impacts arising from two alternative options for the Winterbourne Stoke Bypass.

Background

1.2 Highways England (HE) has consulted the public about options for proposals to improve the A303 Stonehenge – Amesbury to Berwick Down. The 2017 A303 Amesbury to Berwick Down Technical Appraisal Report Public Consultation document (hereafter referred to as TAR) considers two options for bypassing Winterbourne Stoke: the D061 passing to the north and D062 to the south of the village. Both routes are as illustrated in Figure 3 of the TAR. This EPR report focusses on the differences between the two options in the sections from the A360 westwards to where they both re-join the existing alignment of the A303. This EPR report does not address ecological impacts which are common to both options.

1.3 A previous scheme was subject to environmental assessment and public consultation, culminating in a Public Inquiry in 2003. This earlier scheme included a similar route to option (D061) to the north of Winterbourne Stoke. The 2003 scheme did not progress. No such in-depth assessment of the effects of the southern option has been assessed via EIA or tested at Public Inquiry.

1.4 In response to a request for the ecological data on which HE is relying to inform their assessment of the route options, EPR was referred to pages 252-267 of Section 18 of the TAR, in which the whole environmental assessment is summarised. Biodiversity is discussed on page 264.

1.5 At Paragraph 18.3.44 of the TAR, HE predicts that both options could result in a 'Large Adverse Effect' on the River Avon Special Area for Conservation (SAC) and the River Till Site of Special Scientific Interest (SSSI). Predicted impacts to other important ecological features are summarised in paragraphs 18.3.45 to 47 of the TAR. CPSTV believes, however, that the HE has failed to recognise that more significant ecological effects may arise from the southern option. They therefore commissioned EPR to identify and describe the important ecological features which could be affected by the predicted impacts arising from the southern option. Where possible these have been compared with those predicted from the northern scheme.

1.6 This information is supplied to assist Highways England to discharge its biodiversity duties under the Natural Environment and Rural Communities Act and the Conservation of Habitats and Species Regulations 2010 (as amended). These duties are translated into HE's objective set out in their Public Consultation Booklet, under Environment and community:

> *"To improve biodiversity and provide a positive legacy for nearby communities."*

The study area

1.7 Winterbourne Stoke lies at the southern edge of the Salisbury Plain. The River Till rises on the Plain and flows south through Winterbourne Stoke and Berwick St James, into the River Wylye, all of which are part of the River Avon catchment. The Till is a seasonally dry to the north of the present A303, but to the south generally flows throughout the year (Last, 2013 and see Annex 1). As discussed below, the southern option D062 is predicted to generate impacts which could affect the Till and the River Avon system. The River Avon system, including the Till, is recognised as one of the most biodiverse chalk rivers in Europe. This system is a designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). Other features of ecological importance on the chalk farmland either side of the Till Valley, which could be affected by the southern route, are also discussed. Parsonage Down SSSI (an outlying area of the Salisbury Plain SAC) could be affected by changes in air quality.

Scope

1.8 EPR's approach takes account of the Chartered Institute of Ecology and Environmental Management's (CIEEM) advice in Guidelines for Ecological Impact Appraisal in the UK and Ireland (Jan 2016).

1.9 The report comprises five main elements:

- Prediction of the likely biophysical changes arising from the southern bypass;
- Review of the ecological context to identify Important Ecological Features which could be affected by the predicted changes.
- Assessment of the potential impacts that could arise from these changes;
- Summary of the legal and policy consequences; and
- Comparison of the route options.

Methods and Constraints

1.10 Information for this report was obtained by desk research, liaison with local naturalists and a site visit. Desk research on the study area included reviewing information held by the Joint Nature Conservation Committee (JNCC) on European Sites and Natural England for Sites of Special Scientific Interest.

1.11 Karen Colebourn BSc CBiol FCIEEM, a planning ecologist, and Andrew Cross BSc (Hons) MSc MCIEEM a botanist and historic landscape/ecology specialist, both of EPR, visited the bypass options area on 20 February 2017. Surveys at this time of the year allow an overview of the landscape and habitats but are constrained because features may be for example difficult to identify; dormant or not yet present in the landscape.

1.12 In addition to the desk and field work, EPR met the following local naturalists on 20 February 2017, to collect and discuss local records:

- Mr Peter Hayes (from the Wilton Fishing Club);
- Mrs Barbara Last (botanist and author);
- Mrs Anika Lange; and
- Mr Neil MacDougall.

1.13 In addition to biological records and information from the above, Mr Tim Bale and Mrs Pauline Stephenson – both of whom are very familiar with the nature of the study area - have also provided, respectively, information on the aquatic ecology of the Till and bird records for the Berwick St James parish.

1.14 EPR has followed Highways England (paragraph 18.2.30 of the TAR) in that the route corridor is shown as extending to 75m either side of the centre line of the route options.

2. NATURE AND EXTENT OF PREDICTED IMPACTS

2.1 **Table 2.1** below summarises the changes associated with the construction of the southern bypass option D062 that may generate ecological impacts.

Table 2.1: Activities that may generate ecological impacts

Preliminary activities prior to the main construction phase
ground investigations;
vegetation clearance; and
archaeological excavation
Construction phase
vegetation/habitat clearance including tree felling.
soil stripping;
movement of materials to/from or within the site;
accidental discharge/spillage of construction and excavated materials, oils, fuel and chemicals;
demolition operations;
acoustic disturbance and vibration from construction activities;
piling, causing disturbance to springs and groundwater flow
assembly areas for components of construction;
diversion or reduction of water levels to facilitate construction;
discharge of dewatering fluids
dust generation;
run off from dust suppression methods
on-site borrow pits;
lighting;
provision of services and utilities;
setup and subsequent removal of site offices/compounds and final site clearance after construction;
structural works for new road; and
plant maintenance.
Operational phase
road drainage;
traffic movement;
lighting; and
physical presence of new road and associated infrastructure.

2.2 The above activities are predicted to generate the changes to the study area set out in **Table 2.2** below.

Table 2.2: Summary of predicted changes and Zone of Influence (ZoI)

Predicted Change	ZoI	Duration
Ground disturbance by structural and any archaeological investigations, storage of plant and materials, assembly of component parts, provision of services and utilities, site compounds, soil stripping and structural works.	150m wide route and working area	Prior to and during construction
Vegetation clearance	150m wide route and working area	During construction
Change in water regime if water levels altered to facilitate construction	River Till, fen and meadows and lower chalk stream	During construction and operation
Sediment runoff from soil stripping, earthmoving during construction of embankments and cuttings, and within the River floodplain during construction of viaduct. Ongoing sediment runoff from embankments until vegetated or stabilised. Water runoff from dust suppression and other activities	River Till, fen, meadow, transport of fine sediments into Lower Till and River Avon system	During construction and operation
Increased risk of water pollution arising from storage and movement of materials, fuels and chemicals and from construction plant and traffic	River Till, fen and meadows, lower Till chalk stream and River Avon system	Prior to construction, during construction and during operation.
Increased noise and vibration from pre-construction, construction and traffic movements	Beyond working area for noise. 40m for vibration.	Prior to construction, during construction and during operation
Potential fracture of chalk substrate and disruption to existing groundwater flows due to intrusive ground investigations and piling operations for viaduct.	Middle Till fens and meadows, lower Till chalk stream and River Avon system	Site investigations and construction
Increased risk of neglect as grazing will be less attractive	Swamp and Riverside Meadows	
Increased lighting	River Till, fen and woodland	During construction and operation
Demolition of structures	150m wide route and working area	During construction
Increased traffic movements	Route	During operation
Increased shading	Route	During operation
Changes in Air Quality	Within 200m of the route	During operation
Landscape planting	Site	During operation

3. ECOLOGICAL CONTEXT

Introduction

3.1 The route of the proposed Southern Bypass from approximately the western portal westwards to where it re-joins the existing A303 is shown on **Map 1**. The route passes through an undulating chalk plateau and crosses the River Till Valley. The British Geological Survey (BGS) maps the bedrock geology in the study area as the Sleaford Chalk Formation that is locally overlain in shallow, dry valleys with Head deposits and by Head and Alluvium deposits on the Till valley floodplain. The BGS maps show that the Till valley north of Winterbourne Stoke on the bypass route to be Head whereas to the south of Winterbourne Stoke, the valley floor is Alluvium with Head in adjacent valleys.

3.2 Winterbourne Stoke lies at point on the River Till where the River Till differs between a seasonal, summer-dry winterbourne to the north and a more permanent year-round stream to the south. The first edition 25 inch to the mile OS map marks several valley floor/valley edge springs just south of Winterbourne Stoke and these likely mark the transition from winterbourne to year-round stream. Sample water flow measurements by Wessex Water for the River Till and the hydrological part of the SSSI citation are given in **Appendix 1**.

3.3 The landscape setting in which the bypass is described under the following:

- National Character Area 132 Salisbury Plain and West Wiltshire Downs
- Natural Area 80 South Wessex Downs; and
- Landscape Biodiversity Area 08 Salisbury Plain.

3.4 These landscape descriptions set out the importance of:

- the chalk stream as a one of the most important features defining this landscape; and
- the importance of habitat connectivity for the future of biodiversity.

Historical Ecology

3.5 The proposed southern route passes through the historic parish of Berwick St James. This parish has large areas of enclosed land (parish enclosure was c.1790) with areas of ancient countryside associated with the floodplain. The flood plain has relict water meadow features. Very small areas of downland are shown on the land utilisation survey map of 1939 but there were extensive pastures within the parish covering approximately the same proportion of the parish as the arable lands. Since then there has been an expansion and intensification of arable farming and consequently a near total loss of pastures on the plateau.

Features of Ecological Importance

3.6 The features of ecological importance on the route of the proposed bypass are listed in **Table 3** below. These features have been identified from various sources including the TAR; MaGIC/DEFRA and the Campaign for the Preservation of the Southern Till Valley (CPSTV), supplemented by a site visit on 20 Feb 2017. Information regarding the location of spawning Salmon and of Brook Lamprey was provided by Mr Peter Hayes and Ms Anika Lange has provided the approximate location of Stone Curlew Plots.

Table 3: Summary of important ecological features on the southern bypass route that could be affected by the predicted changes

Important local Ecological Features	Estimated importance, condition and trend
River Avon SAC	International importance for vegetation, fish and invertebrates Mostly favourable condition, but declining due to recreational impacts.
Salisbury Plain Special Protection Area (SPA)	International importance for birds including Stone Curlew
River Till SSSI	County – International importance for vegetation, fish, otter, water vole and invertebrates. Unfavourable Recovering condition. NE identify the Till as within the River Restoration Strategy as part of the remedy to its ecological issues.
Fen, Marsh, Swamp and Wet Woodland outside SSSI	Local Importance (where outside designated national/county sites) Unfavourable condition as most derelict or fertilised Declining in quality (fertilisation)
River-side meadows	Local importance Unknown condition and trend
Field Trees in Till Valley	Local importance. Included here are trees (e.g. Oak; Ash and Willow) on the floodplain and adjacent fields. Some are relicts of ancient boundaries, others are long established field trees. Maintained condition. Declining through lack of recruitment.
Beech Plantations on chalk plateau and slopes	Local importance. The Beech Plantations are characteristic of the post enclosure chalk landscape in the Parish. Some of the plantations (e.g. The Park) are over 100years old. Favourable and Maintained condition.
Protected Road Verge	Local Importance. Hold flora and fauna of conservation interest. 2 verges are in the zone of influence: one is on the A303 and the other on a lane to the west of the River Till between Winterbourne Stoke and Berwick St James.
Birds of Conservation Concern: Great Bustard	This species is in an active re-introduction phase. IUCN lists this species as Red List Vulnerable and is a EU Birds Directive Annex 1 species. Importance, condition and trend unknown.
Birds of Conservation Concern: Stone Curlew	EU Birds Directive Annex 1 species; NERC Act S41 species. This bird is being actively conserved in the parish, with input from Natural England and RSPB. County Importance Condition and trend unknown
Birds of Conservation Concern: Barn Owl	Listed on the Wildlife & Countryside Act Schedules. This species is known to breed in the area. Importance, condition and trend unknown.
Assemblage of Bats	Local – County Importance Most species within the assemblage are declining nationally due to loss of roosts and degradation of supporting habitats (see Bat Conservation Trust Guidance 2012).

4. POTENTIAL ECOLOGICAL IMPACTS FROM THE SOUTHERN BYPASS OPTION

4.1 The changes identified in Section 2 could impact on the important ecological features identified in Section 3 as set out in **Table 4** below. **Maps 2** and **3** show, respectively, the location of the southern bypass '150m corridor' where it crosses the SAC and the SSSI. **Map 4** shows the habitat mosaic in the land adjacent to the SAC and SSSI. **Map 5** shows the wider landscape with beech plantations and locations of Stone Curlew and Greater Bustard in the Berwick St James parish.

Table 4: Summary of Important Ecological Features and Potential Impacts arising from southern route option D062

Important local Ecological Features	Potential Impacts
Rive Avon SAC	Contribution to loss/degradation of habitat for species for which SAC was selected, particularly chalk stream with water buttercup, Salmon, Bullhead, Brook Lamprey and Desmoulin's Whorl Snail). High potential for disruption to the groundwater flows and springs which support the habitats in the Till for the above species. Potential for permanent disruption to habitat connectivity for SAC species along the River Till valley, including prevention of Salmon reaching spawning area. Increased risk of sedimentation and pollution
Salisbury Plain SPA	Disruption to breeding Stone-curlew on SPA supporting habitat near the southern route.
River Till SSSI	As above for the SAC impacts but also includes potential for fragmentation and degradation of habitat for SSSI features including Brown Trout; Grayling; Water Vole and Otter, including reduction in prey species. Loss of SSSI habitats - wet woodland and swamp.
Fen Marsh and Swamp (those outside SSSI)	Loss of fen marsh and swamp vegetation on River Till floodplain. Degradation and fragmentation of habitat.
Riverside Meadows	Degradation and fragmentation of habitat.
Field Trees in Till Valley	Loss of field trees.
Beech Plantations on chalk plateau and slopes	Loss of 100+ year old trees and plantation habitat. Increased disturbance to retained habitat adjacent to bypass corridor.
Protected Road Verges	Loss of habitat and species
Birds of Conservation Concern: Stone Curlew	Disturbance to breeding habitat and landscape connectivity for this species.
Birds of Conservation Concern: Barn Owl	Loss of nesting and foraging areas. Disturbance to retained areas. Increased risk of road accidents.
Assemblage of Bats	Potential to lose roosts and disrupted habitat connectivity for this species group using the mosaic of habitat along the Till valley and connecting woodland habitat.

5 COMPARISON WITH THE WINTERBOURNE STOKE NORTHERN BYPASS OPTION

5.1 At paragraph 18.3.46 the HE mentions that there are differences between the ecological impacts of the northern and southern options, but provides no detail. The information set out in **Table 5** below provides evidence with which to compare the potential impacts of the two options.

5.2 HE has found that both route options could cause potential impacts on the Salisbury Plain SAC and Special Protection Area (SPA). Deposition of airborne pollutants such as NOx seems to be the most likely issue. As the northern option is closer to these protected sites, it seems likely that this route will increase the risk more than the southern one. However, most NOx is deposited within 200m of the source, and the effect of the prevailing wind must also be taken into account.

5.3 The Great Bustard has been re-introduced to Salisbury Plain, but no information is available to assess the likely effects. It has therefore not been included in the table below.

Table 5: Comparison of the potential ecological impacts of Options D061 and D062

Important Ecological Feature	Potential impacts of northern option D061 v Southern Option D062
River Avon SAC	
Chalk stream vegetation [SAC 3260 vegetation]	Reduced risk in the northern option as the stream does not flow above Winterbourne Stoke for much of the year. The northern vegetation will have higher resilience to any alteration of groundwater levels, caused by abstraction or dewatering required for construction.
Salmon and Brook Lamprey	The stream north of Winterbourne Stoke is upstream of springs and thus a more seasonal waterbody than south of the village. The area to the north of winterbourne Stoke is less favourable habitat for salmon and lamprey. Southern option may prevent salmon from full range of spawning grounds. The northern option is likely to have less of an impact on these species as it crosses a more seasonal watercourse. Use of the northern option provides a 2-3km buffer zone between potential sources of sediment and pollution, and the sensitive perennial sections of the Till. This also applies to any aquifer drawdown effects.
Bullhead	Bullhead has been reported as spawning within 200m of the southern route option. Reduced risk in the northern option as this species may only be present when the winterbourne is flowing.
Desmoulin's Whorl Snail	Recorded in Berwick St James. Unlikely to be present in the winterbourne and therefore less vulnerable to the northern option.
Salisbury Plain SPA	
Hen Harrier	Insufficient information to assess effects.
Hobby	
Quail	
Stone-curlew	This species is actively encouraged to breed on habitat outside the SPA boundary and is present very close to the southern route option. At this location, it is likely to be severely affected by disturbance during construction and may be affected by noise and vibration during operation of the new road.
Salisbury Plain SAC/Parsonage Down SSSI	
Chalk grassland vegetation [SAC 5130 and 6210 vegetation]	The northern route runs parallel to the southern edge of the SAC/SSSI and within 200m for much of this section and thus potentially affected by Air Quality issues, although limited to 200m from road and limited by prevailing wind. Reduced risk from southern option as the route is further from the Salisbury Plain SAC and different alignment.

Important Ecological Feature	Potential impacts of northern option D061 v Southern Option D062
River Till SSSI (See above for features shared with SAC)	
Fen, marsh and swamp vegetation.	Southern route likely to cause greater risk of loss, pollution and hydrological damage.
Wet Woodland	Not present on the Till at the northern option. Direct loss of wet woodland habitat on the southern bypass option
Water Voles	Loss and degradation of habitat on southern route. No appropriate habitat within northern route.
Otters	Less likely to be affected by northern route, as the winterbourne is dry for much of the year.
Brown Trout and Grayling	Less likely to be affected by northern route, as the winterbourne is dry for much of the year.
Features of Local Importance	
Fen, Marsh and Swamp and Riverside meadows outside SSSI	Direct loss of habitat for both options and increased risk of pollution and air quality changes. Potential impacts to grazing management for retained pastures nearby. Loss of peaty soils on southern route and changes to hydrological regime underpinning soil.
Field Trees	Ash pollards at risk from northern route. Southern route may affect oak, ash and willow.
Beech plantations	These would be removed, fragmented and degraded by the southern route. No effect from the northern route.
Barn Owl	These birds forage over fields affected by both the north and southern route options, but are known to nest in woodland that would be affected by the southern option.
Assemblage of Bats	Both routes would affect foraging habitat, but the southern route would also disrupt flight lines and remove roosting habitat.

6 CONCLUSIONS & LEGAL AND POLICY IMPLICATIONS

6.1 As set out in **Table 5** above, the southern route D062 is likely to generate more ecological impacts than the northern route D061. This is principally because the southern route would affect the features for which the River Avon SAC and the River Till SSSI are designated more profoundly that the northern route. The southern route would also affect Stone-curlew, one of the species for which the Salisbury Plain SPA is designated and a range of locally important features which would either not be affected by the northern route, or would be affected less severely.

6.2 The northern route could result in air pollution effects on a small part of Salisbury Plain SAC and the Parsonage Down SSSI within the SAC.

6.3 Section 4 of the TAR sets out the legislation and policy which applies to the determination of the proposed scheme. At paragraph 4.2.1 of the TAR, the HE 'states that the proposed scheme is a Nationally Important Infrastructure Project. Given the World Heritage Site status of Stonehenge, it might even be of higher importance than that. This must be considered when determining whether to go ahead with the scheme.

6.4 However, when, as in this case, there are likely to be significant effects on European Sites, the Habitats Regulations make it clear that alternative options must be compared, and the least damaging option selected. Further, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and the National Planning Policy Framework (NPPF) require the same approach to be applied to features of less than European importance.

6.5 Consequently, the conclusion of this preliminary ecological appraisal is that the northern route, D061 is the preferred option.

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PEA: A303: Winterbourne Stoke Bypass Options
Maps

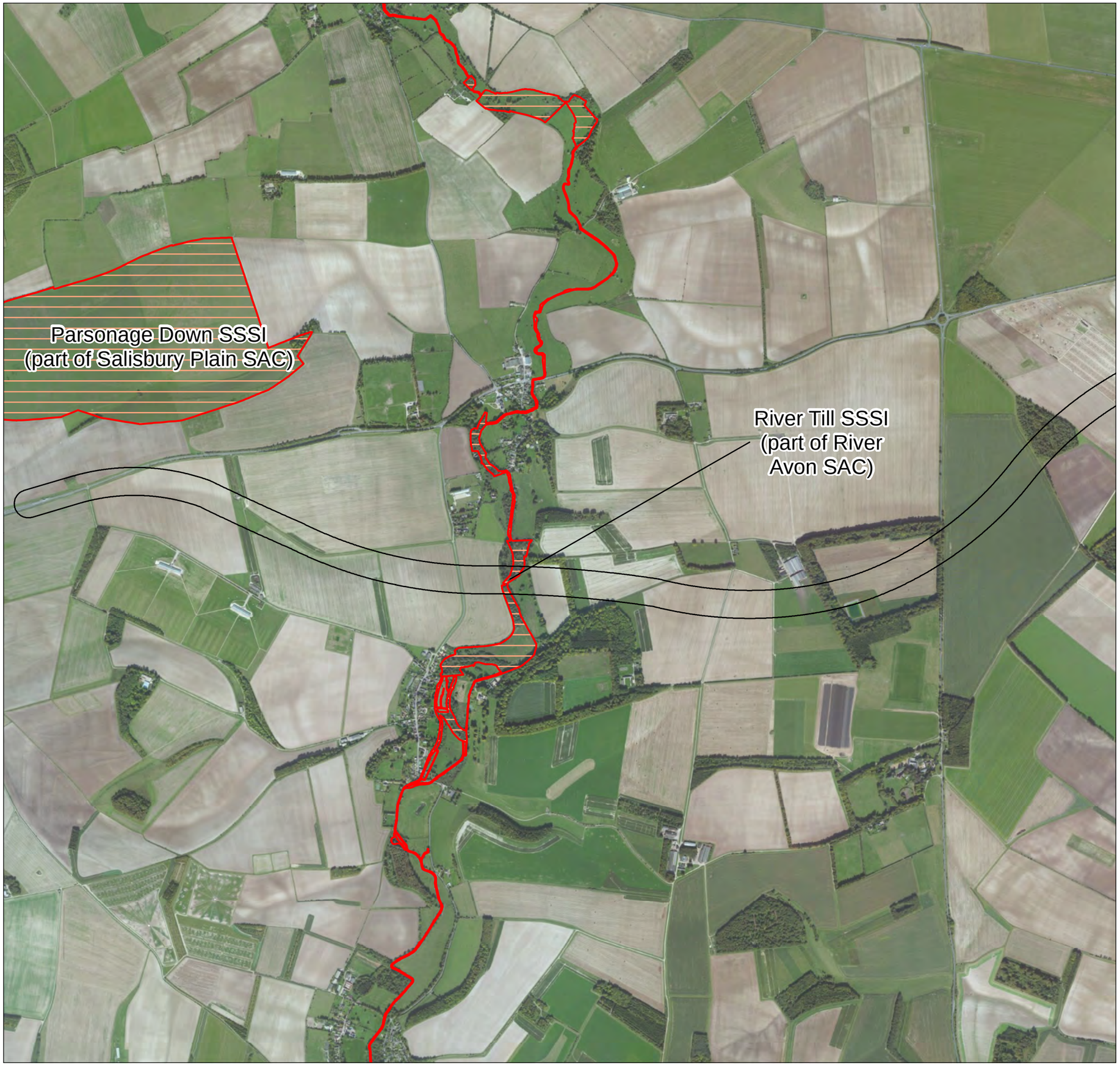
Map 1 Landscape of Southern Bypass Route

Map 2 River Avon SAC

Map 3 River Till SSSI

Map 4 Habitat Complexity and Connectivity on the River Till valley

Map 5 Landscape and Biodiversity on the Chalk Plateau



MAP 1 Landscape of Southern Bypass Route

KEY

SAC & SSSI

Road outline

The Bypass width is here shown as 150m based on the Biodiversity Assumptions in A303 Stonehenge Amesbury to Berwick Down. Technical Appraisal Report Volume 1 Para 18.2.30.

SCALE: 1:20,110 at A3

0 250 500 750 1,000 Metres

N

EPR

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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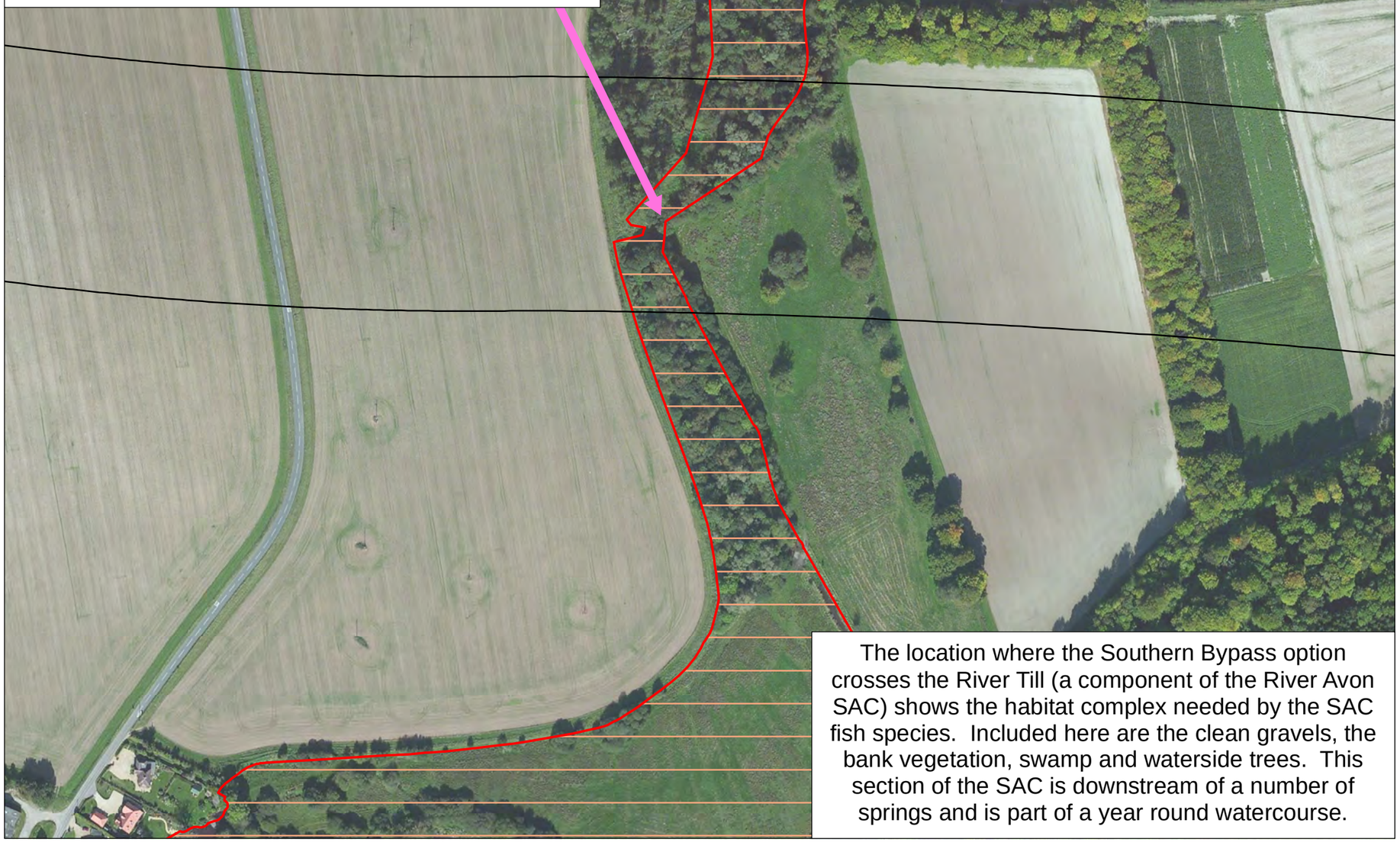
Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

Chalk stream with Water Buttercup Habitat



The location where the Southern Bypass option crosses the River Till (a component of the River Avon SAC) shows the habitat complex needed by the SAC fish species. Included here are the clean gravels, the bank vegetation, swamp and waterside trees. This section of the SAC is downstream of a number of springs and is part of a year round watercourse.

MAP 2 River Avon SAC

KEY

Road outline

SAC & SSSI

SCALE: 1:3,000 at A3

0 50 100 150 200 Metres

N

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CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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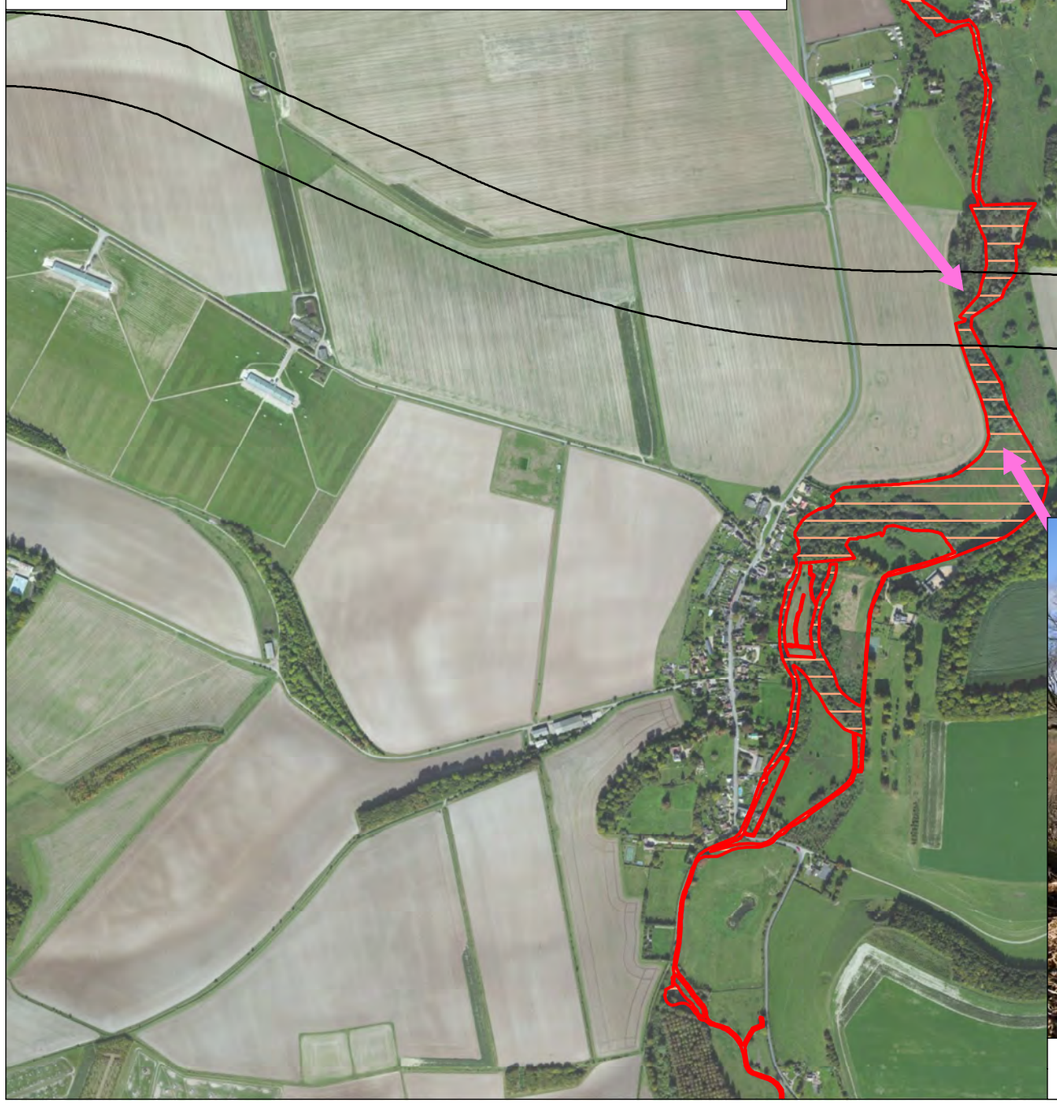
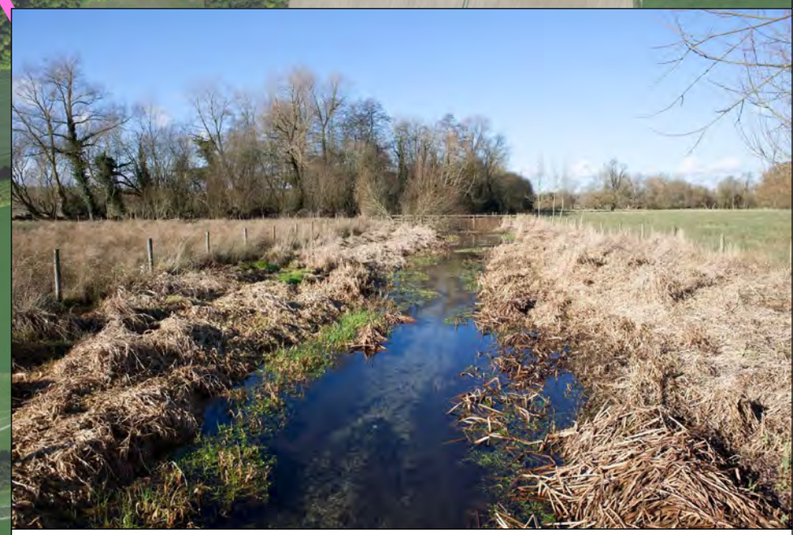
Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

SSSI habitats under proposed crossing

The location where the Southern Bypass option crosses the River Till SSSI (a component of the River Avon SAC) has clean gravels, bank vegetation and wet woodland for SSSI features including salmon, lamprey, bullhead, brown trout, grayling water vole; otter and Desmoulin's Whorl-snail.





SSSI habitats south of proposed crossing

MAP 3 River Till SSSI between Winterbourne Stoke and Berwick St James

KEY

Road outline

SAC & SSSI

SCALE: 1:12,500 at A3

0 200 400 600 800 Metres

N

EPR

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CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

The River Till floodplain between Winterbourne Stoke and Berwick St James is a mosaic of chalk stream channels (artificial and natural) in between wet woodlands; swamp; alluvial grasslands; rush pastures, field trees and relict hedgelines. This habitat complex supports the SAC and SSSI features of interest as well as providing interconnecting habitat for bats, birds and mammals extending southwards to the River Wylye.

Habitat Mosaic on the River Till Floodplain

MAP 4 Habitat Complexity and Connectivity on the River Till valley

KEY

Road outline

SAC & SSSI

SCALE: 1:8,000 at A3

0 50 100 150 200 Metres

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PROJECT: Winterbourne Stoke

DATE: February 2017

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Beeches in The Park

Beech Plantations on Plateau looking to West

MAP 5 Landscape and Biodiversity on the Chalk Plateau

KEY

Road outline

SAC & SSSI

The post enclosure landscape of plantations and tracks. These features are now over 100years old and are locally distinctive. They provide habitat otherwise unavailable in the arable landscape of extensive fields for species such as Barn Owls. Also present in the landscape are Stone Curlew and Great Bustard

SCALE: 1:20,000 at A3

0 250 500 750 1,000 Metres

N

EPR

Ecological Planning & Research

CLIENT: Campaign for the Preservation of the Southern Till Valley

PROJECT: Winterbourne Stoke

DATE: February 2017

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Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

Appendix 1

Extract from IFM Conference Paper 2008: Fish out of water-use of the River Avon winterbournes

Introduction

Winterbournes occur in the upper reaches of many chalk streams and are so called because they only flow in the winter and typically dry during the summer and autumn. An example of this seasonal change on the River Till is provided in Figure 1 below.

Figure 1 - Seasonal change at Winterbourne Stoke on the River Till

The four hydrological zones are represented in a winterbourne signature from the River Till in Figure 3.

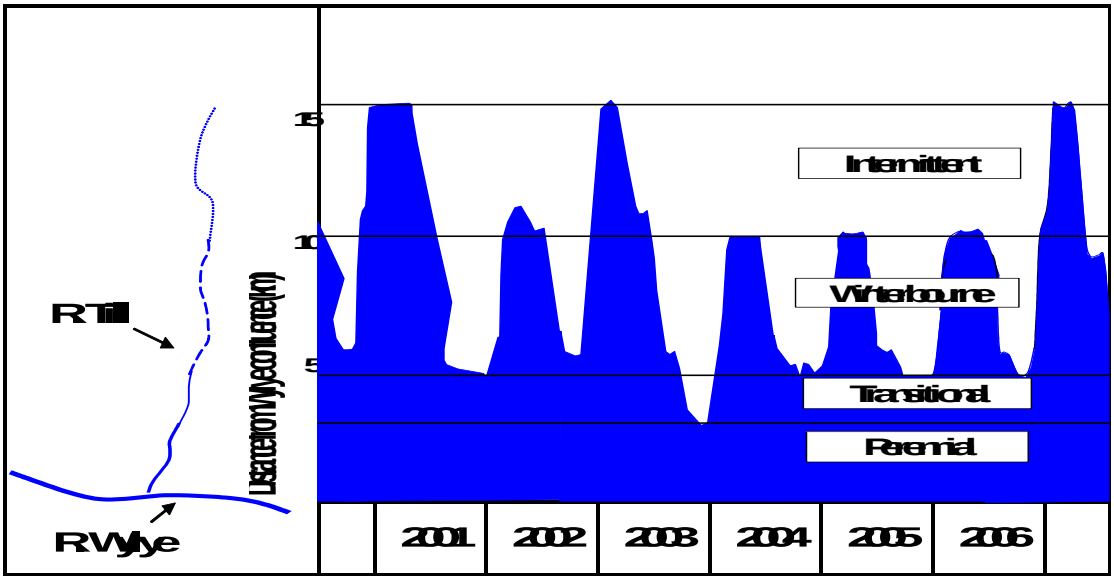

Figure 3 - Winterbourne signature of the River Till

Both figures extracted from Extract from: IFM Conference 2008. '*Fish out of water- use of the River Avon winterbournes*'. Andy House, Neil Punchard and Fiona Bowles

Extract from SSSI Citation at https://designatedsites.naturalengland.org.uk

Hydrology/Hydrogeology

1. *The River Till is a tributary of the River Wylye, itself part of the River Avon System SSSI. It is spring fed from the aquifer underlying the Chalk plateau of Salisbury Plain and flows through predominantly chalk geology. The upper part of the Till is a winterbourne, supported by water flowing from the aquifer in winter and early spring. As aquifer levels fall to a more stable level in summer, the river flows from a perennial head in the mid-section of the Till. The lower section, downstream from this, has the character of a chalk stream.*

    a. The citation therefore refers to three sections, classified into either Winterbourne (Upper section), or Chalk Stream (middle and lower sections) (see citation maps at https://designatedsites.naturalengland.org.uk/SiteUnitList.aspx?SiteCode=S2000431&SiteName=&countyCode=19&responsiblePerson=).

2. The upper winterbourne section is mapped to extend just to the south of the A303.

3. Based on local knowledge (Last, 2013)[1], the lower perennial section is considered to commence at Asserton House and to run approx. 3km south to the confluence with the River Wylye, and almost always containing permanent running water[2].

4. Within the middle section of the River Till, there is a junction of the upper and middle chalk layers in the vicinity of Berwick St James, resulting in a number of springs arising in and around the River (Plate 1), and forming a perennial head which is thought to typically arise in a wetland to the north of the Village. At this location, the soils of the River bed abruptly change from the gravel beds typical of the upper section, to clay based alluvium, which is likely to arrest any shallow subsurface groundwater flowing from the north, thereby contributing to the arising springs and marshy wetlands dominant in this section (see discussion on ecology below). The middle section of the River Till effectively functions as transitional zone between the upper winterbourne and the lower perennial sections, with the amount of aquifer recharge from yearly rainfall influencing both the amount of subsurface groundwater flowing from the northern upper section, as well as the pressure of the perennial head, both of which determine how far north and upstream perennial water in the middle section sits each year.

    a. All sections of the Till are influenced by abstraction by Wessex Water. The winterbourne section has been reported as being only marginally affected, with the perennial section, particularly the middle section, being greatly affected by abstraction, noticeably so in the late 1980s and early 1990s[3] .

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[1] Last B (2013). Portrait of a Parish, the Natural History of Berwick St James.
[2] *Ibid* P32. In December 1990 there was no flow at Berwick Bridge. There was no flow to the confluence of the Wylye in the summers of 1934 and 1976, two very dry years.
[3] *Ibid* P32

Appendix 2

River Avon SAC Features for Selection

Annex I habitats that are a primary reason for selection of this site

3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation

The Avon in southern England is a large, lowland river system that includes sections running through chalk and clay, with transitions between the two. Five aquatic *Ranunculus* species occur in the river system, but stream water-crowfoot *Ranunculus penicillatus* ssp. *pseudofluitans* and river water-crowfoot *R. fluitans* are the main dominants. Some winterbourne reaches, where *R. peltatus* is the dominant water-crowfoot species, are included in the SAC.

Annex II species that are a primary reason for selection of this site

1016 Desmoulin`s whorl snail **Vertigo moulinsiana**

There is an extensive population of **Desmoulin's whorl snail *Vertigo moulinsiana*** along about 20 km of the margins and associated wetlands of the Rivers Avon, Bourne and Wylye. This is one of two sites representing the species in the south-western part of its range, in chalk stream habitat. It occurs here in a separate catchment from the Kennet and Lambourn, within an environment more heavily dominated by arable agriculture.

1095 Sea lamprey **Petromyzon marinus**

The Avon represents **sea lamprey *Petromyzon marinus*** in a high-quality river in the southern part of its range. There are excellent examples of the features that the species needs for survival, including extensive areas of sand and gravel in the middle to lower reaches of the river where sea lampreys are known to spawn.

1096 Brook lamprey **Lampetra planeri**

The Avon is a high-quality river that represents the southern part of the range of **brook lamprey *Lampetra planeri***. A healthy, stable population occurs in the main river and in a number of tributaries. The main river, and in particular its tributaries, provides clean beds of gravel for spawning and extensive areas of fine silt for juveniles to burrow into.

1106 Atlantic salmon **Salmo salar**

The Avon in southern England represents a south coast chalk river supporting **Atlantic salmon *Salmo salar***. The salmon populations here are typical of a high-quality chalk stream, unaffected by the introduction of genetic stock of non-native origin. The Avon has an excellent mosaic of aquatic habitats, which include extensive areas of gravels essential for spawning and growth of juvenile fry. There has been limited modification of the river course by comparison with many other southern lowland rivers in England.

1163 Bullhead **Cottus gobio**

The Avon represents **bullhead *Cottus gobio*** in a calcareous, relatively unmodified river in the southern part of its range in England. The River Avon has a mosaic of aquatic habitats that support a diverse fish community. The bullhead is an important component of this community, particularly in the tributaries.

Source: JNCC SAC List.

Vector Transport Consultancy
1 Charlesfield Lane
Livingston
West Lothian, EH54 7FA
01506 237020
enquiries@vector-consultancy.co.uk

Contact: Iain MacDonald
Email: iain.macdonald@vector-consultancy.co.uk
Direct Dial 01506 680097

Our Ref: P1707

Date: 27th February 2017

Freepost A303 STONEHENGE CONSULTATION

Dear Sirs

A303 Stonehenge Consultation Feedback

My name is Iain MacDonald and I am a Director of Vector Transport Consultancy with 28 years experience as a Transport Consultant, including development and appraisal of major infrastructure schemes such as the proposed A303 scheme.

I have been asked to review the proposals for the A303 Amesbury to Berwick Downs Scheme, currently presented for public consultation.

It is clear from the earlier stages of appraisal and the options presented for public consultation, that the two bypass options around Winterbourne Stoke, which include the tunnel under the World Heritage Site are the favoured variants for consideration. I have focused my review on these two options and focused on the relative merits of the Northern Bypass (D061) and the Southern Bypass (D062) as reported in the Traffic Appraisal Report (TAR) and supporting volumes, and provided via the public consultation website.

The height of the embankments and the height of the viaducts over the River Till, for the north and south bypasses are not stated explicitly in the documentation published as part of the consultation. However, earlier variants D001 (north option) and D002 (south option) were described with the anticipated maximum embankment height to the west of the tunnel portal and the height of the viaduct over the River Till. It is assumed that these remain valid for the options under consideration. The drawings in Appendix F of the consultation documentation provide some indication of the width of cuttings and embankments required for each of the road alignments, together with chainage lengths. The video montage which provide a 'fly through' view of the north and south bypass routes, appear to exaggerate the widths of cuttings and embankments (relative to the width of the road), compared with those presented in the drawings. Consequently, the video montage may provide a misleading impression of the visual impact of embankments.

When considering visual impact of each of the options, we need to consider the structures which would be required, as part of the mainline road requirements and those required to connect the new road to the existing road infrastructure.

To the west of the tunnel portal, the north and south bypass options each indicate a grade separated dumbbell junction arrangement, with the connecting roads. For the northern option, the dumbbell junction would connect to the existing A303, providing direct connection to Winterbourne Stoke village and connection to the A360. For the southern bypass option, the dumbbell junction would connect to a re-aligned A360.
The northern bypass dumbbell junction location is at a section of embankment. The height of the embankment is likely to facilitate a dumbbell junction with connecting road running below the new bypass route, through the embankment. Therefore, the roundabouts and slip roads would be below the level of the new road. Conversely, the southern bypass dumbbell junction

location is at a section of the road which is also on embankment, but lower than that in the northern bypass. Consequently, it is likely that the dumbbell junction connector road for the southern option, between the roundabouts would need to pass over the new road, rather than below. Therefore, the connecting road between the roundabouts and potentially the roundabouts themselves and slip roads, would need to be on raised structures or embankment, at a level higher than the new roadway.

The viaduct over the River Till, for the northern option, is estimated to be 8 metres above the river, whereas, for the southern option, the viaduct would be higher at 13 metres above the river.

When considering visual impact of the two competing proposals, we need to consider the potential mitigation to be offered with sympathetic planting by the roadways. The sections in cutting are likely to lead to the lowest levels of visual intrusion. Sections on embankment will lead to higher levels of visual intrusion, with the potential for some mitigation through planting. The presence of above ground structures are likely to present the highest levels of visual intrusion, with the least opportunity for mitigation through planting. As such, the southern bypass, with a higher level river viaduct and high level structures at the junction with the A360, is likely to present higher levels of visual intrusion within the local landscape.

The connection to the A360 proposed with the southern bypass option would require re-alignment of the A360 in the vicinity of the junction, in order to ensure the connections and structures lie outside the World Heritage Site boundary, which runs along the edge of the existing A360 alignment in this area. The connection of the new road to the existing A303 for the northern bypass option is likely to require less re-alignment and less new road construction.

There is no indication of provision for surface water runoff from the new road surfaces or for mitigation of the impact from sediment, heavy metals and hydrocarbons from road runoff. I have been informed that the ground water and wetlands around the southern bypass route are more highly susceptible to impact from sediment, heavy metals and hydrocarbons, than the areas around the northern bypass route. Both routes would require suitable mitigation against the risk of excessive environmental impact from general runoff and from runoff following an incident or spillage. However, it is likely that given the increased sensitivity of the southern bypass route and the likelihood that more new road surface will be created for the southern bypass option, more extensive mitigation measures are likely to be required. Consequently, the mitigation measures, such as settlement ponds and containment measures are likely to take up more additional land, for the southern bypass route, than for the northern bypass route.

Economic assessment was undertaken to monetise benefits of each option for comparison with the cost of each option under consideration.

For options D061 and D062, the additional journey length along the route, average journey time between the A36 and A338 and the average journey time savings, are the same for both options (Table 1, p10 of the TAR). The environmental monetised benefits and scheme construction costs were deemed to be identical for both options.
For economic assessment, the sole differentiating factor between the north and south bypass options was the benefits derived using the forecast traffic model results.

The traffic model used, was developed specifically for assessment of this stage of scheme development. The model incorporated a core area broadly defined by Warminster in the West, Tidworth in the East, Salisbury in the South and Devizes in the North. Within this core, the network incorporates simulated junction modelling which ensures that junction delays vary

according to the level of traffic assigned through the junctions. Outside the core simulation area, a buffer network allows traffic to assign around the simulation area and presumably facilitates alternative points of entry to the simulation area, for strategic traffic. A model of this type is suitable for estimating forecast volumes of traffic on the proposed improved options, as it will enable traffic to re-assign from other routes to take advantage of the improved journey times offered by the proposed road scheme options.

The variation between the northern and southern bypass could only be the connections to the existing road network, at the A303 and A360. Other than these differences, the route length and journey times were deemed to be the same. Given the very modest differences between the north and south bypass options within the context of a relatively strategic model network, it was surprising to see the reported magnitude of difference between the options, with respect to scheme benefits.

The difference in traffic related scheme benefits between the northern and southern bypass schemes was calculated to be £85 million more benefits for the southern bypass compared with the northern bypass.

The traffic forecasts for the new road sections were presented in Tables 10-8 and 10-9 of Volume 1 of the TAR. The traffic volumes for the northern bypass scheme were higher than the southern bypass scheme, for the majority of time periods and forecast years compared.

Normally, when comparing options for major road schemes, the options which attract more traffic to the new scheme, generate the greater scheme benefits. This generally holds true for modelled tests when the same demand matrix is applied to alternative scheme models, as the traffic re-assigning to the scheme under test, benefits from reduced journey times. However, in large assignment models with disaggregate demand zones, spurious benefits can be generated in remote locations, as background 'noise' in the model, rather than the benefits relating to the features of the scheme in question. It seems unlikely that the northern bypass scheme would attract more traffic than the southern bypass scheme yet generate lower levels of traffic related benefits.

There is no information regarding the level of model assignment convergence achieved for each model run, nor regarding the principal traffic movements which derived benefits for each option. This information would be required to check that the unexpected results are not due to model noise, rather than local traffic assignment benefits.

A further feature of the results of the traffic assignments for the northern and southern bypass schemes is the imbalance of flows over the course of the day. Roads frequently experience tidal flow over the course of a day. When the traffic volume in one direction is significantly higher than the other direction in the AM period, we would expect to see the balance redressed and the converse true in the PM period. However, in the model results presented, the volumes over the time periods combined are consistently higher in the eastbound direction than in the westbound direction. The model is intended to represent average conditions over the course of the year. Therefore, it seems illogical that there should be a consistent imbalance of traffic in one direction. We would expect a much closer balance of traffic flows.

The final irregularity noted with the traffic model results, is the traffic volumes presented in Table 10-8, for the forecast years 2039 and 2051. The traffic volumes for each road section are identical for the AM and PM periods. Given the flow tidality, albeit imbalanced, exhibited for earlier years, it seems unlikely that exactly the same traffic assignment results would apply to each section, during different time periods in each direction. The same results could be replicated if the same demand matrix was mistakenly assigned to the model network, for both

periods. i.e. if say the AM matrix was assigned to the AM model network as well as to the PM model network. If the wrong matrix was assigned, then this would mean that the option comparisons and the scheme economic assessment would not have been made with common demand matrices for each test. This would render the tests invalid and, in addition, would explain the unexpected mis-correlation of higher scheme traffic with lower scheme benefits.

If larger demand matrices were assigned to the northern bypass model than the southern bypass model, then this would lead to a mis-calculation of lower traffic related benefits for the scheme.

It is clear from the model results presented that there is further explanation of the results required and a strong possibility that mistakes have been made in the model assignments and / or background model nose in the convergence process has generated spurious and invalid benefit calculations.

Whilst the material presented for consultation provides extensive coverage of the stages undertaken for identifying and sifting corridor and route options, the results are presented at a high level. The background reports which support the decision making process would provide further useful detail.

The options presented for consideration consist of two closely competing but clearly favoured options, coupled with a third choice option (F010) which is has been consistently assessed as less favoured against policy and scheme objectives.

Given the very short list of options under consideration, it seems inconsistent that the data behind the assessments made, is not available to the public who are being asked to comment on the favoured options.

The public are being asked to comment on a virtually finalised scheme, with limited information.
Whilst the promotor may be seeking to rely on the accuracy, impartiality and judgement of the consultants who have undertaken the scheme development and asking the public to accept the results without the need for further scrutiny, the inconsistencies in the traffic modelling results suggest that this position is not reasonable at least as far as traffic modelling work is concerned. There is a strong possibility that the traffic modelling work and the consequent economic appraisal are flawed.

The various options considered and developed were not introduced at the same time, but evolved and developed over a period of time. As such, it is not necessarily the case that the judgement used to undertake the Appraisal work and develop Appraisal Summary Tables and Environmental Assessment would have adopted a consistent approach at all times. The apparent errors in traffic forecasting and economic appraisal were to some extent masked by the means by which data was presented and the limited amount of detail available regarding model development, model calibration, assignment convergence levels and sources of calculated scheme benefits. Similarly, other aspects of the scheme development stages may contain flaws which are not evident in the data provided.

I believe that given the relatively conclusive stage of scheme development and the relatively minor differences between the variants of the preferred route; the publication of the technical work undertaken to reach this stage is not an unreasonable expectation.

I believe the following documents should be made publically available on a suitable scheme information web site:

a. Traffic Data Collection Report.
b. Local Model Validation Report.
c. Traffic Forecasting Report.
d. Economic Assessment Report.
e. Environmental Assessment Report (EAR).
f. Appraisal Summary Tables and Supporting Worksheets Report.
g. Initial Route Options Development – Design Fix C Environmental Report

In conclusion:
When comparing the northern and southern bypass options, the visual impact of the southern route is likely to be higher, owing to the need for more high level structures.

The southern bypass route would be likely to require more surface water runoff mitigation measures and greater land take for new road surface and new surface water runoff containment and treatment measures.

The northern bypass route ostensibly attracts more traffic and hence better fulfils one of the scheme objectives, by attracting traffic from less suitable roads (one presumes, given the limited information available) and hence provides traffic relief benefits to local communities.

This conclusion is only valid if we can rely on the traffic modelling. However, the accuracy and reliability of the traffic model results must be called into question given the inconsistency between higher scheme traffic and lower scheme benefits for the northern bypass option.
The traffic model results are suspect and further investigation, including publication of the detailed model outputs, should be undertaken before any further conclusions are reached.

Yours sincerely.

Iain MacDonald
Director

JSP CONSULTANTS
(Consultants in Noise & Vibration)

2 Millards Way Upton Scudamore
Nr Warminster Wiltshire BA12 0DR

Tel: 01985 847405 Fax: 01985 847405

Mr J S Pollard BSc, C Eng, MIOA
(Member of Association of Noise Consultants)

Email: jspnoise@aol.com
Website: www.jspconsultants.co.uk

REVIEW OF THE REQUIREMENTS AND CONTENT OF THE HIGHWAYS ENGLAND TRANSPORT APPRAISAL REPORT FOR THE A303 STONEHENGE PROJECT

Prepared for

The Campaign for the Preservation Of the Southern Till Valley

Date: 28 February 2017

Report No: RPT1297

1. INTRODUCTION

This report reviews the requirements and content of the acoustic aspects of the Highways England Transport Appraisal Report (TAR) for the proposed A303 Stonehenge Amesbury to Berwick Down Public Consultation process, with particular emphasis on the location of the two bypass options for the A303 road around Winterborne Stoke. The consultation period of 7 weeks from the February 2017 release date was intended to allow time for local residents to express their views on the northern and southern routes.

The Highways England TAR document, and its associated appendices, only summarise the acoustic issues in very general terms, and attempts to obtain the detailed technical reports prepared by Arup/Atkins have been met with a release refusal, on the grounds that either the technical reports do not exist or there is no need for the general public to have access to them. Appendix 1 of this report reproduces the two emails dated 1.3.17 and 13.2.17 that were submitted to Highways England requesting this information.

Fortunately by putting pressure on the system, including a Freedom of Information Act Request, representatives from the Parish Councils of Shrewton, Winterbourne Stoke and Berwick St James were privy to a meeting with Highways England representatives on the 23rd February 2017. Whilst this meeting provided further insight and useful discussion on the project details plus a number of slides of results, it was considered that more information would be needed from Highways England before the Parish Council representatives could make informed judgement on behalf of local residents.

Those attending the meeting were shown information, but were denied the right to take such information away in the form of the Highways England PowerPoint presentation. Furthermore attendees were told that they " would be unable to interpret the slides 'in context' and that it was privileged information". At the same time attendees were encouraged to "inform the community".

Section 2 of this report covers the information normally expected to be provided for projects of this size, section 3 outlines in more detail the procedures recommended in Government documents such as the Design Manual for Roads and Bridges (DMRB) (reference 1) and section 4 covers the Calculation of Road Traffic Noise (CRTN) prediction method (reference 2). Section 5 briefly outlines the scope of the TAR document in terms of its acoustic content and section 6 discusses the results, conclusions and deficiencies from the TAR document and the February meeting and highlights some the of concerns raised by the local Parish Councils.

2. ASSESSMENT METHOD

For its assessment process, Highways England has adopted the guidance in the Department for Transport TAG Unit A3 Chapter 2 report and has used the CRTN method for calculating road traffic noise and the DMRB procedures for quantifying the predictions. According to chapter 18, the noise study area was selected to cover 600m either side of the proposed scheme for the main roads under consideration, 600m either side of other routes within 1km of the scheme where noise changes of at least 1 dB are expected in the opening year and 50m either side of existing roads where noise changes of at least 1 dB are expected in the opening year and 3dB in the longer term. 'Do something' scenario (i. e. 15 years after scheme opening) and 'do nothing' scenario (i.e. 15 years of normal traffic flow increase without the scheme changes) have both been assessed.

The traffic noise predictions have been conducted for the 2 proposed dual carriageway A303 routes and the existing single carriageway A303 route. The predictions are reported to be in line with the CRTN method, but it is unclear to what degree the detailed guidance has been followed. Acoustic mitigation measures such as barriers, earth bunds have definitely not been included, but the Highways England representatives at the February meeting implied that the predictions were based on existing topographical information only, by following existing

terrain/ground contours with 3D digitisation, but not allowing for the effect of cuttings, embankments and viaducts. This is unclear because cuttings, embankments and viaducts etc will have a significant effect on the results, but nowhere in the TAR documents are the route options defined in sufficient detail to provide the necessary inputs for the 3D digital representation.

Other known inputs to the prediction model are reception points at 4m above local ground level (i.e. first floor property level), façade locations closest to the noise source, low noise road surface corrections and no specific meteorological conditions. Soundplan is believed to be the commercial package used for the CRTN prediction process.

Somewhat surprisingly a baseline noise survey has not been conducted and the assessment has been based on predictions only. Without knowing the existing noise conditions, it is difficult to know how much emphasis can be placed on the prediction accuracy for the existing A303 route. The reason given for the lack of a baseline noise survey is that a survey is not necessary at this stage of the route option choice, but bearing in mind how long the A303 Stonehenge Improvement review has been in progress, it is difficult to believe that noise measurements have not been conducted around Winterbourne Stoke and Berwick St James in earlier years.

Noise mitigation measures normally take the form of acoustic barriers such as acoustic fences, walls and earth bunds between source and reception point, plus building sound insulation treatments, such as window glazing improvements.

The Noise Insulation Regulations 1975 specify three conditions to be met for eligibility for property sound insulation:-

a. the new traffic noise level must not be less than 68 dBA L_{10} 18 hour.

b. the new noise level must be at least 1 dBA above existing noise levels.

c. the new or altered highway is assessed to be responsible for contributing at least 1 dBA to the final noise level.

All three conditions need to be satisfied as stated in Regulation 3.

Regulation 4 extends to the highway authority the discretionary power to provide insulation where properties are adversely affected by road improvement schemes (as opposed to new roads), provided the use of the altered road causes or is expected to cause noise at a level not less than 68 dB(A). Regulation 5 extends to the highway authority the discretionary power to provide insulation where properties are affected by noise levels from the construction of the proposed road.

3. DMRB ASSESSMENT PROCEDURES.

The first stage in the DMRB procedure is to select an area of, say, ± 300m either side of the centre line of the road scheme and identify noise sensitive locations within the 300m distances. This information is normally displayed on a map with the ± 300m bands marked in 50 or 100m intervals either side of the road. Noise sensitive locations are normally defined as residential properties, places of worship, public buildings (libraries etc), schools, colleges, public open spaces, sports & leisure facilities, footpaths etc

In addition to front line rows of houses on both sides of the road, there are often second line and possibly third line rows of houses set further back with gardens in between. Consequently, although high noise levels are experienced, at the first line of houses, such houses provide very good acoustic shielding for the second and third rows such that traffic noise levels can reduce considerably in built up areas at relatively short distances from the main road. Most houses tend to be of the conventional two storey height and for a relatively

flat area, a line of housing can provide 15-20 dB attenuation depending on source and receiver distances. Any breaks in the houses, however, will result in considerably less attenuation.

In order to assist the traffic noise assessment, and satisfy DMRB requirements, ambient noise measurements are normally conducted at a number of locations along the scheme route. This baseline noise survey is important to assess the current acoustic environment and consequently normally covers a number of the previously identified noise sensitive locations close to the road and more distant locations across the ± 300m wide assessment area. Data can be acquired at free field or façade locations depending on access availability, and can include both daytime and night time visits.

The traffic noise calculation procedure (see section 4) requires noise predictions over the 18 hour period 06.00-24.00 hours, which can be based on known 18 hour traffic flows or the summation of 1 hour traffic flow noise levels. Consequently any traffic noise measurements should strictly speaking be conducted over the same 18 hour period, or the 3 hour shortened measurement procedure (3 consecutive hours between 10.00 and 17.00 hours) recommended in CRTN. In practice, however, 18 hour measurements, and to a lesser extent 3 hour measurements, can be very time consuming and costly, particularly for large study areas. Providing that a given measurement position is dominated by traffic noise, 10 or 15 minute measurement periods give a good measure of the 1 hour traffic noise levels and thus 1 hour predictions can be calibrated against the 1 hour derived measurements to determine whether the 18 hour predictions are realistic or not.

Stage 3 of the DMRB requires a noise nuisance assessment to be conducted for all properties where the noise change is 1 dB or more. Nuisance is measured as the percentage of people bothered by traffic noise and the DMRB provides two graphs based on social surveys. Figure 2 of the DMRB (not reproduced here) shows a steady state relationship between noise nuisance and noise exposure in the form of the percentage number of people bothered (very much or quite a lot) by traffic noise versus the L_{10} (18 hour) noise level. Figure 3 of the DMRB (not reproduced here) shows a relationship between changes in noise nuisance and changes in noise exposure in the form of change in percentage people bothered (very much or quite a lot) by traffic noise versus the change in L_{10} (18 hour) noise level.

The DMRB stage 3 procedure requires that the nuisance assessment should classify reception point locations according to their ambient levels in bands of below 50 dBA, 50-60 dBA, 60-70 dBA and above 70 dBA. These bands apply to the 18 hour L_{10} noise level. For each ambient band it is then necessary to state the number of properties subject to noise increases or decreases of 1<3 dBA, 3<5 dBA, 5<10 dBA, 10<15 dBA and above 15 dBA. The number of properties subject to the following increases or decreases in the percentage of people bothered by noise is then required: below 10%, 10<20%, 20<30%, 30<40%, above 40%.

4. CRTN METHOD

Traffic noise is normally measured or predicted in L_{10} units, where L_{10} is the noise level exceeded for 10% of the given time period. The information can be provided in the form of 1 hour values for any given hour of the day or night or an 18 hour value based on the average of the eighteen 1 hour values between 06.00 and 24.00 hours. Other units such as L_{eq}, L_{50}, L_{90}, L_{max} exist for other assessment requirements. For example L_{90} is used for defining the background or ambient noise level, where L_{90} is the noise level exceeded for 90% of the given time period.

The DMRB refers to the need to conduct traffic noise predictions by means of the CRTN method (reference 2). This Department of Transport method takes into account the speed and flow of the traffic, the road gradient, HGV content, source and reception point heights, perpendicular distances to noise source line etc, angles of view of each segment, plus any

barrier attenuation or ground absorption effects on route. In addition corrections are applied for road surface conditions (texture and depth), low flow conditions (below 200 vehicles per hour) and reflection effects from adjacent facades and opposite facades on route.

The two main parameters, however, are the traffic flow values (q) and the source/reception point distances (d). In the case of the former, traffic noise varies as 10log q so that a change in traffic flow from q_1 to q_2 will produce a change in noise level of 10log q2/q1. Hence a doubling of flow will give a 3 dBA increase, whilst a 25% change in flow will produce a 1 dBA change, which is why the DMRB refers to 25% flow changes and 1 dBA noise changes. In the case of the latter, traffic noise varies as 10log d so that a halving of the distance will produce a 3 dBA increase in noise. Passing vehicles are considered to be a 'line' noise source, whereas a stationary noise source will be a 'point' noise source with a 6 dBA increase for halving the distance.

Calculations can be performed for 1 hour traffic flows or 18 hour flows and whilst the DMRB procedure requires 18 hour L_{10} noise levels, single 1 hour L_{10} levels are often calculated for comparison with measurement. Normally the prediction model would be checked by applying it to the current situation with measured traffic flows and measured noise levels at selected time periods from the baseline noise survey. Any difference between measured and predicted noise levels for the current situation would then be applied to the future situation to allow for inaccuracies in the modelling process, such as road surface corrections.

5. TAR DOCUMENT AND ASSOCIATED APPENDICES

The TAR document covers a number of subject matters, but the acoustic sections are mainly contained in Chapter 10 on traffic analysis and modelling, Chapter 18 on environmental assessment and Appendix H with the noise assessment summary. The document covers a number of proposed dual carriageway route options, but it is the 2 preferred route options of D061 (northern bypass) and D062 (southern bypass), which need to be considered in this report.

Route option D061 of the new A303 goes north of Winterbourne Stoke and includes (from west to east) an approximate 5m deep cutting after the Parsonage Down area, an embankment north of Scotland Lodge farm up to 20m height to navigate the steep topography, a viaduct structure over the Till Valley, a further embankment after the River Till, crossings with the existing A303 and A360 roads, and finally a cutting near Diamond Wood.

Route option D062 of the new A303 goes south of Winterborne Stoke, but north of Berwick St James, and includes (from west to east) an embankment up to 14m height prior to the B3083 road, a viaduct of approximately 10m height over the River Till, an embankment of approximate 12 m height and subsequent cutting prior to the Oatlands Dairy Unit, an embankment up to 8m height before the A360 road junction and a final embankment up to 7m high before Diamond Wood.

Both route options are approximately 400m longer than the existing A303.

6. ASSESSMENT RESULTS AND CONCERNS

The TAR document provides very little analysis of the traffic noise predictions and it is impossible for the general public to make any informed judgements on the 2 routes. Chapter 18 appears to give the main conclusions of the study with vague statements like 'there would not be a large difference in noise effects between route options D061 and D062' and 'the majority of noise reductions for all routes would be around Winterbourne Stoke'. This last sentence is stating the obvious, since both route options are moving the A303 well away from its current route through the centre of the village.

As a result of a WebTAG assessment, the document provides further information on the number of households experiencing changes in noise levels rounded to the closest hundred

properties. This information is summarised in tables 18.1 and 18.2 of the document and shows exactly the same numbers of households experiencing increased noise or decreased noise for both route options. It is not clear whether this is a typing error or not, and gives no guidance to residents choice of route option.

Slightly more information was provided at the February meeting, by way of slides showing the predicted changes in road traffic noise at Berwick St James for the 'do minimum (nothing)' case and the proposed 2 route options. Unfortunately it was not possible to have hard copies of the slides.

The 'do minimum' case applied to the existing A303 road through Winterbourne Stoke in the year 2039 and showed the Leq noise levels in the form of coloured residential reception points in Berwick St James in bands of 3 dBA between 45 dBA and 75 dBA. The significance of this slide is difficult to ascertain without having the corresponding existing 2017 data. The route option slides showed the change in noise levels (presumably Leq units) at Berwick St James for firstly the northern bypass and secondly for the southern bypass. The graphs were in the form of coloured residential reception points in Berwick St James for 3 dBA bands between greater than -10 dBA to greater than 10 dBA.

The corresponding route option slides for the predicted noise level changes at Winterbourne Stoke were not provided, although the 'do minimum' case slide for Winterbourne Stoke properties was provided. Similarly there were no slides comparing the 2 route options on one graph for either Berwick St James or Winterbourne Stoke, although this would have been difficult to provide bearing in mind all the data on the individual slides.

The only other conclusion of interest from chapter 18 of the TAR document was the statement that less than 10 households may be likely to qualify for noise insulation with route option D061 and less than 15 households for route option D062. Obviously these households are close to the 2 route options and it should be possible to determine which properties these statements are referring to from the February meeting slides.

One of the issues raised by Berwick St James residents is the effect of wind speed and direction on the results. In line with standard practice the CRTN predictions take no account of prevailing wind conditions. Also it is standard practice for reasons of reproducible results to measure nose levels in good weather conditions of no rain and no wind or a slight breeze. ISO standard 1996 Part 2 (reference 3) recommends that wind speeds should be no more than 2m/s to 5 m/s. Two documents of interest covering the effect of wind conditions are the CONCAWE report and a technical paper by the Hayes McKenzie Partnership.

The CONCAWE report (reference 4) describes a method for predicting the propagation of noise between source and receiver over large distances for various meteorological conditions. It is based on petrochemical plant studies and provides a correction factor.

$$\Sigma \mathbf{K} = K_1 + K_2 + K_3 + K_4 + K_5 + K_6 + K_7$$

where the seven attenuation mechanisms account for geometrical spreading, atmospheric absorption, ground effects, meteorological effects, source height effects, barriers and in-plant screening.

CRTN already accounts for geometrical spreading) (K_1) and barrier attenuation (K_6) in its calculation procedure. In-plant screening (K_7) is specific to power station complexes and is not appropriate for the A303 study.

Atmospheric attenuation (K_2), due to the absorption of sound by the atmosphere, is very frequency dependent and needs to be assessed in conjunction with source noise levels in 1/3 octave frequency bands. In the absence of the latter it cannot be included in the prediction process and is not part of CRTN.

Ground attenuation effects (K_3) are also frequency dependent particularly when the ground surface is acoustically 'soft' (e.g. grass/soil). In the absence of frequency information it also

cannot be included in the prediction method and is not part of CRTN. Source height effects (K_5) are related to the ground effects and are dependent on grazing angles of incidence between source and receiver.

Finally the meteorological correction K_4 is wind and temperature dependent and a function of frequency. For soft ground the CONCAWE report provides both a frequency related calculation process and a more simplified frequency independent model.

The validity of the prediction model has been tested over the distance range 100-2000 m and wind speeds up to 7m/s and variations of up to 10 dBA have been found.

The Hayes McKenzie Partnership technical paper (reference 5) covers a study of road traffic noise measurements at 2 sites near Birmingham and Heathrow under different wind directions (northerly, easterly, southerly and westerly) for wind speeds between 0 m/s and 5 m/s. The results varied between the 2 sites due to the open countryside environment at Birmingham and the more urban environment at Heathrow and the different distances from the various roads, but in general spreads of up to 15 dBA were experienced for the Leq unit.

In summary these 2 reports show that wind speed and direction can be responsible for large variations in transmitted noise from source to receiver and this aspect is not covered in the Highways England submissions. Residents of Winterbourne Stoke are very concerned that, as prevailing winds are known to carry the noise across fairly open fields on route from the current A303 road, the southern route would be subject to increased noise levels in the village due to the dominance of winds from the south.

The other area of concern relates to the modelling approach adopted by Arup/Atkins for the various new topographical features of embankments, cuttings and viaducts. As mentioned in section 2, it is unclear what features have been built into the prediction model aside from the existing terrain changes along the current A303 road. Embankments, cuttings and viaducts are part of CRTN procedures and worked examples are given in the CRTN document. Cuttings will have reflecting walls and screening walls with the latter acting as acoustic barriers in the same manner as acoustic fences, walls or earth bunds. Embankments and viaducts will not provide any screening, unless the edge of the embankment acts as a barrier to close by reception points, or there are purpose built barriers alongside the road.

The attenuation provided by an acoustic barrier depends on the height of the barrier, the source and reception point heights and the distances between the barrier and the source and reception points. The closer the source and reception points are to the fence, the greater the attenuation obtained. For the barrier to be effective the reception point needs to be in the shadow zone of the source point. If the reception point lies in the illuminated zone of the source point, then the attenuation will be very small or zero. The attenuation of a barrier can be predicted for known source/receiver distances using standard sound ray path differences. The CRTN document shows potential barrier attenuations of up to 20 dBA for source and receiver both close to the barrier, but in practice 15 dBA maximum attenuation is a more realistic figure.

7. CONCLUDING REMARKS

A brief review of the Highways England Transport Appraisal Report and Associated Appendices has shown that the documents in their current form are hopelessly inadequate for local residents to assess the noise implications of the route options and to make an informed choice between the northern bypass and the southern bypass around the village of Winterbourne Stoke.

Email correspondence with Highways England representatives and discussions at the 23rd February 2017 meeting between Highways England staff and the Parish Councils confirm that much more information exists on the traffic noise predictions for the 2 routes than has been released to date. This information is clearly available in report form and needs to be released to interested parties.

The degree to which the CRTN method for predicting road traffic noise has been followed in its entirety is unclear. The TAR document implies that all procedures in CRTN have been followed, but the February meeting indicated that the predictions were based on existing topographical information only and did not allow for the effects of cuttings, embankments and viaducts.

Detailed information on the location and shape of these new topographical features have not been provided and neither has there been any discussion on the mitigation requirements of acoustic fences, walls and earth bunds.

Wind speed and direction issues, although not part of the CRTN prediction procedures, need to be addressed owing to the residents' concerns of prevailing wind directions.

The most important omission from the Highways England investigation is the complete lack of a detailed baseline noise survey. Such surveys are considered essentially for projects of this size and efforts should be made to determine whether surveys exist from earlier studies of the A303 Stonehenge route.

8. REFERENCES

1. *Design Manual for Roads & Bridges. Volume II Section 3 Part 7*
   Traffic Noise & Vibration. August 1994.(since updated)

2. *Calculation of Road Traffic Noise*
   Department of Transport Welsh Office 1988

3 *Description, Measurement & Assessment of Environmental Noise Part 2*
   ISO 1996-2 Second Edition 2007

4. *The Propagation of Noise from Petroleum and Petrochemical Complexes to Neighbouring Communities*
   Acoustic Technology Limited Report for CONCAWE dated May 1981

5. *The Effects of Wind Speed & Direction on Ambient & Background Noise Levels in the Suburban Environment*
   Proceedings of the Institute of Acoustics Vol 24 Pt 3 2002

APPENDIX 1

Campaign to Protect Rural England (CPRE) South West

From: CPRE Somerset <admin@cpresomerset.org.uk>
Sent: 01 March 2017 08:22
To: A303Stonehenge
Subject: Stonehenge tunnel consultation
Attachments: stonehenge objection - final.pdf

Please find attached a letter of objection from CPRE South West to the A303 tunnel proposal at Stonehenge.

I would be grateful for an acknowledgement of this email.

Thanks

Becky Collier
Admin Support – CPRE SW

Campaign to Protect Rural England
Standing up for your countryside

CPRE South West

Chairman
Janette Ward

Please reply to:-
CPRE SW Admin Support
Becky Collier
8 Rowdens Road
Wells
Somerset BA5 1TU
Email: beckycollier@talktalk.net

Via email to:A303Stonehenge@highwaysengland.co.uk

28th February 2017

Dear Sir/Madam

A303 STONEHENGE CONSULTATION RESPONSE

CPRE South West represents the seven county branches in the South West of England and thousands of individual CPRE members. Our letter should be read in conjunction with the detailed response submitted by CPRE Wiltshire.

We are grateful for the opportunity to respond to the consultation on the proposals for managing the impact of the development of the A303 Expressway and protection of the World Heritage Site (WHS) at Stonehenge and we would like to begin with the following **general statement:**

We feel that this consultation is fundamentally flawed. We are presented with only 'one' option that will cause damage to a globally important site, and will not, as intended, improve the tranquillity and setting. In addition to this, we consider that it will fail to provide benefit to local communities and business. Furthermore, we have been given far too little information about the impacts of the scheme. It is evident that much information relevant to our understanding of the project and the problems arising from it has yet to be obtained by Highways England. Statements about impacts on archaeology, heritage, landscape and the natural environment are not substantiated by detailed evidence. Thus, we believe that the consultation is both inadequate and premature.

CPRE South West **strongly disagrees** with the 2.9km tunnel proposal across the WHS. In our view this will cause irreparable damage to this globally important cultural site and, more generally, to the surrounding cultural and natural landscapes. We value not only the currently known heritage, but equally, the considerable amount of heritage still to be discovered, which is an invaluable part of our nation's cultural capital. Recent excavations of Mesolithic heritage highlight the hidden wealth of the site yet to be fully understood and which is put at risk by this proposal.

The iconic stones and the wider WHS at Stonehenge sit within a largely open, downland landscape which supports important wildlife and biodiversity. CPRE SW is concerned that all infrastructure developments in the sub region should comply with the commitment made by the UK government to "leave the natural environment of England in a better state than that in which we found it". We believe this proposal runs contrary to that stated commitment.

We would also like to make the following, specific points:

- The proposed 2.9km tunnel is far too short. The WHS is 5.4km wide, so the tunnel and the accompanying new road, tunnel portals and major junctions would result in irreparable damage to archaeology and landscape - in direct contravention of UK planning policy and the Government's commitments under the terms of the World Heritage Convention and Valetta Conventions and the WHS Management Plan.

- The proposal would increase traffic, noise and light pollution through the WHS, and the lighting and signage required for a high speed route will alter the dark skies at present to be found around the WHS and in this part of rural Wiltshire.

- Recent archaeological work within the WHS shows the emerging significance of Stonehenge and its surrounding area. The site has to date been largely protected from incursion by modern building schemes and planning developments. However the designation of the A303 as an Expressway, with the associated above surface structures (gantries, lighting, split level access) and two major portals within the WHS itself will dramatically change this. We note that the details of the signage, gantries, lighting and emergency lay-bys are not included in this consultation, which is a concern as it means consultees have not been shown an accurate picture of the impact that this scheme will have on this globally important landscape.

- In addition we are concerned at the impact of the expressway on this rural area of south Wiltshire. Here "soft" tourism in the form of appreciation of landscape, tranquillity, heritage and culture is an important part of the local economy and is not fully quantified in any of the supporting documents behind the road proposal. The historic, cultural and natural environment plays a key role in the local and wider economy, bringing in valuable business from the UK and abroad, supporting local small enterprises in this rural area as well as the adjacent urban areas such as Salisbury.

- From our experience and knowledge of the sub region, and from a careful study of both Google's congestion maps as well as Highways England's own figures, the road plays a rather more local role than purely as an end-to-end expressway. The subtle and vital connections into local towns and smaller communities will be irreversibly changed by this proposal yet no appraisal of these has been made as part of the overall planning process.

- In our view the evaluation made of the economic advantages of turning the A303 into an expressway (A303/358/30 Corridor Improvement Programme Economic impact study Feb 2013) is not sufficiently rigorous or inclusive. This study is light on local information and is in considerable disagreement in its final analysis with the more thorough "London to South West and South Wales Multi Modal Study" report carried out by Halcrow Group Ltd for the Government Office for the South West in 2001.

- The figures presented by Highways England at the last of the Taunton consultation meetings, but not made public as yet, predict that the traffic on the road will grow between 25% and 55%. The impact on the WHS and its rural downland setting in the light

of these predicted figures has not been assessed as a part of the overall assessment, and not made available to local consultees. We believe that this error must be urgently rectified.

Fundamentally, we believe that connectivity for the South West could be achieved in far less damaging and intrusive manner. There remains the desire for a robust railway link from Waterloo to Exeter and beyond via Basingstoke. Improved internet services would dramatically improve the business viability of the rural areas of the South West.

We do not believe that Government wishes to develop a road scheme that will damage 'forever' what is one of the most important, iconic, special and loved places within the UK and worldwide. We believe the current proposal is significantly flawed and that if there is anywhere for taking a more enlightened, strategic and long term investment approach to transport development, surely it must be here.

We hope you will take our views into account

Yours faithfully

Becky Collier
Admin Support – CPRE South West

Campaign to Protect Rural England (CPRE) Wiltshire

From: CPRE Wiltshire <admin@cprewiltshire.org.uk>
Sent: 23 February 2017 11:35
To: A303Stonehenge
Subject: CPRE Wiltshire response to Highways England re A303
Attachments: Signed letter to A303 Stonehenge Consultation AH 230217.pdf

Importance: High

Good morning
Please find attached a letter from CPRE Wiltshire to be included in the A303 Stonehenge Consultation.
Please could you acknowledge receipt of this letter.

Kind Regards

Geraldine White

Administrator
CPRE Wiltshire

Campaign to Protect Rural England
Wiltshire

Campaign to Protect Rural England
Wiltshire

PROTECT WILTSHIRE

46 New Park Street
Devizes,
SN10 1DT
Tel: 01380 722157
Email:admin@cprewiltshire.org.uk
Web site: www.cprewiltshire.org.uk

Chairman: Anne Henshaw
Vice Chairman: Charmian Spickernell

CPRE Wiltshire response to Highways England consultation on A303 Amesbury to Berwick Down scheme

To whom it may concern,

A303 Stonehenge Consultation

Dear Sir or Madam,

Introduction

CPRE Wiltshire Branch is an independent charity limited by guarantee and affiliated to the CPRE National charity. Our objects are broadly to campaign for a beautiful, living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work in and enjoy, for now and for future generations.

CPRE Wiltshire Branch has been involved in discussions about and proposals for Stonehenge for over 30 years. As members of the Stonehenge Advisory Forum we helped to prepare successive Stonehenge Management Plans and the current combined Management Plan for the whole World Heritage Site (WHS). Our membership, which numbers approximately 1,000, is kept informed about our activities concerning Stonehenge via our website and newsletter, *Wiltshire Voice*.

CPRE Wiltshire Branch is supported by national CPRE in its objection to the current proposals for the A303 at Stonehenge. We support the objections and concerns raised by the Stonehenge Alliance, some of which we also address in this response.

Owing to the paucity of detailed information provided in Highways England's Technical Appraisal Report, we are unable to comment fully on the proposals before us.

Our response to Highway England's Questionnaire concerning proposals for the A303 between Amesbury and Berwick Down.

Question 1. To what extent do you agree with our proposed option?

We strongly disagree with the option before us.

The 2.9km tunnel is inadequate to protect the WHS and its setting as is required by the protective planning framework; it would also be in conflict with the Government's commitments under the terms of the World Heritage and Valetta Conventions and the WHS Management Plan. In relation to the natural and water environments, it would bring adverse impacts to biodiversity, including adverse impacts on protected species and designated areas recognized under the Habitats Regulations. There would be adverse impacts on landscape overall. Insufficient information has been made available fully to assess the impacts of tunnel and road building.

Question 2. To what extent do you agree with our proposed location of the eastern portal?

We strongly disagree, for reasons given above and because of the impact of the tunnel portals and new dual carriageway on the setting of the ancient Avenue. To suggest that this feature would be restored by the proposed works gives no regard to the imposition of major new infrastructure right beside it and compromising its integrity.

Question 3. To what extent do you agree with our proposed location of the western portal?

Again, we strongly disagree, for the same reasons as given above. The western portal and expressway would form a highly adverse intrusion into a tract of countryside that is at present tranquil and archaeologically of considerable importance in its own right, and integral to the WHS as a whole. The scheme appears to overlook the critical significance of the landscape to the prehistoric inhabitants who modified it to meet their needs, using its topography for the deliberate disposition and interconnectivity of monuments and sites: thus, presumably, enhancing the experience of passing through it to reach the Henge. The scheme treats the Henge and its immediate surroundings as of paramount importance, when it

seems highly likely that arrival at the Henge was the culmination of a significant journey towards it through the landscape, sometimes within sight of the Stones and sometimes not.

We are also very concerned about the proximity of the western portal to the RSPB bird sanctuary on Normanton Down and the potential disturbance of wildlife in the woodlands close by the proposed engineering works.

Question 4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

We are opposed to the A303 scheme as proposed principally because of the damage it would do to the WHS and its setting. Since the bypass is a part of the A303 scheme, we cannot separate our concerns to opt for one or other bypass at this stage. Both bypasses would have serious impacts on the natural and historic environments west of the WHS – about which we have been given virtually no useful information upon which to form any opinion. Nevertheless, we consider that a bypass ought to be provided for Winterbourne Stoke and see no reason why it should be attached to the road scheme across the WHS. Noise and air quality impacts of a bypass should be taken very much into consideration.

Question 5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

Damage to archaeology and setting (notably Blick Mead Mesolithic site); pollution of the River Avon SAC and variations in its flow both during and after construction; air quality and noise impacts for residents of Countess Road and Amesbury (close to the junction); impact on the setting of the WHS.

Question 6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

No information has been supplied on this feature of the scheme. Clearly it could have a major adverse impact on the WHS, archaeology and setting. It could also have adverse impacts on landscape and biodiversity.

Question 7. Do you have any other comments?

We have been given far too little information about the impacts of the scheme. It is evident that much information relevant to our understanding of the project and the problems arising from it has yet to be obtained by Highways England. Thus the consultation is both inadequate and premature.

No information has been given on crucial elements such as signage, lighting, gantries and emergency lay-bys. We consider the exhibition videos misleading in this respect.

Statements about impacts on archaeology, heritage, landscape and the natural environment are not substantiated by detailed evidence. There are no archaeological reports on work undertaken and we understand that further work will be necessary. There would be highly adverse environmental impacts on Conservation Areas, Listed buildings and Amesbury Abbey Listed Park and Garden.

We consider the heritage impact assessment to be highly questionable for a cultural WHS. It is said that the outstanding universal value (OUV) of the WHS would be protected when it clearly would not be. The obligation under the WH Convention is to protect the WH property: in so doing, its OUV is protected – but not otherwise.

The scheme is primarily a road scheme. That it would pass through a WHS is an important fact that cannot be overcome by acknowledging the importance of the WHS and, at the same time, providing a solution that is inadequate to protect it. We question the need for the scheme under the criteria put forward by the client and the lack of convincing alternatives. Assumptions about economic benefits to the South West apparently depend upon hearsay, not data.

If road widening is necessary, whatever is decided upon should not damage the WHS and its setting.

We note the overall negative impacts of the scheme as reported in the TAR, including the early assessment and sifting tool exercise showing a poor financial case and a neutral commercial case for Corridor D routes now under consideration.

Question 8. Feedback on this consultation: how did you hear about it?

We were informed by letter.

Question 9. Do you have any feedback on this consultation – events, information provided, advertising etc.

It appears that, in the main, only local views are being sought for a road scheme of national importance and a WHS of international significance. We find this puzzling.

We deplore the lack of information that is needed to comment from a knowledgeable standpoint concerning most issues arising from the scheme.

Campaign to Protect Rural England
Wiltshire

PROTECT WILTSHIRE

Our representative was invited to attend a single Traffic and Access Stakeholder Group meeting that offered no more than a presentation of the scheme in general, including the client's aims and reasons for it. There was no useful discussion of options under consideration; indeed none was revealed.

Finally, we have serious doubts about the validity of consultation that provides minimal information and none at all on a number of critical issues. The proposed scheme conflicts with basic policies for protection of the historic and natural environment and we have seen no justification for damage to these interests on the grounds of need and/or affordability.

If the Government indeed considers it necessary to proceed with widening the A303, the scheme should be halted and reconsidered so that any consultation may be properly supported with all the necessary information. This should follow informed consultation with independent stakeholders (i.e. not simply declared supporters or promoters of the scheme) on the appropriate approach for such a sensitive environment, and involving a public choice from options based on sound and unambiguous evaluation.

Yours sincerely

Anne Henshaw

Chairman CPRE Wiltshire

Chris Hudson Designs

Response ID ANON-BABJ-X8VT-9

Submitted to **A303 Stonehenge**
Submitted on **2017-01-19 14:24:25**

Introduction

Name

Name:
Chris Hudson

Postcode

Postcode:
NW5 3DX

Email

Email address:
chrishudso@waitrose.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Chris Hudson Designs

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
Is the tunnel drilled or cut and cover? I have assumed the former.
I would not favor the latter.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
I cannot comment on this. It is up to local people and organisations.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
No.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:
Museums Association news email.

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
No.

Commission C4 (World Heritage and Astronomy) of the International Astronomical Union

Response ID ANON-BABJ-X6DC-4

Submitted to **A303 Stonehenge**
Submitted on **2017-02-27 21:58:00**

Introduction

Name

Name:
Prof. Clive Ruggles

Postcode

Postcode:
LE1 7RH

Email

Email address:
rug@le.ac.uk

Postal address

Address:
School of Archaeology and Ancient History, University of Leicester, LEICESTER

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Commission C4 (World Heritage and Astronomy) of the International Astronomical Union

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to disagree

Please provide any comments to support your answer for question 1:
The proposal clearly has benefits, in particular by removing the A303 from the landscape immediately to the south of Stonehenge. This would not only help restore the monument to its landscape setting but would also eliminate the stream of vehicle lights passing within 250m of the monument which are so intrusive at night.

Nonetheless, the proposal places the western tunnel portal directly on the solstitial sightline to the SW from Stonehenge. In addition, the southern route option seems to envisage roughly 2 km of open dual-carriageway road running out broadly along the sightline together with a new two-level road junction, also placed within the sightline. All this appears to be directly contrary to Policy 3c in the 2015 Management Plan and viable strategies for implementing it (see §7). It also raises serious concerns that the integrity of the SW sightline from Stonehenge could be permanently destroyed, eliminating forever the possibility of visitors to Stonehenge once again seeing the winter solstice sun setting behind the distant natural horizon along the axis of the monument. It is the view of this Commission that we should be aiming to preserve this key sightline for eternity. There are currently stands of trees blocking the sightline but trees are temporary; on the other hand, the landscaping accompanying major roadworks could compromise the sightline irreversibly.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
The location of the eastern portal does not directly raise any astronomical concerns. We note favourably that it is placed so as to restore the route of the Avenue, the formal approach to Stonehenge, whose final approach is along the solstitial axis. This final approach has itself only recently been restored, following the removal of the A344 road in 2013.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
The proposed western portal lies almost exactly on the winter solstice sunset alignment. See §7 for discussion.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The proposed southern route (option 1S) would result in a dual-carriageway road running down the solstitial alignment for approximately 2km (mostly within the WHS) to a new two-level road junction (just outside the WHS), again on the alignment. See §7 for discussion.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Our main concern is that, in order to maintain as dark a sky as possible from the vicinity of Stonehenge, light scatter into the sky from any lighting at the junction should be minimised by using full cut-off luminaires.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Our main concern is that under the proposed southern route (option 1S), this new junction would lie right on the solstitial alignment to the SW. See §7 for discussion.

7. Do you have any other comments?

Q7:
ABOUT US

Our Commission, on behalf of the International Astronomical Union (IAU), works alongside UNESCO to implement the Astronomy and World Heritage Thematic Initiative (whc.unesco.org/en/astronomy/). This Initiative aims to improve the identification, conservation and management of specific types of properties connected with astronomical observations and traditional astronomical knowledge. We are concerned with Stonehenge as one of a very small number of existing World Heritage Sites with a strong relationship to astronomy. This response is confined to issues of direct interest to our Commission although we are, of course, aware of a range of broader issues.

Clive Ruggles, who has submitted this response as President of the Commission, is also a member of a "Consortium of Stonehenge experts" who are separately submitting a broader archaeological view.

THE IMPORTANCE OF THE SOLSTITIAL SIGHTLINE TO THE SW

Stonehenge is famous worldwide as an, and arguably the, iconic example of an ancient monument connected with the sky. The most tangible aspect of this is its solstitially aligned axis. Upon entry to the Visitors' Centre, a prominent sign introduces visitors immediately to the fact that the solar alignment is one of the most important features of the site.

Since 2011, various sightlines within the Stonehenge World Heritage Site (WHS) have been recognized as carrying attributes of the Outstanding Universal Value (OUV) that qualifies the area for World Heritage status. The sightline to the SW at Stonehenge itself, being the principal direction faced by the monument, is indisputably the most important of them. The removal of the A344 road in 2013 allows visitors once more to approach the monument along the intended formal route (the Stonehenge Avenue) from the NE, facing the direction of winter solstice sunset. This helps considerably to strengthen visitors' appreciation of the importance of the view straight ahead through the monument at the final point of approach.

The 2009 and 2015 Management Plans list the seven attributes that express the Outstanding Universal Value (OUV) of the Stonehenge World Heritage Site [MP09, p. 28; MP15, p. 32]. (N.B. The 2015 Management Plan includes Avebury but all 7 attributes apply to the Stonehenge part.) Attribute 4 is "The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy".

The significance of the solstitial axis at Stonehenge is recognized explicitly in the Statement of Significance agreed by UNESCO's World Heritage Committee in 2008 (see [MP09, pp. 26–27]) as well as in the Statement of Authenticity that forms part of the revised statement of OUV submitted to UNESCO in 2011 (and formally adopted in 2013) [MP15, p. 28]. "An outstanding example [of a highly organised prehistoric society able to impose its concept upon the environment] is the alignment of the Stonehenge Avenue ... and Stonehenge stone circle on the axis of the midsummer sunrise and midwinter sunset" [MP09, p. 27].

Preserving the integrity of the solstitial sightlines in the Stonehenge WHS is a major theme of an extended case study included in the second ICOMOS–IAU Thematic Study on astronomical heritage. The case study [ECS15] was one of a set presented at a side-event at the 2015 UNESCO World Heritage Committee (39COM) in July 2015, and was published in March 2016 on the UNESCO-IAU Portal to the Heritage of Astronomy (www.astronomicalheritage.net). It has since been widely disseminated both within the UK and internationally, for example at the Avebury and Stonehenge Archaeological and Historical Research Group (ASAHRG) in Jan 2015, at the European Association of Archaeologists' annual conference in Sep 2015, and at a public workshop on Science and Technology at Stonehenge held at the Politecnico Milano in May 2016. The whole Thematic Study volume is due for publication in time for presentation at the 41st meeting of the UNESCO World Heritage Committee (41COM) in July 2017.

The need to preserve (and, where possible, to restore) the integrity of the sightlines is recognized in the 2015 Management Plan. Policy 3c [MP15, p. 105] is to "Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself". Action 31, already undertaken (see [ECS15]), is to "identify key views between the attributes of OUV and both into and out of the WHS [and] identify key astronomical alignments".

Strategies for implementation could, and in the opinion of our Commission should, include:
• Improving and restoring ridges and horizons within the sightlines by removing visual obstacles such as buildings and trees;
• Avoiding new planting that, when fully grown, could obscure the sightlines; and
• Defining a buffer zone that includes the sightline corridors extending beyond the WHS. Fountains Abbey WHS (see [ECS15, fig. 8]) provides a precedent.

PRESERVING THE INTEGRITY OF THE SOLSTITIAL SIGHTLINE TO THE SW FROM STONEHENGE

The winter solstice sightline to the SW from Stonehenge is the single most important sightline in the WHS. Currently, its integrity is compromised by the existing A303 road, crossing the sightline just ~500m from Stonehenge, and by three plantations of tall trees—Normanton Gorse, ~1km from the site; The Diamond, just over 2km from the site; and a narrow plantation enclosing a trapezoidal area just over 3km from the site— each of which blocks the view to the distant horizon, formed by part of a hill ~1km WNW of Druid's Lodge (4.4 km from the site).

Thanks to the removal of the A344 road, direct approach to Stonehenge is now possible once again along the Avenue. This means that the view straight ahead is of prime importance at all times, not just around the time of sunset on days close to the winter solstice.

We believe that an important priority, especially given the prospect of removing the current A303, should be to clear a strip through the trees currently blocking the SW sightline so as to restore it to its original state and permit the view both of the setting solstitial sun nowadays and also of the position where the sun would have set at the time of construction.

This implies opening up, and keeping clear, a sector of landscape at least 2° wide in azimuth, so as to include the whole sun as the lower limb contacts the ground, the last gleam, the sun's position in 2500 BC, and a margin of at least one solar diameter (0.5°) on each side. A sector ~2° wide opening out from Stonehenge would be ~150m wide at a distance of 4.4 km.

We feel strongly that any form of lighting (either fixed lighting or vehicle lights) needs to be avoided along the full extent of the sightline. Even at a distance of a few kilometres, lighting would affect the view directly along the sightline at sunset or at night, running counter to all the progress being made in restoring the site to its landscape and sky.

SPECIFIC RECOMMENDATIONS

Ideally, and perhaps essentially, the landscape topography within the SW sightline (sector) should be left completely intact. Only this would guarantee absolutely that the integrity of the sightline is preserved for the future. This would imply that the western tunnel portal would need to be moved to the west of this sector, and that no part of the approach road should be cut through this sector.

A crucial question, then, is whether it might be acceptable for road construction to take place within the sightline, but too low to be visible from Stonehenge in the absence of trees. In our view the following points, at least, would need to be addressed:

a) All parts of the road and its associated earthworks within the solstice sector would need to be invisible below the natural topography (in the absence of trees), i.e. screened behind natural ridges (even when these have been cleared of trees) and below the distant horizon. Under no circumstances should existing or additional trees be used for screening.

b) All vehicles must be screened from view at all times. Not only would vehicle lights be intrusive at night: the eye would be drawn to any movement during the daytime. This implies that at all points the road surface must be at least 5m below the visible natural topography (when cleared of trees) and horizon. In particular, there must be no direct view of headlights/rear lights from vehicles, especially those travelling directly or almost directly towards or away from the monument.

c) For a two-level road junction, given that road vehicles may be up to 5m in height, (a) and (b) imply that the ground surface would need to be at least 11m below the viewshed from Stonehenge at every point.

d) Even if no lighting is installed at the tunnel entrance and junction, having these on the sightline opens up the possibility that lighting will be required (perhaps as a legal requirement, e.g. because of altered health and safety regulations) at some point in the future.

In sum, no part of the road, built constructions (bridges, viaducts) or earthworks, signage, vehicles, street lights, vehicle lights, or diffuse or reflected light from vehicles should be visible along the sightline. Trees cannot be taken into account: any screening by trees is temporary but changes to the visible topography are permanent and irreversible. It would be doubly bad to rely on trees to screen the road, related constructions, or lights.

The onus would need to be upon the planners to demonstrate that the proposed earthworks would NOT compromise the sightline. This would not only involve topographic modelling; it would also require specialist input from archaeoastronomers.

Even if the above concerns are addressed, it is possible that roadworks might still be visible from other points along the sightline, such as the "Sun Barrow" immediately to the NE of Normanton Gorse. This is relevant to Attribute 3 as well as Attribute 4. The composite visibility plan (Map 10) in the 2009 Management Plan [MP09, p. 184] might be helpful in regard to this issue.

CONSTRAINTS AND ALTERNATIVES

The eastern tunnel portal is placed so as to preserve the line of the destroyed Avenue, and should not, therefore, be moved further west. Thus it appears that if the tunnel length is constrained at 2.9km, then the western portal could not be moved westwards out of the SW sightline sector.

The proposed western portal is placed at a low point in the landscape, and the two proposed approach routes follow relatively inconspicuous courses through the landscape: in particular, the southern route runs close to a dry valley. This implies that it may be tricky or impossible to find alternative approach routes without

either destroying archaeological features or making the roadway more visible.

Together, these imply that it could be challenging to find acceptable alternatives under current constraints. This makes it all the more imperative to ensure that the integrity of the solstitial sightline to the SW is not compromised, simply in order to find a swift workable solution.

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[MP15] Simmonds, S. and Thomas, B. (2015). Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan 2015 (ed. Nichols, E. and Tyson, R.). Published on behalf of the Stonehenge and Avebury WHS Steering Committees. www.stonehengeandaveburywhs.org/management-of-whs/stonehenge-and-avebury-whs-management-plan-2015

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:
(Your form does not allow me to tick more than one option!)

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Consortium of Stonehenge experts

Response ID ANON-BABJ-X6QK-S

Submitted to **A303 Stonehenge**
Submitted on **2017-02-27 11:47:14**

Introduction

Name

Name:
Mike Parker Pearson

Postcode

Postcode:
WC1H 0PY

Email

Email address:
m.parker-pearson@ucl.ac.uk

Postal address

Address:
UCL Institute of Archaeology
31-34 Gordon Square
London WC1H 0PY

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Consortium of Stonehenge experts

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
We do not agree with the proposed option (i.e. the tunnel routes D061 & D062).

The option for the surface road beyond the southern edge of the World Heritage Site (option F010) is the only one which does not have a severe impact on the WHS. Therefore it must be taken. The others have dreadful consequences for the world's most famous archaeological site and its landscape setting.

Option F010 is cheaper than a tunnelled route through the WHS, another reason for its being adopted. The tunnel options (D061 & D062) have major drawbacks, documented below. These could be allayed if the length of the tunnel is increased to protect much more of the WHS.

The major negative consequences of the tunnel options (D061 & D062) are:
a) The landscape/astronomical impact of the proposed western portal, and its approach road, on the key midwinter sunset alignment from Stonehenge.
b) The destructive impact of the approach roads to the western and eastern portals within the WHS.
c) The expensive and time-consuming requirement to maintain high standards of archaeological recovery, both of artefacts from plough soil and of ephemeral features from hand-trowelled subsoil surfaces, within the WHS.
d) The setting of a bad precedent by allowing large-scale destructive development within a WHS. This 'lowers the bar' for allowing development to over-rule conservation within a WHS. It is especially bad when a more beneficial option (F010) is possible.

About us
We, the signatories to this contribution to the consultation, are senior archaeologists who have carried out internationally recognised research within the Stonehenge WHS within the last ten years or more. Most of us are employed by UK universities; many were employees of various universities or of English Heritage when doing that research. Together, we have been responsible for many of the major discoveries of recent times. We ask this submission be noted with the respect due to the large group of proven experts who have compiled it. This text has been jointly written; it represents our shared collective view.

Until now there has been no effective consultation with us, the wider community of archaeologists studying the Stonehenge landscape. So the opportunity has so far been missed to incorporate into the plans for the A303 our great, fast-growing and fast-changing knowledge of archaeology in and around the World Heritage Site (WHS). All of this knowledge is material which is crucial if the Highways England proposals are to have justified merit. The document we are responding to has evident weakness, as it is clearly based on inadequate and obsolete information. The only effective conduit for upwards communication of archaeological

information and evaluation appears to have been through HMAG (Heritage Monitoring and Advisory Group) and Arup Atkins. Neither has thus far consulted the leading experts.

In a public consultation, responses are often measured by counting: X respondents preferred option 1, Y preferred option 2. We ask that this submission not be treated in that way. In constructive spirit, we have made a collective expert group and make this submission, which we respectfully ask be considered in its own right, not just as another view, informed or not, to be counted amongst the Xs or the Ys.

Prof. Mike Parker Pearson FBA FSA FSA(Scot) MCIfA PhD University College London
Dr Umberto Albarella PhD University of Sheffield
Dr Mike Allen FSA PhD Allen Environmental Associates
Dr Barry Bishop PhD University of Buckingham
Prof Nick Branch FSA PhD University of Reading
Dr Christopher Chippindale FSA MCIfA PhD University of Cambridge
Prof Oliver Craig MSc PhD University of York
Dr David Field FSA PhD Formerly English Heritage
Prof Charly French FSA PhD University of Cambridge
Prof Vince Gaffney FSA PhD University of Bradford
Paul Garwood MSc University of Birmingham
Prof David Jacques FSA MPhil University of Buckingham
Dr Nicholas James PhD University of Cambridge
Dr Joshua Pollard FSA PhD University of Southampton
Prof Colin Richards PhD University of the Highlands & Islands
Dr David Robinson PhD University of Central Lancashire
Prof Peter Rowley-Conwy FSA FSA(Scot) RSNA PhD University of Durham
Prof Clive Ruggles FSA DPhil University of Leicester
Prof Julian Thomas MA PhD FSA University of Manchester
Prof Christopher Tilley PhD University College London
Prof Kate Welham MSc PhD University of Bournemouth

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
We cannot agree until there is adequate information on the character and survival of archaeological deposits east of the proposed portal as far as the Countess junction, site of the present roundabout on the edge of Amesbury

Very little is known about the flanks of the Avon valley at this point. A considerable quantity of flint artefacts of the Neolithic period (the era of Stonehenge) has been collected from the King Barrow Ridge over the years: this was a favoured settlement location at that time and also in the period before (the Mesolithic). A long barrow (burial monument older than Stonehenge) and small groups of round barrows (burial monuments a little younger than Stonehenge) are close to the proposed portal. It is very likely that important, fragile archaeological deposits survive within the vicinity – deposits not yet discovered.

The line of the Stonehenge Avenue, the prehistoric approach route to Stonehenge, should be preserved and reinstated by this scheme. That is good.

Blick Mead is a recently discovered site here on the edge of the Avon Valley. There is concern about impacts of any groundwater reduction on deposits associated with this prehistoric site, which lies immediately next to the present A303. Blick Mead has the longest dated sequence for a settlement of Mesolithic date (the era well before the time of Stonehenge) yet found in Britain, its dates spanning the 8th–5th millennia BC. This long-term use of the area by Mesolithic hunters may explain why the Stonehenge area became a significant focus for the Neolithic people who built Stonehenge just over the ridge from Blick Mead. The D061/D062 road proposal could affect and damage this important Mesolithic site if remains survive north of the current A303 (as is known from archaeological evaluation close to Countess junction). Major modifications to the landscape have been suggested as likely to change groundwater conditions, leading to dewatering and oxidisation on the south side of the A303 where part of this site lies. Any possible effect on groundwater needs to be evaluated before any impact can be properly assessed.

The proposed eastern portal will badly damage the visual setting of the prehistoric hill-fort of Vespasian's Camp and affect its extra-mural archaeological deposits. The hill-fort’s entrance faces north, so any works on the southern flank of the A303 will impinge on this, its natural access point.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
We strongly disagree.

To understand this point, a brief astronomical mention will help. For more than a century, it has been well-known to the largest public that Stonehenge is oriented towards the north-east, the direction of the midsummer solstice sunrise. This is why tens of thousands go there each Midsummer’s Day. But new research and

analysis clearly shows that the primary orientation is on the same axis, but in the other direction, towards the south-west, towards the direction of the midwinter solstice sunset. This remarkable astronomical dimension of Stonehenge is today the most widely known aspect of its singular character, the strongest basis for its world-wide fame. It is one of the most important features of the Stonehenge landscape, one which most of all must be respected and preserved.

But the proposed western entrance of the tunnel lies almost exactly on this winter solstice sunset alignment!

The proposed road-line west of the western portal (and within the WHS) is also broadly on this alignment. If the integrity of this south-west solstice sightline from Stonehenge is destroyed, it will forever prevent visitors to Stonehenge properly seeing the winter solstice sun setting behind the distant natural horizon – exactly as was possible in prehistoric times. This calamity would contravene Policy 3c of the 2015 WHS Management Plan: that the monuments' astronomical alignments be maintained and enhanced to achieve a good landscape setting.

The proposal will increase the area of road surface within the WHS, particularly at the western portal and to the west of it. Here, the new stretch of road would destroy important prehistoric features that formed Bronze Age field boundaries. One is probably part of a still little-understood 'palisade' ditch complex, dating to the Early Bronze Age (the period after Stonehenge). There seems to have been a network of enclosure around Stonehenge, and the area around the monument was in this era apparently devoid of fields, creating a cordon sanitaire around the monument. We can show a similar and fitting respect today by not having a tunnel portal and deep approach cuttings here.

The entrance to this palisade ditch complex – where parallel ditches form a trackway leading in the direction of Stonehenge – is close to this projected line of the new road. Either side of the trackway are Bronze Age field systems, each a separate co-axial unit that may focus on a settlement nearby. All these features are integral to understanding later stages of the construction and subsequent use of Stonehenge. Research excavations in 2008 of an area of Bronze Age field systems north of the proposed road line revealed evidence for Mesolithic, Neolithic and Early Bronze Age activity before the fields were formed, and this is also likely to be the case among these prehistoric field remains that will be destroyed by the proposed tunnel.

This south-western approach to Stonehenge was important not only during the Bronze Age, after the stones of Stonehenge were put up, but much earlier – before the age of Stonehenge. Important visual components of these are three famous barrow cemeteries, specifically the huge Neolithic long barrows at Winterbourne Stoke and Lake. Together standing sentinel over the southwestern approach to Stonehenge, they would have been significant to those occupying the intervening valley. Their prominence a full two millennia after construction – a length of time equivalent to a Roman construction being still of compelling significance to ourselves in the 21st century – is evident from the construction of a Late Bronze Age linear ditch that runs between them.

There are other, vitally important examples of these singular and archaic long barrows here: another is extant to the north of the woodland known as The Diamond; a now-levelled example is in the field system close to the A360. Additionally within view is yet another, the superb and well-preserved long barrow on the southern flank of Normanton Down, with a mysterious and now-levelled 'mortuary enclosure' alongside. There is another at Normanton Gorse, and we understand that recent evaluation has encountered another. So we have as many as seven of these Early Neolithic long barrows across that part of the valley where the western portal would be placed. Such a grouping of long barrows in a small area is unique in the world, not just unusual. It shows that this area was out-of-the-ordinary significance during the Early Neolithic period. We can expect that the fast-evolving techniques of field archaeology will lead to major revelations here – if the monuments and their precious setting are not wrecked.

Part of the point of a tunnel or new route is to re-unite the northern and southern parts of the WHS, which are split by the present surface A303 – a road so busy it is dangerous to try to cross it on foot. But the archaeology is just as important in this western area as further east. It is definitely desirable to re-unite this part of the landscape so that one could walk between the Winterbourne Stoke and Lake barrow groups. But the present proposal would only move the road a little, and leave a far larger blot on the landscape than exists at present.

The approach cutting to a western portal here – deep and wide – will inflict a vast gash on the landscape. With the western portal here, this new gash is not in a peripheral or archaeology-free zone, but in one which is, in a different way, as genuinely unique, just as the famous stones are at Stonehenge itself.

The portal and approach road will also be a visual blemish when seen from round barrows right along the flanks of Wilsford Down valley and including parts of the Lake and Winterbourne Stoke groups.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The southern route.

The least damaging option for the WHS is route F010, which follows this southern route. If D062 is adopted (against our recommendations), the line of the southern route (at its east end) needs to be altered so as to avoid the deleterious impact on the landscape setting of one of Stonehenge's two principal astronomical alignments.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The Mesolithic site at Blick Mead, already mentioned, is exceptional and precious. In addition, round barrow cemeteries along the Avon valley to both the north and south of Amesbury show that the valley was heavily utilised during the Early Bronze Age. So we can forecast that there will be traces of archaeological activity on the valley floor. The destruction of archaeological deposits existing here has not been given adequate consideration.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Bronze Age settlement occurs around the present crossroads, and damage of any kind to the surface will require comprehensive excavation. The present lighting

here already has a distracting effect on the ‘dark sky’ around Stonehenge because it makes a glowing ‘light-spot’ in the landscape as it is seen in many directions.

This lighting will remain a problem if the junction is moved to the south. While it would be possible to use reduced-height lamp-posts, and full cut-off luminaires to reduce light scatter, in its proposed position this lighting would still distract from the midwinter sunset axis as seen from Stonehenge. Headlights of on-coming cars will be another source of light impacting on the solstice axis.

The importance of the archaeology of this area is outlined above: a significant Early Neolithic focal point pre-dates Stonehenge and the area then continues in importance through the Early and Middle Bronze Age (that is, also post-dating Stonehenge). The archaeology here is subtle and fragile – and at present little understood. It deserves to be preserved and treated with extreme care, rather than regarded as not of consequence

7. Do you have any other comments?

Q7:
1) Radical and continuing changes in our understanding of Stonehenge, its landscape and archaeology
Archaeology, like so many scientific studies, is radically changing in its methods. New technologies, such as the 3-dimensional radar method of «LIDAR», have transformed our ability to detect traces too faint for the naked eye. Old techniques of excavation and field survey have been transformed by hi-tech innovations. So our knowledge of the Stonehenge landscape has been radically changed in the last 20 years: too many new and astonishing finds to state here, they fill many recent books. The extraordinary and unique Blick Mead site (above) is a new find, and so are astonishing new aspects to Durrington Walls, a long-known site within the WHS that continues to yield new information about the Neolithic people of Stonehenge. We can anticipate that these new discoveries will continue to be made. It is dangerous to plan on the basis that what we know now of the ancient landscape is all that exists in the ancient landscape.

2) The short term and the very long term in planning the future of Stonehenge
The standing stones and structures – the famous part of Stonehenge – are well over 4,000 years old. Other parts, less obvious to the untrained eye, are many centuries older. Other monuments in the WHS landscape are yet older still, by many more centuries. The Blick Mead Mesolithic site is twice as old as the stones at Stonehenge! Where planning normally deals with the short term, of decades extending perhaps into a century or so going forward, and often must notice the medium-term surviving traces such as 18th- or 19th-century or even medieval buildings, planning in the Stonehenge landscape must deal with a long term, indeed a very long term of several thousands of years.

It follows that planning at Stonehenge must be cautious and always propose minimal intervention. There is no area in the WHS where we can say, ‘We know that it is safe to place a tunnel portal or major new surface road here because there is nothing there which is important now or will be seen as important in the future.’

Therefore the whole tunnel option is misconceived. The option avoiding the WHS must be preferred.

3) A history of soon-regretted, short-term errors in caring for the Stonehenge landscape
In the century since Stonehenge came into public ownership at the end of the First World War, there have been several big buildings put into its landscape. Each was seen as sensible at the time. Yet within as short a time as a decade (!) each was seen as a mistake, so grave a mistake it was not just regretted but demolished. So each modern structure has now disappeared from visible view. Yet the scars left, irretrievably wrecking the archaeology, will never be repaired. Here are three of them.

• Immediately after the then Ministry of Works began to care for Stonehenge, it was obvious that houses for its custodial staff should be built nearby, so the stones would always have guardians close by: within 15 years, the houses were demolished as a hideous and wrong intrusion.

• At much the same time, it was obvious that visitors needed refreshment and facilities, so a Stonehenge Café was built close by: again, within 15 years, the café was demolished as a hideous and wrong intrusion.

• In the 1960s, it was obvious that the car-park was too small, the working buildings for custodians too small and the refreshment facilities were poor. And it was dangerous for visitors to walk across the fast and busy A344 road to reach the stones. So in 1969/70 a large car-park, semi-underground buildings, and access tunnel under the A344 were built. This was uncontroversial, an obvious improvement. Yet, within 15 years, the head of English Heritage declared their abolition to be its highest priority, and MPs called these facilities a ‘national disgrace’ which must be removed. Now they have been, leaving a wrecked area so close to Stonehenge covering several hectares.

4) The two Stonehenge astronomical alignments, that to the north-east and that to the south-west, in public understanding and perception
Because Stonehenge is so famous, public perceptions of it are held right across the world and are often understandably out of date. In the 1960s a widespread notion was that Stonehenge was not just astronomically aligned but was itself some kind of prehistoric computer or calculating machine to predict eclipses: this idea is still broadly held, although the evidence is strongly against it.

We can see that informed and expert opinion has now decidedly shifted towards understanding that the main astronomical alignment at Stonehenge is not north-east towards the midsummer sunrise, but south-west towards the midwinter sunset (above). Yet only now are the public beginning to visit to see the midwinter sunset rather than the midsummer sunrise. We can expect it will be 20 or 30 years before that newer understanding is commonplace. Notice the time-frame it takes for mistakes to be understood: between 10 and 15 years. If a western tunnel portal is built on that midwinter solar alignment, in the early 2020s, we can forecast that it will be universally seen by the late 2030s to be another short-term disaster – one which is far bigger, has far more impact and is irreversible in a way that the disasters of the previous century were not. The wretched 10–15 year time-span from ‘sensible’ to ‘disastrous’ will have been repeated!

5) The cost and timetable of the required highest-quality archaeological study
Any proposed works on the line of the A303 will require considerable and costly archaeological excavations. These must be carried out to the standards maintained by recent research projects within the WHS. The Stonehenge Environs Project of the 1980s and the Stonehenge Riverside Project of 2004–2009 proved that much archaeological evidence for prehistoric activity around Stonehenge survives only in the plough-soil. And evidence which survives as truncated, features cut into the chalk – pits, post-holes, stake-holes and tree-holes – is mostly ephemeral, so it is not always detected by standard excavation strategies that

concentrate on machine-stripping to bedrock and only cursory surface cleaning of the bedrock's surface.

Such hard-to-recognise evidence may be unwittingly destroyed without record. So the mitigation work must include arrangements for sampling and screening/sieving a suitable proportion (2%–4%) of the plough-soil prior to machine-stripping, and hand-trowelling of all machine-stripped trench surfaces to ensure recovery of all archaeological features regardless of size or visibility. This work is expensive in labour and time, especially since the proposed scheme would require the largest archaeological excavation ever undertaken within the WHS. Without shared standards within the WHS, there will be no possibility of drawing comparisons between different 21st-century excavations to evaluate and understand the character, date and extent of the more ephemeral traces of prehistoric activity around Stonehenge.

6) The integrity of the Stonehenge World Heritage Site
Until a century ago, it was only the stones themselves which were seen to constitute precious prehistoric Stonehenge. First World War photographs show artillery field guns being hauled through the very monument – 'safe' as long as they did not hit the actual stones. Increasingly, we have come to understand that Stonehenge is not only the stones, not only the eroded earthworks immediately near the stones, but a whole landscape extending to the horizon in most directions and even beyond. This fact was recognized when the WHS was defined as an area extending several kilometres from Stonehenge in each direction.

The integrity of the WHS was respected when new visitor provision was designed in the 2000s. Sites for a visitor centre were not sought within the WHS: the visitor centre must be outside it, and was so built. Further access paths and roads to and from Stonehenge must not cross the WHS and interfere with its archaeology: so a scheme was devised which uses the former A344 line for access, a choice which has meant nil new impact with in the WHS.

The proposal for D061/D062 is a sad and retrograde step. Instead of respecting the WHS as defining the area to be protected, it recognizes only the land which is visible from the stones themselves – a throwback to the limited ideas of 1916! It seeks to protect archaeological remains along the 2.9 km across the WHS which lies above the line of the tunnel, but cheerfully destroys everything within (and, in places, beside) the road's footprint along a length of over 2 km – nearly as long – of the WHS. And it inflicts within the WHS two enormous and deep approach cuttings to the tunnel portals.

7) Cost and benefit: why is Highways England's preferred option both more expensive and more damaging?
We are at a loss to understand the preference for the tunnel scheme. It is more expensive than the southern surface route (option F010). It is vastly more damaging than that option avoiding the WHS. The international significance of the Stonehenge WHS should, in our view, trump a collection of middle-order concerns about effects on nationally or locally important aspects of the broader environment that were given as reasons for rejection of route F010 prior to this public consultation.

8) Standards in heritage protection: the UK's deserved high reputation
The UK has an international reputation for the quality of its heritage protection and enhancement; that reputation can only be maintained – setting the bar high enough to encourage others to reject large-scale damaging developments in other WHS sites around the world – if the length of the proposed tunnel is more appropriate to the 5km-width of the WHS which the road line will traverse, or if the southern surface route is chosen.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Council for British Archaeology

Response ID ANON-BABJ-X6UX-A

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 22:50:50**

Introduction

Name

Name:
Dr Mike Heyworth MBE

Postcode

Postcode:
YO30 7BZ

Email

Email address:
mikeheyworth@archaeologyuk.org

Postal address

Address:
Council for British Archaeology
Beatrice de Cardi House
66 Bootham
York YO30 7BZ

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Council for British Archaeology

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The Council for British Archaeology (CBA) is an educational charity working throughout the UK to involve people in archaeology and to promote the appreciation and care of the historic environment for the benefit of present and future generations.

The Council was founded in 1944 for the 'safeguarding of all kinds of archaeological material and the strengthening of existing measures for the care of ancient and historic buildings, monuments, and antiquities' and to improve public education about archaeology.

Today it has some 500 organisational and over 5000 individual members and subscribers and its advocacy represents the public voice for archaeology in the UK.

The Council has a long-established interest in the conservation and management of the World Heritage Site (WHS) around Stonehenge. Over the last year we have consulted our members, held an open public debate, and engaged with our trustees in updating our position statement on the management of the WHS. The final document (available at http://new.archaeologyuk.org/stonehenge) was agreed by members in General Meeting in November 2016 and contains three Cardinal Principles on which we base our analysis of the latest proposals for the A303:

The CBA's primary objectives are:
1. to protect and conserve Stonehenge itself and its landscape of inter-related monuments
2. to manage appropriately and plan for the whole WHS landscape whose prehistoric significance is now becoming increasingly clearly understood
3. to further public understanding of that increasing significance

Given the limited options presented in the formal consultation, the CBA supports the principle of a long bored tunnel as the road solution for the A303 which will deliver the greatest environmental gain - though we believe that options including a surface route south of the WHS should also be considered in detail alongside the tunnel option. The removal of the A303 from the surface of the WHS would be highly beneficial and the CBA encourages Highways England on behalf of the Government to continue to work with the heritage sector and other key stakeholders to find the most beneficial achievable solution for the proposed tunnel in the area.

The CBA recognises that the latest proposals are an improvement on previous options (eg the 2.1k tunnel examined at public inquiry in 2004), but we still have considerable concerns about the impact of the tunnel portal locations and the new surface dual carriageways on the archaeological landscape and the Outstanding Universal Value of the World Heritage Site, particularly at the western end.

We also have concerns that the implications for the eastern side of the WHS have not yet been sufficiently examined - and that not all the results of recent investigations and considerations, which would inform our view and that of others, are yet in the public domain.

We are therefore not able to support the current proposals, particularly due to the damage which would be done to the western side of the WHS by the proposed location of the portal and the new road build within the WHS, however we are keen to work constructively with Highways England and other stakeholders to find an achievable solution to ensure that the benefits of removing the A303 from the landscape around Stonehenge can be realised in the years to come.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
We welcome the change in the location of the eastern portal to allow the line of the Avenue to be reinstated in this area. Before a definitive view can be formulated on this proposal, however, further archaeological evaluation work is needed to understand the character and survival of archaeological deposits in this area (which has not received detailed attention hitherto) and to consider the impact on nationally important heritage assets, such as Vespasian's Camp.

Further evaluation is also needed regarding the potential impact of any proposed works on groundwater levels which may affect the survival of archaeological deposits associated with the Mesolithic site at Blick Mead.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
We strongly disagree with the proposed location of the western portal, and the implication for the surface route of the dualled A303 within the WHS. The location of the portal and surface road will have a major negative impact on the nationally important heritage assets in the area, and their setting, which would constitute substantial harm.

There are two key components to our disagreement. Firstly, in particular, the portal is too close to the Normanton Down barrow group, including the Bush Barrow, and the Lake Barrow Group.

Secondly, the proposed portal location is highly sensitive in relation to the alignment of the midwinter solstice sunset which is now recognised to be an important – some would say the most important - astronomical alignment and which needs to be maintained and enhanced - as stated in the WHS Management Plan.

We also have reservations about the construction of a considerable length of fresh road surface within the WHS, in an area containing significant heritage assets, which may have been the dominant focus of Neolithic human activity in the WHS and also contains evidence of Bronze Age activity.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Further to our comments in relation to Q3 above, of the two options the proposed southern route takes the road further away from sensitive barrow groups, but further consideration is needed for the exact line of the bypass to avoid the issues discussed in Q3.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Further detailed archaeological work is needed in the area of the proposed junction to ensure that any damage to sensitive archaeological deposits is mitigated appropriately and to avoid damage to the Outstanding Universal Value of the WHS.

There needs to be wider engagement with archaeologists working in the area, particularly in relation to the Mesolithic site at Blick Mead, to ensure that the methodology for any archaeological evaluation work is appropriate and proportionate to the potential significance of the archaeological evidence which may be disturbed.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Further detailed archaeological work is needed in the area of the proposed junction to ensure that any damage to sensitive archaeological deposits is mitigated appropriately and to avoid damage to the Outstanding Universal Value of the WHS.

There needs to be wider engagement with archaeologists working in the area to ensure that the methodology for any archaeological evaluation work is appropriate and proportionate to the potential significance of the archaeological evidence which may be disturbed.

The issue of lighting will also need extremely careful consideration, taking into account the impact on astronomical alignments identified as important and protected in the Management Plan.

7. Do you have any other comments?

Q7:
The option for a surface route for the A303 routed outside the WHS to the south has not been presented as a formal option in the public consultation, though it is mentioned in some of the consultation documents.

We would support further exploration of this option which may have the potential to avoid damage to the WHS and to achieve maximum benefit from the removal of the A303 from the entire area of the WHS without damaging the archaeological deposits in the WHS. However, we are mindful that there may be as yet unknown damaging impacts to deposits (known and unknown) south of the WHS, along with other negative impacts that need to be considered.

The precautionary principle embedded in environmental stewardship must be followed to ensure that a long-term, sustainable solution is achieved for any major intervention which is proposed for the WHS.

We commend to you the principles included in our updated position statement on Stonehenge to guide future consideration for the plans for the A303, and would like to emphasise that this proposal is the subject of enormous national and international interest. All those involved will be judged by present and future generations on the quality of what is achieved - the eyes of the world truly are upon us.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
There has been limited opportunity for facilitated public discussion and detailed discussion with the heritage sector during a relatively short consultation period, notwithstanding the local exhibition events.

The lack of detailed information on the results of recent archaeological evaluation work within the World Heritage Site has been particularly unfortunate, given the international importance of the archaeology of the WHS.

The CBA has offered to host a meeting to bring together specialists and other stakeholders to work with Highways England to find an achievable solution to ensure that the benefits of removing the A303 from the landscape around Stonehenge can be realised in the coming years. We reiterate that offer here and suggest that a meeting in the summer, once the results of the consultation have been analysed and the results of the latest archaeological evaluations have been published, would be timely.

Council for British Archaeology (Wessex Region)

Response ID ANON-BABJ-X6VQ-4

Submitted to **A303 Stonehenge**
Submitted on **2017-03-01 16:24:27**

Introduction

Name

Name:
Francis Taylor

Postcode

Postcode:
SP5 4DF

Email

Email address:
frstaylor1@btinternet.com

Postal address

Address:
14 The Croft
Bishopstone
Salisbury
SP5 4DF

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Council for British Archaeology (Wessex Region)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The Council for British Archaeology (CBA) Wessex is a regional group of the Council for British Archaeology and includes Wiltshire and the Stonehenge and Avebury World Heritage Site within its area. It is an educational charity working to involve people in archaeology and promote appreciation and care of the historic environment for the benefit of present and future generations. The Group has a membership of almost 400, comprising both individuals and institutions. Although we work closely with the national body of the Council for British Archaeology, we are a separately registered charity. CBA Wessex has been involved in discussions about proposals for the Stonehenge visitor centre and the A303 for many years and was one of the parties invited to prepare the Management Plan for the Stonehenge and Avebury World Heritage Site.
The national body of the CBA, in conjunction with CBA Wessex, drew up a set of Cardinal Principles against which any proposed construction within the World Heritage Site should be judged. These include :-
• Minimum damage to known or potential archaeological remains.
• Minimum visual intrusion on monuments and landscapes
• Maximum tranquillity
• Efficient use of previously developed areas.
We have used these Principles in preparing our response to the current proposals.
We do agree with the proposed option. CBA Wessex has consistently supported the concept of a bored tunnel under the World Heritage Site (WHS) and recognise that the latest proposals are an improvement on previous options (e.g. the 2.1km tunnel proposed in 2004). We also note that, by relocating the eastern portal further east, the current proposal takes into account the importance of the Stonehenge Avenue. We cannot support the current proposals as they stand as we believe that the 2.9km tunnel on offer is too short and the western portal and the proposed road to the west of that portal will have a major negative impact on the World Heritage Site. The only acceptable alternatives are to construct a longer tunnel that emerges closer to (or ideally beyond) the boundaries of the World Heritage Site or else the southern surface route (F010) which avoids the World Heritage Site altogether. We note that this southern route, while referred to in some of the documents, was not included as an option in the Public Consultation. We recognise that this southern route passes through areas that have not been studied to the same degree as the WHS and may have impacts on archaeology elsewhere but it remains a viable option especially as we understand it would be cheaper than the 2.9km tunnel currently proposed.
We are aware that ICOMOS-UK, two years ago, informed Government Ministers that ".. we are concerned that associated portals and dual carriageways could have a highly adverse impact on other parts of the World Heritage landscape that cannot be set aside, however great the benefits of a tunnel." These comments need to be taken into account.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
We welcome the change in the location of the eastern portal which allows the route of the Avenue to be reinstated. Ideally the portal should have been even further east but we understand that there are technical and financial restraints that may prevent this. The eastern portal is in an area that has not been so intensively studied from an archaeological viewpoint so further work is required in this area. The proposed portal is not far from the recently discovered Blick Mead Mesolithic site on the edge of the Avon Valley and there is a risk that major civil engineering work in this area could have an impact on groundwater levels which in turn would have a negative effect on this important Mesolithic settlement site. Further evaluation work is required in this area.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
The proposed location of the western portal is totally unacceptable from an archaeological point of view both from its position near important archaeological monuments and also due to the necessity to construct a considerable length of fresh road surface within the World Heritage Site. The proposed surface roads to the west of the western portal bisect an area containing a unique cluster of Neolithic Long Barrows and Mortuary sites and this area may have been the dominant focus of Neolithic human activity in the WHS. The maps supplied with this consultation indicate a portal location close to both the Normanton Down Barrow Group (which includes the famous Bush Barrow) and the Lake Barrow Group. Some of these barrows are located within Normanton Gorse, currently an area of woodland that acts as a screen to the north of the portal, but should this woodland be cleared at some point in the future, this screen will disappear. The proposed surface roads (for both D061 and D062) are shown to pass through a small area of woodland known as the Diamond and cut directly though an area of Bronze Age field systems that are likely to include settlement evidence. There is also suspected to be a Saxon cemetery in this area.
A further major issue with the location of the western portal is its position directly on the alignment of the Midwinter Solstice as viewed from Stonehenge. Although the public flock to Stonehenge to view the sun rise on the Midsummer's Day it is now believed that the more important alignment, though on the same axis, is in the opposite direction towards the Midwinter solstice sunset. Although the portal is located in a dip in the landscape and will, we understand, be unlit, the headlights of cars approaching the portal will be clearly visible to viewers at Stonehenge. The WHS Management Plan specifically states that the astronomical alignments of Stonehenge must be maintained and the current proposal contravenes this policy.
We note that the western portal is close to the RSPB stone curlew reserve on Normanton Down which is further evidence that this location is not acceptable.
As a result of the above comments the CBA Wessex Trustees feel that the portal needs to be located further west, ideally outside the WHS, but at least it should be to the west of the Diamond plantation.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
We do not have a strong preference but on balance prefer the southern route as this avoids the Coniger Barrow cemetery and the SSSI at Parsonage Down. The southern route also ties in with the F010 route option which avoids the WHS altogether.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The important issues are the protection of the Mesolithic site at Blick Mead (mentioned earlier) and the archaeologically sensitive areas along the Avon Valley. The junction must take into account the setting of nearby monuments including the well known Ratfyn Barrow.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
There are significant archaeological monuments (a long barrow and numerous round barrows) near the roundabout that forms the current junction so any movement away from this spot would improve their setting. Both of the proposed A303/A360 junctions are located in potentially archaeologically sensitive areas including Bronze Age field systems which probably include evidence of settlements. These are areas that have not yet been examined in great detail so further exploratory work would be required. Further information is required on the nature and impact of these junctions.
The design and layout of the lighting at the junctions is very important as, especially for the southern route (D062), it could be visible from Stonehenge and would be on the axis of the midwinter sunset.

7. Do you have any other comments?

Q7:
The entire landscape within the World Heritage Site is internationally important and any action that is taken to solve the A303 traffic issues will be scrutinised right across the globe, not just now but for generations to come. It is therefore important that we do not do anything that we will regret in the future. This is the time for serious long term thinking rather than trying to solve a short term problem with a cheap solution. We have the opportunity to remove traffic from within the WHS so the Highways Agency should look again at a much longer tunnel or a southern route outside the WHS boundary.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
The documents that were required in order to put together a considered response were only available to download from the Highways Agency website. Some of these were hundreds of pages long and the print size on the screen far too small to be readable. This made it impossible for anyone without access to a computer and good quality printer to see all the background information. In the past we have been sent hard copies of the documentation, but this time we were told that this was not possible " …. because of the large number of pages involved". Considering the vast amount of data and the importance of this scheme, the consultation period was far too short. The public information events were just an opportunity to look at plans of the proposed scheme options, they were not opportunities to engage in detailed discussions. As an archaeological body with a significant interest in and proposals affecting the Stonehenge landscape we regret the lack of opportunity to engage in meaningful discussions about these proposals.

Cross Plain Surgery

Response ID ANON-BABJ-X65Y-B

Submitted to **A303 Stonehenge**
Submitted on **2017-02-18 11:18:00**

Introduction

Name

Name:
Dr Bill Grummitt

Postcode

Postcode:
SP4 8DH

Email

Email address:
Billgrum@live.com

Postal address

Address:
Geateways House
London road
Shrewton
Wilts
SP3 4DL

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Cross Plain Suregry

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
The need for a satisfactory solution has been increasingly pressing for several years. Village traffic increase, especially during peak periods, is adding considerably to local pollution, and to health risks as well as safety risks with often speeding traffic, and some anguish and stress for the local population, most of whom seem in despair that anything will ever happen.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:
Out of site is important for the heritage site despite some extra cost

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Both options have advantages and disadvantages. Local considerations may influence final decision but Southern route looks likely to be less disruptive during

construction, and I personally prefer the final outcome, though have no strong view.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Ok
Get on with it!

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
No strong views
Should be minimally disruptive to current landscape

7. Do you have any other comments?

Q7:
DO NOT ALLOW LOCAL OR NATIONAL POLITICS TO DERAIL THIS AGAIN

PLEASE, PLEASE, PLEASE GET ON WITH IT

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

Several of above

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
This looks to me like a decision already made and just needing to go through the process of 'consultation' to ensure it isn't not derailed yet again.
I hope this is true but do not yet trust this is true.

Cycling Opportunities Groups for Salisbury (COGS)

From: gill anlezark and jimmy walker <gillandjimmy@googlemail.com>
Sent: 01 March 2017 14:02
To: A303Stonehenge
Subject: Response to consultation from Cycling Opportunities Group for Salisbury (COGS)
Attachments: A303 Stonehenge to Berwick Down 2017.docx; STONEHENGE2009IMPORTANTCYCLEROUTES.pdf

Please find attached our response and a map prepared for the previous tunnel consultation (2009) showing important cycle routes. This should now also include the trackbed of the closed A344 that was still open to traffic in 2009, but still has no surface suitable for cycling in all weathers for all different types of bike.

Please do not hesitate to contact me if you would like to discuss anything in the response or at a later stage in the design process.

Regards

Gill Anlezark
Hon. Membership Secretary, COGS

Dr G M Anlezark
23 Anderson Road
Salisbury
SP1 3DX
01722 325608
www.cogsbike.org.uk

RESPONSE FROM COGS TO HIGHWAYS ENGLAND CONSULTATION ON A303 STONEHENGE TO BERWICK DOWN

Thank you for giving COGS the opportunity to comment on the proposals for the A303 Stonehenge to Berwick Down. COGS is a voluntary body representing more than 140 cyclists in and around Salisbury. We aim to improve facilities for cycling by working with Wiltshire Council and Sustrans, and are affiliated to Cycling UK.

For this response, we have consulted our colleagues from Hampshire Cycling and Cycling UK who were extensively involved in previous consultations for an A303 tunnel scheme, and the Stonehenge Visitors' Centre planning application. In view of these previous consultation and planning exercises, we are very disappointed that so little consideration is given in the exhibition and documents to non-motorised users (NMUs) and sustainable transport modes. We trust that this consultation will result in the design and implementation of world-class facilities for NMUs, bearing in mind that we are still waiting for the implementation of planning obligations agreed under the Visitors' Centre application.

Although there is little for us to comment on at present, this response outlines our concerns and highlights where facilities for NMUs should be designed into the scheme to extend benefits to many users and local residents.

The Highways England Cycling Strategy (2016) states (p1) that "our planned road improvements programme will provide integrated schemes which improve cycling facilities" and " cycling facilities which are safe, separate from traffic and that enable users of all abilities to cycle, encouraging cycling as a sustainable means of transport". The opportunity offered by improvements to the A303 must be taken and include cycling in the design from the outset. The Strategy further states that Partnership Working is a key guiding principle. We at COGS will be happy to assist in fulfilling the delivery of the cycling vision as a partner and stakeholder to "identify and support the delivery of cycling facilities" and look forward to working closely with you as the design process develops.

Transport Focus has recently summarised the priorities for Highways England's network for cyclists, pedestrians and equestrians (January 2017). The interests of these three groups of vulnerable road users largely coincide in that they need safe, direct and convenient routes along and across major roads. They agree that "they want provision incorporated for them at the outset of scheme design, rather than fighting for adaptations later". The network "can be a barrier to making journeys, severing links between communities, places of work and routes such as the National Cycle Network (NCN)".

Our main concerns

- **Access and surface between Stonehenge Road and Longbarrow roundabout.** The A303 provides an all-weather link for east-west journeys by bike, although there is no cycle-friendly infrastructure. There is no pavement or other pedestrian facility between Stonehenge Road and Winterbourne Stoke, thus pedestrians, and equestrians, are excluded from a direct route to Stonehenge from both directions.. When the tunnel is constructed, its use will be prohibited for all 3 groups, increasing severance between communities and places of work, for example, unless the facilities designed to replace the existing road allow use by all NMUs in all conditions. For cyclists, surface quality is important to give a safe comfortable ride to people on a wide range of different types of bike. There is no alternative at present except the A303 and **a bound surface to replace it is essential.**

- **Where the realigned A303 crosses essential cycling routes** At present the A303 causes considerable severance to cyclists, pedestrians and equestrians travelling across it on quiet local roads or off-road on bridleways and byways. These key routes are summarised on the accompanying map. The tunnel will mitigate effects on some of them but road junctions and realigned roads must assist NMUs where these routes are affected.

- **Where cyclists need to leave/rejoin the local road network at Longbarrow, Stonehenge Road and Countess roundabout** Both roundabouts are very poorly designed for cyclists. Although the underpass at Countess provides a safe crossing for pedestrians and cyclists it is sub standard in height and width, and needs to be considered when redesigning the roundabout. Longbarrow roundabout is not all cycle-friendly at present. Although this will be mitigated by the tunnel, NMUs will need to cross the A360 to access the existing A303 through Winterbourne Stoke. The precise position of the eastern portal is yet to be determined, but Stonehenge Road must remain as a tarmac surface and the junction with the Woodford Valley road be preserved.

Design Issues that need to be addressed

- **Surfaces** Preserve and maintain tarmac surfaces through Amesbury to Stonehenge Road and through Winterbourne Stoke, provide a bound surface across the WHS designed sensitively between the end of Stonehenge Road and Longbarrow roundabout
- **Cycle-proof all junctions and crossings** where vulnerable road users need to use local roads and rights of way
- **Ensure that severance is not increased** for local residents and non-motorised through travellers between Amesbury, Winterbourne Stoke and Shrewton

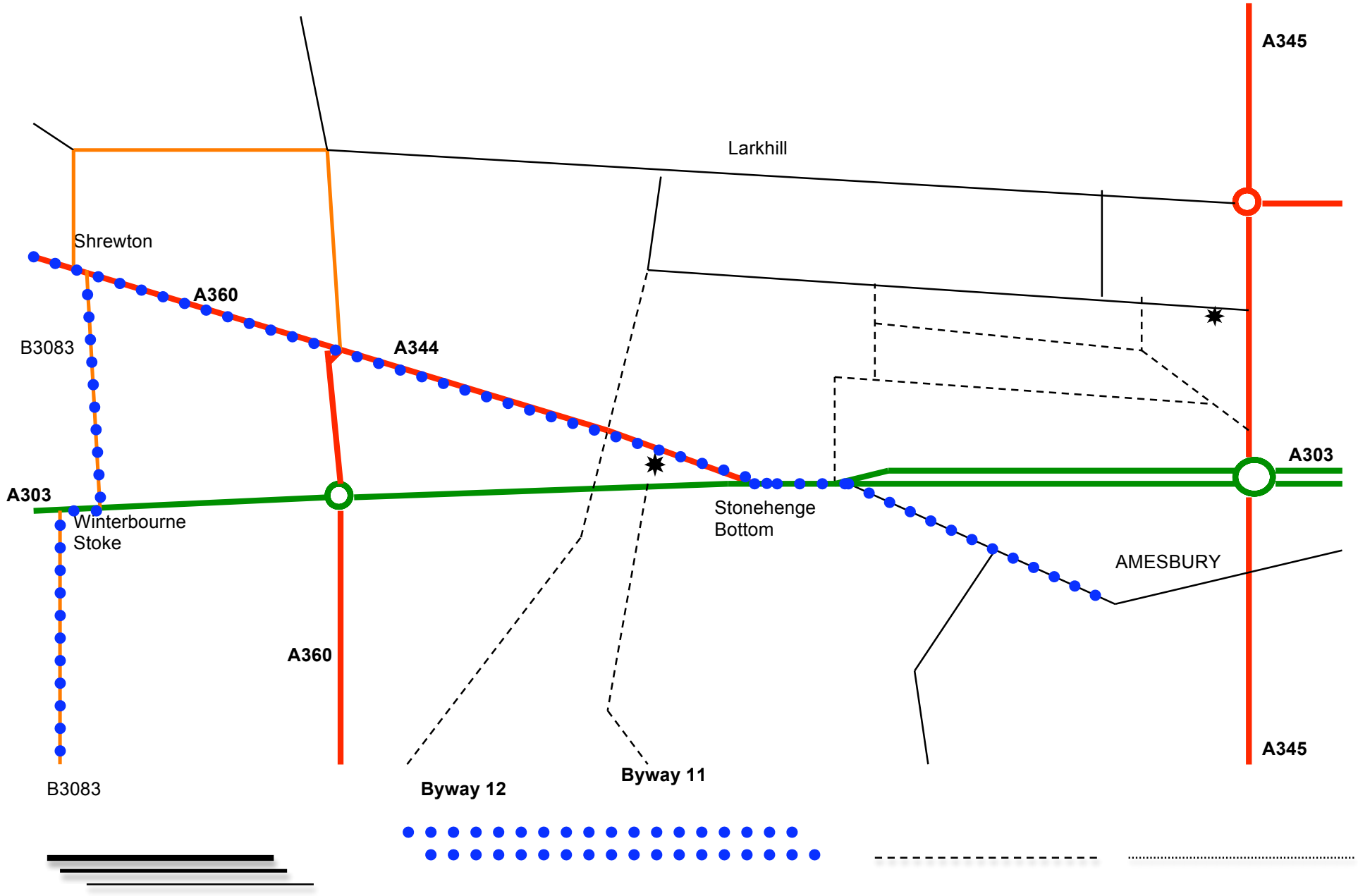
- **Improve links** to NCN45 via Amesbury and the Woodford Valley and to NCN24 via the Woodford Valley to Salisbury and Till Valley to Stapleford, improve byway 11 and 12 surfaces and ensure their continuity with new infrastructure to provide a comprehensive network of routes for NMUs
- **Signage** Provide signage to a high standard to aid NMUs to negotiate the network and encourage sustainable travel for local residents and visitors

Benefits

Although we are responding on behalf of cyclists, including the facilities outlined above in the A303 scheme will have much wider benefits. At present, sustainable travel is not encouraged. There is no direct connection between Amesbury and Shrewton via Stonehenge that is suitable in all weathers for NMUs (including vehicles for disabled users, people with prams, bikes that are unsuitable for off-road use). Likewise, most of these groups are excluded from direct travel between Amesbury and Winterbourne Stoke by the necessity to use the A303. The scheme must address these issues to benefit others than motorised users of the A303 wishing to travel east-west as quickly as possible.

Dr Gill Anlezark
February 2017

STONEHENGE 2009 VITALLY IMPORTANT CYCLE ROUTES



Devon and Cornwall Business Council

Response ID ANON-BABJ-X6ZJ-1

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 13:19:43**

Introduction

Name

Name:
Ben Rhodes

Postcode

Postcode:
PL6 8BX

Email

Email address:
ben.rhodes@dcbc.co.uk

Postal address

Address:
1 Davy Road, Plymouth, PL6 8BX

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Devon and Cornwall Business Council

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
This arterial route is vital to the economy of the SW and as such, we urgently require these and other improvements.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
We have no strong views surrounding the local delivery of the scheme.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
As above.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
DCBC would like to take part in future consultation events, which focus on the A303/A358/A30 scheme.

Downland Walking

Response ID ANON-BABJ-X653-5

Submitted to **A303 Stonehenge**
Submitted on **2017-02-17 22:19:32**

Introduction

Name

Name:
Cathie Barnett

Postcode

Postcode:
SP2 9PG

Email

Email address:
cab24holidays@gmail.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
DownLand Walking

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
It will make the area more visually appealing without the traffic and give a better idea of what the area may have looked like. It will also protect a very important historical, ancestral and religious site.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Will there still be padestrian access from Amesbury to Durrington along a footpath

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Will there still be access onto the A303 from Longbarrow junction

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

TV or radio

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Eleanor Scott Archaeology

Response ID ANON-BABJ-X6NS-X

Submitted to **A303 Stonehenge**
Submitted on **2017-02-28 09:28:07**

Introduction

Name

Name:
Dr Eleanor Scott

Postcode

Postcode:
Po1 5ba

Email

Email address:
el.scott@hotmail.co.uk

Postal address

Address:
54,Renny RD
Portsmouth
Po1 5ba

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Eleanor Scott Archaeology

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
You are still proposing to damage a landscape and sites of international significance

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Too close to valuable archaeology

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
Too close to the archaeology

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:
Neither

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
To avoid damaging the environment, and archaeology 'without parallel' on the planet

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

Same as above

7. Do you have any other comments?

Q7:
You can't do this without the tunnel being 6-7km long

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
It wasn't well flagged for people not on social media.

English Heritage Trust

From: Davies, Jennifer <Jennifer.Davies@english-heritage.org.uk>
Sent: 03 March 2017 11:24
To: A303Stonehenge
Cc: Alcorn, Andrew; Parody, Derek
Subject: English Heritage response to the A303 consultation
Attachments: EHT Consultation Response FINAL.pdf

Sensitivity: Confidential

Dear Sirs,

Please find attached the formal English Heritage Trust response to the A303 consultation.

Yours faithfully

Jennifer Davies | Acting General Manager | Stonehenge

English Heritage, Stonehenge Visitor Centre
Amesbury, Salisbury, Wiltshire, SP4 7DE
Direct Line: 01980 636601
Mobile: 07881 344738

www.english-heritage.org.uk
www.facebook.com/StonehengeEH
www.twitter.com/eh_stonehenge

ENGLISH HERITAGE

Step into England's story

English Heritage cares for over 400 historic monuments, buildings and places - from world famous prehistoric sites to grand medieval castles, from Roman forts on the edges of empire to cold war bunkers. Through these we bring the story of England to life for over 10 million visitors each year.

The English Heritage Trust is a charity, no. 1140351, and a company, no. 07447221, registered in England.

ENGLISH
HERITAGE

Step into England's story

Freepost A303 Stonehenge Consultation

2nd March 2017

Dear Sirs

A303 Stonehenge – Amesbury to Berwick Down
Response to Public Consultation

English Heritage cares for over 400 historic buildings, monuments and sites across the country. In our role as an independent charity, our purpose is to conserve these sites to the highest standards possible, in keeping with their status as part of England's national heritage.

The prehistoric stone circle of Stonehenge is the best known site within our care and as part of the wider World Heritage Site, it is a powerful witness to the once great communities of both the Neolithic and Bronze Age.

We have already seen the benefits of removing the old visitor facilities adjacent to the Stones and the grassing over of the A344. The proposed A303 road scheme has the potential to transform the Stonehenge World Heritage Site landscape. Provided it is well designed and located sensitively, this scheme could greatly enhance the Outstanding Universal Value of the World Heritage Site whilst simultaneously improving the setting of the Stones themselves, and people's experience of them, by the removal of the surface road.

In addition to our contribution to stakeholder working groups, please see below our response to the public consultation opened on 12th January 2017:

1. To what extent do you agree with our proposed option?

Agree

We strongly believe in the principle of a tunnel and that the proposals have the potential to deliver benefits for Stonehenge, if sited and designed in such a way that is sensitive to the World Heritage landscape, associated monuments and the experience of people visiting the site.

However, while the overall proposals are to be welcomed for the positive transformation which they could bring to the World Heritage Site, there are some aspects of what is currently presented in the consultation documents that require significant improvement to ensure protection of the Outstanding Universal Value of the World Heritage Site – for example we have particular concerns over the proposed position, alignment and design of the western tunnel portal.

ENGLISH
HERITAGE

The proposal for a twin-bored tunnel of at least 2.9km could unlock enormous benefits for Stonehenge and the wider World Heritage Site. It would allow the removal of much of the current, damaging surface A303 allowing the reunification of the large part of the World Heritage Site to the south of the existing road with the part to its north containing Stonehenge and the other currently accessible major ceremonial monuments. This would restore peace and tranquility to Stonehenge whilst opening up safe public access to the many monuments and extensive prehistoric landscape which lies to the south of the current A303.

We welcome the proposed location of the eastern portal that would allow for the reinstatement of the line of the Stonehenge Avenue, an ancient processional route to the stones – and a major feature of the Stonehenge landscape – already partially restored by the removal of the A344 road by English Heritage in 2013. This is the first time that a Government scheme to improve the A303 within the Stonehenge landscape has allowed the line of the Avenue to remain intact.

The proposed western tunnel portal location needs significant improvement, due to its proximity to and impact on the Normanton Down barrow group – one of the key groups of ceremonial and funerary monuments for which the World Heritage Site is designated. We seek Highways England's commitment to improving this aspect of the scheme.

2. To what extent do you agree with our proposed location of the eastern portal?

Agree

Highways England's proposals could deliver significant improvements for heritage in the eastern section of the route, where the proposals would allow the course of the Stonehenge Avenue – presently severed by the A303 - to be reunited. It has responded to the advice given by the UNESCO World Heritage Centre and their heritage advisers ICOMOS in their April 2016 report. The proposed scheme is a significant improvement on the previously approved scheme from 2004, which would have exacerbated the severance of the Avenue by the A303.

It is however critical that the portal is kept sufficiently clear of the Avenue to allow good meaningful public access and that the infrastructure is designed and located sensitively if this improvement is to be properly realised.

3. To what extent do you agree with our proposed location of the western portal?

Strongly disagree

ENGLISH
HERITAGE

The location of the tunnel's western portal is close to the Normanton Down barrow group and this is the element of the proposals that we are keen to see Highways England improve significantly.

It is absolutely essential that the western tunnel portal is designed and positioned sensitively, taking into account the importance of the Outstanding Universal Value of the World Heritage Site. We have particular concerns regarding the positioning of the portal and approach road in relation to the midwinter solstice alignment that is a very important aspect to many visitors to Stonehenge. The position of the portal is also known from evaluation work to compromise groups of monuments recently discovered.

4. Of the two possible routes for the Winterbourne Stoke bypass, which do you consider is the best route?

We consider option 1S to be the best route

Option 1N
The current positioning of the northern route to bypass Winterbourne Stoke indicates that groups of prehistoric monuments would be compromised by the road passing through them. This route would also compromise views from Stonehenge and pass through areas of great natural significance. The northern route would therefore have most impact on historic assets within the World Heritage site and therefore affect the Outstanding Universal Value.

Option 1S
The current positioning of the southern route to bypass Winterbourne Stoke is unlikely to give rise to any additional material impacts on scheduled monuments and other assets within the World Heritage Site that contribute to the Outstanding Universal Value.

English Heritage would therefore strongly support the **southern option** that would have less impact on significance and should also potentially be beneficial to coach movements to the Stonehenge Visitor Centre.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

Over 1.3 million visitors per year visit the Stonehenge Visitor Centre by road with peak numbers seen during the summer months when roads towards the South West of England are already busy.

It is essential that traffic is able to flow freely from East to West on dual lanes, without having to stop and give way. Entry and exit slip roads must be long enough at the points where they join the A roads to allow easy merging of traffic, especially of large vehicles.

ENGLISH
HERITAGE

Clear signage for westbound traffic must show that the Stonehenge Visitor Centre is reached by staying on the A303 to the next junction west (currently Longbarrow). Clear signage should also announce the beginning of the Stonehenge & Avebury World Heritage Site.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

The majority of the visitors to the Stonehenge Visitor Centre approach from London and the East and need to complete their journey on the A360. We need to be sure that they can access the Visitor Centre safely and without delay.

The junction must therefore be designed to accommodate a very high volume of traffic, and in particular large coaches, moving from the west bound A303 to the north bound A360 and returning in the opposite direction. A simple crossroads will not be sufficient.

7. Do you have any further comments?

We require further information from Highways England regarding the treatment of the existing A303 if the proposed scheme goes ahead. We look forward to the roadbed being restored to grassland to re-connect Stonehenge with its wider landscape.

We have concerns about the effect of a very lengthy construction phase on the enjoyment of visitors to Stonehenge and the World Heritage Site and their appreciation of the assets of Outstanding Universal Value.

Our ability to generate revenue for the charity and continue to contribute so significantly to the local economy may be affected.

We would urge Highways England to avoid any delays to the journeys of those accessing our Visitor Centre during the construction phase. Also to be mindful of the noise, dust and visual impact of the works for visitors making what could be a once-in-a-lifetime trip to Stonehenge and to provide appropriate mitigation.

Yours faithfully

Kate Mavor

Kate Mavor
Chief Executive

Exmoor Tourist Association

Response ID ANON-BABJ-XGCK-V

Submitted to **A303 Stonehenge**
Submitted on **2017-02-06 16:53:25**

Introduction

Name

Name:
Antony Brunt FCA ACCA

Postcode

Postcode:
TA24 6SF

Email

Email address:
AntonyBrunt@yarnmarkethotel.co.uk

Postal address

Address:
Yarn Market Hotel
High Street
Dunster TA24 6SF

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Exmoor Tourist Association

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

7. Do you have any other comments?

Q7:
I strongly disagree with the tunnel. It is a huge cost to the taxpayer and could easily be replaced by a dual carriageway over the line of the existing road.
Your point of access to sites on both sides of the A303 is noted but this could simply be achieved by a pedestrian / agricultural vehicle tunnel under the A303 at a fraction of the cost.
I am in total agreement with the rest of the scheme.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Freight Transport Association

Response ID ANON-BABJ-X6JY-Z

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 12:36:42**

Introduction

Name

Name:
Ian Gallagher

Postcode

Postcode:
TN4 9UZ

Email

Email address:
igallagher@fta.co.uk

Postal address

Address:
Freight Transport Association, Hermes House, St. John Road, Tunbridge Wells. TN4 9UZ

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Freight Transport Association

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
The Freight Transport Association (FTA) is one of the UK's largest trade associations and represents over 15,000 members relying on or providing the transport of freight both domestically and internationally, to or from the UK. FTA members operate over 200,000 commercial goods vehicles on the roads in the UK; which is more than half of the UK fleet of goods vehicles.

The freight industry is heavily reliant on the transport infrastructure that it uses, performing to a consistently high standard. Distribution networks, delivery routes and schedules have been designed to achieve availability of sufficient goods at the point of consumption by business or consumers without the need for extensive and expensive stock holding.

Freight transport operators as road users; expect reliable journeys in return for the duties paid in taxation and other charges that are made for use of the UK's road space. Without reliable journeys industry, cannot count on getting their goods to the market place and inevitably this does influence UK efficiency and the cost of goods to the customers.

The southern surface route south of the World Heritage Site (WHS) (Option 2 Route F) remains the Associations preferred option. A surface route would provide for all vehicle types and goods carried. It would remove the potential for serious injuries and deaths through vehicle fires in a contained space and maximize the benefits to the WHS through the removal of the trunk road and associated traffic delays during the proposed tunnel construction. It is important therefore that the proposed tunnel provides a safe and expeditious route which is available for all road users.

Delays in journeys are a significant cost to the freight industry. FTA figures find that congestion cost operators an estimated £1 per minute per HGV in running costs therefore whilst delays during construction are inevitable these must be minimised. the Association would welcome confirmation that all goods carry vehicles including those carrying dangerous goods, will not be restricted from using the tunnel. In addition, Highways England must confirm at the earliest opportunity its intentions regarding any tolling or charging schemes.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
The Freight Transport Association supports the consultation view that the Eastern and Western entrances to the tunnel remain out of site of the stones, however given the limited information available the Association will reserve judgement until further information becomes available.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
The Freight Transport Association supports the consultation view that the Eastern and Western entrances to the tunnel remain out of site of the stones however given the limited information available the Association will reserve judgement until further information becomes available.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
The Association fully supports the proposal to bypass Winterbourne Stoke, and is in favour of the option that produces the least impact on the environment, community and the WHS.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The Association supports the proposal to develop the junction at the A303/A345 Countess roundabout. The plan for a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road, with slip roads accommodating traffic movements between the two roads will remove the current pinch point.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The Association supports the consultation proposal to bypass Winterbourne Stoke and develop a new junction that separates the traffic going east-west along the A303 from traffic going north-south.

7. Do you have any other comments?

Q7:
Highways England has for some years now been providing the travelling public with information about the performance of its network in making information freely available at the point of use. The value of the information must not be underestimated and in the freight industry there is now awareness that informed journey planning does make a difference to efficiency of road freight fleets and therefore has a direct effect on the UK economy. To allow road users to plan, advanced warnings of restrictions and road closures should be communicated in advance of work.

Given the shortage of parking provisions for commercial vehicles across the country designed where a commercial vehicle driver is able to take legal breaks from driving, the Association feels that these proposals provide HE with a good opportunity to incorporate parking provisions into its plans,

The Association will work closely with Wiltshire County Council ahead of the commencement of this development. However, FTA would welcome involvement in any road user group to discuss traffic management and any proposed HGV weight restrictions planned to mitigate an increase in traffic on other roads.

Delivering an expeditious East - West route into South West England is overdue. This is welcomed by business and road users alike, However every care must be taken to ensure that the impact on the World Heritage Site remains minimal. The Stonehenge area is unique and needs to be protected for the benefit of future generations. it is imperative therefore that any final decision takes fill account of this unique environmental whilst also considering the economic needs of the Region.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Friends of Wiltshire's Rights-of-way (FoWRoW)

Response ID ANON-BABJ-X37C-M

Submitted to **A303 Stonehenge**
Submitted on **2017-03-04 21:15:47**

Introduction

Name

Name:
Fiona Shaw

Postcode

Postcode:
SN10 3UE

Email

Email address:
fkjshaw@gmail.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Friends of Wiltshire's Rights of Way (FoWRoW)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
We think this proposal will improve road safety for all users of the A303 and those who use the rights of way currently bisected by the road. We support making the A303 a RoW, although we object to the extinguishing of motor vehicle rights on the whole length - instead we request that motor vehicle rights are retained for the section between Amesbury byways 11 and 12, as recommended by the planning inspector during the 2004 public inquiry - a recommendation later approved by the secretary of state.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Don’t know

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
We have no preference either way and hope for a solution that respects the wishes of local communities is chosen.

We think it important that all public rights of way affected by the proposed bypass are retained as continuous routes for all type of user, either by the construction of tunnels and refuge areas, or by the creation of new, dedicated routes that link together all affected rights of way.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
We would request the wishes of local residents are taken into account, and RoW are maintained and where possible improved.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
We would request the wishes of local residents are taken into account, and RoW are maintained and where possible improved.

7. Do you have any other comments?

Q7:
Please dedicate the short section of (current) A303 between Amesbury byways 11 and 12 as a byway open to all traffic (or retain it as a public road) so that recreational motor vehicle users may continue to use this historic route without having to seek an alternative route on historically dangerous roads.

The proposals will make the route particularly attractive to horse riders and carriage drivers, so we request that you take particular care to their needs. We think that tunnels are the safest engineering solution for equine users.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Thank you for taking the time to consider our concerns.

GLASS (Green Lane Association)

Response ID ANON-BABJ-XGNE-1

Submitted to **A303 Stonehenge**
Submitted on **2017-02-08 21:07:10**

Introduction

Name

Name:
Dale Wyatt

Postcode

Postcode:
SN77PE

Email

Email address:
wiltshire.rep@glass-uk.org

Postal address

Address:
Chapel House
Chapel Lane
Fernham
Faringdon
Oxfordshire
SN7 7PE

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
GLASS (Green Lane Association)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
GLASS thinks improvements to the A303 are definitely required and a tunnel is by far the best solution. However our worry is that the rights of way on the ground above have not been considered. They are a major benefit recreationally to members of our organisation, and in particular, if the tunnel project goes ahead, then BOAT 12 is likely to become a dead end as it currently joins the A303 near the stones.

We would like to ensure the Amesbury BOAT 11 is linked to the nearby BOAT to the west (Amesbury BOAT 12) and that access remains to recreational four wheel drive vehicles.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
Either route will affect rights of way and local farms. Possible the southern route has slightly more merit.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
This part has no real significance to our organisation, but a flyover makes a lot of sense here. Any rights of way that cross the road must be considered as connectivity is key.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Again, keep the traffic flowing. A roundabout will become a bottleneck.

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:
We've been trying to protect our right to continue driving the Byways around Stonehenge and have been keeping a close eye on proceedings for some years.

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Only that we'd like our consideration to be seriously thought about and that users aren't short changed when it comes to connectivity of rights of way, along with maintaining the current status and free all year round use.

Go South Coast

Response ID ANON-BABJ-XGTR-M

Submitted to **A303 Stonehenge**
Submitted on **2017-02-06 12:47:14**

Introduction

Name

Name:
Paul Walker

Postcode

Postcode:
BH15 2PR

Email

Email address:
paul.walker@gosouthcoast.co.uk

Postal address

Address:
Strategic Development Manager
Go South Coast
Towngate House
2-8 Parkstone Road
Poole BH15 2PR

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Go South Coast (Bus Operator of Salisbury Reds & Stonehenge Tour et al)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
We tend to agree with the need for reliable journey times not only along the HE A303 Trunk network but also the need to ensure journey time reliability along the local north-south route network. In particular we agree that more predictable journey times will reduce the inconvenience and cost of unexpected delays. Moreover we acknowledge the need of the scheme to boost tourism - not only to the far south west but also the need for the scheme to increase tourism in south Wiltshire. We note Visit Englands' survey which shows that Stonehenge is the fourth most visited tourist attraction outside of London and the increasing number of visitors that also visit Salisbury Cathedral mean there is a need to ensure connectivity between the site and the city further demonstrating the need for enhanced north-south connectivity being afforded through the scheme.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
We currently convey over 90,000 visitors to the site each year and so the ability for a reliable journey from Salisbury to Stonehenge that can be facilitated by bus needs to be incorporated into the scheme. We are unsure from the information provided how our buses would access the site and so would welcome an early discussion with the HE to ascertain the routing of buses to the site as soon as possible so we can take a view whether to object or support the proposal.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
We currently convey over 90,000 visitors to the site each year and so the ability for a reliable journey from Salisbury to Stonehenge that can be facilitated by bus

needs to be incorporated into the scheme. We are unsure from the information provided how our buses would access the site and so would welcome an early discussion with the HE to ascertain the routing of buses to the site as soon as possible so we can take a view whether to object or support the proposal.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
We consider that there a southern routing will better meet the needs of local traffic as identified in the route corridor assessment. We consider this could also provide better linkage for buses using the A360 route utilising the Stonehenge tour to the site.

We are unsure of the statement in table 2 of the consultation that "a southern bypass would not need to cross the existing A303 and would be easier to build without effecting east-west traffic flows". We would like clarification on how our buses would access the site and how the junction would facilitate buses here - or whether a junction is not being proposed.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
We support the proposal to grade separate traffic at this junction travelling East-West to North-South to improve overall journey times. We are especially keen that our service Aciv8 which use the junction can maintain journey times reliability during the works. This also effects our services X4 and X5 which pass close to the junction and provide crucial inter-urban journeys to Swindon, Andover and Larkhill. We would like an understanding of the likely impact on journey times on these services modelled through the project so we can understand the need for additional vehicles during certain elements of the work and additional costs that may be incurred though doing this. In addition we would like to see what initiatives and incentives HE will implement to encourage behaviour change and to reduce the overall burden on the network over this period.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
We currently convey over 90,000 visitors to the site each year through this junction and so the ability for a reliable journey from Salisbury to Stonehenge that can be facilitated by bus needs to be incorporated into the scheme.

We would like an understanding of the likely impact on journey times on these services modelled through the project so we can understand the need for additional vehicles during certain elements of the work and additional costs that may be incurred though doing this. In addition we would like to see what initiatives and incentives HE will implement to encourage behaviour change and to reduce the overall burden on the network over this period.

7. Do you have any other comments?

Q7:
Go South Coast operates across the south coast with its core brands based in Poole, Salisbury, Eastleigh, Swindon and the Isle of Wight with smaller depots at Bournemouth, Swanage, Ringwood and Totton. With a fleet of 836 vehicles across all brands, every year we help our customers make over 47 million journeys.

Bus services are provided primarily through the route networks of more bus, Salisbury Reds, Bluestar & Thamesdown serving the Dorset, Wiltshire Southampton & Swindon areas and Southern Vectis on the Isle of Wight.

These networks are in the majority commercially operated but there is significant involvement in the tendered local bus market, together with school and college movements. The prestigious contracts to operate bus services for the University of Southampton - Unilink & Bournemouth University - UNIBUS are currently held, together with contracts for other higher education providers such as Brockenhurst College.

We aim to provide customers with the best experience possible when they travel with us. In order to achieve this we are constantly investing in our fleet and staying ahead of competitors with innovative onboard technology from free wifi to USB charging points and smart ticketing.

Go South Coast welcomes the opportunity to comment of the Consultation and would like to discuss the matters raised with Highways England at the earliest opportunity.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Heart of the South West Local Enterprise Partnership (LEP)

From: Janet Powell <janet.powell@heartofswlep.co.uk>
Sent: 03 March 2017 16:47
To: A303Stonehenge
Subject: HotSW LEP Response to A303 Consultation
Attachments: HotSW LEP Response to A303 Stonehenge Consultation.pdf

Please find attached.

Kind regards
Janet

Janet Powell
Executive Assistant
M: 07740 110129
E: Janet.Powell@heartofswlep.co.uk
W: www.heartofswlep.co.uk
Twitter: @HeartofSWLEP

heart of the south west
local enterprise partnership

Creating opportunities in Devon, Plymouth, Somerset and Torbay

heart of the south west
local enterprise partnership

Email to A303 consultation or send to Freepost STONEHENGE CONSULTATION

2 March 2017

A303 Amesbury to Berwick Down Public Consultation

The Heart of the South West Local Enterprise Partnership welcomes the opportunity to respond to this consultation on upgrading the Stonehenge section of the A303.

Principle of the Proposal
The Local Enterprise Partnership strongly supports the objective outlined in the consultation document, to provide a free flowing dual carriageway to replace the single carriageway section past Stonehenge and through Winterbourne Stoke.

As members of the partnership of Local Enterprise Partnerships and Local Authorities which includes Dorset and Swindon and Wiltshire LEPs, and the Councils of Devon, Somerset, Dorset and Wiltshire, we are pleased that the Government is following through on its commitments within the Road Investment Strategy. These include upgrading all remaining sections of the A303 between the M3 and the A358 to dual carriageway standard, together with creating a dual carriageway link from M5 at Taunton to the A303, as part of a long-term commitment to creating a new Expressway to the South West. The Government has also committed to set aside funding for smaller-scale improvements to the A303/A30 section between Southfields and Honiton to improve safety and journey quality for road users.

These investments are vitally important to the UK and South West economy as demonstrated by our independent economic assessment, validated by DfT, which demonstrates that improving the whole A303/A30/A358 corridor would:

- create 21,400 jobs and deliver a £41.6bn boost to the economy
- deliver £21.2bn of taxation, welfare savings, disposable income and tourism benefits;
- create £1.9bn in transport benefits from reduced journey times and greater resilience;
- save 1807 fatal or serious casualties;
- reduce carbon emissions by 9%

In our view it is vital that the Government delivers these improvements on the ground at the earliest opportunity, and that the detailed design of the schemes is such that the full potential of the improvements in delivering economic growth and productivity benefits for the region and the UK can be realised.

The partnership's desire is for the improvement scheme to maximise both the transport economic benefits and safety benefits by gaining the greatest possible reduction in journey times and collisions; providing free-flow junctions at strategic points of access to other key road links; and ensuring there are good strategic connections with economic growth centres to maximise the wider economic benefits of the scheme for business productivity.

The economic assessment produced by the Steering Group demonstrates that the full economic benefit of the improvements can only be achieved by providing an 'end-to-end' dual carriageway standard route linking the M3 with the M5 and urges the Government to provide sufficient resource within the road investment strategy to deliver this outcome.

Mobile: **07817 497135** email: chris.garcia@heartofswlep.co.uk

The Amesbury to Berwick Down scheme, along with the other schemes currently being progressed at Sparkford- Ilchester and Ilminster to M5 at Taunton, are vital first steps towards achieving a whole route improvement, and as such are strongly supported.

Detailed Route Options

The Heart of the South West Local Enterprise Partnership does not consider it appropriate for it to express a view on the detail questions of whether the route should pass to the north or south of Winterbourne Stoke, or the locations of the tunnel portals, as these are essentially matters for the local communities and local elected authorities.

A303/A345 Countess Junction

We support a. free flow (grade separated) junction between the A303 and the A345 to maximise the efficiency of the connection and the associated economic benefits of the A303 improvements. It would seem inconsistent with the Expressway principle for the A303 to retain an at grade junction here.

A303/A360 Longbarrow junction

We support a free flow (grade separated) junction between the A303 and the A360 to maximise the efficiency of the connection and the associated economic benefits of the A303 improvements.

Yours sincerely,

Chris Garcia
Chief Executive

Mobile: **07817 497135** email: chris.garcia@heartofswlep.co.uk

Home Front

Response ID ANON-BABJ-X8GE-B

Submitted to **A303 Stonehenge**
Submitted on **2017-01-12 10:51:36**

Introduction

Name

Name:
John Slater

Postcode

Postcode:
SP3 5EU

Email

Email address:
enquiries@home-front.co.uk

Postal address

Address:
Unit 4 Oakley Business Park
Dinton
Salisbury
SP3 5EU

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Home Front

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
Our business is based west of Stonehenge but 95% of our customers are east of there, requiring our vehicles to regularly pass this blighted spot. Especially in summer (our peak season) this adds unnecessary delays and costs. We believe we provide useful employment in this area and it would be a shame if the traffic problems (which have grown noticeably worse in the last 2 years) would oblige us to relocate eastwards into Hampshire.
Knowing residents of the surrounding villages whose lives are blighted on the Friday/Sunday holiday commuters I'm sure this can only be good for communities. Its just a shame it wasn't done 10 years ago.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Honouring the Ancient Dead (HAD)

Response ID ANON-BABJ-X69Y-F

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 12:09:50**

Introduction

Name

Name:
Christine Cleere

Postcode

Postcode:
SN25 4WP

Email

Email address:
christine.cleere@honour.org.uk

Postal address

Address:
25 Sawyer Road
Abbey Meads
Swindon
SN25 4WP

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Honouring the Ancient Dead (HAD)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
HAD strongly disagrees with the proposed option. HAD has approached this response by focusing on the following priorities:

Avoid or minimise any damage to any known or possible sites where physical evidence of ancestors may be found
Avoid or minimise any damage to known or potential sites where evidence of ancestors is less likely
Avoid or minimise physical impact or visual intrusion on any known or potential alignments within the broader WHS landscape noting in particular the alignments from Stonehenge itself

The current proposed option is one where there will be vast earthworks wholly within the WHS; the construction of a bored tunnel with large entry portals at both the east and western entrance will cause massive destruction to the precious archaeology of the area and will inevitably result in the disturbance of the physical evidence of ancestors (more commonly termed 'ancestral remains'). It will cause irreversible damage to the world heritage site and entirely unnecessary disturbance to ancestral burial areas. In the view of HAD this is unacceptable.

Specific objections to the plans are laid out in the questions below, but include the potential risk to the Mesolithic Blick Mead site, the proximity of the eastern portal to the Avenue and the nearby Kings Barrows, the alignment of the western portal with the midwinter sunset, as well as the significant risk of disturbance and destruction of evidence of ancestors in surrounding burials and throughout the length of the proposed works.

The only option that minimises these criteria is the southerly route as proposed in Option 2 (Corridor F). It is cheaper to construct, less destructive, wholly avoids the WHS and meets all the criteria of the project as set out in the Highways England booklet "A303 Stonehenge - Amesbury to Berwick Down - The case for the scheme" .

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
The eastern portal appears to have been designed to minimise damage to any extant and known archaeology and will have little or no visual impact from Stonehenge. However, it will be very close to the Avenue (not withstanding that it allows the Avenue to be 'reunited') and a need for a detailed archaeological survey seems to be needed to be certain damage is minimised. Given the scale of the work in constructing the portal and the proximity of the Kings Barrows, HAD believes there is a significant risk that evidence of ancestors will be found. Given that risk HAD cannot support the current plans for the location of the eastern portal, and believe it needs to be moved further eastward and outside of the WHS.

There must be a concern that lighting could be installed at this site at a later date. If (and this would be against the wishes of HAD) the eastern portal is constructed in its currently planned location there has to be a formal written legally binding guarantee that lighting will not be installed at some later date.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
If the southern Winterbourne Stoke bypass option is chosen the western portal has significant risk of damage to evidence of our ancestors given its proximity to known burial sites, with the planned route immediately adjacent the western portal going immediately beneath barrow burials. As stated previously, this will cause irreversible damage to the world heritage site and entirely unnecessary disturbance to ancestral burial areas.

The western portal as proposed is in direct alignment with the midwinter sunset when viewed from Stonehenge. The realigned A303 will therefore approach the western portal in direct alignment with the midwinter sunset, and as the road will be at a higher elevation than the portal it will be clearly visible from Stonehenge itself, creating a stream of traffic headlights moving across the horizon and disrupting the setting sun. Given the significance of alignments to those who constructed this landscape, this is totally unacceptable and must be revised. As with the eastern portal the possibility of additional lighting being added at a later date cannot be discounted.

The HAD position is that if a tunnel is constructed any western portal must be away from the current proposed alignment and outside the WHS.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
By indicating we have no preference to either the northern bypass or the southern bypass we are not indicating that HAD is ambivalent to the proposals, but that neither of the options given are acceptable.

HAD believes that the northern route for the Winterbourne Stoke bypass will have an impact on the environment and on local burial sites as well as Roman and post-Roman sites. However, the southern choice will result in a major impact on Stonehenge from the siting of the A303/A360 junction - see question 6 below. HAD have therefore come to the conclusion we cannot support either of the options given in this consultation.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The proximity of the Mesolithic site Blick Mead to the immediate south of this proposed work gives cause for concern. This site is of huge significance and there is the possibility of damage to the site, particularly from changes in the water table during and after completion any construction work, which may result in damage to waterlogged deposits along this part of the River Avon. Some archaeologists have suggested there is likely to be evidence of ancestors in and around the area of the proposed changes and these must be taken in to consideration. Moving the current alignment of the A303 slightly further north would mitigate some of the effect of this work on Blick Mead, but would involve the demolition of some properties

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The location of the A303-A360 junction is dependent on whether the northern or southern option for the Winterbourne Stoke bypass is chosen. If the southern bypass option is chosen this junction will lie in alignment with the midwinter sunset when viewed from Stonehenge; there is significant risk of light pollution from traffic heading in an easterly direction and from any lighting incorporated in the design of this junction. It appears that the location of this junction will be on the current horizon line of Stonehenge and therefore any such pollution will be highly visible from that location. Therefore if, against the recommendation of HAD, the current plans go ahead the proposed location of the A303/A360 junction needs to be moved.

7. Do you have any other comments?

Q7:
The ancestors are part of the Stonehenge landscape; the land and the ancestors cannot be separated here. As an initiative we believe in respect for our ancestors and the evidence they have left behind; therefore if the project does go ahead, when ancestors are found and exhumed, all interested parties must be informed, including HAD. This includes not just the archaeological teams, but others for whom these places are crucially sacred. There must be opportunity for ritual to honour those who have been disturbed.

HAD takes the position that no ancestors should be unnecessarily exhumed but that where it takes place exhumation licences must be readily available for public scrutiny. HAD will expect reburial, even if it may be after a clearly defined and limited period of scientific study of the bones or ashes.

Throughout this document HAD has shown that it is not acceptable to build a tunnel and associated portals wholly within the World Heritage Site. The site of Stonehenge and the surrounding environment is a unique, precious and fragile area rich in the evidence of our ancestors. As recent discoveries have shown,

there is nowhere within the WHS that can be considered devoid of ancestral activity and influence.

In the view of HAD only the southerly route wholly outside the WHS can mitigate the problems and destruction the current proposal presents. The potential damage to Blick Mead in the east at the Countess Roundabout, the physical damage that will be inevitable at both the eastern and western portals, the light pollution that will be caused by both traffic and street lighting - either potential at both portals, or actual at the A303/A360 junction - shows that the currently proposed route is unacceptable. As we have stated before in this document, the proposals as they stand will do irreversible damage to the world heritage site and entirely unnecessary disturbance to ancestral burial areas.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:
All of the above except letter, email and local authority (unable to tick more than one box)

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Inside Out Art Group

Response ID ANON-BABJ-X358-7

Submitted to **A303 Stonehenge**
Submitted on **2017-03-04 08:18:20**

Introduction

Name

Name:
Diana Baur

Postcode

Postcode:
Ll20 7LF

Email

Email address:
dianabaur@hotmail.com

Postal address

Address:
Glandwr
Llanarmon DC

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Inside Out Art Group

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
This is an appalling option.

It will desecrate the world heritage status for this amazing monument.

We are stewards of the present and the past for the future.

We are not here to obliterate our past, and the natural world. We are here to make decisions that will preserve and enhance life on this planet for future generations. (There is no planet B!!!!)

Our priorities are wrong.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Ideally there should be NO tunnel at all, but if there has to be, it has to start and end much further away from the Heritage site.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
Ideally there should be NO tunnel at all, but if there has to be, it has to start and end much further away from the Heritage site.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
see 2 and 3 above

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The aims of this entire project is wrong. The consultation time is far too short.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The aims of this entire project is wrong. The consultation time is far too short.

7. Do you have any other comments?

Q7:
The aims of this entire project is wrong. The consultation time is far too short.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
With ever increasing traffic THE TIME IS NOW for more imaginative ways of reducing the use of cars, or at some point very soon traffic will be queuing up to visit Britain's last tree.

International Council on Monuments and Sites (ICOMOS) UK

From: Susan Denyer <SusanDenyer@icomos-uk.org>
Sent: 04 March 2017 23:03
To: A303Stonehenge
Subject: A303 Stonehenge Consultation
Attachments: STONEHENGE ICOMOS-UK Response to HA Tunnel Consultation FINAL 4.3.17.pdf

Importance: High

To: Highways England

Please find attached a formal response from ICOMOS-UK to the Highways England Consultation on the A303 Stonehenge.

I would be grateful for a confirmation that this has been received.

Regards

Susan Denyer
Secretary, ICOMOS-UK
International Council on Monuments and Sites, UK
70 Cowcross Street
London EC1M 6EJ
+44 (0)20 7566 0031
www.icomos-uk.org

icomos uk
international council on monuments & sites

STONEHENGE, AVEBURY AND ASSOCIATED SITES WORLD HERITAGE SITE

ICOMOS-UK RESPONSE

TO HIGHWAYS ENGLAND PUBLIC CONSULTATION

ON PROPOSED A303 2.9KM TUNNEL SCHEME

[Sent by email to A303Stonehenge@highwaysengland.co.uk on 4th March 2017]

1. OVERALL SUMMARY:

On the basis of evidence set out below, ICOMOS-UK firmly objects to the current option for a 2.9km tunnel for the substantial negative and irreversible impact if would have on the attributes of Outstanding Universal Value (OUV) of the World Heritage site (WHS) of Stonehenge, Avebury and Associated sites.

To suggest that this damage can be mitigated by benefits brought by the tunnel to the centre of the WHS, is to fundamentally misunderstand the commitments made to sustain OUV at the time of inscription of the property on the World Heritage List.

Although we approve in principle with the idea of a tunnel for the A303, this is only if:

- All options for constructing a bypass located outside the WHS have been adequately considered via a robust and consistent methodology, and an informed consultation process;
- The tunnel is long enough to ensure that its tunnel portals, associated approach roads and cuttings do not impact in any way on the WHS or its setting;
- That construction impacts arising from a tunnel solution do not have a permanent adverse impact on the attributes of Outstanding Universal Value (OUV);
- All necessary Heritage Impact Assessments (HIAs) have been undertaken independently undertaken on the basis of a clear understanding of the attributes of OUV.

ICOMOS-UK does not consider that these parameters have been satisfied, as set out in more details below, and thus we cannot support the 2.9km tunnel option, either with a corresponding by-pass to the north, or with one to the south, of Winterbourne Stoke, as currently proposed in the public consultation document.

The reasons provided for excluding the southern route F010 are not substantial, and inexplicably the lack of harm to the WHS has not been given adequate weighting. Given that this option has no adverse impact on the WHS and can be built for substantially less money than the tunnel, we consider that the decision to exclude if from consultation must be re-considered. Subject to further refinements, this surface route option provides the opportunity to improve the A303 and to safeguard the whole of the WHS and its setting which must be the twin aims of this project.

ICOMOS-UK strongly suggests that further consultations be held that explore options for a longer tunnel as well as comparative routes to the south of the WHS, with an equal and consistent methodology and scoring being applied for all route options, and one that recognises that WHS status is at least equal to that of an AONB, and arguably of much greater significance.

During the pre-consultation options assessment process, we consider that the potential impact on the OUV of the WHS should have been given the highest priority, in terms of determining appropriate parameters for assessing impact on OUV, and this in our view does not appear to have been the case.

ICOMOS-UK understands the financial constraints that are in place, and the need to resolve ongoing difficulties with the road network, but does not consider that such constraints can be a justification for compromising a full assessment of potential adverse impact of various options on the OUV of the WHS in advance of decisions being taken, or indeed for inflicting considerable irreversible harm on the WHS which we consider that the proposed tunnel option would do.

2. STRUCTURE OF RESPONSE

Below are set out more detailed comments on the

- *Overall consultation process*
- *Assessment of options*
    - *Lack of adequate acknowledgment of the implications of WH status*
    - *Benefits to parts of a WHS cannot outweigh irreversible negative impacts on OUV in other parts of the site*
    - *Lack of clarity in distinguishing between the main henge monument and the Stonehenge part of the WHS*
    - *Inconsistent parameters used for measuring impact*
    - *Lack of HIAs*
    - *Length of tunnel appears to be based on cost rather than cultural heritage considerations*

- *Lack of adequate detail to allow a full analysis of options*
- *Lack of compliance with NPPF*

- *Conclusion*

NOTE:

ICOMOS-UK understands that the two variations of the single tunnel route currently being consulted on are referred to by Highway's England under the following designations:

- *Highways England Route D061 (tunnel and by-bass to the north Winterbourne Stoke) and*
- *Highways England Route D062 (tunnel and by-pass to the south Winterbourne Stoke)*
- *Highways England - Route F010 (a 21.5km surface dual carriage way that by-passed the World Heritage site to the south) was a 3rd option that we understand performed well but that was excluded from the current consultation.*

For clarity we will refer to these routes by their Highway's England designation.

3. OVERALL CONSULTATION PROCESS

ICOMOS-UK is concerned at the way the consultation process for the proposed A303 has been organised. Following the report of the joint UNESCO World Heritage Centre/ICOMOS Advisory mission carried out between 27th and 30th October 2015, we had expected a structured process that fully evaluated different tunnel and other options in relation to the OUV of the WHS, and with the options appraisal involving key stakeholders, In the event, one tunnel option has been put out for consultation, with two sub-options for either a northern or southern by-pass of Winterbourne Stoke, D061 or D062 respectively. This limited variation of two near identical options has been presented:

- Without any accompanying HIAs being carried out in line with ICOMOS Guidelines on Cultural Heritage Impact Assessments[1];
- Without indications being set out as to how the proposed tunnel interacts with or impacts on the attributes of OUV;
- With relatively few details being provided of other options that have been discarded; and

[1] ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011, see: https://www.icomos.org/world_heritage/HIA_20110201.pdf

- With an apparent pre-set length for the tunnel.

Up until now, it is disappointing to note that there appears to have been no dialogue or consultation by the Government with key cultural heritage stakeholders, apart from Historic England and the National Trust.

As the problems of the Stonehenge road have been on the agenda for at least two decades, amongst these stakeholders there is considerable technical knowledge and understanding of the issues and the potential solutions that have been considered as well as of the OUV of the WHS. This understanding of OUV has been enhanced by recent extensive fieldwork and archaeological investigations that are beginning to show the scope, interconnectedness and current rich archaeological potential of the wider Stonehenge landscape, of which the main henge monument is the most conspicuous part.

Perhaps not surprisingly, widespread concerns are being expressed by archaeological, cultural heritage and landscape organisations who have so far not been engaged in the consultation and evaluation processes.

4. ASSESSMENT OF OPTIONS

ICOMOS-UK does not consider that the methodology that has been used for assessing potential road options can be said to be robust for the following reasons:

i) *Lack of adequate acknowledgment of the implications of WH status*

The commitments of the State Party under the WH Convention to protect the international status of the WHS has not been given the status needed to reflect the commitments of the State Party to the WH Convention. We do not understand why the need to protect the WHS has apparently been given such a low priority in the overall assessment process, below AONBs, leases and general environmental concerns, and consider that this reflects poorly on the overall credibility of assessment process.

The hierarchy of constraints applied to this (and to the other two A303 upgrade projects in the same Highways England funding commitment) appears to have little logic with WH status being given lower priority than an AONB, environmental factors and existing leases.

At the earliest stage of the planning process, for one of the other two A303 upgrade schemes within the funding commitment that includes the

Amesbury to Berwick Down section, the then Highways Agency were directed to avoid the Blackdown Hills Area of Outstanding Natural Beauty (AONB). As a result they now propose instead to upgrade a branch road to a dual carriageway link between the M5 at Taunton and the A303 rather than upgrading the existing A303 corridor. The justification for this proposal by Highways England was taken purely because the existing A303/A30 runs through an AONB.

AONBs have national status for their nature conservation and visual qualities. If there is a presumption in favour of respecting the integrity of areas with national designation, there must also logically be an enhanced commitment to international designations, such as a WHS. As the Government has committed itself to sustaining the OUV of the WHS of Stonehenge, Avebury and Associated Sites for the benefits of all humanity following its inscription on the WH list in 1998, it is not logical or acceptable to suggest that this means that the WHS has lesser value than an AONB.

Similarly, in the consideration of the various potential options for the Amesbury to Berwick Down section, it appears the then Highways Agency were instructed not to consider any options for a southern route that crossed land within the boundaries of RAF Boscombe Down. We understand this MoD site is leased to QinetiQ on a 25-year Long Term Partnering Agreement (LTPA), thus Boscombe Down remains a government airfield but is operated by QinetiQ on behalf of the MOD.

Publically available sources suggest the land is leased until 2025 or 2026, but it remains outside the WHS, and we do not consider that the commercial or strategic non-availability of the land should have been a prima facie reason for excluding it in the options assessment. No reason is offered in the current consultation for the exclusion of the RAF Boscombe Down land from areas to be considered. It has no other known specific designations or constraints beyond its ownership and lease status.

It is our view that all the other southern routes that were investigated prior to the current public consultation were longer in distance, and in their geographical divergence, from the current course of the A303 than they would have been if the land at RAF Boscombe Down had been ‘available’ and considered as part of the initial options assessment process.

On the basis of the methodology set out by Highways England in consultation meeting with the Stonehenge and Avebury WHS Steering Groups, it was clear that many of the southern routes, including the '3rd' place route F010, were discarded for perceived traffic and sustainability issues that could have been eliminated, or substantively addressed, if the Boscombe Down land had been included in the assessment process.

Indeed it is likely from what was presented on the scoring for the options assessment criteria that if the Boscombe Down land had been taken into consideration, and new routes for a southern bypass of the WHS had been assessed on the basis of its availability, then these routes could have provided a much more favourable scoring outcome than the variations on the single tunnel route D061 and D062 currently being consulted on. Moreover these new southern routes, or a variation of F010 redirected with a more efficient route through Boscombe Down, do not have any direct or irreversible harm on the OUV of the WHS such as result from routes D061 or D062.

ii) *Benefits to parts of a WHS cannot outweigh irreversible negative impacts on OUV in other parts of the site*

Such a claim is made in the justification for Routes D061 and D062 when it is said that the benefits of the tunnel in the central part of the WHS will outweigh the dis-benefits resulting from damage to the setting of known archaeological sites as a result of the construction of portals and approach roads. Direct damage to attributes of OUV is a direct threat to OUV, and this damage or threat cannot be mitigated by benefits elsewhere in the WHS.

<u>It is a fundamental principle of WHSs that the OUV for which they were inscribed must be sustained wholly not partially; however great the benefits of an improvement project might be, these cannot compensate for loss to the attributes of OUV resulting from that same project.</u>

iii) *Lack of clarity in distinguishing between the main henge monument and the Stonehenge part of the WHS*

The main henge monument is said to be of international status equivalent to the Pyramids, whereas what has been recognised as being of international status, through inscription as a WHS, is not just the henge monument on its own but the whole of the two parts of the WHS of Stonehenge and Avebury and Associated Monuments<u>. This includes all the</u>

relevant monuments and archaeology (known and currently unknown) therein that contribute to the attributes that make up OUV.

This lack of clarity has been exacerbated by the lack of HIAs that would have set out formally the potential impact on attributes of OUV, and indeed by the lack of any mention in the consultation process of the attributes of OUV as set out in the Statement of OUV.

Archaeological details on even a very basic level, particularly in relation to solstice alignments, are absent from the Technical Assessment that accompanies the consultation. The focus of the consultation relates mainly to the visual and acoustic improvements arising from diverting the A303 away from Stonehenge itself (i.e. the main henge), and the fact that proposed portals are said to be invisible from Stonehenge, with the implication that this is the main consideration.

The assessment lacks any analysis or appreciation of the irreversible impacts on archaeology and on archaeological associations and alignments that will result from Routes D061 and D062 in other parts of the WHS and thus on the attributes of OUV for which the property was inscribed.

iv) *Inconsistent parameters used for measuring impact*

For the previously discarded southern surface Route F010 outside the WHS, (not brought forward in this consultation) it is stated that the footprint of the road would be imposed on an area rich in archaeology, with known sites and a high potential for revealing undiscovered sites. Inexplicably, no such similar concerns are set out for tunnel Routes D061 and D062, notwithstanding that these routes will involve around 2 km of new dual carriageway in the WHS, in places where there has never been a road, and where surveys over the past decade have highlighted the extraordinarily high archaeological importance of these areas and the potential for further major archaeological discoveries. For the proposed tunnel option it is crucial to acknowledge that it would be imposed on an area rich in archaeology, with known sites and a high potential for revealing undiscovered sites, where preference should always be preservation *in situ*, in line with national guidance from Historic England[2]

[2] Preserving Archaeological Remains: Decision-taking for Sites under Development (Published 8 November 2016) - https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/

and the provisions for heritage assets of archaeological interest set out in the Planning Practice Guidance[3].

v) *Lack of HIAs*

Without detailed HIAs having been undertaken that consider impact on the OUV of the WHS, it is difficult to understand precisely how the dis-benefits of the various options have been assessed in relation to OUV.

From the information provided, there appears to be a considerable disparity between the considerable dis-benefits of the tunnel Route Options D061 and D062 in terms of impact on OUV, and those of the discarded southern Route F010 outside the WHS, which are minimal. The southern F010 route would be sufficiently to the south of the WHS that while it might give rise to some impacts on the setting it would not directly impact at all on the OUV of the WHS. Furthermore, it is understood that the constructions costs of the southern route F010 have been estimated to be £400m less than those for the tunnel.

No convincing grounds have been put forward as to why the southern route entirely outside the WHS was discounted before the public consultation, other than to say it might promote 'rat running' on the remaining existing routes within and around the WHS in the vicinity of the former (then closed/removed) section of the current A303.

However, it is noted that the data used to support the claim that 'rat running' would occur, leading to significant local traffic dis-benefits, was presented without any mitigation that could result from a fully designed southern option that could include measures to prevent/discourage this effect. We understand that these mitigation measures could have been delivered if this Option had been taken forward for full design. On this basis, the data used to eliminate the southern option F010 on the basis of sustainability and traffic grounds appears flawed. And in terms of impact on OUV, the lack of impact has not been given a high weighting.

vi) *Length of tunnel appears to be based on cost rather than cultural heritage considerations*

[3] Paragraph: 040 Reference ID: 18a-040-20140306 of the Planning Practice Guidance - https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#non-designated-heritage-assets

ICOMOS-UK does not consider that the length of the proposed tunnel is satisfactory as it will result in:

a. highly adverse and irreversible impacts on the attributes of the cultural and archaeological landscape that convey OUV, particularly in the south-west part of the WHS;
b. Such damage cannot be mitigated by benefits elsewhere in the WHS,

It is understood that the location of the western portals is a cost base decision, rather than a decision based on detailed understanding of the location and significance of cultural heritage assets that contribute to OUV. As much of the cost of a tunnel derives from the initial setting up costs, the cost of extending it would not necessarily be proportionate (i.e. the price per metre would reduce the longer the tunnel was, subject to other considerations relevant to the design of a longer tunnel). It is further understood that the Highways Agency consider that is it would be possible technically to extend the tunnel length to allow portals to be placed at the edge of the WHS (albeit this would also require detailed HIA analysis in terms of impacts on the setting of the WHS), but that they are constrained by their brief and the funds so far allocated.

vii) *Lack of adequate detail to allow a full analysis of options*

Without detailed HIAs to set out clearly and formally the potential adverse impacts (or benefits) of the various previously discarded route options on the OUV of the WHS – which has not been done – the consultation on this single tunnel option, with its two sub options for a Winterbourne Stoke by-pass, does not stand up to scrutiny either in terms of the methodology for its initial selection over other potentially less harmful options, or in terms of the assessment procedures that have been applied to this specific option. With regard to the latter, the potential impact of the western portal and the associated c. 2km of new dual carriageway in previously undeveloped land within the WHS has the potential for irreversible damage the settings of and relationships between a number of highly significant monuments (both upstanding and below ground) in the SW quadrant of the WHS, which contribute to the OUV of the property. And has been set out above, no amount of benefit to the centre of the WHS resulting from the tunnel can mitigate that damage.

The details provided in the documentation do not allow an understanding as to how the severe damage to the WHS deriving from either Highways

England Routes D061 or D061 can be compared to the harm/benefits/costs of the other options or the status quo.

viii) *Lack of compliance with NPPF*

The NPPF makes extremely clear at Paragraph 132 that:

"Substantial harm to or loss of designated heritage assets of the highest significance, notably ***scheduled monuments****, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and* ***World Heritage Sites****, should be* ***wholly exceptional****."* [Emphasis added.]

For clarity, on this basis, we consider that both Options D061 and D062 presented under the current public consultation would likely result in a very high level of substantial harm (under Para 133 of the National Planning Policy Framework (NPPF)) to a designated heritage asset (the WHS) of the highest international significance, and similarly to many other high value designated national heritage assets within the WHS.

Furthermore, it is clear to us that none of the other exceptions set out in the points at Paragraph 133 of the NPPF apply, and, as other equally, or more favourable, routes for the upgrade of the A303 have been excluded to the south of the WHS, there is no justification for the harm arising to the WHS when this could be entirely avoided, whilst also delivering the same traffic benefits that may result from the removal of the current route of the A303 in routes D061 or D062.

5. CONCLUSIONS

On the basis of evidence set out above, ICOMOS-UK firmly objects to the current option for a 2.9km tunnel for the negative and irreversible impact if would have on the attributes of OUV of the WHS.

To suggest that this damage can be mitigated by benefits resulting from the tunnel to the centre of the WHS, is to fundamentally misunderstand the commitments made to sustain its OUV at the time of inscription of the property on the World Heritage List.

Although we approve in principle the idea of a tunnel for the A303, this is only if:

- All options for constructing a bypass located outside the WHS have been adequately considered via a robust and consistent methodology, and an informed consultation process;

- The tunnel is long enough to ensure that its tunnel portals, associated approach roads and cuttings, and supportive infrastructure do not impact in any way on the WHS or its setting;
- It is clearly demonstrated that temporary works associated with the construction of an acceptable road/tunnel scheme do not cause damage to the WHS and setting, including by construction compounds, haulage roads, and ground treatment/dewater plant and spoil holding lands.
- That construction impacts arising from a tunnel solution do not have a permanent adverse impact on the attributes of Outstanding Universal Value (OUV);
- All necessary Heritage Impact Assessments (HIAs) have been undertaken on the basis of a clear understanding of the attributes of OUV.

ICOMOS-UK does not consider that these parameters have been satisfied, as set out in more details below, and thus we cannot support the 2.9km tunnel option, either with a corresponding by-pass to the north, or with one to the south, of Winterbourne Stoke, as currently proposed in the public consultation document.

The reasons provided for excluding the southern route F010 are not substantial, and inexplicably the lack of harm to the WHS has not been given adequate weighting. Given that this option has no adverse impact on the WHS and can be built for substantially less money than the tunnel, we consider that the decision to exclude if from consultation must be re-considered. Subject to further refinements, this surface route option provides the opportunity to improve the A303 and to safeguard the whole of the WHS and its setting, and these must be the twin aims of this project.

ICOMOS-UK strongly suggests that further consultations be held that explore options for a longer tunnel and also comparative routes to the south of the WHS, with an equal and consistent methodology and scoring being applied for all route options, and one that recognises that WHS status is at least equal to that of an AONB and arguably of much greater significance.

During the pre-consultation options assessment process, we consider that the potential impact on the OUV of the WHS should have been given the highest priority, in terms of determining appropriate parameters for assessing impact, and this in our view does not appear to have been the case.

ICOMOS-UK understands the financial constraints that are in place, and the need to resolve ongoing difficulties with the road network, but does not consider that such constraints can be a justification for compromising a full assessment of potential adverse impact of various options on the OUV of the WHS in advance of decisions

being taken, or indeed for inflicting irreversible harm on the WHS which we consider that the proposed tunnel option would do.

4th March 2017

Jacked Structures Ltd.

17 FEB 2017

Jacked Structures

PUSHING THE BOUNDARIES

2/9/2017

Jacked Structures Ltd
Alport Farm
Overton Common
Malpas
Cheshire
SY14 7DG

A303 STONEHENGE: Amesbury to Berwick Down: Public Consultation – 12 January to 5 March 2017

Avoiding Desecration of the World Heritage Site

As professional consultants, we have developed several unique concepts for installing shallow tunnels with minimum or no disruption to surface operations and believe that we can improve on the present scheme proposals and complete the road in tunnel throughout the whole World Heritage Site.

Currently the proposed tunnelling is over a length of 2.9km but does not extend over the whole World Heritage Site by around 1.1 km at the Western end and 500m at the Eastern end. This results in massive tunnel portals with depth to around 10m below ground level extended by substantial sections of road in deep cuttings and surface sections within the World Heritage Site.

This will create visual, noise and air pollution impacts on the World Heritage Site and in addition cut off open access across the site.

We believe these impacts be avoided by extending the road in tunnel to beyond the boundary limits of the World Heritage Site. This can be achieved with the use of shallow tunnel methods which are illustrated below.

The stages of construction are:

From a launch pit area outside the World Heritage Site,

1. Temporary access tunnels, in this case four in number, are driven over the full length from launch area to a temporary main tunnel launch shaft
2. From within the tunnels piles are driven to provide the walls and support for the road tunnel
3. Within the tunnel a combined capping beam and slide path are constructed.

These operations are all constructed underground at depths below where archaeological remains could be found.

Two options for installing the main Jacked Deck are possible,

1. For deeper sections with about 3m cover or more the Jacked Deck slides down the preformed track fitted with a shield and driven as a tunnel.
2. The second option for shallower sections with about 2m of cover the Jacked Deck is installed into position along the tracks in open cut mode. Once installed the overburden soils removed can be replaced over the Jacked Deck and the surface restored to its original condition.

The open cut installation offers a less costly alternative than the full tunnel mode. In both cases the highway would be in tunnel below the full surface length of the World Heritage Site.

These methods have been well proven on previous projects.

This approach has many advantages,

- The highway will be underground throughout the full length of the World Heritage Site
- If programmed and installed in advance of the deep central tunnelling section, the jacked tunnels would provide vehicle access into the main tunnel launch and reception pit areas allowing incoming materials and outgoing spoil to be carried away to outside the World Heritage Site boundary thereby removing a major impact of the main deep tunnelling works
- Although, at such a preliminary stage with lack of definition on scope, it is not possible to develop a cost budget the shallow tunnel method is much less costly per meter than traditional deep bored tunnel cost. The additional cost over present scheme is not likely to add a large amount to the current estimate.
- Jacked Deck installation involves excavation using an open shield allowing any unforeseen archaeological finds to be recovered and not destroyed.
- Shallow surface investigation along the proposed line could identify archaeological sites with adjustments to alignment and level to ensure they are not disturbed

Illustrative examples of Jacked installations are shown below.

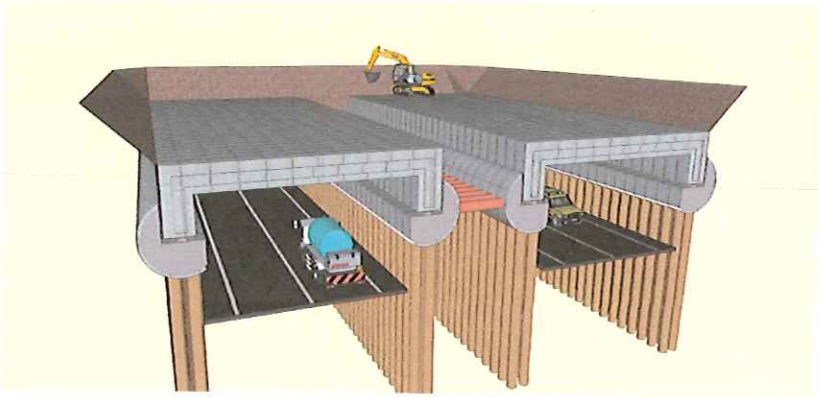


Figure 1 - Stonehenge Jacked Deck shallow mode

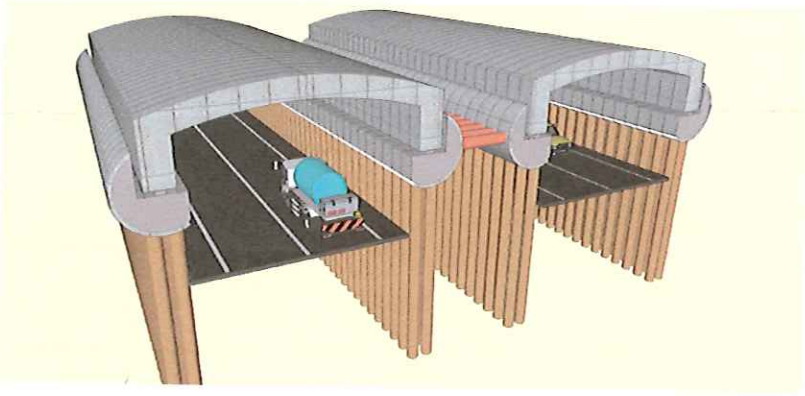


Figure 2 Stonehenge Jacked Arch tunnel mode

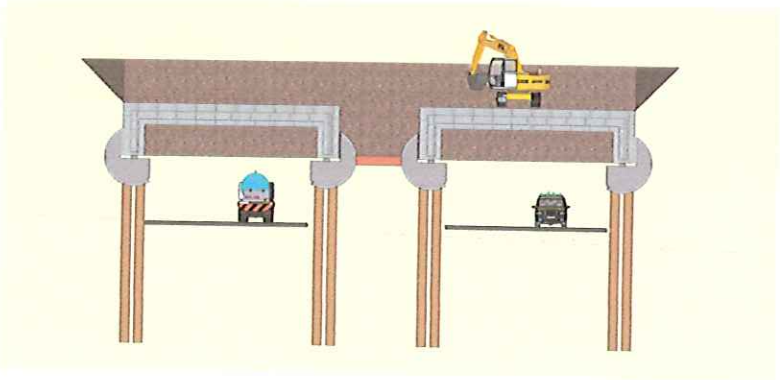


Figure 3 Stonehenge Shallow surface soil removed

James Thomson C.Eng
Jacked Structures Ltd

JSP Consultants

Response ID ANON-BABJ-XGJ1-9

Submitted to **A303 Stonehenge**
Submitted on **2017-02-16 10:18:56**

Introduction

Name

Name:
John Pollard

Postcode

Postcode:
BA120DR

Email

Email address:
jspnoise@aol.com

Postal address

Address:
2 Millards Way
Upton Scudamore

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
JSP Consultants

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Don’t know

Please provide any comments to support your answer for question 1:
I am a noise consultant assisting local residents & parish councils & I request under The Freedom Of Information Act copies of the detailed acoustic reports prepared by Arup/Atkins on the CRTN predictions for the proposed 2 route options of the A303 & the existing road situation. This information is not available in the TAR report & Appendices on the Highways England website, & has not been made available to me despite various email correspondence with the A303 Stonehenge Correspondence Officer Complex Infrastructure Programme (Oli Melzack)

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Don’t know

Please provide any comments to support your answer for question 2:
See above response

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:
See above response

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
See above response

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
See above response

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
See above response

7. Do you have any other comments?

Q7:
See above response

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Local authority

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Lack of detailed information on acoustic issues

Le Visionaire Vegan and Yoga Society, Mauritius

From: TransportSecretary
Sent: 16 January 2017 10:17
To: POCorrespondence
Subject: FW: Road Tunnel under Stonehenge

TO

Mrs Kathryn Elliman (née Marsh) | Diary Manager & Assistant Private Secretary to Secretary of State for Transport, , Department for Transport
5/15 | 020 7944 4397 | 07920 592919

From: GRAYLING, Chris [mailto:chris.grayling.mp@parliament.uk]
Sent: 16 January 2017 10:16
To: TransportSecretary
Subject: Fwd: Road Tunnel under Stonehenge

Begin forwarded message:

From: DEV ANAND BALLOO <devanandblue@yahoo.co.uk>
Date: 16 January 2017 at 09:57:26 GMT
To: "chris.grayling.mp@parliament.uk" <chris.grayling.mp@parliament.uk>, "pressoffice@highwaysengland.co.uk" <pressoffice@highwaysengland.co.uk>
Subject: Road Tunnel under Stonehenge
Reply-To: DEV ANAND BALLOO <devanandblue@yahoo.co.uk>

The RT HON Chris Grayling MP,
Secretary of State for Transport.

Dear Sir,

I write on behalf of Yogi Tamby Chuckravanen, a renowned Yogi and Spiritual Master living in Mauritius, to express his utmost concern over the road tunnel project passing under the Stonehenge.

The Yogi has always propounded that the Stonehenge has been built by one of the earliest civilisation namely the Dravidians, to channel cosmic energy from the planets and to establish contact with
the Aliens.

Constructing a tunnel under the Stonehenge and its vicinity will cause irreparable damage both from the Archaeological and planetary point of view for the following reasons:

1. According to the Yogi, the structure dates back to 50,000 years back and not 10,000 years as seem to suggest certain historians/Archaeologist. This was built by the

Dravidian civilisation as a vortex of energy for the sages to attract Cosmic energy and transmit it to the people and environment.

2. In fact the real Stonehenge structure embodying a Crystal at its centre is situated under the present Stonehenge structure. This crystal was the source of very powerful Energy which the Sages used to regenerate, to store the immense amount of Energy which they obtained from their meditation and to feed spaceships.
3. The coordination between all the planets was done through the Sages, who had the secret of attracting Energy. They were powerful beings. Anyone who was in the possession of these secrets could either use it positively or negatively. Similar to Yogi Tamby Chuckravanen, Sages were guided by Nature. They were given this power to maintain and develop the planetary system. This is precisely the reason why a Stonehenge was built beneath was to deflect the attention of those who wanted to acquire this power and use it negatively. Yogi knows the passage how to reach the underground structure.
4. If any structure is constructed under the Stonehenge, there will not be any vibration and it will no longer attract any energy.
5. Scientists found that this place was considered as a shrine or a temple in ancient times, where people came to find cure to multiple diseases from the Sages. Scientists also found that there are some connections with 'Sound' in this site which they are unable to further explain. In fact, the 'Sound' they are inquiring were the cosmic sounds Sages used to communicate with the inner world and which the Yogi uses in his meditations. The Yogi has an archive of information to decode the secrets of the Stonehenge. He has given facts decades ago which science is finding now.
6. The Yogi has also announced that Stonehenge was a site which ancient Dravidian Sages constructed in relation to their acute knowledge of astronomy. Besides being the 'excluded place' for gigantic spaceships to land, the megalithic circles of huge rocks corresponded to astronomical alignments. The Stonehenge on top acted as radars to attract solar, lunar and planetary Energy and transferred it to the Stonehenge which is underground.
   Planet earth has a unique function in the planetary system, but it is also interdependent of other planets..
7. The underground edifice of the Stonehenge therefore became an epicenter for the link between the cosmos and planet earth. Further, the architectural precision based on advanced planetary and mathematical knowledge, made it an enigmatic place where the communication with the outer-space, both through intense meditation and through physical displacement via spaceships, was made.

The Yogi firmly believes that the British will take the right decision in this case and not do like the others who keep destroying all ancient structures in the name of God, claiming that they are the first people who came on this earth.

Despite coming from the tiny island of Mauritius and knowing well that his voice may not be heard, the Yogi has faith in the intelligence of the British and the high consideration they have for their Heritage.

The Yogi visits Stonehenge every year for a deep meditation. He is ready to come and decipher the secrets of the Stonehenge structure at his own cost if required.

Dev Anand Balloo
On behalf of Yogi Tamby Chuckravanen

Response ID ANON-BABJ-X8CV-R

Submitted to **A303 Stonehenge**
Submitted on **2017-01-16 10:18:12**

Introduction

Name

Name:
DEV ANAND BALLOO

Postcode

Postcode:

Email

Email address:
devanandblue@yahoo.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
LE VISIONAIRE VEGAN AND YOGA SOCIETY. MAURITIUS.

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Dear Sir,
I write on behalf of Yogi Tamby Chuckravanen, a renowned Yogi and Spiritual Master living in Mauritius, to express his utmost concern over the road tunnel project passing under the Stonehenge.
The Yogi has always propounded that the Stonehenge has been built by one of the earliest civilisation namely the Dravidians, to channel cosmic energy from the planets and to establish contact with the Aliens.
Constructing a tunnel under the Stonehenge and its vicinity will cause irreparable damage both from the Archaeological and planetary point of view for the following reasons:
1. According to the Yogi, the structure dates back to 50,000 years back and not 10,000 years as seem to suggest certain historians/Archaeologist. This was built by the Dravidian civilisation as a vortex of energy for the sages to attract Cosmic energy and transmit it to the people and environment.
2. In fact the real Stonehenge structure embodying a Crystal at its centre is situated under the present Stonehenge structure. This crystal was the source of very powerful Energy which the Sages used to regenerate, to store the immense amount of Energy which they obtained from their meditation and to feed spaceships.
3. The coordination between all the planets was done through the Sages, who had the secret of attracting Energy. They were powerful beings. Anyone who was in the possession of these secrets could either use it positively or negatively. Similar to Yogi Tamby Chuckravanen, Sages were guided by Nature. They were given this power to maintain and develop the planetary system. This is precisely the reason why a Stonehenge was built beneath was to deflect the attention of those who wanted to acquire this power and use it negatively. Yogi knows the passage how to reach the underground structure.
4. If any structure is constructed under the Stonehenge, there will not be any vibration and it will no longer attract any energy.
5. Scientists found that this place was considered as a shrine or a temple in ancient times, where people came to find cure to multiple diseases from the Sages. Scientists also found that there are some connections with ‘Sound’ in this site which they are unable to further explain. In fact, the ‘Sound’ they are inquiring were the cosmic sounds Sages used to communicate with the inner world and which the Yogi uses in his meditations. The Yogi has an archive of information to decode the secrets of the Stonehenge. He has given facts decades ago which science is finding now.
6. The Yogi has also announced that Stonehenge was a site which ancient Dravidian Sages constructed in relation to their acute knowledge of astronomy. Besides being the ‘excluded place’ for gigantic spaceships to land, the megalithic circles of huge rocks corresponded to astronomical alignments. The Stonehenge on top acted as radars to attract solar, lunar and planetary Energy and transferred it to the Stonehenge which is underground.
Planet earth has a unique function in the planetary system, but it is also interdependent of other planets..
7. The underground edifice of the Stonehenge therefore became an epicenter for the link between the cosmos and planet earth. Further, the architectural precision based on advanced planetary and mathematical knowledge, made it an enigmatic place where the communication with the outer-space, both through intense meditation and through physical displacement via spaceships, was made.

The Yogi firmly believes that the British will take the right decision in this case and not do like the others who keep destroying all ancient structures in the name of God, claiming that they are the first people who came on this earth.

Despite coming from the tiny island of Mauritius and knowing well that his voice may not be heard, the Yogi has faith in the intelligence of the British and the high consideration they have for their Heritage.

The Yogi visits Stonehenge every year for a deep meditation. He is ready to come and decipher the secrets of the Stonehenge structure at his own cost if required.

Dev Anand Balloo
On behalf of Yogi Tamby Chuckravanen

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Not Answered

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Lodmore Farm

Response ID ANON-BABJ-XGKY-J

Submitted to **A303 Stonehenge**
Submitted on **2017-02-15 10:52:53**

Introduction

Name

Name:
James Bateman

Postcode

Postcode:
BS40 6DF

Email

Email address:
lodmore@codecogs.com

Postal address

Address:
Lodmore Farm
East Harptree
Bristol
BS40 6DF

Are you responding on behalf of an organisation?

No

If yes, which organisation?:
Lodmore Farm

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
What a total waste of money. The present road (303) past Stone Henge should be upgraded to a Dual Carriage way. THERE IS NO NEED FOR A TUNNEL. It is claimed that this would impinge on the view from the Henge across the open countryside. That may be true but when the Henge was built we did not have large fields of corn complete with modern farm machinery

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
Just complete the A303 down to Exeter as a dual carriage way get on with it. The problems of the 303 past Stone Henge did not exist until the road to Warminster was closed.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Mere and District Railway Modellers

highways england

21959

1 8 FEB 2017

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find ou Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	TOM SNOOK
Postcode	BA12 6FG
Email	TOM@FREEWINDS.CO.UK
Postal address *This is optional but providing your email or postal address will allow us to update you with any news on this consultation.*	16, WALNUT ROAD MERE WILTSHIRE.

Are you responding on behalf of an organisation? [X] Yes [ ] No AND SELF.

If yes, which organisation? FOUNDER MEMBER MERE & DISTRICT RAILWAY MODELLERS SECRETARY WESSEX ASSOCIATION OF R.M.

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

THIS IS ESSENTIAL FOR SMOOTH TRAFFIC FLOW.

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

ANOTHER SOLUTION SIMILAR TO 5. IS NEEDED HERE FOR CONTINUED TRAFFIC FLOW.

7. Do you have any other comments?

PLEASE REFER TO ENCLOSURE.

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

- Received a letter from Highways England ☐
- Received an email ☐
- Social media (e.g. Facebook or Twitter) ☐
- Newspapers or magazines ☒
- Posters or other outdoor advertising ☐
- TV or radio ☐
- Other online/website sources ☐
- Word-of-mouth ☒
- Local authority ☒
- Other source ☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

YES

FROM SOUTH WEST WILTSHIRE AREA BOARD MEETINGS

AMENITY CLUB AND ASSOCIATION MEMBERS

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [x] Strongly agree — IF THE PROPOSED TUNNEL IS ADOPTED.
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

CONCEPT PORTAL DESIGN

PREFER TOP LEFT OR TOP RIGHT ON PAGE 43 of BOOKLET.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	[ ]
Option 1S– A southern bypass of Winterbourne Stoke	[x]
No preference	[ ]

Please provide any comments to support your answer for Question 4

THE LIE OF THE LAND FAVOURS THIS OPTION AS THERE WOULD BE LESS DISTANCE AND RUPTURE OF LANDSCAPE. FURTHER THE JOINING TO THE EXISTING DUAL CARRIAGE WAY WOULD REQUIRE LESS WORK AND BE MORE NATURAL WITH THE EXISTING LANDSCAPE.

Continued over

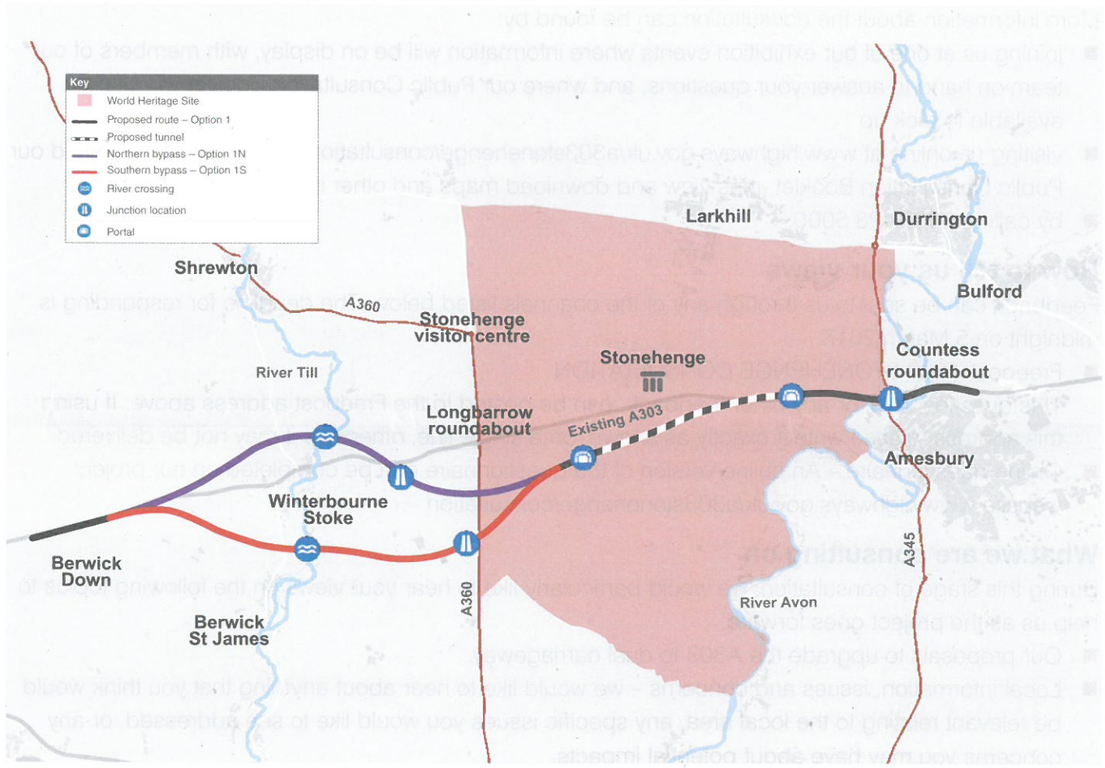
A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
- a bypass of Winterbourne Stoke either to the north or south of the village
- improvements to the existing junctions between the A303 and the intersecting A345 and A360

For more information on how we arrived at our proposed option please refer to Chapter 6 of the Public Consultation Booklet.

The proposed option is shown on the plan below.



1. To what extent do you agree with our proposed option?

- [ ] Strongly agree
- [x] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Highways England A303 Stonehenge

It would appear to us that the option suggested is by far too ambitious and costly as a simply solution is there for taking.

When travelling in a westerly direction it is clear the present dual to single carriageway configuration moves towards Stonehenge. Examining the lay of the land to the south of the existing single carriageway, it is clear that there is adequate land put aside to lay another carriageway as far as the existing roundabout of the A360. This new carriageway could be constructed some two metres lower than the existing carriageway thereby minimising its impact in visual terms to the WHS. From the Longbarrow junction the proposed option 1 south could still be incorporated.

If however the premiss is to improve the WHS at a cost of one billion pounds because of arguments raise by the archaeologists over surface disturbance, then you need to look no further than one of the largest pig farms in Wiltshire being situated in the WHS and the surface disturbance caused by the animals to counter their argument! Should the tunnel go ahead then this pig farm should also be removed so that the WHS is fully restored to its former landscape. With out this action nothing makes sense.

As a person who has attended a number of South West Wiltshire Area Board Meetings and heard about what has been going on since 2000, then perhaps it is time for Highways England to act in a business-like manner and show Wiltshire and Somerset that it cares, as in the time it has been thinking about the Stonehenge problem three large dual carriageways projects have been completed on the A30 in Cornwall.

T.F.Snook. Retired World lead product designer. February 2017

2. To what extent do you agree with our proposed location of the eastern portal?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

Correct position

Continued over

National Farmers' Union West of England

From: Andrea Witcombe <Andrea.Witcombe@nfu.org.uk>
Sent: 02 March 2017 15:20
To: A303Stonehenge
Subject: A303 Consultation - NFU Response
Attachments: A303 Amesbury To Berwick Consultation Response - NFU 2017.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Highways
Please find attached the **National farmers Union (NFU) response to the A303 Amesbury to Berwick Downs Consultation,** which closes on the 5th.
If you would prefer we submit this response via a different route please let me know as soon as you are able.
Thank you for taking our comments and requests into consideration – we look forward to your response in due course.
With best wishes,

Andi Witcombe
NFU County Adviser for Wiltshire
T: 07971451770
E: andrea.witcombe@nfu.org.uk
A: NFU, 1st Floor Unit 2, London Road Office Park, London Road, Salisbury, Wiltshire, SP1 3HP
Find out more about the National Farmers Union at: www.nfuonline.com

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Your ref:
Our ref: NFU/Response/A303Feb2017
Email: South.west@nfu.org.uk
Direct line: 01392 440700
Date: 28th February 2017

Dear Highways England,

National Farmers Union Comments:

A303 Stonehenge Amesbury to Berwick Down Consultation

The National Farmers Union represents over 47,000 farmers and growers across England and Wales; more than 800 of these farm here in Wiltshire. We understand that during this stage of the above named consultation you are seeking views on:

- The proposals to upgrade the A303 to dual carriageway between Stonehenge and Berwick Down, and;
- Local information, issues and concerns relevant to these works, including specific issues we feel should be addressed or concerns about potential impacts.

We were disappointed to find no reference to agricultural land or farm businesses in the consultation documentation and so on behalf of our farming members please find below our response:

Proposals to upgrade the A303

We understand the need to upgrade the single lane sections of the A303 to dual carriageways to improve traffic flow and safety for the benefit of local communities, business and tourists as well as the enhance connectivity to the South West region.

Many of **our members businesses will be significantly impacted by the proposed route and associated construction works** between Amesbury and Berwick Down, including the location of the tunnel portals, access junctions and either of the proposed bypass routes around Winterbourne Stoke. We expect Highways England to thoroughly consult individual land owners who are impacted by the proposed works to gather their views and recommendations - and crucially to ensure that farm business are not disadvantaged or destroyed as a result of the upgrade works.

Furthermore**, we expect that the upgraded road <u>will not</u> carry any limitations or restrictions which would prevent any type of agricultural vehicles accessing and using the entire A303** between Amesbury and Berwick Down, or further afield. As a result of this consultation **we require Highways England to clarify that there will be no restrictions to agricultural vehicles on the A303** to appease the concerns that the local farming community have about this issue.

We look forward to your response on this issue in particular.

Local information, issues and concerns

Construction Impacts

The consultation documents highlight the need for careful and considered planning to ensure the least issues caused to road users and the World Heritage Site. However, we feel strongly that the **impact on farm businesses** in the immediate and local area must also be thoroughly reviewed and considered ahead of any construction works. Our comments on the construction of this scheme are as follows:

- **Meetings *with* farmers: Effective and comprehensive one to one meetings** with the farming community must be a priority before and during construction to ensure that there is minimal impact on farm business operation either as a direct or indirect result of these works.
- **Agricultural liaison officer**: Highways England should provide an agricultural liaison officer to **lead on all farmer communications** to ensure consistency in messaging and action as a result of local issues identified throughout the works.
- **The long term impacts** of construction works must be outlined and **mitigation actions** agreed in advance of construction with impacted farm businesses. It is vital that farmers know if and crucially when their land will be taken and once the route has been approved and so timings of the operations must be shared and discussed with them as soon as possible. This will enable farmers to meet their obligations under agri-environment schemes and the Basic Payment Scheme. Both farmers and Highways England will need to keep natural England and the RPA informed about the progress, plans and construction of the A303 scheme.
- **Limit Land Take:** Highways England must take **no more land than necessary** to build the new road scheme so that the impact on the viability of farm businesses is reduced. Land taken on a temporary basis must be returned and reinstated in condition suitable for agricultural production. It is essential that a record of condition is taken of land on farm holdings including soil sampling before construction takes place.
- **Weight Limit restrictions:** No weight restrictions, or other restrictions, should be imposed on agricultural vehicles using the A303 **particularly within the tunnelled section**. In addition, there should be no weight or other restrictions placed on agricultural vehicles and the **type of agricultural material being transported** (for example hay and straw) on the A303 particularly within the tunnelled section. Any additional **local weight limit restrictions** imposed to protect communities from diverted or rat-run traffic before, during or after construction must not impact farm vehicles.
- **Access to the A303**: Agricultural vehicles must have access to the new proposed A303 dual carriageway and this must be considered early in the design stage once a preferred route has been identified. For example, long diversion routes to access the A303 will not be acceptable for farm traffic as this will have a massive impact on the viability of some farm businesses. **The A303 is a very important link road for** rural businesses in the area and as such should not leave any of them at a disadvantage. This includes access to the Wiltshire Grain storage facility at Shrewton - this **101,000 tonne capacity store services 152 farmers in the local and surrounding areas**. Clearly access arrangements for this site, once the tunnel has been constructed, will be a key concern for the business and local villages who may find traffic diverted though their streets. We expect Highways England to release their proposals for access to this site as soon as possible.
- **Waste and Spoil:** Land should not be compulsory purchased for the scheme in order to take waste and spoil from the construction works. Details of where spoil will be taken to must be provided in advance of construction and in close consultation with impacted farmers and land owners.

- **Access to Severed Land:** There is no mention in the consultation of how access to severed land on farms will be retained during and after the construction works. **All efforts must be made to cause the least impact on** farm business operations to ensure that businesses are able to continue to function during this process and access land once the road has been completed.
- **Soil**: Details of how soils will be stored and kept clean during construction must be set out at the earliest opportunity and further detail must be provided to explain how soil will be reinstated for agricultural use, including information about the type of aftercare plan which be put in place. The NFU would expect to see this detail in the Environmental Impact Assessment and in the Code of Construction moving forward.
- **Drainage and field drainage:** There is no mention of the **drainage needs** for this scheme, including how both ground and surface water will be managed during construction and after the scheme is complete. This information is essential for both farm business and local environment protection and must be thoroughly considered, planned and agreed in advance of the works. Farmers will need to know how their field drainage is to be dealt with during construction and reinstated once construction is completed and we expect Highways England to clarify their powers and intentions in writing before any works begin.
- **Meetings *for* landowners and farmers:** The NFU requests that further specific meetings are held for landowners and farmers once this consultation has been completed to inform them of the next stages, relevant timings and to provide more specific detail as requested in this response to the consultation. These should be held along with more one to one meetings, as bullet pointed above. We look forward to receiving dates for these meetings shortly.

Scheme Design

The design of the tunnel portals and the rest of the road networks **should not take more agricultural land than absolutely necessary** and the future design of these elements should therefore be considered accordingly.

We also note that within the Stonehenge Consultation Document [s160536] there are several visualisations of the proposed routes for the A303. Page 21 shows what the surface landscape would look like if the tunnel were constructed. In this picture several fences have been removed – it is important that both Highways England and the World Heritage Site recognise that much of the **land in this area is managed for arable and livestock production and as such field boundaries should not be removed** or changed as part of these works**,** and especially without explicit consent from the land owner. It is important that this consultation does not give an unrealistic perception of the landscape once the existing road has been removed or altered.

Economic Impacts

The consultation documents highlight the need to balance the cost of the project with the economic benefits to the area. We agree with the need to achieve the best value for money during major infrastructure works. However, **this consultation does not recognise the economic benefits that the food and farming sector delivers to this area,** and we believe Highways England should seek ways in which to reduce the impact of these works on farm and food businesses, during and after construction.

- For example, **farm businesses in our county contribute £121 million GVA annually** with an output of £334 million agricultural output each year. Alongside their direct contribution to the local economy our farmers spend more than £212 million annually on farm inputs.

- This **£212 million is therefore spent supporting a huge range of other rural businesses such as** feed, seed and fertiliser suppliers; machinery dealers, mechanics and engineers; legal, financial and advisory services; haulage and delivery companies; veterinary, genetics and nutritional specialists; builders, electricians and plumbers; local wholesalers and markets **to name but a few**.
- In addition, farm businesses themselves employ **6,000 full time workers** on holdings across the county and thousands of other part time and seasonal workers.
- Our farmers grow arable and horticultural crops, sheep, beef, pigs and poultry and produce milk for sale in local, national and international markets – as well as produce environmental outcomes for the benefit and enjoyment of all.

It is vital that **farm businesses are adequately compensated for their short and long term business losses** as a result of the A303 scheme, throughout all stages of the works.

Environment & Landscape Impacts

Alongside food production, local farm businesses also manage the landscape and environment which benefits us all. Alongside the importance of historic buildings and archaeological sites, which have been noted in this consultation, we feel that the importance of the managed environment should also be highlighted. Alongside the World Heritage Site and other associated archaeological features, the construction area also includes:

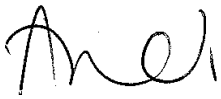
- Areas designated under **agri-environment schemes**, including Higher Level Stewardships, Entry Level Stewardship and mid-tier Countryside Stewardship. These are all voluntary agreements that land owners enter with Natural England, to produce both food and environmental outcomes. The construction of this scheme must not cause farmers to become non-compliant with the rules and regulations surrounding these agreements. Conversations must occur as early as possible where there is a risk that this may be the case during this scheme.
- The entire construction area falls into a **ground Water Nitrate Vulnerable Zone** (NVZ) which has been designated to ensure water quality is not negatively impacted by man-made activities. Farmers within this catchment adhere to strict rules regarding their farm operations and the works to the A303 should not cause them to be non-compliant. Furthermore, works to the A303 itself should not cause negative impact to the NVZ and we expect Highways England to publish how they intend to safeguard groundwater quality as part of these works.
- Both the river Till and the Rover Avon, which flow to the east and the west of Stonehenge, are designated **Sites of Special Scientific Interest** (SSSIs). Riparian owners along these water courses have a duty to protect the SSSI and it is imperative that the construction works to not negatively impact the status of the SSSIs in the area, during or after the works are complete.
- An **RSPB reserve** is located above the proposed tunnel route.
- **Priority Habitat Inventory** designations within the construction area include semi-improved grassland; lowland calcareous grassland; lowland meadows; deciduous woodland. These habitats are managed by farm businesses in the area.
- In addition, the construction area includes habitats which have been identified to be of **great important for arable and grassland farmland birds** including: corn bunting, grey partridge, lapwing, stone curlew, yellow wagtail for example.
- Nearby, Natural England have identified bats as a **European Protected Species**. These creatures will feed from the farmland and habitats in the local area.

Although we recognise the importance of heritage conservation in the area we are disappointed to find little reference to the voluntary environmental agreements, environmental designations and important habitats within the construction area – all of which are managed by farm businesses. We

feel that Highways England **should demonstrate how they intend to safeguard these environment and landscape features as part of these works.**

In conclusion, we welcome the opportunity to comment on the first stage consultation for the A303 improvement works and expect Highways England to take our comments, and those of the land owners impacted, into serious consideration ahead of any construction works.

Yours sincerely,



Andi Witcombe

NFU County Adviser for Wiltshire

Steven Bartlett & Oliver Newport

NFU Group Secretaries for South Wiltshire & Mere

Open Access to Stonehenge

Response ID ANON-BABJ-X3BD-Z

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 14:14:03**

Introduction

Name

Name:
Francis Stoner

Postcode

Postcode:
EX16 9AL

Email

Email address:
francis.stoner@btinternet.com

Postal address

Address:
Old Post Office
Morebath
via TIVERTON
Devon
EX16 9AL

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Open Access to Stonehenge

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
Open Access to Stonehenge is a collective of individuals and groups, working on issues related to Stonehenge, with particular emphasis on Open Access. I administrate the public Facebook Group and Page for Open Access to Stonehenge. The consensus of opinion among the 3,300+ members is that the Group is OPPOSED to the current proposal. Objections have been expressed by numerous other groups, such as the Stonehenge Alliance and the Council for British Archaeology, with all of which we concur.
Funds allocated to the A303 corridor would be better spent further West, on real accident black-spots such as The Eagle Tavern junction; and on other sections of single carriageway, such as at Chicklade. Fatal accidents tend not to occur when traffic is moving at less than 30 miles per hour, as it's claimed it does near Stonehenge at peak times...
The uniquely complex hydrology, and the likelihood of its disruption affecting springs which never freeze or run dry at Blick Mead, a cradle of civilized activity after the last Ice Age; the possibility of encountering phosphatic chalk; the security nightmare of traffic in a tunnel on an Essential Service Route in proximity to military installations; the fact that commuter traffic in Wiltshire will still generate gridlock, and that any alleviation will start to become ineffective after 2051 (on current projections stated in the Agency's traffic forecasting); the admitted uncertainty of traffic-flow modelling and prediction; the inconvenience to local residents caused by having to go "round the houses" to even get on to the A303 if the proposal goes ahead; the very real prospect of a tunnel project soaking up ALL (and more) of the funds allocated to the entirety of the A303 corridor; the irreversible nature of what is contemplated; the potential loss of what little remains of free public access to Stonehenge - for instance, the view of it from the A303 and from By-Way Twelve (the Netheravon Coach Road, otherwise known as the Stonehenge Drove); these points have mostly been raised by individuals, and taken together with the cogent objections set out in detail by other groups, indicate that a tunnel is the very worst and most extravagant option.
There are no traffic controls at the Longbarrow Junction, which appears to be a deliberate exercise in generating traffic congestion on the single carriageway of the A303 as it passes Stonehenge. Intelligent technology exists, and should be employed NOW to co-ordinate traffic flows here and at the Countess Junction, especially at peak times, regardless of future plans for these junctions.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
There should have been other events; for instance, in Exeter, Taunton and Yeovil: and the consultation period is too short.

RAC Motoring Services

Response ID ANON-BABJ-XGC9-A

Submitted to **A303 Stonehenge**
Submitted on **2017-02-06 16:31:29**

Introduction

Name

Name:
Nicholas Lyes

Postcode

Postcode:
WC1R 4JH

Email

Email address:
nlyes@rac.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
RAC Motoring Services

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
The RAC strongly supports plans to ease congestion on a stretch of road that is a notorious bottleneck on one of the two major routes linking the South West of England to London and the South East. The situation is at its worst in the summer months when traffic volumes are boosted by holiday traffic, by visitors to Stonehenge and by those travelling to 1-off events such as the Glastonbury Festival. Much of the A303 is now dual carriageway with 2 lanes/carriageway and there is an urgent need to bring those few remaining sections of single lane carriageway up to that of the bulk of the A303. The proposals to turn the A303 between the M3 and the M5 near Exeter into an Expressway, with a uniform minimum standard along its entire length requires that the bottleneck around Stonehenge must be removed. The need to upgrade this section of the A303 has been recognised for many years and the RAC is now keen that Highways England begins work as soon as practically possible.

With traffic levels now at record highs, respondents to this year's survey for the RAC's Report on Motoring 2016 identified 'traffic congestion and slower journey times' as the 4th highest overall motoring priority, up from 9th in 2015. This illustrates the sense of urgency that motorists attach to projects such as this that tackle the most congested sections of the strategic network.

The RAC also believes that by cutting congestion, local air quality will also improve, and the tunnel will help reduce noise for nearby residents in the area.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:
The RAC is unable to comment on the choice from an engineering perspective but from a user perspective, the proposed location of the Eastern Portal seems sensible. The final choice should take account of the preferences of local residents and those most affected by the levels of congestion and pollution.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:
RAC is unable to comment on the choice from an engineering perspective but from a user perspective, the proposed location of the Eastern Portal seems sensible. The final choice should take account of the preferences of local residents and those most affected by the levels of congestion and pollution.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
The RAC would be content with either option but would encourage Highways England to opt for that which is regarded by those living in the area as least disruptive to the local environment and that the is most likely to bring the best long-term benefits.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
This section of road has been identified as a major bottleneck as it is the first roundabout encountered by those travelling west from the M3. The RAC would support plans to separate traffic, which may include a flyover or an underpass as this seems likely to be the best way to improve traffic flow and reduce congestion. The proposal is also consistent with longer term plans to designate the A303 as an Expressway.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The requirement for such a junction follows automatically from the decision to upgrade this section of the A303 to dual carriageway and to by-pass Winterbourne Stoke. We therefore support plans to separate traffic going east-west along the A303 from traffic going north-south along the A360.

7. Do you have any other comments?

Q7:
To summarise, the RAC strongly supports plans to reduce congestion along this stretch of the A303. The RAC's 2016 Report on Motoring has identified increasing congestion and longer journey times as major concerns. The Report also found that when motorists were asked to prioritise different types of investment in the Transport infrastructure, investing in targeted improvements of major roads ranked 3rd out of 13 possible types of investment. 70% of motorists also agreed that motorway and high speed carriageway journey times are becoming less predictable. 73% agreed that much tougher steps should be taken to reduce traffic congestion. The RAC would be willing to provide more regional specific data to Highways England on these specific areas should this be of interest.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
None

Rescue - The British Archaeological Trust

From: secretary@rescue-archaeology.org.uk
Sent: 24 February 2017 09:00
To: A303Stonehenge
Subject: Rescue response to consultation
Attachments: Stonehenge Feb 2017.pdf

Please see the response from Rescue, The British Archaeological Trust attached.

Thank you

Jo Caruth
Secretary
Rescue (The British Archaelogical Trust)

tel: 01449 900121
mobile: 07764 371411
email:secretary@rescue-archaeology.org.uk
website: http://rescue-archaeology.org.uk/

Rescue - The British Archaeological Trust is a non-political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad. We do not receive any state support and are entirely dependent on the contributions of our members to support our work. It is only by weight of numbers that we can effectively campaign to save our archaeology, and in these times of cuts and push for growth, our voice is desperately needed. Please consider joining Rescue, for only £15 a year, you can help protect the past for the future.

Rescue
The British Archaeological Trust

15a Bull Plain, Hertford
Hertfordshire, SG14 1DX
Telephone: 01992 553377
Office hours: Tuesday and Friday mornings. Otherwise please leave a message on the answerphone.
rescue@rescue-archaeology.freeserve.co.uk
www.rescue-archaeology.org.uk

Highways England's consultation on the A303 at Stonehenge response from RESCUE

To whom it may concern,

Highways England's A303 Stonehenge Consultation

RESCUE is a non-party political organisation dedicated to supporting archaeology and archaeologists in Britain and abroad (www.rescue-archaeology.org.uk). We do not receive any state support and are entirely dependent on the contributions of our members to support our work. We've been campaigning since our foundation in 1971, to support the cause of British Archaeology. Our Council follows developments at Stonehenge and we have published articles on Stonehenge planning matters in *Rescue News* which is sent to all members.

In responding to Highways England's consultation on proposals for widening the A303, including a 2.9km bored tunnel, we have the following objections and observations, placed in the order set out in the A303 Stonehenge Questionnaire.

Question 1. *To what extent do you approve of our proposed option?*
Answer. Not at all. We strongly disagree with the proposals and with the suggestion that 'out of sight of Stonehenge' is acceptable in a WHS that encompasses a wider landscape, much of it out of sight of Stonehenge and equally considered to be of outstanding universal value (OUV). Furthermore, it appears that changes in the visibility of the henge for those travelling towards it are integral to its positioning in a landscape of monuments through which one passes.

Question 2. *To what extent do you agree with our proposed location of the eastern portal?*
Answer. We strongly disagree with the location proposed. The tunnel portals and expressway entering them would lie just east of the Avenue, one of the most important prehistoric features in the Stonehenge landscape. The setting of the Avenue and its future enjoyment by visitors would suffer major adverse effects from visual, light and noise intrusions. There are further concerns about the physical and environmental impacts of new road engineering on the important Mesolithic site of Blick Mead which lies beside and possibly partly under the A303 below Vespasian's Camp.

Question 3. *To what extent do you agree with our proposed location of the western portal?*
Answer. We strongly disagree with the location proposed. There would not only be major adverse impacts on the setting and enjoyment of the Normanton Down barrow group, of which the famous Bush Barrow is a part, but also on an unusual grouping of Neolithic long barrows through which the expressway would pass, damaging the integrity of their relationships to one another and the landscape, the topography of which clearly influenced their placement. We have seen no report of recent geophysical survey work in the western part of the WHS in the area south of the present A303. Nevertheless, an extensive Bronze Age field system is known, through which the expressway would pass, and it would be fair to suggest that within it may be evidence of a Bronze Age settlement and, possibly, of earlier settlement remains. Woodland and field boundaries affected by the proposals may also mask remains of archaeological material associated with the development and use of the Stonehenge landscape as a whole by its Neolithic and Bronze Age inhabitants.

We understand from the media that there are plans to realign and/or mitigate the impacts of the western portal owing to its proximity to the Normanton Down barrows and location on the Stonehenge midwinter solstice axis but, despite any such efforts, we are convinced that an expressway should not be located in such a sensitive area. There is a lamentable lack of information provided for us to take into account the findings of archeological evaluations already completed and yet to be undertaken in this area of the WHS. For any further survey work in this area, we would expect rigorous examination to the same standard and incorporating multiple geophysical techniques as undertaken by the Stonehenge Hidden Landscape Project. We suggest that this is not a Site in which standard evaluation ought to be undertaken owing to the potential for loss of fragile evidence in ploughsoil or just beneath.

Question 4. *Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?*
Answer. No archaeological evaluation work has been presented for our assessment of the proposed bypass routes. The northern route, examined for the earlier A303 Improvement scheme, clearly contains much archaeology still in situ, including extensive ancient field systems and water meadows. There are multiple geophysical anomalies yet to be examined. There are Listed buildings and Conservation Areas in villages on which one or other of the routes could have impacts, notably on setting and of noise. It is evident that both routes will be sensitive archaeologically, especially where they lie within the setting of the WHS where particular care and protection are required. Aerial photography indicates that the southern route crosses highly sensitive archeological ground between the A360 and the villages of Winterbourne Stoke and Berwick St James.

Question 5. *What are the most important issues for you as we develop our proposals for the A303/A345 Countess Junction?*
Answer. We are concerned about potential disturbance of archaeological remains in this area of Saxon and medieval settlement. We have already mentioned concerns about Mesolithic remains at Blick Mead and possibly elsewhere in this area, including beneath the A303, and there are also likely to be archaeological remains of later date in this location. We would expect full evaluation, investigation and recording in advance of any engineering work undertaken. This includes work in areas of construction compounds and drainage treatment areas.

We note the presence of Vespasian's Camp, the Conservation Area adjoining the A303, Amesbury Abbey Registered Park and Garden, and Listed buildings – all in the vicinity and all of which would be adversely affected by noise and/or visual impacts of any flyover.

Question 6. *What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?*
Answer. The principal issues must relate to the archaeology and setting of the WHS and its attributes of OUV. A grade-separated junction visible and audible within the WHS and/or its setting would bring major adverse impacts that would and could not be offset by improvements elsewhere in the WHS. Should the road scheme be approved, we would expect a positive improvement to the setting of the Winterbourne Stoke long barrow and the Bronze Age barrows associated with it: moving the junction only slightly further away would not fulfill this expectation. Again, there is likely to be highly sensitive archaeology west of the A360, including any Bronze Age remains disturbed by construction of the present roundabout.

Question 7. *Do you have any other comments?*
Answer. We are astonished that such an inadequate scheme has been brought forward for the Stonehenge half of the WHS, notwithstanding issues of cost and apparent demand for an expressway. We are particularly concerned about the evident disregard for the World Heritage Convention and planning policy and guidance for development in the WHS.
The Technical Appraisal Report states, at 18.3.39 :

> ". . . a Neutral score has been recorded for the historic environment, representing a balanced outcome between important beneficial impacts and a large number of adverse impacts on designated and non designated assets. Route Options D061 and D062 [the options now before us] would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments. These adverse impacts are a result of changes to the setting of the monuments and the relationships between monuments and the landscape. Both options would cross a scheduled linear boundary monument resulting in a very large adverse impact and D061 would have a large adverse impact on two scheduled barrow complexes north of Winterbourne Stoke. Both options would also adversely affect listed buildings, a conservation area and a registered park and garden at the eastern end of scheme around Amesbury. The partial removal of the A303 would deliver benefits for over 50 scheduled monuments, including Stonehenge and other high and very high value scheduled monuments within the WHS, resulting in a range of slight to very large beneficial impacts for both D061 and D062."

The partial removal of the A303 from the WHS would result in a number of major adverse impacts on heritage assets within the WHS and its setting, including the WHS itself. The methodology used to arrive at a 'neutral' score for the historic environment overall is highly questionable in this case, where ICOMOS guidance warns against the standard EIA approach for cultural WHS without adaptation, and does not suggest that positive and negative impacts should be weighed to arrive at a scale of impact.

Question 8. *How did you hear about this consultation?*
Answer. Word of mouth. Letter to Rescue representative.

Question 9. *Do you have any feedback on this consultation – events, information provided, advertising etc?*
Answer. We are surprised at the limited locality and advertising of this consultation on a major project adversely affecting a WHS of international significance.

Rescue was invited and sent a representative to a 'Heritage Forum' prior to announcement of the consultation. Contrary to expectation, this was a presentation of the scheme brief and had little specifically to do with heritage. No details of any scheme proposals under consideration were given to allow for comment on heritage aspects, despite the Technical Appraisal Report's statement that 'this forum will be used to disseminate information about the heritage aspects of the scheme' (p.272).

Despite the requirements of the NSIP process, we think a choice of options should have been offered, including one that would do no damage to the WHS.
It is unfortunate that we have not been provided with enough information, especially on archaeological matters, to enable us to comment adequately on potential impacts of the proposed scheme.
In our view, the project ought to be reconsidered and re-evaluated in the light of the demands of the World Heritage Convention and planning policy. If road widening is justified, new options should be brought forward, such as a longer tunnel that would protect the WHS and its setting.

Yours faithfully,

Jude Plouviez, Chair

RGV. Engineering (Netheravon) Ltd

highways england

1711

13 FEB 2017

RGV ENGINEERING (NETHERAVON) LTD
Heating, Plumbing and Electrical Contractors
HIGH STREET, NETHERAVON, SALISBURY, WILTSHIRE SP4 9PQ
Telephone: (01980) 670667 Fax: (01980) 670811
www.rgvengineering.co.uk
V.A.T. Reg. No. 188 8375 96
15953
ECA
David Burke
Managing Director
david.burke@rgvengineering.co.uk
Established since 1970

A303 Stoneh

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	DAVID JONATHAN BURKE.
Postcode	SP4 9PL
Email	david.burke@rgvengineering.co.uk
Postal address	RIVERDOWN HOUSE KINGS HILL NETHERAVON SALISBURY. WILTSHIRE.

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? RGV. ENGINEERING (NETHERAVON) LIMITED

Please provide any comments to support your answer for Question 1

I OWN + RUN TWO WELL ESTABLISHED PLUMBING, HEATING + ELECTRICAL BUSINESSES (RGV ENGINEERING LIMITED + BENNETT + DEAN (SALISBURY) LTD) – IN TOTAL I HAVE APPROX 60 VEHICLES (VANS + CARS) + ECONOMically COUNTESS ROUNDABOUT / A303 HAS TO PUT IN POLITELY BEEN AN ABSOLUTE NIGHTMARE + COST BURDEN OVER THE LAST 10 YEARS – YEAR ON YEAR IS ONLY GETTING WORSE!

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☐
Option 1S– A southern bypass of Winterbourne Stoke	☐
No preference	☑

Please provide any comments to support your answer for Question 4

NO PREFERENCE - OTHER THAN THE QUICKEST MOST COST EFFECTIVE + LEAST DISRUPTION TO THE OLD A303 WHILST BEING CONSTRUCTED

7. Do you have any other comments?

PLEASE START + COMPLETE URGENTLY!

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☑
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☑
Posters or other outdoor advertising	☐
TV or radio	☑
Other online/website sources	☐
Word-of-mouth	☑
Local authority	☐
Other source	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

TO DATE VERY WELL DONE + THANK YOU

Road Haulage Association

Response ID ANON-BABJ-X6A8-P

Submitted to **A303 Stonehenge**
Submitted on **2017-03-01 14:34:35**

Introduction

Name

Name:
Chrys Rampley

Postcode

Postcode:
KT13 9DZ

Email

Email address:
c.rampley@rha.uk.net

Postal address

Address:
Road Haulage Association
The Old Forge
South Road
Weybridge
Surrey

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Road Haulage Association

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
Given the increase in commercial vehicle traffic resulting from a welcome rise in economic activity, the RHA urges Highways England and the local authority to take steps to promote additional growth by making sure the region is adequately connected by road, and that sub-standard routes are upgraded. We believe the improvements proposed to the A303 will make Stonehenge and the surrounding area more attractive to the transport industry. We look forward to the improved connectivity that these improvements will bring.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
The RHA has no strong opinion in this regard. however, what is more important to the haulage industry is the design of the tunnel itself. It must cater for all vehicle types with a clearance height to Highways England's design standards to allow vehicles up to 5.03 metres to transverse the tunnel and a Tunnel classification 'A' for hazardous goods i.e. Hazardous Goods without restriction - like the newly-built Hindhead Tunnel.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
The RHA has no strong opinion - see comments above.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
The RHA supports a bypass scheme which is likely to remove a significant volume of traffic from Winterbourne Stoke and separate local traffic from through traffic and which will help boost economic activity. We are sure there are pros and cons for both options but have no preference. That said, we would not want to lose the fact that the inhabitants of Winterbourne Stoke will still need to be fed and watered and therefore provision must be made for commercial vehicle needing to access the area in order to service local businesses and to deliver to households.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
RHA supports efforts to enhance road safety. Design is key to reduce conflict between vehicle types manoeuvring around the junction. We would like to see fluidity at the junction - ease of use with reduced need for stopping to reduce fuel consumption and air pollution.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
RHA supports efforts to enhance road safety. Design is key to reduce conflict between vehicle types navigating through the junction. We would also like to highlight the importance of good traffic management and in particular the positioning of road signs. Good signage helps drivers to find the right routes and avoid the risk of trucks, for example, hitting low bridges, or using weight restricted roads because signs are in the wrong place or because the sign gives insufficient notice for the driver to divert.

7. Do you have any other comments?

Q7:
We would like to emphasise the important role the haulage sector has in supporting economic growth. The options which Highways England has presented for consultation will have wide ranging transport, economic and environmental effects on all users of the A303. However to do nothing is not an option. Under investment has had a significant economic impact in this region. RHA urges Highways England to make progress on upgrading and improving the network as quickly as possible to ensure it can deliver the performance needed to support the nation in the 21st century.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:
Details forwarded by our regional office to the policy team for response

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Rob Beale Ltd

highways england

28 JAN 2017

SG

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name: ROB BEALE

Postcode: SP3 6DJ

Email:

Postal address:

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? ROB BEALE LTD / TEMPORARY TOILETS

Please provide any comments to support your answer for Question 1

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

FAR Better to go FOR option G and By pass Salisbury at the Same time.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☐
Option 1S– A southern bypass of Winterbourne Stoke	☑
No preference	☐

Please provide any comments to support your answer for Question 4

Better Still Go for option G and By pass Salisbury as well.

7. Do you have any other comments?

Yes rather than Spend So much Money
Builinding tunnels and an bypass why not
Go for option G. and kill 2 birds with
one Stone ?

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☐
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☐
Other source	Salisbury Chamber of Commerce. ☑

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

No other than for goodness Sake go for
option G and Build a road they bypasses
Salisbury as well as by passing Stonehenge.

Royal Astronomical Society

Response ID ANON-BABJ-X635-5

Submitted to **A303 Stonehenge**
Submitted on **2017-03-02 13:58:29**

Introduction

Name

Name:
Robert Massey

Postcode

Postcode:
W1J 0BQ

Email

Email address:
rm@ras.org.uk

Postal address

Address:
Royal Astronomical Society
Burlington House
Piccadilly
London

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Royal Astronomical Society

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to disagree

Please provide any comments to support your answer for question 1:
If this work goes ahead, the Society urges Highways England to adopt the northern route proposal, so we cannot endorse an option that includes the southern route.

The sightlines within the Stonehenge World Heritage Site (WHS) are recognised to be of Outstanding Universal Value, and part of the qualification for WHS status. In particular, the solsticial axis, the line of midsummer sunrise and midwinter sunset, is aligned with the Stonehenge Avenue, and is recognised explicitly in the Statement of Significance agreed by UNESCO's World Heritage Committee.

Policy 3c of the 2015 World Heritage Site Management Plan states the need to "Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself".

The sightline to the SW towards midwinter sunset, in the principal direction faced by the monument, is thus of vital importance. One of the proposed options, the southern route for the bypass, would see the road run broadly along the alignment for 2 km, mostly within the WHS itself. This would destroy the integrity of the sightline, and eliminate the possibility of visitors seeing the winter solstice sun setting behind the distant natural horizon along the axis of the monument.

The consultation document at present does not take this into account, and it is vital that it should.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to disagree

Please provide any comments to support your answer for question 2:
The RAS acknowledges that the eastern portal would be in a position that does not affect the sight lines of the monument.

We do however note the concerns of the Society of Antiquaries of London, who highlight its proximity to significant archaeological features in the World Heritage Site landscape, and should this location be used, their wish to see appropriate screening as well as mitigation measures during its construction.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
In the plans, the western tunnel entrance lies almost exactly on the winter solstice sunset alignment. The only way to address this appears to be to extend the length of the tunnel, so that the entrance is significantly removed from the sightline. Given the enormous global significance of the Stonehenge monument and wider site, in the present day, and for future generations, Highways England should seriously consider a tunnel length of twice that proposed, or – were the cost of this to be considered unacceptable - radically different solutions, to be developed in willing consultation with professional societies and agencies.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
This route for the road would not run along the sightline to the same extent as the southern option. In the current plans the tunnel entrance would still though interfere with the view along the SW alignment.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The preservation of the sightlines is of particular importance to the RAS.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The preservation of the sightlines is of particular importance to the RAS.

7. Do you have any other comments?

Q7:
The Royal Astronomical Society, with more than 4,000 members (‘Fellows’) is the leading body for astronomy and geophysics in the UK. Our membership includes professional scientists in universities, research establishments, and the private sector, teachers, science writers and historians, including a number who specialise in the archaeology of sites of astronomical significance.

Governance of the Society is supported by a number of subcommittees with specialist interests, including the Astronomical Heritage Committee, whose members shaped this response.

Our sister learned society, the Society of Antiquaries of London, will submit a separate response concentrating on the issues of care of the prehistoric environment of the Stonehenge site. We also endorse the submission from Commission C4 of the International Astronomical Union, some of whose arguments we reproduce here, and its concerns that are similar to our own.

We recognise that the proposal has benefits, in that it would remove the A303 from the landscape immediately to the south of Stonehenge, and thus improves the integrity of the SW sightline. As well as improving the landscape setting, this would eliminate night-time intrusion from the vehicle lights that presently pass within 250m of the monument.

Nonetheless the RAS is greatly concerned that the preservation of sightlines, integral to the monument and wider World Heritage Site, does not appear to have been considered in the proposals.

The Society urges Highways England to consider this issue and reshape the proposals accordingly, to avoid irreparable damage to a site of international importance. We have leading archaeoastronomers amongst our membership, who will be happy to give detailed expert advice on beneficial modifications to the scheme.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Royal Society for the Protection of Birds (RSPB)

28 FEB 2017

giving nature a home

RSPB Wessex Office
Enterprise House
Cherry Orchard Lane
SALISBURY
Wiltshire
SP2 7LD

Freepost A303 STONEHENGE CONSULTATION

24th February 2017

Dear Sir / Madam

A303 Stonehenge, Amesbury to Berwick Down Public Consultation

The RSPB is committed to working with Highways England to find an acceptable solution, which allows improvements to the A303 while safeguarding the wildlife interest of the World Heritage Site (WHS), and the stone-curlew as a designated feature of Salisbury Plain Special Protection Area (the SPA).

However, because the proposals will directly impact a number of stone-curlew nesting territories, and have potentially adverse effects on the Salisbury Plain stone-curlew meta population (the stone-curlew population that exists on, between and around Salisbury Plain and Porton Down) and the SPA, the RSPB **objects** to the scheme as published. Our reasons are set out in the attached Annex. In summary, they are as follows:

- The location of the western portal together with either of the two proposed Winterbourne Stoke bypass options have the potential to impact on at least five stone-curlew breeding sites.
- The removal of the existing section of the A303 between The Avenue and Longbarrow roundabout, whilst highly desirable in terms of reducing impacts on Stonehenge and potential for chalk grassland re-creation, will increase access and

therefore recreational disturbance in the proximity of the RSPB's Normanton Down nature reserve, in likelihood rendering it less favourable for stone-curlew.

- The combination of the above impacts is likely to have an adverse effect on more than 1% of the UK stone-curlew population and the Salisbury Plain meta population, a component of which, the Salisbury Plain SPA, is classified.

We are concerned that no information has been made available relating to the environmental impact of the proposals. The RSPB is keen to maintain a constructive dialogue with Highways England in order to enable a full assessment of the proposals, and minimise the environmental impact, using the best available science.

We reserve the right to add to or amend our position, and look forward to being consulted as work on the full assessment of the impacts progresses, including consideration of appropriate avoidance and mitigation measures for predicted impacts on the stone-curlew population, and opportunities for significant chalk grassland enhancement.

Yours faithfully,

Phil Sheldrake

Annex: Response by the RSPB to the A303 Stonehenge, Amesbury to Berwick Down Public Consultation

Introduction

The RSPB was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of over 1 million. The principal objective of the RSPB is the conservation of wild birds and their habitats. A key means by which the RSPB achieves its principal objective is by acquiring land and managing its nature reserves.

The RSPB also attaches great importance to all international, EU and national law, policy and guidance that assist in the attainment of this objective. The RSPB campaigns throughout the UK and in international fora for the development and effective delivery of such law and policy. In doing so, it also plays an active role in the domestic processes by which development plans and proposals are scrutinised and considered, offering ornithological and other wider environmental expertise, in particular in the public inquiry context.

The WHS at Stonehenge represents one of the most important landscapes in the country, being rich in both cultural and natural history. Within the WHS, the RSPB manages a nature reserve at Normanton Down as denoted on the map (Map 1) included in the consultation documentation. Successive WHS Management Plans have promoted the reversion of arable land to species rich chalk grassland, typical of the downland of the greater Salisbury Plain plateau. The RSPB has exemplified this at Normanton Down where an area of 92ha, including some of the Normanton Down Barrow Group, has been restored and is being managed for its chalk grassland flora and the rare stone-curlew.

Whilst our immediate concerns relate to the potential negative impacts on our Normanton Down reserve and the rare stone-curlew, we recognise that the scheme presents an unparalleled opportunity to enhance the WHS for both people and wildlife. The WHS sits at the heart of the RSPB's Chalk Country *Futurescape* vision[1] focused on the restoration of Wiltshire's downland heritage landscape. The RSPB currently manages four nature reserves totalling in excess of 700ha across south Wiltshire with this headline objective.

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[1] The Wiltshire Chalk Country vision links two Areas of Outstanding Natural Beauty, the North Wessex Downs and the Cranborne Chase and West Wiltshire Downs, with the Stonehenge World Heritage Site at its heart. It includes the SSSI and SAC designated grasslands on Salisbury Plain and Porton Down. It supports a quarter of the UK's breeding stone-curlews and is also an area to target improving conditions for other farmland birds; it is a hotspot for lapwing, grey partridge and corn bunting, all of which are priority species for agri-environment schemes.

The stone-curlew *Burhinus oedicnemus* is a rare breeding species in Britain. The species is restricted in range to eastern England and central southern England around Salisbury Plain and Porton Down, all of which have designations as SPA in recognition of the importance of their populations of stone-curlews. Stone-curlews are listed on Annex I of the Directive on the Conservation of Wild Birds 2009/147/EC (codified version) (the `Birds Directive') as requiring special conservation measures including but not limited to SPA classification, are specially protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), and are a bird of conservation concern and a Section 41 Priority species under the Natural Environment and Rural Communities (NERC) Act 2006. Separately and collectively, these place obligations on Highways England to avoid impacts on the breeding stone-curlew population.

The RSPB Wessex Stone-curlew Project has monitored breeding stone-curlews in central southern England since the mid 1980s. In 2016, there were 118 breeding pairs confirmed in central southern England and 246 pairs (estimated) in eastern England, giving a UK total of 364 pairs (estimated).

The proposals as presented have the potential for both construction and operational phase direct and indirect adverse impacts on stone-curlew and our Normanton Down nature reserve. We set out our concerns below:

Location of western portal

As no details are provided regarding the exact location and nature of the portal it is difficult to provide specific comment at this stage in relation to direct impacts on the Normanton Down reserve. However, at the indicative location it is likely to have significant detrimental impact on the wildlife interest of the reserve. The construction of the portal will certainly result in disturbance impacts on stone-curlew with a significantly reduced likelihood of them settling and successfully breeding. In 2016 two pairs of stone-curlew bred on the reserve. We look forward to being consulted on this issue as work on the full assessment progresses.

We are aware of concerns raised by English Heritage, Historic England and the National Trust regarding the proposed location of the western portal in relation to potential impacts on the archaeological features of the Normanton Down Barrow Group. Given that the main driver of the scheme is to remove the road from the WHS, thus removing the detrimental impact its presence has on the WHS' many archaeological features, it is evident the proposed location of the western portal fails to achieve this key objective.

Research conducted by Footprint Ecology in 2008[2] found a negative impact of trunk roads on stone-curlew nest density on arable land up to a distance of at least 1000 metres, and maybe up to 1500 metres. **The RSPB objects to the indicated location for the western portal due to its potential to negatively impact the Normanton Down RSPB nature reserve and its capacity to continue to support two breeding pairs of stone-curlew.** We urge Highways England to reconsider the location of the portal outside of the WHS boundary.

Bypass options

Both of the proposed routes as presented will directly impact stone-curlew nest sites, the northern route on two and the southern on three. In addition, there will be an effect on stone curlew resulting from the realignment of the A303 to one of the new proposed options. The RSPB would expect this impact to be assessed consistent with the Footprint Ecology research referred to above.

Together with this assessment, we would also expect to see modelling of the areas affected by car headlight shed as this could potentially be a disturbance factor. We are particularly concerned that our Normanton Down reserve will be affected in this way.

Removal of existing carriageway between the Avenue and Longbarrow roundabout

A stated objective of the scheme is to encourage people to explore more widely within the WHS, a principle that the RSPB supports subject to appropriate safeguards to protect its ecological features. Currently, the existing carriageway between the Avenue and Longbarrow roundabout acts as a physical barrier, and as such, the southern portion of the WHS experiences relatively few visitors. The proposed tunnel will remove this barrier, increasing the extent of uninterrupted downland landscape directly accessible from the WHS visitor centre and Stonehenge potentially resulting in a significant increase in visitor numbers to the south of the existing carriageway, including the RSPB nature reserve at Normanton Down.

Stone-curlews are known to be susceptible to disturbance from human activities. Research by Taylor in 2006[3] on the Wessex stone-curlew population, showed that stone-curlews respond to potential disturbance agents at large distances (>500m) compared to many other birds. The main effect of disturbance was reduced likelihood of birds settling to breed

[2] Footprint Ecology 2008. The effect of housing development and roads on the distribution of stone-curlews in the Brecks.

[3] Taylor, EC. 2006. Stone-curlews and human disturbance: effects on behaviour, distribution and breeding success

in habitat that is suitable in other respects. Models predict that where disturbance elicits an active response from the birds at frequencies exceeding one per hour the probability of site occupancy can be reduced from 60% to 15%.

We have serious concerns that the removal of the existing carriageway will have a negative impact on the current favourable status of the Normanton Down reserve in attracting and retaining breeding stone-curlew. The Environmental Impact Assessment (EIA) will need to robustly assess the predicted increase in numbers of visitors in the vicinity of the reserve and the impacts of such increases on rare and vulnerable wildlife, along with full details of how these impacts will be mitigated. We have particular concerns relating to the potential for the significant increase in recreational disturbance around the summer solstice celebrations, not only with regard to stone-curlew, but also other wildlife on the reserve and how this might be mitigated. The RSPB considers that access management is likely to be critical to reducing the disturbance effect and maintaining the integrity of the Normanton Down nature reserve.

Salisbury Plain stone-curlew meta population and the Salisbury Plain SPA

In addition to the direct impacts of the tunnelling, dualling and realignment of the A303 trunk road, the proposals could have a detrimental impact on stone-curlew with potential adverse impacts on the Salisbury Plain meta population and SPA.

Regulation 61 of the Conservation of Habitats and Species Regulations 2010 requires a competent authority to determine if any plan or project proposal is likely to have a significant effect on an SPA, and if necessary, carry out an appropriate assessment of its implications in view of the site's conservation objectives.

The RSPB is keen to work with Highways England and Natural England throughout the process to ensure robust assessment of the impacts and full consideration and adoption of avoidance and mitigation measures.

European Protected Species (EPS) and priority habitats

No information is provided regarding EPS and priority habitats. We are aware that there may be rare bat species present such as the Barbastelle *Barbastella barbastellus.* The proposal could also affect air quality by increasing traffic levels, which could affect priority habitats in particular species rich chalk grassland. The EIA will need to robustly assess these impacts and determine appropriate avoidance and mitigation in relation to these matters.

RSPB 24 February 2017

Rudler Car Transportation & Storage Ltd

Response ID ANON-BABJ-X8ME-H

Submitted to **A303 Stonehenge**
Submitted on **2017-01-13 17:59:15**

Introduction

Name

Name:
EDMUND RUDLER

Postcode

Postcode:
SN4 7PX

Email

Email address:
ed@rudler.co.uk Rudler Car Transportation & Storage Ltd

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Rudler Car Transportation & Storage Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly agree

Please provide any comments to support your answer for question 1:
Either North or South of Winterbourne Stoke provide a relatively short bypass that will improve the views from Stonehenge immensely

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly agree

Please provide any comments to support your answer for question 3:
Not visible from Stonehenge

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Less disruption to existing trees

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
To keep the traffic on the A303 moving with a flyover

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
To keep the A303 traffic moving

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:

Protect Solutions

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Sacred Grove Western Isles

Response ID ANON-BABJ-X6K9-1

Submitted to **A303 Stonehenge**
Submitted on **2017-03-04 15:16:21**

Introduction

Name

Name:
Lois Lloyd BSc(Hons)

Postcode

Postcode:
PL5 3EX

Email

Email address:
loislloyd@blueyonder.co.uk

Postal address

Address:
7 Shirley Gardens
Manadon Plymouth

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Sacred Grove Western Isles Http://sacredgrovewesternisles.co.uk

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Q1 This tunnel planning cannot avoid the historical worldwide data on similar TBM tunnel boring machine projects which rarely finish on time, nor to projected costs, often doubling over time. The recent Office of Rail and Roads warning of funding problems with major schemes is significant:
“The updated plans may mean that some major improvement schemes are delayed or reviewed to make sure they deliver value for money. Highways England must agree the revised plans with government.” http://orr.gov.uk/publications/reports/update-on-highways-englands-capital-planning-and-asset-management

Fundamentally, this consultation has been too short in its timeline and too narrow in its scoping for an important UNESCO WHS for which there is both national and international concern;
It should have been more broadly advertised; and the consultation provides no effective choice for the WHS as both 'options' cause it considerable harm.
Absence of Historic England, English Heritage, National Trust and Wiltshire Council experts from events left little opportunity to question key decision influencers.

For these reasons we would like you to re- run the consultation with options that cause no further damage to the World Heritage Site, including options that do not involve building more roads on the WHS.

Option F010 surface road beyond the southern edge of the WHS is both lower in cost and more practicable to relieve congestion over a wider area than a tunnelled route through the WHS Expert opinions including National Trust and English Heritage see a 2.9k tunnel as the very least acceptable in a WHS that is 5.4km wide, yet they as Custodians have been compromised regarding what is acceptable in the WHS hence widespread agitation and objections to both portals sites!
Why weren’t these considerations included at the scoping stage?
Why is any development within the WHS area at all?

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Q2: Strongly Disagree – as noted in Q1, failure to take account of expert knowledge and concerns of WHS integrity safeguarding, including those widely known from previous historical A303/tunnel projects and recent invaluable finds at Blick Mead

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
Q3: Strongly Disagree – intolerable disregard for astronomical alignments, again, in spite of historical knowledge of the import of these. Why were these factors not taken into account during pre planning?

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
Q4: Northern route is the least damaging for the WHS but the Southern route will separate villages so Local views on the route must be taken into account

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Q5: Damage or compromise to the site of Blick Mead must be avoided and expert concerns must take precedence over building plans and costs
Future archaeological research must be considered and not lost in short sighted traffic gain.
Creating WHS development precedents should also be carefully avoided – this is a world renowned site, it deserves care and long term intelligent planning not short term visions.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Q6: As Q5 also avoidance of light and noise pollution, and damage to settlements, all of which will affect the historical integrity and ambiance of the WHS also the astronomical alignments; local needs must be noted.

7. Do you have any other comments?

Q7:
Q7: Creating WHS development precedents should also be carefully avoided – this is a world renowned site, it deserves care and long term intelligent planning not short term visions.
The development and grassing over of the A303 must not compromise full access to the Byways Open To All Traffic on the WHS in accordance with the Decision and precedent created by the 2011 public inquiry into the proposed permanent Traffic Regulation Order.
This Project lacks credible options, regardless of this being the latest in a line of previous failed similar projects. Lessons do not appear to have been learned, neither by planners nor Custodians. We get to initial consultation and still the old problems of protecting the integrity of the Stonehenge landscape gets lost in a demand to remove traffic at any cost.
Why were the obvious problems of a short tunnel not realised?
Why are we having to point out the obvious yet again?
There are much wider social policy implications and impacts upon the surrounding villages and towns and their traffic management by anything than just what happens in the immediate Stonehenge area.
The Custodians demand a Neolithic vision, failing to recognise that Stonehenge has been a loved and incredible vision just by being there, over centuries, during which change and human interaction has made it famous worldwide. It should not be stuck in one age and badly served by lack of resources both in fiscal and imaginative terms.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:
all media sources, you set this question so only one can be chosen which negates (tick all that apply)

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Too restricted in options, despite previous similar attempts on this project
too short in time available to comment
Not enough national information in the tv and papers considering this is the most famous UK and among the top of worldwide WHS in prestige
too narrow in visual information, more videos and overlaid routes on maps would have been useful
Was there any attempt at easy read information for those with disabilities or clearer printing?
You Ethnic Diversity form only offered White - not White British?

For these reasons we would like you to re- run the consultation with options that cause no further damage to the World Heritage Site, including options that do not involve building more roads on the WHS.

Salisbury & District Angling Club

Response ID ANON-BABJ-X6EY-U

Submitted to **A303 Stonehenge**
Submitted on **2017-02-24 09:27:09**

Introduction

Name

Name:
John Stoddart

Postcode

Postcode:
SP34BL

Email

Email address:
jbstoddart@tinyonline.co.uk

Postal address

Address:
Salisbury and District Angling Club
New Bottom Rd
Stratford Sub Castle
Salisbury
SP34HD

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Salisbury and District Angling Club

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Neither agree nor disagree

Please provide any comments to support your answer for question 1:
Our concern is not with the road proposal but with its impact at particular sites. We agree that the A303 needs relief and find this scheme addresses that concern. Any design of road relief scheme in the area will impact upon our fishery holdings and so it is that impact that we seek to address.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
As above.

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:
As above.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
As above.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
This is our most immediate concern. We hold the fishing up and down stream of the A303 at Countess and Ratfyn. These reaches are already impounded by a number of structures including the A303 bridge and are in a poor ecological state. They have limited capacity for river restoration because of the costly engineering difficulties at the site. This is SSSI, SAC and part of the Environment Agencies ongoing river restoration priority in the catchment. We hold long term leases on the fishing at this site and work closely with the agencies and owners towards its best care.
We would be concerned that any plan should not further increase the difficulties of this reach of the river, this would be particularly by impoundment or run off and environmental risks during construction. Without knowing exactly what is proposed at this site we wish to register our interest as lease holders with an economic interest in the upkeep of the riparian environment. We are concerned not to see our access to this important fishery limited as this will impact on us financially.
We believe that with good will there may be an opportunity for Env. Agency, Natural England, ourselves and landowners to bring forward a river restoration programme for this reach which could fulfill catchment plan ambitions for this area of the river. At best we would hope that the A303 scheme could provide this opportunity as well as being implemented in a way that fully protects the river.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
This is of lower concern to us.

7. Do you have any other comments?

Q7:
The crossing of the River Till is also of concern to us as we hold fishing down stream of the likely site on the lower Till and on the Wylye. Again without precise designs it is difficult to comment but our concerns would be the mitigation of run off, avoiding impounding the river, mitigation of environment risks during construction.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:
Through survey teams examining the river environment for the scheme.

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Salisbury & District Value Cars Ltd

Response ID ANON-BABJ-XGMG-2

Submitted to **A303 Stonehenge**
Submitted on **2017-02-02 12:52:39**

Introduction

Name

Name:
MR T J DEACON

Postcode

Postcode:
SP27YS

Email

Email address:
tim@salisbury-valuecars.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Salisbury & District Value Cars Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
I strongly disagree because I do not agree that the tunnel is a viable option. It is a very expensive extravagance that will fail to meet the needs of the 303 and will just cause further delays due to maintenance closures and will without doubt damage the very sensitive landscape around Stonehenge. This would only be a temporary solution for today and does not deal with the solutions needed for the whole of the county and beyond for the future. This project would be like Hiroshima on and under the landscape. There are better alternatives on offer!! Such as Mr Andy Rhind-Tutts alternative !!!

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
I don't believe there should be a tunnel !!!!!!!
I am a Director of a large Taxi, Executive Car and Coach operation in Wiltshire. THE TUNNEL WILL NOT!!!!!! solve our issues. There are still a great number of vehicles trying to get to the west country/cornwall from the A36, Blandford, Ringwood and beyond that travel directly into Salisbury trying to get to the West Country. Would it not be more viable to build a new by pass from the 303 around Salisbury (bear in mind that Government and John Glenn has promised this for many years incorporating a link to the Hospital giving better access and reducing possibility of death due to traffic congestion. link this road up with the 303 further down as per Andy Rhind-Tutts suggestion!!!

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
there should not be a tunnel built

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
You have not got it right for the last 40 years plus , and I think you are making a big mistake now!!
This will not solve the issue

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Think again about this proposal

7. Do you have any other comments?

Q7:
I am appalled at the amount of proposed money that is to be spent to create a demolition of our heritage whilst creating a white elephant that will not deliver what is required

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

Visit Wiltshire

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
An absolute waste of money and resources

Salisbury Motorcycle Action Group

Response ID ANON-BABJ-X3M9-Z

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 23:29:21**

Introduction

Name

Name:
Finbar Colson

Postcode

Postcode:
SP2 8AG

Email

Email address:
Slippery5am@icloud.com

Postal address

Address:
New Shaston
2a Burford Avenue Salisbury Wiltshire SP2 8AG

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Salisbury Motorcycle Action Group (a local group being part of a national organisation)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Safe access for all PTW's

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Safe access for all PTW's

7. Do you have any other comments?

Q7:
Any road change must allow free and unecumbered access to all powered two wheelers

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

TV or radio

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Sarum Bikers

Response ID ANON-BABJ-XGSC-4

Submitted to **A303 Stonehenge**
Submitted on **2017-01-30 10:29:59**

Introduction

Name

Name:
CHRISTOPHER JOHN LUXTON

Postcode

Postcode:
SP47XE

Email

Email address:
Cjluxton@qinetiq.com

Postal address

Address:
1 HARVARD WAY AMESBURY WILTS

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
SARUM BIKERS

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
A TUNNEL WOULD BE A MASSIVE WASTE OF MONEY , ALL THATS NEEDED IS A CONTINUOUS DUAL CARRIGE WAY RIGHT THRIUGH TO THE WEST COUNTRY WITH A FLYOVER AT COUNTESS ROUNDABOUT.FOR 5000 YEARS STONHENGE HAS BEEN OPEN TO PUBLIC VIEW AND ITS NICE TO SEE THE STONES WHEN YOU RETURN TO OUR LOCAL AREA , ITS WRONG FOR ENGLISH HERITAGE AND HIGHWAYS AGENCY TO TRY AND REMOVE FREE VISUAL ACCESS THEY DONT OWN WHAT IS A NATIONAL MONUMENT . SARUM BIKERS AND ALL THE PEOPLE I KNOW LOCALLY AND THATS ALOT OF PEOPLE FEEL VERY STRONGLY ON THIS , NO TUNNEL , JUST A DUAL CARRIGE WAY AND FLY OVER PLEASE!!!

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
DUAL CARRIGE WAY AND FLYOVER AT COUNTESS IS ALL THATS NEEDED,

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
DUAL CARRIGE WAY AND FLYOVER AT COUNTESS IS ALL THATS NEEDED.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:
JUST WIDEN EXISTING ROAD INTO A DUAL CARRIGE WAY!! EASY!!

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
JUST BUILD A FLYOVER AND BIN ROUNDABOUT AND CONJESTION IS GONE!!ITS NOT ROCKET SCIENCE!!

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
CONTINUOUS DUAL CARRIGE WAY WITH SLIP ROADS, MINIMAL CONJESTION?

7. Do you have any other comments?

Q7:
A TUNNEL IS NOT NECESSARY AND A MASSIVE WASTE OF MONEY WHEN WE ARE WHAT £1.7 TRILLION IN DEBT AS A NATION?WRONG TO RESTRICT FREE VISUAL ACCESS TO THE STONES ALL THATS NEEDED IS TO WIDEN EXISTING ROAD TO A DUAL CARRIGE WAY!! AND A FLYOVER AT COUNTESS AND BIN THE ROUNDABOUT!!

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Newspapers or magazines

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
MASSIVE AMOUNTS OF MONEY HAS ALREADY BEEN SQUANDERED ON THIS ! WHAT A WASTE SPEND IT ON THE NHS !!

Snake Bend Syndicate

Response ID ANON-BABJ-X6EC-5

Submitted to **A303 Stonehenge**
Submitted on **2017-02-24 11:31:49**

Introduction

Name

Name:
Geoff Wilcox

Postcode

Postcode:
SP4 9DY

Email

Email address:
geoffwilcox@btinternet.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Snake Bend Syndicate

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Impact on Ecology of the Avon valley due to poor consideration of the risk to water quality and infringement of the WFD and the SSI and SAC status of the Avon.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to disagree

Please provide any comments to support your answer for question 2:
See Question 1

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Impact on the Avon water course detrimental to the WFD and the status of the Avon Valley

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Damage to chalk Aquifers and poor controls over surface water drainage

7. Do you have any other comments?

Q7:
The risk to the Avon Valley has not been addressed, little known facts are in place with regard to tunnelling in the chalk and how water will be managed.
See below:
Water would be conveyed from the carriageway to Drainage Treatment Areas (DTAs), where the water would be treated as described below and then discharge through infiltration. An overflow from the infiltration basin would be placed where the infiltration is located near a watercourse. This overflow would be restricted to a rate agreed with the Environment Agency.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:
Contacted directly as the River Keeper for Mr Charles Rowland Ratfyn Farm

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Would prefer all future meetings and contacts to be advised via my email address.
geoffwilcox@btinternet.com

Society of Antiquaries of London

Response ID ANON-BABJ-X6JN-N

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 12:31:21**

Introduction

Name

Name:
John Lewis

Postcode

Postcode:
W1J 0BE

Email

Email address:
jlewis@sal.org.uk

Postal address

Address:
Society of Antiquaries of London
Burlington House
Piccadilly
London W1J 0BE

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Society of Antiquaries of London

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
The Society welcomes in principle the Highways England proposals for a 2.9km bored tunnel for the A303 from just west of the Countess Roundabout to a point west of Normanton Down. This is a positive recognition of the importance of the World Heritage Site (WHS), a potentially deliverable means of significantly reducing the adverse impact of the A303 on the landscape round Stonehenge, and of providing a solution to the bottleneck caused by the existing road. As the scheme is designed in more detail, the Society will wish to see that there is minimal impact on scheduled monuments, the least possible new construction within the WHS, and that this solution to traffic within the WHS proves to be the least visible and audible from key monuments. We will also wish to see the results of archaeological evaluation work carried out in advance of some of the key areas on the surface where the proposed road will run, and we have a number of observations (below) about the impact of construction work on the Stonehenge landscape.

We are also aware, however, of Paragraph 110 of the Operational Guidelines for the Implementation of the World Heritage Convention, which states that ‘Impact assessments for proposed interventions are essential for all World Heritage properties.’ To make an adequate impact assessment it is necessary fully to understand the range of impacts, positive and negative, on the attributes that carry the outstanding universal value (OUV) of the site before a decision is made. A sound decision to proceed with either of the short-listed routes therefore needs to be based on a full understanding of the impacts of each option on the OUV of the property, including buried archaeology both on the route lines, and within the often extensive additional land that could be disturbed by temporary construction works and ecological mitigation measures.

We understand that archaeological evaluation is being undertaken, but until that work is complete and available for public scrutiny, together with realistic and affordable construction management plans, including precise details of the design, especially for the portals and their approach ramps, lighting, fencing, signage, and drainage, as well as ecological mitigation plans for each option, the evidence base to inform a sound and defensible decision to adopt a specific route, especially one which clearly will have some impact on the WHS, is seriously defective. When this information is available, heritage impact assessments of the options should be produced and published in accordance with Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS International, 2011), following the advice of the 2016 ICOMOS/UNESCO Advisory Mission (4.2.1, p25).

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
The tunnel mouths, both to east and west, are very close to significant archaeological features in the World Heritage Site landscape. The tunnel length at present proposed is 200m less than the 3km length which the consultation document asserts is the most that can be constructed without ventilation shafts. A modest small extension of the tunnel's length, particularly at its western approach would give a little more breathing space to key monuments within the WHS.

We must, however, see the detailed proposals for the eastern tunnel portal and its screening. We must see well-reasoned evidence that the buried remains of the Avenue will be secure, and will wish to be able to gauge how Highways England will ensure there is no impact on the Stonehenge Avenue in the positioning and, importantly, during the construction of the eastern portal.

In any proposal to excavate a tunnel, it is the approaches that do the harm. Design drawings do not necessarily reveal the full extent of the permanent and temporary impacts of construction based on the reality of the large scale civil engineering, which can reach substantially beyond the line of the road itself. The fact that parts of this road, and the tunnel mouths themselves, where much of the activity of construction will be concentrated, are within the WHS means that the practical aspects of the engineering works need to be considered at the outset and be included in the assessment. The results from the new evaluation trenches along the course of the proposed new road alignments west of the western tunnel portal will be of key interest here.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to disagree

Please provide any comments to support your answer for question 3:
See our answer above to Q2. The tunnel mouths, both to east and west, are very close to significant archaeological features in the World Heritage Site landscape. The tunnel length at present proposed is 200m less than the 3km length which the consultation document asserts is the longest that can be constructed without ventilation shafts. A modest extension of the tunnel's length at the western approach in particular would enable the new road alignment to give a wider berth to the Normanton group of barrows at the western end.

The prospect of boring beneath the Normanton barrow group is on the face of it alarming. This is arguably the most famous barrow group in the country and unintended damage through fracturing of the chalk bedrock could destroy the integrity of intact deposits. There could also be a shaft burial amongst the mounds, which tunnel boring would disturb. The reasons for placing the western portal in this sensitive location have not been explained.

The portal in the location proposed will also be roughly on the line of the mid-winter sunset as viewed from Stonehenge, as is pointed out by the Royal Astronomical Society. Even if the lighting of the portal and the headlights of cars are not directly visible from Stonehenge, they will in all probability create a significant glow, thus adversely impacting upon the desired quality of darkness at the horizon. As that sightline is one of the major attributes of the WHS's central monument, it would seem to be counter-productive to align the road so nearly on it, even though at the depth planned for the tunnel portal, this will not be visible from Stonehenge itself.

All in all, therefore, it might seem less risky to place the portal further to the north west (west of Normanton Gorse and south of the existing A303) thus avoiding the Normanton Down Group altogether. The road could still utilise lower ground south of Longbarrow Crossroads, and the existing A303 could still be closed, albeit that the new route would be closer to that barrow group and the extant scheduled long barrow on Wilsford Down. The current proposal favours the Winterbourne Stoke Longbarrow Group at the expense of (and potential risk to) the Normanton Down Group. A fuller Impact Assessment examining the siting of the western tunnel mouth, to seek an optimised route for the A303, is required.

We therefore wish to see the detailed proposals for the western portal and any proposed screening. We wish to be able to gauge how Highways England will ensure there is no impact on the Normanton group of barrows. We wish better also to understand whether a bored tunnel could cause a threat or damage to Bush Barrow, the most celebrated round barrow in the region.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The northern route has had archaeological evaluation work carried out, and in consequence can be more easily planned for in detail. If the western tunnel portal can be moved marginally north and westwards, this make it perhaps easier to link with a northern by-pass for Winterbourne Stoke.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
We have no substantive issues over the proposals for the Countess junction

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The most important issues are the impact that such a junction, whether on the northern or southern route round Winterbourne Stoke, will have on the landscape, both during hours of daylight and darkness. The introduction of a significantly lit junction into the landscape at this point will be a substantial distraction to the WHS landscape. We also understand that the site of the proposed junction, wherever it will be placed on the A360 or on the A303, may be the chosen location for much of the necessary plant, storage, and equipment compounds for the overall roads construction. If so, it will be very important to ensure that the full area of the site to be affected is properly evaluated for its archaeological and ecological evidence as part of the Heritage Impact Assessment.

7. Do you have any other comments?

Q7:
In 2006, responding to the then published proposals for the A303 in the Stonehenge area, the Society strongly endorsed the principle of a bored tunnel, expressing the view that this was far preferable to a cut-and-cover version, would remove the negative impacts of surface traffic and its routes within the WHS, and would go a long way towards restoring the completeness of the historical landscape within which Stonehenge stands. We also urged moving rapidly towards implementation. The view we have stated above is consistent with this stance, and welcomes the fact that a longer tunnel is now being actively considered.

There could be permanent direct and indirect impacts on designated and undesignated heritage assets as a result of the construction process. Constructing the boring machines, removing the chalk and transporting it away, shipping in the reinforced concrete to line the tunnel will need a significant land take. There is no indication of where any of that might occur, or its scale. Details of construction methods and of enabling works, whether temporary or permanent, must also be considered, and be subject to the promised consultation later in 2017 and prior to the submission of the Development Consent Order. Such proposals must also reveal what is to be done with the bed of the existing A303.

The presence of a major dual carriageway road on the character of the landscape through which it passes is felt over a very wide area, far beyond its zone of visibility. Such roads, where they are on the surface, cannot be crossed on foot (as the A303 can at present); they need underpasses or overbridges. Noise is a key impact, but those who will be encouraged to walk through the landscape around Stonehenge will always be conscious of its proximity and its presence in the landscape. Highways England need to take every care to minimise the impact of the finished road on the landscape they are seeking to protect through the construction of this tunnel and the approaches to it.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Other online/website sources

Other source:
HIghways England event at the Society's Burlington House HQ

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
It seems to have been pretty comprehensive. Perhaps, in view of the national interest and significance of the site of Stonehenge, there could have been more displays of the proposals outside the immediate area of Salisbury and Stonehenge itself.

South West FoE

Response ID ANON-BABJ-X3W2-3

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 15:50:23**

Introduction

Name

Name:
Kate Freeman

Postcode

Postcode:
SN10 3JT

Email

Email address:
kafreeman42@gmail.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
SW Friends of the Earth

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
1) It is very disappointing that no solution has been presented for consultation that avoids damaging the Stonehenge World Heritage Site altogether. Not doing so disrespects the Outstanding Universal Value of our most iconic World Heritage Site, an archaeological treasure store without parallel in Europe. Instead the approach taken by Highways England is narrowly focused on the Henge Monument and visitor experience.
The WHS setting would be impacted on as well which is likely to have other archaeological treasure. For example the archaeological dig at Larkhill for new MOD housing has revealed remarkable finds and the dig at Blick Mead might extend into areas impacted by the road scheme and junctions.
2) The approximately 2km of new dual carriageways either side of the tunnel portals leading to grade separated junctions introduces major highways engineering into a landscape of special status which will draw in new traffic and noise to an otherwise tranquil areas.
3) There is a serious risk of permanent damage caused by the Winterbourne Stoke bypass options which would cross a Special Area of Conservation and the western flank of the scheme on a Special Protection Area (Normanton Down vicinity). There is no robust Appropriate Assessment to facilitate proper comment, however we are aware that the Stone Curlew, an Annex 1 species which has been successfully nesting in the RSPB reserve is susceptible to human disturbance. There will undoubtedly be disturbance both from constant traffic noise and new roaming visitor patterns that English Heritage plan to introduce.
4) The traffic case for widening the single carriageway to an expressway is unconvincing. Despite the stopping up of the A344, the AADT has remained similar since 2000 at around 23,000-24,000. Whilst there are times when congestion is a cause for considerable concern to local communities and motorists these are at predictable times and could be imaginatively managed.
You maintain in Executive Summary p1 that the traffic operates at "almost twice its capacity". This is factually incorrect. This is derived from DMRB Vol 5 Section 1 Part 3 (TA 46/97) which sets the upper threshold of the economic flow range for an ordinary single carriageway at 13,000 AADT. It is an estimate of the traffic flow range at which a road will operate with greatest efficiency. This is not the same as capacity, which is best expressed as the Congestion Reference Flow of around 22,000 - 23,000 AADT which the TAR refers to later (see TA 46/97 Annex D) which is much the same as at present. Both the single two-way carriageway and a Wide Single Carriageway which has a CRF of 32,000-33,000 should have been considered as an affordable alternative option for a longer tunnel.
5) The TAR assessment fails to appraise the traffic increase from a wider area reassignment on the model. The comparable proposal for dualling the A30 at Bodmin-Indian Queens experienced a 20% increase in traffic volumes three years after opening. The A303 has the potential for much greater reassignment in Wiltshire between London and Exeter, in much the same way that congestion increased following the opening of the dual carriageway through the Hindhead Tunnel in 2011 on a strategic route from London to Portsmouth. Any incident on the new dual carriageway would force A303 traffic to reassign routes through villages if the existing A303 is not retained.
6) We believe that the scheme represents poor value for money and fails to achieve its objectives.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
See our reply to Q1.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
See our reply to Q1
It is premature to comment since we understand that the Western portal and new approach road are subject to further archaeological and geological survey.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
1) In order to comment we need to see
(a) a robust Appropriate Assessment for the impact on the River Till and nearby habitats
(b) a hydro-geological assessment on the whole route

2) We agree that the village needs relief from incessant traffic but we are unconvinced that a bypass to the south would not disturb more people in Berwick St James and a bypass to the north would not continue to disturb the people in Winterbourne Stoke. The noise and traffic fumes of high speed traffic would be considerable.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The proposal for a grade separated junction is inappropriate. It cannot be ignored that this major infrastructure would have a major landscape impact on the setting of the World Heritage Site and damage its integrity. The primary objective should be the protection of the whole WHS and its setting for all time.
More imaginative and effective solutions need to be found in partnership with those who are exploring Blick Mead and those who implement the WHS Management Plan.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Our comments are similar to Q5.
We need to add that the vagueness of the north south routes to Salisbury and Devizes means that this consultation is too premature for public consultation.

7. Do you have any other comments?

Q7:
Despite Government's commitment to the UNESCO World Heritage Convention it is evident that the Client's instruction (i.e. Department for Transport) is to build a solution acceptable to Government's predetermined aspiration to build a tunnel of 'at least 2.9km' for a dual carriageway across the 5.4km WHS within its budget of £1.4bn regardless of other possible options and other means of spending that budget more fruitfully.
We participated as stakeholders in one the transport and access workshops on 18 September 2016 imagining that the issues discussed would lead to a series of options which had proper regard to local traffic management, respected the full width of the WHS and its setting, as well as options for local and strategic access by no-car modes in line with the interests of the stakeholders present.
In conclusion, the proposals are too vague, the information provided is geared towards a predetermined outcome and therefore do not offer the local, national and international communities sound options worthy of our WHS.
This consultation is contrary to the principles of public participation and contrary to the Aarhus Convention, a protocol to empower people with the rights to easily access information and participate effectively in decision-making in environmental matters.
We would like to see the consultation re-run with options that fully protect the WHS.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
See comments in Q8.

Friends of the Earth Proforma

To: A303Stonehenge
Subject: A303 Stonehenge Consultation Response

Dear Highways England Consultation Team,

I strongly disagree with the proposed new roads and tunnel proposed for the A303 at Amesbury – Berwick Down. I believe it is wholly inappropriate to dig a tunnel through the Stonehenge area, which is an irreplaceable UNESCO World Heritage Site.

I consider your consultation is fundamentally flawed:

- You are offering no real choice as both 'options' inflict damage on the Stonehenge landscape

- It is far too brief at 7 weeks

For these reasons I would like you to rerun the consultation. Please include options that cause no further damage to the World Heritage Site, including options that do not involve building more roads.

I strongly disagree with Highways England's proposals:

- new roads, cuttings, tunnel portals and major junctions would result in irreparable damage to archaeology and landscape. This would be in direct contravention of UK planning policy and the World Heritage Convention;

- they would increase traffic, noise and light pollution through the World Heritage Site

- here is a threat to the integrity of the major new archaeological finds at Blick Mead on the edge of the World Heritage Site

- Important nature areas including local rivers and springs could also be at risk.

- The whole "expressway" plan would lead to a major increase in traffic on the route. The drive to combat dirty air and climate changing emissions would be set back.

Yours sincerely

South Wiltshire Ramblers Association Group

Response ID ANON-BABJ-XGYY-Z

Submitted to **A303 Stonehenge**
Submitted on **2017-02-13 20:33:45**

Introduction

Name

Name:
Norman Martin

Postcode

Postcode:
SP5 2NE

Email

Email address:
jnmagpie@tiscali.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
South Wiltshire Ramblers Association Group

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
Whichever route is chosen there will be rights of way crossing the roads as they currently across the A303. Ramblers find these crossings potentially dangerous. Could it please be ensured that any right of way crossing a new route will be constructed so that the crossing is safe. There has been discussion that any crossing should be in an underground tunnel which of course would be the safest option.
Will you please ensure that when decision is made on the new route that consultation on the crossings of rights of way will be made with interested parties.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
See above comments regarding the crossing of rights of way.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:
Picked up booklet at Downton Library.

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Stonehenge Alliance

From: Kate Fielden <katefielden20@gmail.com>
Sent: 03 March 2017 12:47
To: A303Stonehenge
Subject: Response to A303 Stonehenge consultation
Attachments: Stonehenge Alliance response to Highways England. 3 March 2017. Final docx.pdf

Dear Sir or Madam,

I attach the response to the A303 Stonehenge consultation on behalf of the Stonehenge Alliance.

I would be grateful if you should, please, let me know that it has been received

Yours faithfully,

Kate Fielden
Hon Secretary to the Stonehenge Alliance

THE STONEHENGE ALLIANCE
From The Chairman, George McDonic, MBE, BL, DIPLTP, DPA, FFB
c/o Kate Fielden, Hon Secretary,
1 The Old Smithy, Alton Priors,
Marlborough, Wiltshire SN8 4JX

A303 Stonehenge Consultation
Highways England.

Sent by email on 3 March 2017
to A303Stonehenge@highwaysengland.co.uk

Dear Sir or Madam,

The Stonehenge Alliance is a group of non-governmental organisations and individuals, formally constituted in 2001 to oppose the Government's scheme to widen the A303 Trunk road across the Stonehenge World Heritage Site (WHS), including a 2.1km tunnel close to the henge. Since then we have sought enhancements to the WHS and opposed developments that would cause it significant harm. Further information about the Alliance may be found on our website at www.stonehengealliance.org.uk/about-us/.

In this response to Highways England's consultation A303 proposals we have the following general points to make at this stage.

1. *General points*

1.1. We strongly disagree with the proposals for a 2.9km tunnel across the central part of the WHS and positioning of the west and east portals well within the WHS landscape. The scheme would be highly damaging to the WHS, its archaeology and a significant proportion of its attributes of outstanding universal value (OUV). Notwithstanding demands for 'affordability', we note a lack of understanding of OUV in the Technical Assessment Report (TAR) which has led, in our view, to invalid conclusions about damage to the WHS, its archaeology and setting. (Highways England's Q.1–3.)

1.2. The east tunnel portal would have a major adverse impact on the setting and quiet enjoyment of the Avenue, a key feature of the landscape. It would also further degrade the protected 'Nile Clumps' of trees. There is concern about damage to the Mesolithic site, Blick Mead. (Ref. Highways England Q.2)

1.3. The west portal would damage the integrity and setting of the Normanton Down barrow group. The highway emerging from the tunnel would compromise the spatial relationships between a group of Neolithic long barrows deliberately sited around the head of a dry valley in the western half of the WHS. This area is also of considerable importance for its upstanding and buried archaeology of the Bronze Age which may include fragile settlement remains of this and the Neolithic periods. (Highways England's Q.3.)

1.4. We also have serious concerns about the likely disturbance a new expressway nearby would cause to the RSPB breeding reserve for Stone Curlew (an Annex 1 protected species). No

account appears to have been taken of the potential impacts on the bird reserve of new visitor patterns, if the A303 barrier to access is removed. (Highways England's Q.3.)

1.5. We have no views to offer at the present time on the Winterbourne Stoke bypass options, since they are integral to the proposed scheme that would damage the WHS. We do note, however, that both options have serious implications for archaeology (for which there is no information supplied), and for ecology and the water environment. (Highways England's Q.4)

1.6. In respect of proposals for A303 junctions with the A345 and A360, no detailed information has been provided on which to comment. It is evident that grade separated junctions would have a severely adverse impact on the setting and environment of the WHS and almost certainly on elements of its archaeology and on biodiversity and the water environment. (Highways England Q.4 and 5)

2. *Comments arising under Highways England Q.7* *('Do you have any other comments?'):*
2.1. We deplore the lack of options for consideration that would not damage the WHS; and that insufficient comparative data is supplied against which to assess a long bored tunnel and 'do nothing' options.

2.2. We are concerned about archaeological information presumably obtained at the last minute and after the Technical Appraisal Report had been written; as well as the absence of archaeological information yet to be obtained and used properly to inform the Heritage Impact Assessment (HIA) and/or final route options. We have been verbally informed that the route across the western WHS shown in documentation provided is to be re-located: this is unsatisfactory as a basis for consultation.

2.3. The heritage impacts have been gauged using the Design Manual for Roads and Bridges assessment process instead of careful attention to the International Council for Monuments and Sites' (ICOMOS) *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* which advises that standard EIA is not appropriate for WHSs and which, unlike standard EIA, does not advise balancing of beneficial and adverse impacts on heritage assets and/or attributes of OUV. There is scant attention to the WHS as a whole – a heritage asset of the highest significance – and constant emphasis is given to that part of it within view of the henge, termed 'the most sensitive part of the WHS' – an approach rejected by all stakeholders and the Management Plan some years ago.

2.4. The scheme pays little attention to the Government's obligations under the World Heritage Convention, notably for protection of the whole WHS property; or to the demands of planning policy and guidance for WHS, which include protection of its setting as well as the WHS itself. The 'Vision' and 'Purpose' of the WHS Management Plan and a number of its priorities, aims and policies are disregarded. The importance of the 'landscape without parallel' has been overlooked in favour of standard landscape assessment.

3. *In consideration of the benefits and disbenefits to the historic environment of the scheme:*
3.1. The TAR, para.18.3.39 states that:

> "Route Options D061 and D062 would result in a range of slight to very large adverse impacts on more than 60 scheduled monuments",

while para.18.3.37 advises:

> "In terms of the historic environment as a whole (i.e. both within and outside the WHS), the route options would have an impact on the settings of many scheduled monuments within and around the WHS which would benefit from the removal of the existing A303. The construction of the new route would have adverse impacts on the setting of many other scheduled monuments and the fabric of one monument and numerous areas of non-designated archaeology, **this would result in a greater number of adverse effects than beneficial effects** [our emphasis]**.** Additionally, there would be adverse impacts on a number of listed buildings, a conservation area and a registered park and garden; resulting in adverse effects on these environmental resources."

This could hardly be considered a beneficial outcome of the road widening scheme.

3.2. The TAR also states that 'the route options would introduce major new infrastructure into the WHS adversely affecting important assets and key attributes of the site's OUV, e.g. the location of the western portal relative to Normanton Down Barrow Group.' We would also include the adverse impact of the eastern portal on the Avenue in this assessment.

3.3. The TAR, para. 18.3.38 underlines that:

> "On the basis of WebTAG, the assessment would indicate that, in purely numerical terms, the adverse effects resulting from both D061 and D062 route options would outweigh the beneficial effects, with D062 overall having a slightly less adverse effect on heritage assets, particularly outside and to the west of the WHS." It goes on to say:
>
> "However, as set out in the NPSNN [National Policy Statement for National Networks] (2015), great weight must be given to the beneficial effect resulting from the changes to the WHS and also the beneficial impact on Stonehenge and The Avenue."

We find no guidance within the NPSNN that would give rise to this suggestion. We also disagree with the simplistic and nonsensical suggestion in TAR para 18.3.39 that:

> "In this context, a neutral score has been recorded for the historic environment, representing a balanced outcome between important beneficial impacts and a large number of adverse impacts on designated and non designated assets."

3.4. Clearly, the scheme as a whole would result in serious disbenefits to the historic environment, notably of the WHS, that cannot be ignored.

4. *Planning policy considerations*

4.1. The priorities and purpose of the WHS Management Plan are only partially stated in the TAR, para. 4.4.7, as follows:

> "The purpose of this Management Plan is to guide the care of the WHS in order to sustain its Outstanding Universal Value (OUV). The priority for the Management Plan is to encourage the sustainable management of the WHS, balancing its needs with those of the farming community, nature conservation, access, the landowners and the local community."

The Management Plan actually states (p.11):

> "Priorities for 2015–202. The primary purpose of this Management Plan is to guide all interested parties on the care and management of the World Heritage Site to sustain its Outstanding Universal Value. **This will ensure the effective protection, conservation and presentation of the World Heritage Site for present and future generations. It will also ensure that all decisions affecting the World Heritage Site move towards the achievement of the Vision.** [Our emphasis]

Priority 5 of the Management Plan is to "Ensure any development is consistent with the protection and, where appropriate, enhancement of the monuments and their settings and the wider WHS landscape and its setting."

4.2. The wording of Key Policy 59 of the Wiltshire Core Strategy is incorrectly paraphrased in the TAR and Core Policy 6 (Stonehenge) is not mentioned. The opening wording of Core Policy 6 is:

> "The World Heritage Site and its setting will be protected so as to sustain its Outstanding Universal Value in accordance with Core Policy 59."

5. *Transport considerations*

5.1. *Options*

5.1.1. The primary purpose of the A303 scheme is to create an expressway. Traffic data has been presented which shows that the Annual Average Daily Flow figures for 2015 are lower by some 3,000 a day than they were than in 2003, when the previous A303 widening scheme was advanced, principally on heritage, not transport grounds.

5.1.2. On the basis of the information given, the case for dualling the A303 between Amesbury and Berwick Down has not been made.

5.1.3. It is misleading to state (TAR Executive Summary, p.1) that this section of road operates at twice its capacity when the Congestion Reference Flow for a normal two-way single carriageway road is around 22,000 to 23,000 Annual Average Daily Traffic (AADT), much the same as at present. A wide two-way single carriageway road has still more capacity.

5.1.4. The assessment of the current option fails to appraise the effects of wide area route reassignment.

5.1.5. The options considered have been prematurely discounted. The option of a 2.9km tunnel across the 5.4km World Heritage Site presented for consultation has been made after alternatives have been rejected on grounds that are arbitrary and opaque.

5. 2. *Benefit Cost Ratio*
The Benefit Cost Ratio is negative, and only becomes positive when notional WHS monetised benefits are added in. We believe the methodology is open to challenge. For instance, a modeller could derive a plausible Present Value of Benefits (PVB) of £2bn for the benefit to the WHS to 'pay for' doubling the length of the tunnel. Indeed it is acknowledged (TAR, para. 11.4.49) that there is a significant margin for error in the method used.

5.3. *Modelling*
5.3.1. The modelling presented is not fit for purpose. Moving to variable modelling at a later stage calls into question the credibility of any decisions made on the basis of fixed trip modelling on a highly constrained local network at this stage

5.3.2. It seems odd to base decisions on the expenditure of £1bn on a strategic trunk road on local effects (*cf.* TAR, para.10.4.10).

6. *Consultation process* (Q.7–9)
6.1. We believe the consultation process to be deeply flawed. The decision to proceed with a 2.9km tunnel was made by the Government in December 2014, apparently based largely on financial grounds, i.e. how much money it was prepared to spend on the road. No assessment appears to have been undertaken to allow an informed opinion as to why that particular budget was proposed or agreed. From that time until now there has been no public consultation on this option which is the only option before us and work is already in progress on achieving it.

6.2. Until the present consultation was announced at very short notice, 'consultation' appears to have been only with a few 'stakeholders' (TAR, p.13), including the National Trust whose land would not be physically affected. Apparently, local farmers, whose land might be affected, have not been involved in the pre-public consultation process.

6.3. Representatives from two Alliance supporter-organizations attended an Arup Atkins Joint Venture Traffic and Access Stakeholder Working Group on 18 September 2016. A second meeting to present the same information was attended by a Stonehenge Alliance representative the following day. Our representatives were told nothing about options being taken forward, making it impossible for useful discussion to take place. None of the 'objectives' of this stakeholder group as set out in the TAR (p.268), was even considered at that meeting, despite requests, notably for information on short-listed options.

6.4 The consultation is premature in all of the above respects. Not only has there been no meaningful dialogue between important stakeholders and Highways England, we are now presented with inadequate information on major issues, such as archaeology, biodiversity and landscape, to assess the decision process that Highways England has so far undertaken.

6.5. The consultation events held by Highways England were limited in area. Seven weeks of consultation is clearly inadequate for a scheme affecting such an internationally important site. In our opinion nothing short of a 12 week consultation with national and international publicity,

to draw people's attention to the scheme, is satisfactory. We have, for example, over 26,000 signatories to our petitions, at least 10% of whom are signatories from abroad.

6.6. It is a major flaw in this 'consultation' that there were effectively no options on the table, apart from a choice of bypass route for Winterbourne Stoke. In terms of the key impact of the proposals on the World Heritage Site, there is little difference between them. This consultation is little more than a marketing exercise for a broadly predetermined scheme rather than following proper public consultation principles of involvement.
Consequently, it is our view that the scheme process should be halted until such time as a full range of options and key data are made available. Options that would do no further damage to the WHS need to be brought forward – even if their costs are more than have been currently allocated for this section of the A303.

7. *Value for money considerations*
The scheme as proposed offers poor or uncertain outcomes in most respects.
We have the following observations arising from TAR statements concerning Corridor D:

- No data – only perceptions or aspirations – have been provided on the need for road widening to promote economic activity and house building in the South West.
- Journey time saving as a result of road widening is negligible.
- Rat running could be dealt with without road widening.
- Road widening induces more traffic. Measures to relieve local congestion should be tried before embarking on a project that would be expensive, damaging to the WHS and ineffective within a few years.
- There would be large adverse effects on biodiversity and the water environment (TAR, p.14).
- Benefit to the historic environment overall would be adverse. (TAR 18.3.37), and within the WHS slight adverse overall (TAR, p.129)
- Correctly assessed under ICOMOS' criteria, we believe there would be large adverse effects on the WHS that could not be offset by benefits to the central part of the WHS.
- "In terms of landscape both D061 and D062 would have a Moderate Adverse effect." (TAR, p.13)
- "In terms of greenhouse gases all options would result in an increase in user carbon". (TAR, p.13)
- Under willingness to pay assessment, a high response was shown to the suggestion of removing the A303 from the vicinity of the henge. No score was sought for removal of the A303 from the WHS.
- "Corridor D offered lower value for money, primarily due to the high cost of a tunnel." (TAR, p.99).
- Overall the scheme is considered medium value for money. (TAR, p.12).
- Details given of the assessment against EAST (early assessment and sifting tool) cases: show ***poor* financial case and *neutral* for the commercial case** for Corridor D [our emphasis].

In conclusion
We believe that the current proposals are not fit for purpose, do not represent a genuine choice of options in respect of the WHS and that the consultation is inadequate and therefore flawed and it should be rerun. The current budget allocated to this section of the A303 significantly understates the economic and heritage value of this unique World Heritage Site and this should be taken into consideration.

Yours faithfully,

George McDonic, MBE
Chairman, the Stonehenge Alliance

THE STONEHENGE ALLIANCE IS SUPPORTED BY:
Ancient Sacred Landscape Network; Campaign for Better Transport;
Campaign to Protect Rural England; Friends of the Earth; and
RESCUE: The British Archaeological Trust

From: Hilary Deighton <hilary.deighton1@tiscali.co.uk>
Sent: 05 March 2017 17:03
To: A303Stonehenge
Subject: Stop this act of cultural vandalism

Dear Sirs,
You may already have heard from me through the Stonehenge Alliance, but unfortunately there has been some difficulty with either their computers or mine and my response may not have been received.
In case it has, I shall keep this brief. There is, however, no harm at all in doubling and redoubling the anger, outrage and disbelief not only of archaeologists and historians but so many of the wider public with a range of concerns about the preservation of the environment and in this case an environment of profoundly important world significance.
To continue with your ill-considered and horribly destructive plans would be to ruin for now and for all future generations irreplaceable sites and an up-to-now marvellously preserved landscape which is continually revealing new information and for which there is no parallel. Anywhere.
No-one in their right mind would build a *tunnel* on one of the entire world's most important archaeological landscapes.
There are many of us who need a lot of convincing that anything beyond routine road maintenance on the existing road is necessary, let alone desirable. It costs nothing to do no harm - if the avoidance of an act of irreperable cultural vandalism on the scale of the destruction of sites in the Middle East means nothing to you, then think money. It costs nothing to do no harm. It costs the past, the present and the future to destroy the Stonehenge landscape.
Listen to what you are being told by people who actually know, and throw out this hideously misconceived piece of vandalism now.
Yours faithfully,
Hilary J. Deighton, B.A., M.Litt.

THE STONEHENGE ALLIANCE

From the Chairman, George McDonic, MBE, BL, DIPLTP, FRTPI, DPA, FFB

The Rt Hon Patrick McLoughlin MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Sent by email on 3 October, 2014

Dear Secretary of State,

Proposals for the A303 at Stonehenge

The Stonehenge Alliance* is a group of non-Government organisations and individuals originally formed in 2001 which maintains a watch over any major new development that would adversely impact on the World Heritage Site (WHS). We are writing to request your intervention in the current process concerning proposed road improvements affecting the site.

The A303 is currently one of six identified road corridors subject to feasibility studies to examine possible improvements. It is most regrettable that this process has focused on road improvements rather than on considering more sustainable transport alternatives. We have grave concerns about the impacts that the proposed road options might have on the WHS.

Stonehenge is an iconic symbol of Britain's past people and culture. It is a significant draw both nationally and internationally and important culturally and economically. Yet as important as the Stones are, it is their context, the surrounding landscape, which helps make them so special. This is recognised in the designation of the Stonehenge WHS which covers nearly 27 square kilometres. The importance of the surrounding landscape was highlighted in the recent BBC TV *Operation Stonehenge* series which identified numerous new sites in the wider WHS area.

At the last Corridor Feasibility Study Reference Group, a bored tunnel between 2.5 and 2.9km long as well as a northern trunk road diversion, were proposed for the A303 at Stonehenge for further investigation, while a request for a long bored tunnel of at least 4.5km to be costed was dismissed outright. All of the options now under consideration for the A303 at Stonehenge could inflict severe and irreversible damage upon the WHS and its setting and might well lead to the WHS being considered for the World Heritage in Danger List. A longer tunnel would avoid this.

The current approach appears to be pursuing options contrary to the National Planning Policy Framework and at odds with advice from UNESCO and, notably, the International Council on Monuments and Sites (ICOMOS) in its *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011).

We urge you to intervene in the study to ensure that a long bored tunnel of at least 4.5km (for which Highways Agency drawings were done c.2001) be examined and costed alongside the shorter tunnel option already put forward by the Corridor Feasibility Study Reference Group. There is real concern about the haste in which the study is being progressed and we request that greater time for consultation and engagement is taken in order to safeguard this iconic cultural asset.

I look forward to your reply.

Yours sincerely,

George McDonic
Chairman, the Stonehenge Alliance

Copies to: Baroness Kramer, Minister of State for Transport
Rt. Hon. John Hayes MP, Minister for Roads
Julian Glover, Special Adviser
Mary Creagh MP, Shadow Secretary of State for Transport
Richard Burden MP, Shadow Minister for Roads
John Glen, MP for Salisbury
Claire Perry, MP for Devizes
Sir Simon Jenkins, Chairman, The National Trust
Dame Helen Ghosh, Director General, The National Trust
Simon Thurley, Chief Executive, English Heritage
Susan Denyer, Secretary, ICOMOS-UK
Petya Totcharova, Head of Europe and North America Unit, UNESCO World Heritage Centre
Dr Mike Heyworth, Director, Council for British Archaeology
Alistair Sommerlad, Chairman, Stonehenge and Avebury WHS Partnership Panel

Stonehenge Alliance Proforma

To: A303Stonehenge
Subject: Stand up for Stonehenge World Heritage Site

Dear Madam/Sir,

A303 Stonehenge Consultation Response

I strongly disagree with the 2.9km tunnel proposal across the World Heritage Site.
This consultation is fundamentally flawed:

• It is far too brief and narrowly focused for an important UNESCO WHS for which there is both national and international concern;
• It should have been more broadly advertised; and
• The consultation provides no effective choice for the WHS as both 'options' cause it considerable harm.

For these reasons I would like you to rerun the consultation with options that cause no further damage to the World Heritage Site, including options that do not involve building more roads. I would also like to register that I strongly disagree with what has been proposed for the following
reasons:

• The 2.9km tunnel would be far too short for a World Heritage Site which is 5.4km wide;
• The tunnel and the accompanying new road, tunnel portals and major junctions would result in irreparable damage to archaeology and landscape in direct contravention of UK planning policy and the World Heritage Convention;
• It risks damaging the integrity of the Mesolithic site at Blick Mead; and
• It would increase traffic, noise and light pollution through the World Heritage Site

Yours faithfully

Stonehenge and Avebury World Heritage Site Partnership

From: Simmonds, Sarah <Sarah.Simmonds@wiltshire.gov.uk>
Sent: 06 March 2017 15:41
To: A303Stonehenge
Subject: RE: A303 Consultation: Feedback: World Heritage Site Managment Plan
Attachments: Final A303 non statutory consultation WHSPM March 217.pdf

Dear Oli,

Thank you for your acknowledgement.

In my rush to meet the deadline I've just seen that I sent you the version that was not the final proof read edit .

I have attached this as a PDF and would be grateful if you could refer this version.

Thank you very much for your understanding.

Kind Regards,

Sarah

From: A303Stonehenge [mailto:A303Stonehenge@highwaysengland.co.uk]
Sent: 06 March 2017 14:47
To: Simmonds, Sarah
Subject: RE: A303 Consultation: Feedback: World Heritage Site Managment Plan

Dear Sarah

Thank you for your detailed comments relating to the A303 Stonehenge public consultation.

We have recorded them as your feedback to the consultation.

The feedback we receive will be assessed and analysed by the project team and taken into account as we develop more detailed proposals which we will consult on again, planned for late 2017.

Kind regards,

Oli Melzack

A303 Stonehenge Correspondence Officer
Complex Infrastructure Programme

Highways England | Temple Quay House | 2 The Square | Temple Quay | Bristol | BS1 6HA

A303 Stonehenge

@A303Stonehenge
facebook.com/A303Stonehenge/
Website www.highways.gov.uk/a303stonehenge/consultation

From: Simmonds, Sarah [mailto:Sarah.Simmonds@wiltshire.gov.uk]
Sent: 05 March 2017 23:51
To: A303Stonehenge
Subject: RE: A303 Consultation: Feedback: World Heritage Site Managment Plan

Dear Oli,

Please find attached my feedback on the consultation. This is submitted form me in my role as Stonehenge and Avebury World Heritage Site Partnership Manager. It does not represent the views of any of the individual WHS partner on the Committees or Partnership Panel, including Wiltshire Council, who will be submitting their own individual responses.

My role requires me to offer impartial and independent advice on issues relating to the implementation of the Management Plan and the protection of OUV.

I have not submitted via the online form so this the attached document is the only element of my submission.

Kind Regards,

Sarah

From: A303Stonehenge [mailto:A303Stonehenge@highwaysengland.co.uk]
Sent: 03 March 2017 15:07
To: Simmonds, Sarah
Subject: A303 Consultation: Feedback

Dear Sarah

Thank you for your email of 2 March regarding the A303 Stonehenge consultation, initially sent to Andrew Alcorn and Andrew Croft.

You can send any files (including images and .pdf files) to this inbox and it will be added to the consultation feedback database in exactly the same way as any other response. If you have - or are going to - use our online form to submit your written feedback, please provide us with the reference number you will receive upon submission of the form and we will add the .pdfs to the feedback in our database.

With regards to the meeting notes, if they are not intended to be part of your submission, please send them directly to the two Andrews.

Please do not hesitate to let us know if you have any further questions.

Best regards

Oli

Oli Melzack

A303 Stonehenge Correspondence Officer
Complex Infrastructure Programme

Highways England | Temple Quay House | 2 The Square | Temple Quay | Bristol | BS1 6HA

@A303Stonehenge

A303 Stonehenge

facebook.com/A303Stonehenge/

Website www.highways.gov.uk/a303stonehenge/consultation

Highways England Company Limited | General enquiries: 0300 123 5000 |National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
https://www.gov.uk/government/organisations/highways-england **|** *info@highwaysengland.co.uk*

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United Nations Educational, Scientific and Cultural Organization

Stonehenge, Avebury and Associated Sites inscribed on the World Heritage List in 1986

Sarah Simmonds, Stonehenge and Avebury World Heritage Site Partnership Manager

A303 Stonehenge - Amesbury to Berwick Down, response to first phase of public consultation on route options

I very much welcome the opportunity to respond to this consultation on the plans for a major infrastructure project that will affect the World Heritage Site (WHS).

The project offers a remarkable opportunity to remove the harmful impacts of the A303 in line with the aims of the WHS Management Plan. The correct scheme will be crucial in achieving this outcome in such a sensitive landscape. The potential to create new and damaging impacts is a real possibility that needs to be avoided through a carefully designed scheme based on expert advice and meaningful consultation.

Commenting at an early stage in the scheme can be challenging as detailed design, modelling, mapping and evidence from archaeological assessment is not yet available. However the fact that the scheme at this point should still be flexible enough to make changes where concerns are raised is extremely valuable. This comment will highlight where the current outline scheme delivers on the Management Plan and where it requires adaptation to meet its vision, aims and policies.

Policy 1a of the Stonehenge and Avebury WHS Management Plan states the Government departments, agencies and other statutory bodies responsible for making and implementing national policies and for undertaking activities that may impact on the WHS and its environs should recognise the importance of the WHS and its need for special treatment and a unified approach to sustain its OUV. I appreciate Highways England's commitment to this policy.

Role of Stonehenge and Avebury World Heritage Site Partnership Manager

The role of the Stonehenge and Avebury World Heritage Site Partnership Manager is to coordinate the implementation of the Stonehenge and Avebury World Heritage Site Management Plan working with national partner organisations, the local authority, landowners, farmers, local communities and other stakeholders. In addition they monitor and report on the condition of the WHS and revise and update the Management Plan. As one of the authors of the last iteration of the WHS Management Plan in 2015, the first joint Stonehenge and Avebury version, the WHS Partnership Manager is very familiar with its vision, aims and policies.

A key part of the role is to offer impartial and independent advice on issues relating to the implementation of the Management Plan and the protection of OUV.

The WHS Management Plan is endorsed by the major partner organisations who sit on the local steering committees and the WHS Partnership Panel. These organisations and others stakeholders will submit their own response to the project proposal. This response does not represent a partnership position. It is

submitted by the WHS Partnership Manager and represents their summary of how the current scheme and associated options align with the aims and policies set out in the WHS Management Plan.

The ICOMOS Guidance on Historic Impact Assessment for Cultural World Heritage Sites (2011) recommends that the conservation policies embedded in the management system can be used as a measure to assess potential adverse impacts. It suggests that proposals should be tested against policy frameworks and the Management Plan for the WHS. This response is a first step in the process which I hope will assist Highways England in identifying a solution that aligns with the WHS Management Plan's vision, aims and policies. Below is a summary of the policy context on which my response is based. In my role as WHS Partnership Manager I have focused on achieving the appropriate scheme for the WHS rather than attempting to balance the various CRS and other project constraints. The balancing of these aspects will need to be considered by Highways England in their consultation response.

Policy Context

Convention Concerning the Protection of the World Cultural and Natural Heritage

The United Kingdom has been a signatory to the Convention Concerning the Protection of the World Cultural and Natural Heritage since 1984. By signing the Convention, the Government has undertaken to identify, protect, conserve, present and transmit its WHSs to future generations (UNESCO 1972, Article 4). It is for each government to decide how to fulfil these commitments. In England, this is done through the statutory spatial planning system, designation of specific assets and the development of WHS Management Plans.

Statement of Outstanding Universal Value

In 2007 the World Heritage Committee recognised the 'pivotal importance of Statements of Outstanding Universal Value (Statements of OUV) in all World Heritage processes'. The Statement of OUV for Stonehenge, Avebury and Associated Sites was adopted by the World Heritage Committee in June 2013. The Statement of OUV now forms the focus of all protection and management decisions. Statements of OUV are key references for the effective protection and management of WHSs, the main objective of which should be to sustain its OUV. The Statement of OUV can be found at: http://www.stonehengeandaveburywhs.org/assets/Stonehenge-and-Avebury-WHS-SOUV.pdf

Attributes of OUV

From the Statement of OUV, a number of attributes expressing the OUV have been identified to assist in the protection of the WHS. The attributes are not themselves individually of OUV but together they express the OUV of the WHS. These attributes are listed below. Although it is the Management Plan aims and policies that inform this response the attributes and the OUV should be noted as the Plan is primarily designed for their protection.

1. Stonehenge itself as a globally famous and iconic monument.

2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.

3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in the landscape.

4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.

5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.

6. 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.

7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

World Heritage Site Management Plans

Within the United Kingdom, Management Plans provide the overarching strategy for the management of WHSs. Since 1994 it has been UK Government policy that all UK World Heritage Sites should have Management Plans. They are a material consideration in planning decisions and provide a framework for guiding management initiatives. Management Plans are endorsed by the Department of Culture, Media and Sport (DCMS) and referred to UNESCO.

The main purpose of the Management Plan is to sustain the OUV of the WHS by ensuring the effective protection, conservation and presentation of the WHS and its transmission to future generations. To sustain the OUV, it is necessary to protect and manage all the attributes of OUV which contribute towards it. Other interests such as access, interpretation, nature conservation, farming, education, research and the needs of the local community are taken into account.

The Plan establishes an overall vision for the long term future of the Stonehenge and Avebury WHS and sets out aims, policies and actions for the positive management of the WHS.

Vision for the WHS

The vision for the WHS set out in the Management Plan is particularly relevant to consider in the case of a proposed significant change across such a large area of the Site.

The Stonehenge and Avebury World Heritage Site is universally important for its unique and dense concentration of outstanding prehistoric monuments and sites which together form a landscape without parallel. We will work together to care for and safeguard this special area and provide a tranquil, rural and ecologically diverse setting for it and its archaeology. This will allow present and future generations to explore and enjoy the monuments and their landscape setting more fully. We will also ensure that the special qualities of the World Heritage Site are presented, interpreted and enhanced where appropriate, so that visitors, the local community and the whole world can better understand and value the extraordinary achievements of the prehistoric people who left us this rich legacy. We will realise the cultural, scientific and educational potential of the World Heritage Site as well as its social and economic benefits for the community.

The most relevant Management Plan aims and policies are listed at Appendix A below.

National Planning Policy Framework (NPPF): World Heritage Sites

The National Planning Policy Framework (NPPF) states at paragraph132 that great weight should be given to the conservation of designated heritage assets. “The more important the asset, the greater the weight should be.” WHSs are recognised as designated assets of the highest significance. With regard to heritage assets the National Planning Policy Framework (NPPF) states that “significance can be harmed or lost through...development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification”.

Further Guidance on World Heritage Sites

The Planning Practice Guidance (PPG) *Further Guidance on World Heritage Sites prepared in 2014* to align with the NPPF states that '…the description of the Outstanding Universal Value will be part of the World Heritage Site's heritage significance and National Planning Policy Framework policies will apply to the Outstanding Universal Value as they do to any other heritage significance….'(para 031). At paragraph 029 it confirms that Statements of OUV are 'key reference documents for the protection and management of each Site and can only be amended by the World Heritage Committee'

Wiltshire Core Strategy 59

In the UK, World Heritage Sites as a whole are protected primarily through the planning system. This system depends on a hierarchy of the NPPF and Local Plans which include Core Strategies.

The WHS Policy 59 in the Wiltshire Core Strategy underlines that precedence should be given to the protection of the WHS and its OUV. It requires the applicant to demonstrate that full account has been taken of the impact of the proposal upon the World Heritage Site. The proposal needs to demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the WHS and its OUV. This includes the physical fabric, character and appearance, setting or views into or out of the WHS. It also requires that any development demonstrates due consideration of opportunities for enhancing the World Heritage Site and its OUV. In addition development should support and maintain the positive management of the WHS improving its conservation, presentation and interpretation.

The inclusion of this policy in the Core Strategy fulfils Policy 1b of the WHS Management Plan: Set within the framework provided by the Management Plan, relevant stakeholders should implement existing policy and guidance and where necessary develop policies and written guidance at a national and local level for the improved management and conservation of the WHS. These policies should ensure the maintenance of its OUV by protecting the physical fabric, character, appearance, setting and views into and out of the WHS. Relevant Management Plan policies should be incorporated within the Core Strategy and other relevant development plan documents within the Local Plan and additional WHS planning guidance produced.

Guidance on Heritage Impact Assessments for Cultural World Heritage Properties ICOMOS

This guidance recognises that World Heritage Sites are single heritage assets with an international value but that not everything within them contributes to OUV. Those attributes that do must be appropriately protected. The guidance emphasises that an HIA is required to identify negative impacts very early on in the process, in order to inform both the development design and the planning process in a pro-active rather than reactive manner. It should identify how negative impacts can be avoided, reduced, rehabilitated or compensated. The guidance encourages consultation to ensure the most comprehensive understanding of these impacts as well as the detailed surveys with the most appropriate technology to produce valuable tools such as 3D modelling.

The Guidance encourages consultation on the HIA and its scope which it suggests should be agreed with all relevant parties, including the State Party, regional or local government or its agencies, any statutory consultees and local community representatives and the public.

Structure and focus of consultation response

My response to the consultation takes into account the above policy context which is for the most part distilled into the WHS Management Plan. The response therefore focuses on how the proposals align with the Management Plan; the fundamental framework for the management of change within the World Heritage Site.

Effective management of a WHS is concerned with identification and promotion of change that will respect and enhance the Site and maintain its OUV, with the avoidance, modification or mitigation of changes that might damage this.

My response offers an initial outline assessment of how the proposals align with the aims and policies set out in the Management Plan. Due to the lack of detailed design and a complete evidence base at this non-statutory consultation stage the comments are necessarily outline in nature. I have identified the most relevant of the 38 policies and looked at how the scheme either aligns with them or diverges. Where the alignment is slight or absent I have suggested how it might be either achieved or improved. Challenges indicate where alignment might be very difficult to achieve and issues exist in terms of alignment with the agreed management framework designed to safeguard the OUV of the WHS and where possible enhance its attributes

I have also included a short section on other aims, policies and actions from the Management Plan not directly associated with the scheme. These include actions on which Highways England are not the lead partner but should note because in order to attain the full benefits of the scheme for the WHS they would need to be progressed.

I have looked first at the bored tunnel and then separately at the surface elements of the scheme. I have commented on the latter first in general and then on the specific elements of the surface scheme.

Consultation Scheme D61 and D62: Alignment with WHS Management Plan

1. Bored Tunnel of at least 2.9 km

This element of the scheme appears to align extremely well with the aims and policies of the WHS Management Plan which identifies roads and traffic as a major visible and aural intrusion in the rich archaeological landscape. The traffic is described as impacting negatively on the setting of multiple attributes of OUV including Stonehenge, the round barrow cemeteries on King Barrow Ridge and Winterbourne Stoke Barrows.

The bored tunnel would remove, over a substantial area, one of the major intrusive elements identified in the Statement of OUV: “the presence of busy main roads going through the World Heritage property impacts adversely on its integrity.” The Protection and Management Requirements set out in the Statement refer to the continued negative impact of the A303 on “the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape.”

The bored tunnel would also have a positive impact on the following attributes of OUV: 3, 4, 5, 6 and 7. Over this substantial area of the WHS landscape the setting of as well as the interrelationships between the monuments and sites would be greatly enhanced. The removal of the A303 would also remove its intrusion, in this part of the landscape, on the midwinter sunset astronomical alignment. Encompassing and following from these improvements taken alone this element would have the effect of enhancing the landscape as a whole.

Views might also be reinstated that inspired past architects, artists and others as well as the more tranquil setting in which to experience them.

WHS Management Plan Alignment
Vision, aims, policies and actions

The bored tunnel element of the proposed scheme is extremely well aligned with the World Heritage Site Management Plan. It delivers in a number of areas including the vision for the Site which seeks "to provide a tranquil [and] rural setting for its archaeology". It would also help to create the necessary environment to "allow present and future generations to explore and enjoy the monuments and their landscape setting more fully", and open up opportunities for enhanced presentation and interpretation leading to increased understanding of the extraordinary achievements of prehistoric people.

This element of the scheme, placing the A303 in a bored tunnel and thereby removing it from this part of the landscape is particularly well-aligned with the following aims and policies of the Plan:

Aim 3: ***Sustain the OUV of the WHS through the conservation and enhancement of the Site and its attributes of OUV.***

Policy 3c – Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself

Aim 4: ***Optimise physical and intellectual access to the WHS for a range of visitors and realise its social and economic benefits while at the same time protecting the WHS and its attributes of OUV.***

Policy 4c – Encourage access and circulation to key archaeological sites within the wider WHS landscape. Maintain appropriate arrangements for managed open access on foot within the WHS (taking into account archaeological, ecological and community sensitivities) to increase public awareness and enjoyment

Aim 6: ***Reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS.***

Policy 6a – Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore he WHS

Action 133 – seek a solution to the negative impact of the A303 on the WHS, its attributes of OUV and its setting in order to sustain OUV and enhance the Site's integrity. Work with partners to identify such a solution that also addresses current and predicted traffic problems and assists in in delivery of social and economic growth.

Achieving/improving alignment: considerations and recommendations

The current scheme under consultation is modelled on a 2.9 km tunnel which leads to some major infrastructural elements within the WHS that do not align as neatly with a number of the aims and policies of the Management Plan. This is discussed in outline below. A longer bored tunnel delivering similar benefits over the whole length of the WHS would be desirable and should be considered if it proves following detailed evaluation that the impacts discussed below cannot be removed or adequately mitigated.

The surface presentation and management of access along the closed A303 should be designed to maximise the tranquil and rural setting.

The relevant lead partner organisation should work with key partners, stakeholders and the community to implement the policies and actions related to access (physical, intellectual and emotional), sustainable transport, interpretation, sustainable development and community engagement. Vehicular access to byways will need to be managed in line with policy 6b of the Plan to avoid damage to archaeology, improve safety and encourage exploration of the wider landscape. Work will also need to be undertaken on the evolving identity and image of the WHS following this major change in the nature of the landscape and how people are able to relate to it. This work should also consider its relationship to the Avebury half of the WHS. These related projects also apply to the surface elements of the scheme discussed below.

An overview of relevant Management Plan policies not directly related to the scheme but relevant to realising its full benefits is included as Appendix 2 below

2. Related major infrastructure within the WHS: portals, expressway, junctions

This section will provide a brief overview of the challenges to consider for aligning the development of major infrastructure within the WHS with the Management Plan and its aims and policies. This is similar for each of the above surface elements of the scheme and does not need to be repeated in the consideration of the particular challenges for each element. It is vital that the above ground infrastructure does not counterbalance the potential benefits offered by the tunnel set out above by creating substantial harm in another part of the WHS landscape.

Under each element the challenges, as understood at this outline stage of design, are briefly highlighted. The issues that need to be considered in relation to the Management Plan aims and policies and approaches to improving this alignment where possible is the focus of this section.

Any major infrastructure development in an internationally important "landscape without parallel" will be a major challenge. The Management Plan sets out a framework for managing change that will ensure the correct balance is given to protecting the OUV of the WHS: its primary aim. Checking the alignment of the scheme with the aims and policies should therefore be a helpful process in negotiating acceptable solutions.

A key challenge will be to minimise impact on the attributes of OUV; not only the physical remains, attribute 2, but the relational attributes 3,4,5 and 6. The last is of particular complexity as it encompasses much of the landscape: " 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." Criteria ii set out in the Statement of OUV highlights the fact that "The monuments and landscape…… still retain a huge potential for future research." Recent research has shown that there is an enormous amount to discover across the whole landscape to improve our understanding of the period and the use of the landscape by the people at that time. This makes it more challenging to identify an area of the landscape where major infrastructure development could take place without loss of this internationally recognised resource. In addition it sets out the fact that the WHS "provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2,000 years, from the early Neolithic to the Bronze Age."

The location and design of any proposed infrastructure will be of enormous importance in minimising impact. Locating the infrastructure sensitively will be a key challenge particularly as the spaces between the monuments are extremely important to understanding how the landscape was used and evolved in the

Neolithic and Early Bronze Age period. An additional challenge is protecting attribute 4 which highlights the outstanding universal value of the relationship to the skies and astronomy that is reflected in the position and design of the monuments. Part of the authenticity of the WHS is the ability to still experience this link.

Management Plan Alignment
Vision, aims, policies and actions

In addition to the location, the design of the new infrastructure will need to be very sensitive. The Management Plan vision prioritises a tranquil rural setting and the design should adhere to this. It should be noted that the Statement of OUV highlights the evidence provided "of prehistoric technology, architecture and astronomy." Criterion i refers directly to the WHS demonstrating outstanding creative and technological achievements in prehistoric times. The design of portals, junction and other infrastructure should not compete with this element of the OUV remaining as low key as possible. As mentioned in discussion of the bored tunnel, above the vision, aims and policies of the Management Plan also highlight the need for access to "allow present and future generations to explore and enjoy the monuments and their landscape setting more fully". Aim 6 of the Management Plan is to reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS. Policy 6a elaborates on this: Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore the WHS. The bored tunnel delivers very well on this policy but these are more difficult challenges for the surface infrastructure related to the project.

Other polices of note in relation to the development of the surface elements of the scheme include Policy 3c: Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself. In addition 1e which requires development to minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV . This will need to be considered in relation to the design of all elements of the project and include consideration of the car head and tail lights themselves.

Another relevant policy is 3i . This is related the management of woodland within the WHS which should be designed to both sustain and enhance the OUV of the WHS. A key element of this is restoring intervisibility as part of the relational aspects of OUV. The Stonehenge and Avebury *WHS Woodland Strategy* produced for Natural England has mapped opportunities for this enhancement which in some cases is significant. It is important that the surface elements of the scheme do not rely on tree cover to screen their impact on the landscape but seek other methods to achieve this. Relying on existing cover could in some areas take away the opportunity for enhancement of OUV. This is in line with Historic England's guidance on setting *The Setting of Heritage Assets* that emphasises that trees cover should not be used to mitigate unsuitable development.

A further item to note is the need to protect the setting of the WHS. This will have relevance to the junctions and onward routes of the roads and related infrastructure in so far as this impacts on the attributes of OUV within the WHS. This is reflected in the Management Plan policy 1d: Development which would impact adversely on the WHS, its setting and its attributes of OUV should not be permitted. The complexity of setting issues should be born in mind as set out in Historic England's Guidance *The Setting of Heritage Assets (2014)*, setting is not only visual in natures but includes a range of physical and experiential aspects such as context and tranquillity.

The Wiltshire Core Strategy Policy 59 underlines the priority of protecting the OUV of the WHS and its complex dimensions across the landscape and beyond. It requires the applicant to demonstrate that full account has been taken of the impact of the proposal upon the World Heritage Site. The proposal needs to demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the WHS and its

OUV. This includes the physical fabric, character and appearance, setting or views into or out of the WHS. It also requires that any development demonstrates due consideration of opportunities for enhancing the World Heritage Site and its OUV. In addition development should support and maintain the positive management of the WHS improving its conservation, presentation and interpretation.

Policy 7a of Management Plan encourages sustainable archaeological research of the highest quality in the WHS, informed by the WHS Research Framework. It is important that any development does not jeopardise this important aspect of the WHS.

Achieving/maximising alignment: considerations and recommendations

As discussed above there are a number of policy challenges in relation to building major infrastructure within the WHS landscape. As the scheme stands at present although it seems to be very positively aligned in relation to the bored tunnel, it appears to require fairly significant amendment in relation to the Management Plan aims and policies. This applies particularly to the western portal and expressway; both DO61 and D062.

The challenges for alignment are listed below under each element of the surface scheme. The level of challenge in mitigating this is also signalled and suggested approaches for exploring possible mitigation. The bedrock of this will be the production of an extremely robust HIA in line with ICOMOS guidelines for cultural WHSs. As recommended it should include detailed modelling sufficient to fully assess whether the attributes of OUV will be protected by any proposed solutions. The process of producing this HIA should be consultative as set out by ICOMOS and involve key experts with a high level of knowledge, experience and expertise. The WHS has a research group ASAHRG certain members of which are archaeologists with an unrivalled knowledge of the WHS whose advice would be invaluable in working up appropriate solutions. Above all Highways England will need to be able to respond to the results of HIA and adapt their scheme during the next stage of its development prior to the commencement of the DCO process. To be successful this will require adequate time and budget to make significant adjustments in the design and location of the portals and the length of the tunnel or covered expressway. Without this flexibility it will be difficult to address a number of the points listed below to achieve improved alignment with the Management Plan.

It should also be noted that detailed archaeological evaluation has not yet been undertaken along the entire route. The results of this work in an area of such high potential and sensitivity will be crucial in the shaping an acceptable scheme. The process of design will need to be agile enough to respond to the need for exemplary mitigation measures.

2.1 Location of portal: East

Maximising/improving alignment

The position to the east of the Avenue allowing for the reinstatement of the route of the monument aligns well with policy 3e of the WHS Management Plan as it provides the opportunity to make buried or obscured monuments more visible. This could offer interpretation and access gains.

A very detailed mapping and modelling is required to demonstrate the exact nature of intervisibility with components of OUV and to inform an appropriate design to mitigate this. There should be consideration of

how to minimise impacts on the reinstated route of the Avenue mentioned above in order to gain the most benefit possible from this improvement. Impacts on Kings Barrow Ridge should also be included in modelling and the results reflected in any emerging design solution.

Challenges

Evaluation to date has shown low presence indicting that archaeological impact may not be great however the full report is awaited. The current lack of detailed information means that in an area where there is high potential, flexibility in location and design will be required. Further assessment will be necessary once the details of the design are known. The more grassed and rural portal design in line with the vision for the WHS in the Management Plan would require a far great land-take increasing its possible impact on the physical resource.

2.2 Location of portal: West

Challenges

The current position is close to an extremely significant component of OUV Normanton Down barrow cemetery. The proximity of the portal would have a substantial negative impact on the group as well as disrupt the interrelationship with Winterbourne Stoke and Lake barrow groups. The current location would therefore impact on the attributes of OUV and is particularly poorly aligned with policy 3c of the Management Plan as well as Core Policy 59 of the Wiltshire Core Strategy.

Furthermore this the portal location appears to be on the primary south-west midwinter solstitial alignment and therefore to have a negative impact on the fourth attribute of OUV. The Statement of OUV highlights the outstanding importance of this attribute in demonstrating how a wealthy and highly organised prehistoric society was able to impose its concepts on the environment. It is imperative that this is not obscured by a contemporary shaping of the landscape through the introduction of a portal entrance on this alignment. It could also reduce significantly gains related to the enhancement of the alignment made by the placement of the A303 in a bored tunnel the centre of the WHS.

There is currently no information in relation to this aspect of the scheme's impact in the consultation documents. A detailed study needs to be undertaken for the HIA to inform the process of design. This would need to include bare ground modelling to understand and protect the exact alignment without tree cover in line with my the WHS Woodland Strategy mentioned above

2.3. Northern or southern bypass i.e. D061 (1N) or D062 (1S)

2.3.3 DO61 (1N)

This route would go through the Diamond Wood and leave the WHS south of Longbarrow junction.

Challenges

Archaeological evaluation work by Highways England had confirmed the presence of a long barrow, revealed a new long barrow and a hengiform monument. This route severs this newly named Diamond Group a newly

recognised and therefore impacts on the attribute of OUV would appear beyond mitigation. As a consequence of the recent discovery of the Diamond Group it appears this route would have an unacceptable effect on the OUV of the WHS.

2.3.2 D062 (1S)

This route would pass through the edge of Diamond Wood and leave the WHS 1.3 km south of Longbarrow junction.

Maximising/improving alignment

The road is currently either at grade or on an embankment and therefore highly visible in the landscape. Alternatives should be explored. Exploring a longer tunnel through this area could possibly deliver some mitigation of impacts in this area although this would require detailed study of new impacts of an amended scheme. Other ways of concealing the road might be explored taking advantage of the topography although this may not address concerns about the road passing through the group of Neolithic long barrows and associated Bronze Age barrows in the area. Mitigation would require detailed visibility modelling and the design of a solution that minimised impacts. the barrow groups of Winterbourne Stoke, Normanton Down, Lake and the newly recognised Diamond barrow group. The present level of intrusion is not aligned with the aims and policies of the Management Plan as set out above.

Challenges

The funerary and mortuary aspect of the WHS is fundamental to its OUV. Criterion iii states that the Stonehenge and Avebury landscapes offer an exceptional insight into the funerary practices in Britain in the Neolithic and Bronze Age. The Statement elsewhere elaborates on the importance of the insight into changing mortuary culture of the periods provided by the WHS. Recent research into the Stonehenge landscape has indicated that this area was the focus of Early Neolithic and Bronze Age activity. There is an unusual concentration of Early Neolithic long barrows in the area around the expressway and portal. In addition there is substantial future research potential in this area.

No full archaeological evaluation is yet available for this route. The results may prove to be a significant constraint.

Both the road and the junction appear to be on the midwinter sunset alignment from Stonehenge as with the western portal discussed above. The road appears to follow the Solsitial alignment for around 2 km to the junction with the A360 still on this line. Although there are plans not to light the road or junction there would still be headlights and tail lights potentially visible and intrusive to this attribute of OUV. The alignments are identified and discussed in the ICOMOS-IAU Thematic Study {ECS15} extended case study available on the UNESCO-IAU Portal to the Heritage of Astronomy. Bare ground topographic modelling will be important in considering if mitigation is possible through realignment and use of the natural topography.

It appears that intrusion of a new dual carriage expressway through this part of the WHS could introduce some of the same problems that the bored tunnel would remove from the central area of the WHS.

2.4. Countess Junction A303/A345

Maximising/improving alignment

In line with the vision for the WHS, Aim 6 and Policy 6 and Policy 3c the design of the junctions should be as unobtrusive as possible to create a rural and tranquil setting. Engineering design should be modest and light pollution avoided in line with Policy 1e by not lighting the junction if feasible. Signage should be kept to a minimum.

The proposed flyover would need careful assessment of possible impacts on the WHS through visual modelling. The results should then inform the solution which should include a less urban and intrusive design. The aim should be to enhance the setting of the WHS in line with Policy 3c.

The road from the junction to the portal will also need to be carefully assessed as part of the HIA. Although not directly related to the WHS and its OUV or Management Plan and therefore outside the scope of this comment, impacts on this significant Mesolithic Site should be carefully considered.

The design should aim to minimise archaeological impact of junctions by keeping the associated infrastructure such as slip roads within the existing land-take. Consideration needs to be given to Bronze Age activity in the area and possible sensitive archaeology. Adequate evaluation needs to be undertaken.

2.5 Longbarrow Junction A303/A360

Maximising/improving alignment with WHS Management Plan

The design of the junctions is proposed at grade with 8m high flyover which could have the impact of introducing a highly engineered urban element into the setting of the WHS. This would need to be mitigated.

The comments above on design and lighting at Countess are equally relevant to the junction of D061/D062 with the A360.

Challenges

Proposed junction with A360 1 km east of the WHS boundary is in an area of high archaeological potential in the setting of the World Heritage Site. It would be likely to have a harmful visual impact on Winterbourne Stoke Barrow Group a component of the OUV of the WHS. Modelling would be needed to elucidate the nature of the impact and design solutions to mitigate these.

D062 would have a more southerly alignment than D061 crossing the A360 at a lower point at the Park however there remain some significant challenges. The location of the junction appears to be on the solstitial alignment and following the necessary studies and modelling would probably need to be moved to an identified mitigation location to protect this attribute of OUV. Not lighting the road or junction could not address the presence of head and tail lights from the traffic.

Conclusion

The review of the scheme against the Stonehenge and Avebury WHS Management Plan raises some interesting considerations for the ongoing development of the project. The bored tunnel element of the project is very well aligned with the Management Plan aims and policies. It has the possibility to transform the central part of the WHS and could be seen as a major step forward in the achieving the vision for the WHS set out in the Plan.

Challenges arise however with the surface elements of the scheme. There appear to be opportunities for allaying many of these in the east if great sensitivity is applied to the design of the eastern portal and junction at Countess Roundabout. This will need to be based on exemplary studies and modelling that accurately identify all negative impacts.

In the west the challenges are of a greater order. It appears that D061 will probably need to be discounted due to its direct impact on the Diamond Group. In relation to D062 substantial changes will be necessary to align the surface elements of the scheme with the aims and policies of the Management Plan. It would be necessary to reconsider the portal location and identify an approach to concealing the road and traffic to minimise its impacts on the surrounding barrow groups and concentration of long barrows. Any such solution would need to be based on a robust and well researched HIA with skilful and accurate modelling. The challenge of mitigating the impact of surface elements including the junction on the solstitial alignment will need to be met. Screening with trees in the WHS landscape should not be considered an adequate response. The challenges are very complex and WHS partners will need to continue to work with Highways England to explore possible ways to align the scheme with the Management Plan. Partners will also need to continue to work together to deliver the related aims and policies in the Management Plan that will enable the greatest benefit from any scheme that is delivered.

The Management Plan framework offers a valuable perspective on the overarching suitability of the scheme. The options included in this consultation both bring very significant benefits to the WHS and its OUV by removing a large part of the current A303 and its associated negative impacts by placing it in a bored tunnel of 2.9 km. Both options however also introduce sections of new dual carriageway into the landscape in a sensitive area as well as two substantial tunnel portals and complex junctions with consequential engineering development at both the eastern and western edge of the WHS. This introduces a number of significant negative impacts in a previously undisturbed area of the WHS landscape.

If following the detailed studies and modelling necessary for the HIA it becomes apparent that it is not possible to align the current scheme with the vision, aims and policies of the WHS Management Plan, the framework for protection of the OUV of the WHS, alternative solutions should be explored. These might include a longer bored tunnel or a southern route such as F10 outside the WHS. F10 bypassed the WHS to the south thereby avoiding almost all negative impacts on it other than some possible setting issues whilst delivering all of the benefits of removing the A303 from the Site completely. F10 although scoring very favourably for Cultural Heritage against the Client Scheme Requirements and WebTAG assessment was not taken forward to consultation as it scored less favourably in relation to other criteria In the context of the need to protect an internationally important site it may be appropriate to revisit this or other options.

It is important to continue to work together to find a scheme that can be delivered and that aligns with the aims and policies of the WHS Management Plan. I would be happy to assist in reaching this point.

Appendix A

WHS Management Plan 2015: Aims, Policies and Actions most relevant to the proposed scheme

PLANNING and POLICY

Policy 1d – Development which would impact adversely on the WHS, its setting and its attributes of OUV should not be permitted

Policy 1e – Minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV

CONSERVATION

Aim 3: *Sustain the OUV of the WHS through the conservation and enhancement of the Site and its attributes of OUV.*

Policy 3c – Maintain and enhance the setting of monuments and sites in the landscape and their interrelationships and astronomical alignments with particular attention given to achieving an appropriate landscape setting for the monuments and the WHS itself

Policy 3e – Conserve and/or make more visible buried, degraded or obscured archaeological features within the WHS without detracting from their intrinsic form and character

Policy 3i – Sustain and enhance the attributes of OUV through woodland management while taking into account the WHS's ecological and landscape values

VISITOR MANAGEMENT and SUSTAINABLE TOURISM

Aim 4: *Optimise physical and intellectual access to the WHS for a range of visitors and realise its social and economic benefits while at the same time protecting the WHS and its attributes of OUV.*

Policy 4c – Encourage access and circulation to key archaeological sites within the wider WHS landscape. Maintain appropriate arrangements for managed open access on foot within the WHS (taking into account archaeological, ecological and community sensitivities) to increase public awareness and enjoyment

ROADS and TRAFFIC

Aim 6: *Reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS.*

Policy 6a – Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore he WHS

Action 133 – seek a solution to the negative impact of the A303 on the WHS, its attributes of the OUV and its setting in order to sustain OUV and enhance the Site's integrity. Work with partners to identify such a solution

that also addresses current and predicted traffic problems and assists in in delivery of social and economic growth

RESEARCH

Aim 7: *Encourage and promote sustainable research to improve understanding of the archaeological, historic and environmental value of the WHS necessary for its appropriate management. Maximise the public benefit of this research.*

Use ASAHRG expert knowledge for this project – they are a group of archaeologists with an interest in the WHS – either actively leading or involved with all the major discoveries in recent years and currently – group of proven experts

Policy 7a – Encourage sustainable archaeological research of the highest quality in the WHS, informed by the WHS Research Framework

Appendix B
Management Plan 2015: Aims, Policies and Actions not directly related to the scheme but relevant to realising its full benefits

CONSERVATION

Policy 3d – Improve the WHS landscape by the removal, redesign or screening of existing intrusive structures such as power lines, fences and unsightly buildings where opportunities arise

Policy 3h – Explore and develop synergies between the historic and natural environment to benefit the WHS and the maintenance of its OUV. Maintain and enhance the overall nature conservation value of the WHS, in particular: maintain, enhance and extend the existing areas of floristically rich chalk downland turf; enhance the biodiversity of permanent grassland to extend the area of species-rich grassland and provide habitat for birds, invertebrates, bats and other wildlife……

VISITOR MANAGEMENT and SUSTAINABLE TOURISM

Policy 4a – Management of visitors to the WHS should be exemplary and follow relevant national and international guidance on sustainable tourism.

Action 71: Produce a WHS Sustainable Tourism Strategy with WHS partners…

Policy 4b – Spread the economic benefits from tourism related to the WHS throughout the wider community

Policy 4d – Manage special access at Stonehenge for significant occasions including solstices, and for stone circle access outside opening hours for small groups and all open access at Avebury to avoid harm to the WHS and its attributes of OUV

INTERPRETATION, LEARNING AND COMMUNITY ENGAGEMENT

Aim 5: *Improve the interpretation of the WHS to increase understanding and enjoyment of its special characteristics and maximise its educational potential. Engage the local community in the stewardship and management of the WHS.*

Policy 5a – Improve the interpretation both on and off site to enhance enjoyment and appreciation of the WHS

Policy 5b – Develop learning opportunities offered by the WHS both on and off site

Policy 5c – Promote community involvement in the WHS to increase a sense of ownership

Policy 5d – Artists and the creative sector will offer new and inspiring ways for communities and a wider range of visitors to engage with and learn about the OUV of the WHS and the wide range of artistic responses to it both past and present

Policy 5e – Present a unified Stonehenge and Avebury WHS identity and message

ROADS and TRAFFIC

Policy 6b – Manage vehicular access to byways within the WHS to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot whilst maintaining access for emergency, operational and farm vehicles and landowners

Policy 6c – Take measures through sustainable transport planning to encourage access to the WHS other than by car

Stonehenge Campsite

108

06 MAR 2017

highways england

A303 Stonehenge questionnaire

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More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
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How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
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What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	WILLIAM FOX GRANT
Postcode	SP3 4TQ
Email	william@foxgrant.com
Postal address *This is optional but providing your email or postal address will allow us to update you with any news on this consultation.*	SUMMERFIELD HSE BERWICK ROAD BERWICK ST JAMES SP3 4TQ & STONEHENGE CAMPSITE + GLAMPING PODS BERWICK ST JAMES SP3 4TQ.

Are you responding on behalf of an organisation? ☑ Yes · ☐ No

If yes, which organisation? PERSONAL & STONEHENGE CAMPSITE + GLAMPING PODS. www.stonehengecampsite.co.uk

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

ENSURE JUNCTION HAS FLY OVER.

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

USE EXISTING ROUNDABOUT AS THIS WILL SAVE £3 MILLION

HAVE NEW JUNCTION @ LONGBARROW

7. Do you have any other comments?

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

- Received a letter from Highways England ☒
- Received an email ☐
- Social media (e.g. Facebook or Twitter) ☐
- Newspapers or magazines ☐
- Posters or other outdoor advertising ☐
- TV or radio ☐
- Other online/website sources ☐
- Word-of-mouth ☒
- Local authority ☐
- Other source ☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Continued over

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

- NEEDS TO BE CLOSER TO ROUNDABOUT.
- EXTENDED TO DEVIZES ROAD.
- MOVE FURTHER NORTH CLOSER TO LONG BARROW ROUNDABOUT.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	[x]
Option 1S– A southern bypass of Winterbourne Stoke	[ ]
No preference	[ ]

Please provide any comments to support your answer for Question 4

STRONGLY SUPPORT NORTHERN ROUTE AS IT EFFECTS THE MINIMUM OF HOUSES (11) + BUSINESSES (2). THERE WILL BE NO LOSS OF JOBS.
SOUTHERN ROUTE WOULD

- DEVISTATE MY CAMPSITE BUSINESS DUE TO NOISE (SW WINDS)
- SPLIT BERWICK ST JAMES + WINTERBOURNE STOKE.
- RESULT IN CLOSURE OF DAIRY + SHOOT + LOSS OF JOBS
- DESTROY TILL VALLEY – FAUNA, FLORA + WILDLIFE.
- RESULT IN LOSS 10-15 BUSINESS JOBS. SHOOT, DAIRY CAMPSITE POLO GROUNDS. ETC.
- EFFECTS MINIMUM OF 60 HOUSES.
- EFFECTS. MINIMUM OF 6 JOBS.

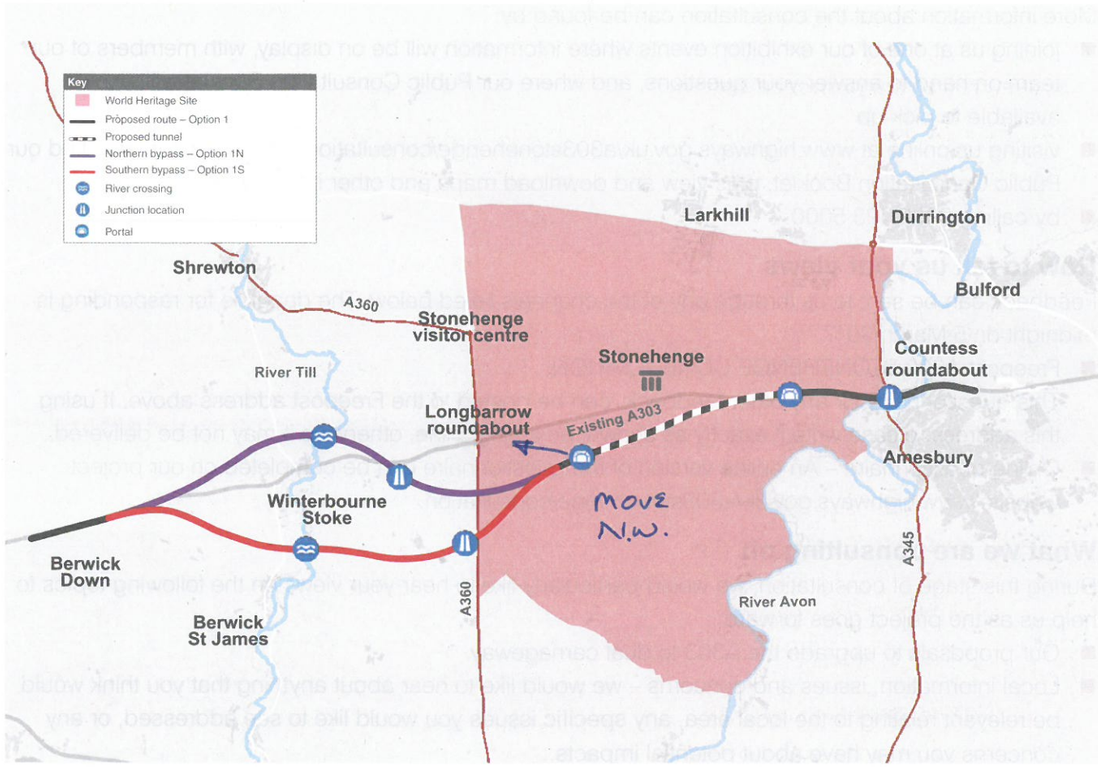
A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
- a bypass of Winterbourne Stoke either to the north or south of the village
- improvements to the existing junctions between the A303 and the intersecting A345 and A360

For more information on how we arrived at our proposed option please refer to Chapter 6 of the Public Consultation Booklet.

The proposed option is shown on the plan below.



1. To what extent do you agree with our proposed option?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 1

FULL SUPPORT PROJECT :-

- IMPROVE ACCESS TO SW.
- IMPROVE TOURISM & ECONOMIC
- IMPROVE JOB PROSPECTS
- IMPROVE ECONOMY IN SW.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

LOOKS LIKE BEST OPTION.

Continued over

Stonehenge Grove L.A.W. (Druid)

highways england

08 MAR 2017

247

A303 Stonehenge questionnaire

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- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	KAROLINE SMITH
Postcode	SP2 7GN
Email	Calliope450 Yahoo.co.uk
Postal address *This is optional but providing your email or postal address will allow us to update you with any news on this consultation.*	8, NICHOLAS COURT SPIRE VIEW SALISBURY

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? STONEHENGE GROVE L.A.W. (DRUID)

Please provide any comments to support your answer for Question 1

TO SHORT AND INADEQUATE.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

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2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

TO CLOSE TO ARCHAEOLOGY

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☑
Option 1S– A southern bypass of Winterbourne Stoke	☐
No preference	☐

Please provide any comments to support your answer for Question 4

7. Do you have any other comments?

LIKE MANY DRUID ORDERS, WE CAN NOT SUPPORT WITHOUT ASSURANCES THAT THE DISTURBED DEAD WILL BE REINTERRED

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☑
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☑
Other source	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

THE CONSULTATION PERIOD WAS NOT LONG ENOUGH, AND NEITHER IS THE PROPOSED TUNNEL

Stonehenge Traffic Action Group

highways england

03 FEB 2017

A303 Stonehenge questionnaire

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- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	MRS Janice Hassett.
Postcode	SP3 4EG
Email	Janbub1@hotmail.com
Postal address	

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? STONEHENGE TRAFFIC ACTION GROUP S.T.A.G.

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

I completely agree with the idea to separate east/west A303 traffic to that going north/south A345. This will allow free movement of traffic into and out of Amesbury

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

over the next 5 years until "the build" starts, the road markings on the present longbarrow O. need to be repainted to show 3 clear entries both east bound and West bound.
There also needs to be a V. large sign telling vehicles to:
GET IN LANE These are the markings we need to stop people over taking on the roundabout using the ~~inside~~ outside lanes. which result in the term "cutting up/in" Obviously trucks need extra room to negotiate the O.

EAST BOUND TRAFFIC

To V.S. Shrewton	A360 N + A303	A303 E only	A360 S only	L.B.R To Salisbury

WEST BOUND TRAFFIC

To Salisbury	A360 S + A303	A303 W only	A360 N only	To VS Shrewton

7. Do you have any other comments?

2020 is an election year so the build needs to commence well before May of that year: March would good!

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☑
Received an email	☑
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☑
Posters or other outdoor advertising	☑
TV or radio	☑
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☐
Other source	☑

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

A much more open and up front approach is evident from the "new" Highway England to that of the Old Highways Agency.
This has been well received by most local people that I have spoken to.

Continued over

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [ ] Strongly agree
- [x] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

Tend to agree with the explanation on page 42 and it appears H.E. are approaching this with a sympathic mind.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

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(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	[x]
Option 1S– A southern bypass of Winterbourne Stoke	[ ]
No preference	[ ]

Please provide any comments to support your answer for Question 4

Using the option 1N to By Pass WBS will go some way to aleviate rat running through Shrewton, but some further consideration is necessary as to the positioning of the junction close to the present Long Barrow O.

Continued over

A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
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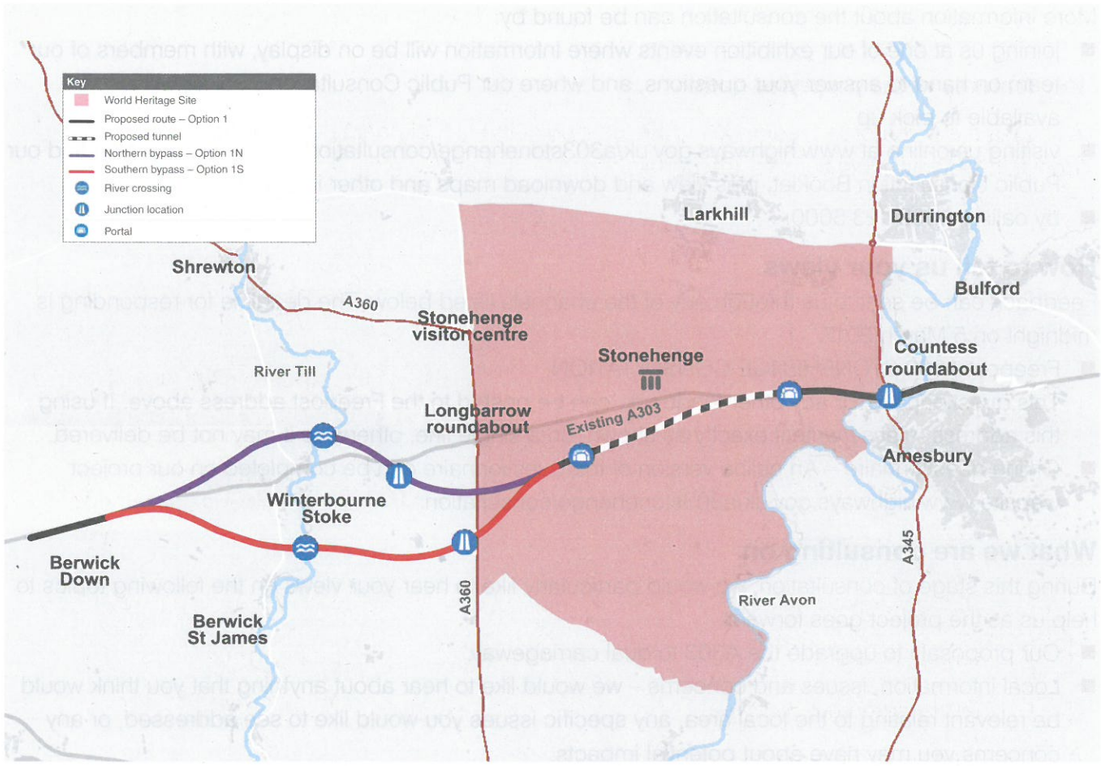

1. To what extent do you agree with our proposed option?

- [ ] Strongly agree
- [x] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 1

Dual carriagway. Dual Tunnel → Dual anything! Lets get the job done and give Shrewton people back their village!

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

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- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

I agree with the explanation on Page 41

Continued over

highways england

442

25 JAN 2017

~~22005~~

A303 Stonehenge questionnaire

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About you

Name	MRS JACKIE AVERY
Postcode	SP3 4DH
Email	jackieavery1@outlook.com
Postal address	

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? Stonehenge Traffic Action Group.

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

When the present roundabout was built the flyover was rejected at Countess Roundabout!! through cost.

The current layout is not satisfactory for A345 traffic at rushour and weekends especially Friday PM.

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

As with Question 5, the current layout is not satisfactory for A360 traffic at rushour & weekends especially Friday pm

7. Do you have any other comments?

I live on the RAT RUN on B3086 in Shrewton, where there is NO PATH. In the meantime I am suffering from heavy traffic flow - last count - 25,000 cars in 2 weeks in October 2016. AND POLLUTION PLEASE ACT

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

- Received a letter from Highways England ☑
- Received an email ☐
- Social media (e.g. Facebook or Twitter) ☐
- Newspapers or magazines ☑
- Posters or other outdoor advertising ☐
- TV or radio ☐
- Other online/website sources ☐
- Word-of-mouth ☐
- Local authority ☐
- Other source ☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

The consultation presentation in Shrewton on 20.01.2017 was excellent and I was given the opportunity to express my views, and to share the "virtual" displays.

Continued over

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [ ] Strongly agree
- [x] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

If you have to have a tunnel.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☐
Option 1S– A southern bypass of Winterbourne Stoke	☑
No preference	☐

Please provide any comments to support your answer for Question 4

As with question 2 and 3. if you take the Southern route OPTION 1S, it could well connect up with a dual carriage way as mentioned in question 1.

Continued over

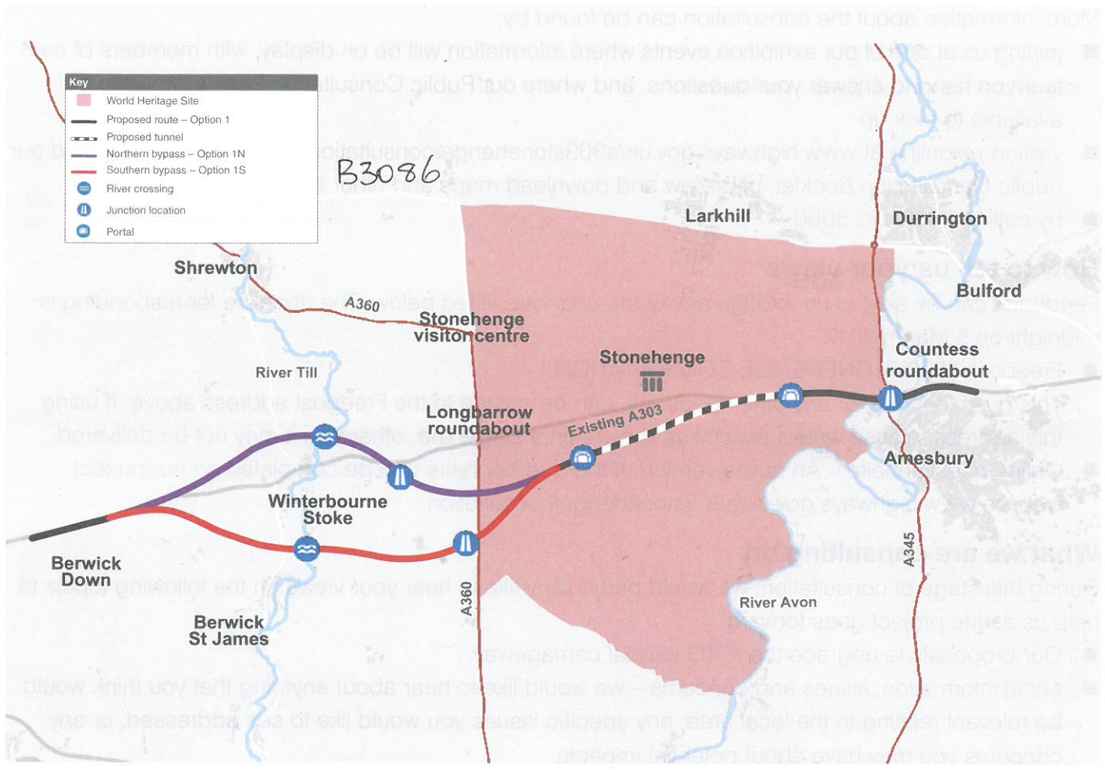
A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
- a bypass of Winterbourne Stoke either to the north or south of the village
- improvements to the existing junctions between the A303 and the intersecting A345 and A360

For more information on how we arrived at our proposed option please refer to Chapter 6 of the Public Consultation Booklet.

The proposed option is shown on the plan below.



1. To what extent do you agree with our proposed option?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [x] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 1

I am pessimistic that the proposed tunnel will never be completed, through archeological findings COST, change of government etc.
I have lived in Shrewton on B3086 for 40+ years, attending numerous ~~enquiries~~ consultations & funding, through rates (Council tax), & enquiries. All which have been shelved. A DUAL CARRIAGE WAY in a cutting would be cheaper? quicker to build.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [x] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

If you have to build the tunnel!

Continued over

Swindon and Wiltshire Local Enterprise Partnership (LEP)

From: Parody, Derek
Sent: 06 March 2017 09:24
To: Melzack, Oli; Christopher Jones
Subject: FW: A303 letter of support
Attachments: letter to Derek Parody A303 March 2017.pdf

Please add to your consultation responses.

Derek Parody
Project Director, A303 Amesbury to Berwick Down
Highways England | Temple Quay House | 2 The Square, Temple Quay | Bristol | BS1 6HA
Tel. No. 07740513055
Web: http://www.highways.gov.uk

From: House, Deborah [mailto:Deborah.House@wiltshire.gov.uk]
Sent: 06 March 2017 09:22
To: Parody, Derek
Subject: FW: A303 letter of support

From: House, Deborah
Sent: 03 March 2017 16:44
To: 'derek.parody@highwaysengland.com'
Cc: Khansari, Parvis; Jones, Karen
Subject: A303 letter of support

Mr Parody,

Please see letter of support for A303 from SWLEP Director attached.

Best regards
Deborah

Deborah K House, Executive Assistant
Swindon and Wiltshire Local Enterprise Partnership
c/o Monkton Park, Chippenham, Wilts, SN15 1ER

deborah.house@swlep.co.uk
www.swlep.co.uk

Mob : 07825098384

swindonwiltshire
Local Enterprise Partnership

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swindonwiltshire
Local Enterprise Partnership

3 March 2017

Derek Parody
Project Director
A303 Amesbury to Berwick Down
Highways England
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6HA

Our Ref : A303 Consultation 12.01.17-05.03.2017

Dear Mr Parody

A303 Amesbury to Berwick Down Non-Statutory Public Consultation

The A303 provides vital connectivity between London and the South West and as such directly impacts upon the ability to drive economic growth across the region. The traffic capacity of the current road stymies this potential growth due to congestion issues and journey time unreliability.

Dualling the Amesbury to Berwick Down section, with the whole of the A303 designated as an expressway in time, will deliver significant infrastructure improvements by creating a road that is fit for the future.

The scheme will assist the Swindon and Wiltshire Local Enterprise Partnership in meeting 3 out of 5 of our identified priorities by 2026, being:

- **Transport infrastructure improvements** – to enable a well-connected, reliable and resilient transport system to support economic and planned development growth at key locations;
- **Place shaping** – to deliver the infrastructure required to deliver our planned growth and regenerate our City and Town Centres, and improve our visitor and cultural offer
- **Business development** – to strengthen the competitiveness of small and medium sized businesses and attract a greater share of foreign and domestic investment into the area.

Monkton Park | CHIPPENHAM | SN15 1ER
Web-site: www.swlep.co.uk

swindonwiltshire
Local Enterprise Partnership

The A303 scheme will remove a potential barrier to investment, improve connectivity between business and their customers and provide employees with greater access to higher value jobs.

The Swindon and Wiltshire Local Enterprise Partnership has campaigned for and supported the need for improvements to the A303, in conjunction with its partners, and welcomes the scheme proposed by Highways England. We look forward to this long-awaited scheme being further developed and hopefully coming to fruition.

Yours sincerely

Paddy Bradley

Paddy Bradley
Director

Monkton Park | CHIPPENHAM | SN15 1ER
Web-site: www.swlep.co.uk

The Amesbury Abbey Group

AMESBURY
THE AMESBURY ABBEY GROUP

Andrew Akorn, Esq.,
Project Manager,
Freepost
A303 Stonehenge Consultation

27th January, 2017

Dear Mr Akorn:

Firstly, may David Cornelius-Reid and I thank you and your team for your courtesy when we met at The Holiday Inn on Wednesday. It was good to have an open discussion and I trust you now have a better idea of our problems.

It was also good to know that you do not require to use any of the land forming part of Amesbury Abbey. The grounds, as you know, contain very important archaeological finds and there is probably more to come. A large proportion of our Residents have previously visited the Abbey and the Chinese Summer House and have been struck by the tranquillity of its 35 acres of parkland with the River Avon flowing through. This has a considerable impact on their future decision to join the Abbey community. and is vital to our business.

You are also aware that we provide some ninety vulnerable Residents with safe and secure care provided by some 100 nurses, care and support staff. Add to this Doctors, physiotherapists and other professionals and a very large traffic in supplier and maintenance staff and you will appreciate the volume of traffic which simply must have free, quick and continuous access from Countess Road. Therefore any alterations which you make to the traffic flow at the Countess Roundabout cannot avoid causing us grave concern. There is also a need for ambulance access. We are certainly one of the largest employers in the area and any diminishment in our ability to continue our business at this level would have severe economic consequences for Amesbury itself.

You advised us that the planning for the access to the Stonehenge Tunnel was not yet completed and we write to emphasise that any form of elevated road would be disastrous from our point of view. You advised us that the elevation would be some twenty six feet in height supported on piles driven into the ground for some twenty feet. Add to this the height of an articulated vehicle and you have a situation where noise, light and air pollution would cause distress to our Residents and Staff alike – this would continue daily, seven days a week and fifty-two weeks a year with a minimum traffic flow of some 35,000 vehicles a day. When you consider this you will comprehend our concern.

AMESBURY ABBEY, AMESBURY, WILTSHIRE SP4 7EX. UK

Telephone: +44 (0)1980 622957 *Facsimile:* +44 (0)1980 623767
Website: www.amesburyabbey.com

Obviously we are also concerned about the maintenance of this access during what, I suspect, will be quite a lengthy construction process which will also apply to the construction of the Tunnel itself unless you use the Winterbourne Stoke entrance for this purpose.

Of the two alternatives discussed, a bridge over the Roundabout would be our preferred option but this opinion is only voiced under pressure and on the assumption you can find no alternative solution. It is singularly unfortunate that The National Trust, English Heritage and other public bodies put the need for an increased journey time before the welfare of so many people.

We look forward to hearing from you when your plans are further developed.

With kind regards,

Yours sincerely,
For and on behalf of Amesbury Abbey Limited

Marion E. Paviour

Mrs Marion E. Paviour

highways england

24 JAN 2017 865

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	MRS MARION E. PAVIOUR
Postcode	SP4 7EX
Email	treesfield.house@btinternet.com
Postal address *This is optional but providing your email or postal address will allow us to update you with any news on this consultation.*	Amesbury Abbey Church Road Amesbury Wilts SP4 7EX

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? Amesbury Abbey Ltd.

Please provide any comments to support your answer for Question 1

The tunnel is not of concern but the alternatives to its approach across the Countess Roundabout are of major importance to Amesbury and in particular to Amesbury Abbey. No details have yet been published for consultation and it is therefore premature to comment in detail.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

Please see above - until comprehensive details have been publish anyone would suggest chaos

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke ☐

Option 1S– A southern bypass of Winterbourne Stoke ☐

No preference ☐

Please provide any comments to support your answer for Question 4

Winterbourne Stoke is not our concern - Amesbury is!

7. Do you have any other comments?

Plenty! Space too small!

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email	☑
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☐
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☐
Other source Rumour	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Poorly presented - emphasis on tunnel a effect on Amesbury Gyrad. Insufficient detail on proposed alternatives to A303

The British Horse Society

Patron Her Majesty The Queen

Bringing Horses and People Together

The British Horse Society
Abbey Park,
Stareton,
Kenilworth,
Warwickshire CV8 2XZ

Email enquiry@bhs.org.uk
Website www.bhs.org.uk
Tel 02476 840500
Fax 02476 840501

The British Horse Society

03 MAR 2017

Transport England
Stonehenge Consultation

28th February 2017

Dear Sirs,

We are responding to the Stonehenge Consultation on behalf of the British Horse Society. We are the two principal contacts for you with BHS Wiltshire.

The British Horse Society Wiltshire branch is active in promoting and improving off-road access for horse riders in partnership with Wiltshire Council. Graham Bennett, Chair of BHS Wiltshire, is a qualified lawyer with 40 years of experience in commercial development law. He is also a legal advisor to the BHS on access issues in the south west. Myra Bennett is the BHS Wiltshire County Access officer.

We are interested in the maintenance and improvement of current rights of way for non-motorised users over the consultation area and enclose a plan showing those rights of way that appear on the definitive map. We have walked or inspected all relevant routes in the past few weeks in preparation for this response to consultation.

The current A303 has the effect of severing off-road rights of way which pass across it, as crossing is far too dangerous for non-motorised users. Other rights of way simply end at the A303.

The A303 Stonehenge upgrade is, therefore, a once-in-a-lifetime opportunity to reconnect the south and north side of the consultation area via off-road rights of way already in existence. This will provide users from Berwick St James, Shrewton, Winterbourne Stoke, Larkhill and the Woodford Valley with access to miles of rights of way currently denied to them due to the presence of the current A303. Not only will this reconnection enormously benefit local walkers, horseriders and cyclists by creating round routes from villages, it will offer significant extra attractions to tourists seeking to enjoy the area peacefully.

What we seek to achieve:

To maintain and improve the existing rights of way network and to connect up existing rights of way in the consultation area:

- using sections of restricted byway formed by the old A303 or
- by incorporating new restricted byways down the side of the new, dualled A303 at Yarnbury Castle and alongside the re-engineered A360.

Restricted byways allow use by walkers, cyclists, horse riders and horsedrawn vehicles.

We would very much appreciate being kept up to date with the progress of the consultation and we are available to attend meetings to clarify or discuss our proposals with Transport England and other interested rights of way users.

Our contact details are below.

Yours faithfully

Myra Bennett
Tel: 01794 341308
Mob: 07786 912180
Email: myrabennett57@icloud.com

Graham Bennett
Tel: 01794 341308
Mob: 0796 8847359
Email: graham.bennett1@icloud.com

BHS Wiltshire response to the Stonehenge Consultation

Referring to the map:

The old A303 shown as restricted byway (red dots on map):

- From point W to point X = connecting bridleway AMES10, byways AMES11 and AMES12
- From point Y to point Z = providing access to and from Winterbourne Stoke to the network of rights of way beyond point Z.

Crossing points required over/under new A303 (N or S) and the A360 for existing rights of way:

- shown at points A,B,C,D,E,F,G for various categories of rights of way
- shown at point J (for motorised and non-motorised users) between byways WSTO6A and WSTO6B over the new village entry road into Winterbourne Stoke.

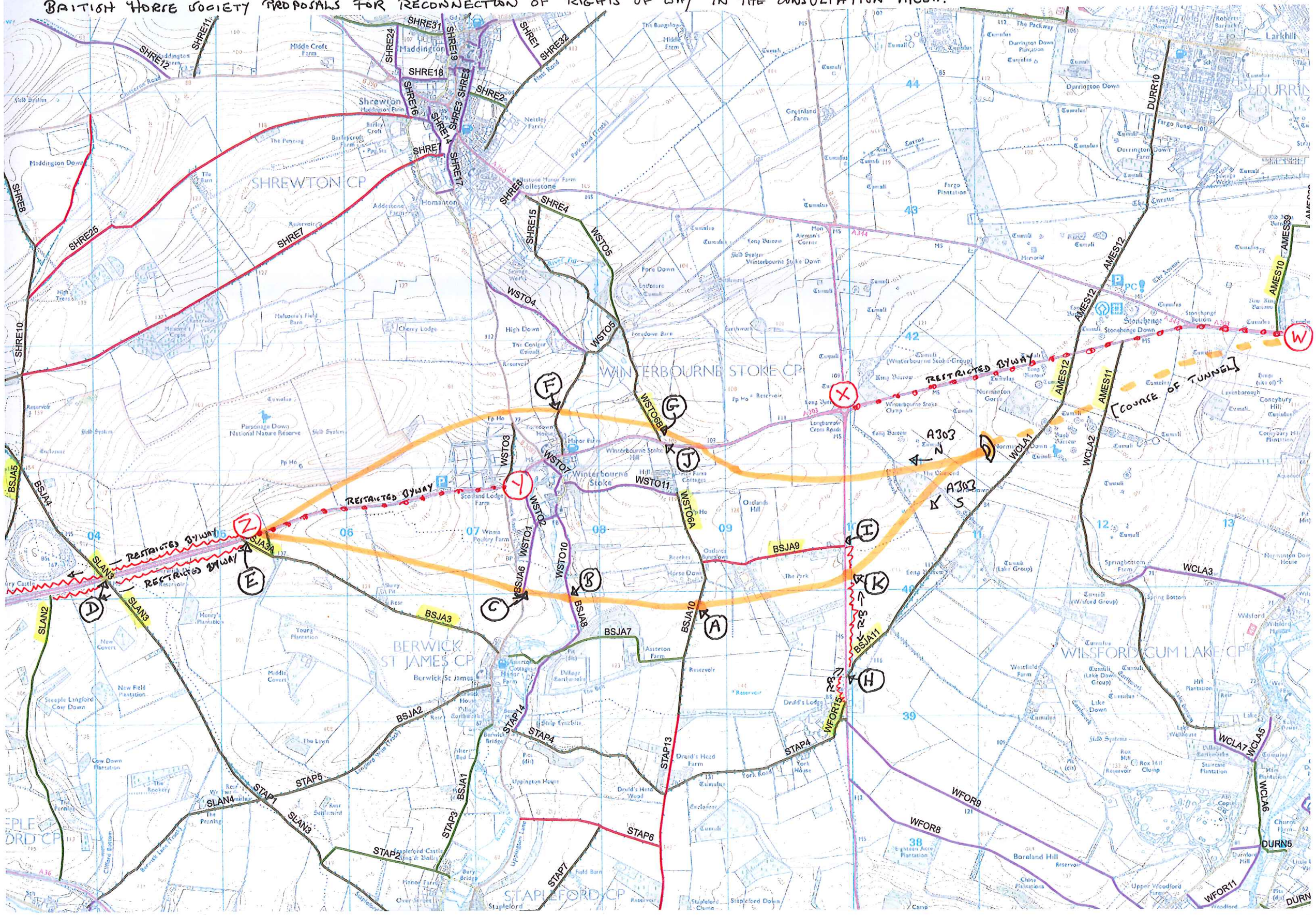
New restricted byway connections required (wavy red lines):

- from byway STAP4/WFOR15 to byway BSJA11 on the east or west side of the re-engineered A360
- from restricted byway BSJA9 to byway BSJA11 on the east or west side of the re-engineered A360
- from byways BSJA5, and SLAN3 to the old A303 restricted byway at point Z on the north side of the new A303
- from bridleway SLAN2, byway SLAN3 and byway BSJA3 to the old A303 restricted byway at point Z on the south side
- point D would give access over/under the A303 to motorised and non-motorised users of byway SLAN3
- point E would give access to non-motorised users from either side of the new A303 to the restricted byway at Z.

These connections, put in as part of the roadworks, would create very much improved off-road rights of way circular routes for local communities, by connecting up otherwise dead end rights of way. It would remove the current dangerous (for non-motorised users) road connection between byways WFOR15 and BSJA11 and connect up the dead end restricted byway BSJA9; required crossing points over the A360/A303 (S) are shown at points I, K and H.

The connections thus created would not only very significantly improve off road access for local users, they would also vastly improve opportunities for locals and tourists to explore further afield on foot, cycle or horseback from communities as far away as Salisbury, with all the related economic benefits. Potential rights of way connections available are up to the Ridgeway in the north, and the New Forest in the south.

BRITISH HORSE SOCIETY PROPOSALS FOR RECONNECTION OF RIGHTS OF WAY IN THE CONSULTATION AREA.



The Hill Brush Company Ltd

Response ID ANON-BABJ-X8KC-D

Submitted to **A303 Stonehenge**
Submitted on **2017-01-22 19:30:39**

Introduction

Name

Name:
Philip Coward

Postcode

Postcode:
BA12 6AE

Email

Email address:
pwc@hillbrush.com

Postal address

Address:
i understand that you are planning to build a tunnel to keep the A303 traffic noise from Stonehenge, but this tunnel is going to cost a huge amount of money, and I cannot understand why you don't just move the A303 a mile to the south and then go south of Winterbourne Stoke and connect into the Wyle by-pass. The road could easily be put into a cutting to reduce the traffic noise at Stonehenge. The savings could then be put towards replacing all of the single road with dual-carriageways.

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Hill Brush Company Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
I explained why I disagree with the proposed option on the previous page.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly agree

Please provide any comments to support your answer for question 2:
I am happy with where the proposed new road joins the existing A303, but not with the tunnel and proposed direction.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
As suggested, why not take the proposed road much further south and in a cutting, not in an expensive tunnel.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The road has to go to the south of Winterbourne Stoke, if my suggestion of taking the route around Stonehenge much further south and in a cutting.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
It is vital that a flyover is installed to replace the Countess Roundabout, because the roundabout causes terrible tailbacks. When a large amount of money was spent enlarging the roundabout a few years ago, a lot of us were initially rejoicing because we thought that a flyover was being built!

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
The A303/A360 junction again needs to involve a flyover, to allow the A360 traffic to flow uninterrupted beneath the A303.

7. Do you have any other comments?

Q7:
Our business is situated on the western side of Mere, and we are desperate for all of the single lane sections of the A303 to replaced with dual carriageways. It is dreadful that the A303, which is a major highway has not been improved for a very long time, and the congestion at peak times is inexcusable. In any other European countries the A303 would by now be a motorway. I remember seeing the plans for the dualling of the section of the A303 to the east of Mere about 30 years ago, and successive governments have used varying excuses for why they do not upgrade the road, and it is time for the excuses to end.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
I just hope that those of us who want the road improved are listened to!

The Loyal Arthurian Warband (LAW)

highways england

08 MAR 2017

247

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

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What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name: Rev King Arthur Pendragon

Postcode: SP2 7GN

Email: K.Pendragon@Yahoo.co.uk

Postal address: 8, Nicholas Court, Spire View Salisbury

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? Loyal Arthurian Warband / Druid orders & Covens

Please provide any comments to support your answer for Question 1

BOTH PORTALS NEED TO BE (OUT SIDE) OF THE W.H SITE, IT NEEDS A LONGER BORED TUNNEL

TITULAR HEAD & CHOSEN CHIEF
LOYAL ARTHURIAN WARBAND

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

TO CLOSE TO ARCHAEOLOGICAL SENSATIVE SITES.

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke ☐

Option 1S– A southern bypass of Winterbourne Stoke ☐

No preference ☑

Please provide any comments to support your answer for Question 4

7. Do you have any other comments?

NOR CAN WE SUPPORT ANY SCEME WITHOUT ASSURANCES THAT ANY HUMAN REMAINS THAT ARE DISTURBED ARE REINTERRED AS CLOSE AS POSSIBLE to THEIR INTENDED FINAL RESTING PLACE

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☑
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☐
Word-of-mouth	☐
Local authority	☑
Other source	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

The National Trust

National Trust

3rd March 2017

Highways England
A303 STONEHENGE CONSULTATION

By email

Dear Sir/Madam

A303 STONEHENGE
Road improvement from Amesbury to Berwick Down

Thank you for the opportunity to respond to the Highways England consultation on the proposed A303 Stonehenge road improvement.

The National Trust is Europe's largest conservation charity with nearly five million members. Established over 115 years ago, our primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we manage over 250,000 hectares of countryside, 3,620 listed buildings, and 700 miles of coastline across England, Wales and Northern Ireland. We are the largest private landowner in the UK. Given the range of our activities, we are in a position to comment both from the perspective of a landowner and as a major conservation organisation responsible for safeguarding the nation's natural and historic assets.

The Trust owns around 850 ha of the Stonehenge landscape within the World Heritage Site (WHS), which is internationally recognised for its extraordinarily dense concentration of prehistoric monuments. Most of this land is farmed by agricultural tenants, and also features extensive areas of chalk grassland with significant opportunities for wildlife enhancement. Areas of our landholding are already open for free public access but we believe the removal of the road could present opportunities to transform public access and enjoyment of the Stonehenge Landscape. Our vision is for a reunited landscape that is a global exemplar of archaeological and nature conservation best practice, enabling first class public access and sharing the story of this globally important place.

The Trust has been an active stakeholder engaging with Highways England, Historic England and others regarding proposals for improvements to the whole A303/A358/A30 corridor. We are aware of the longstanding challenges of highway access to the south-west

National Trust
South West Region
Place Farm Courtyard, Court St
Tisbury, Wiltshire, SP3 6LW
Tel: +44 (0)1747 873250
Fax: +44 (0)1747 873251
www.nationaltrust.org.uk

via this corridor, and the important benefits for local communities, visitors and the wider economy that could arise from road improvements.

We recognise that there are strongly held views regarding the Stonehenge landscape. We believe it is important to make the right decision and that this can only be achieved through understanding and evidence appraisal. As such, the Trust has carried out two detailed assessments over the last three years with our partners on the impact of the potential road schemes on the Outstanding Universal Value (OUV) of the WHS. Our early stage assessment showed the potential benefits of a tunnel of at least 2.9km. We welcome the new position of the eastern portal and believe that – with careful design – a bored tunnel solution of sufficient length to also address the issues (outlined in our response) at the western portal could have significant benefit to the WHS; allowing a substantial section of the existing highly damaging A303 to be removed, providing improvements to monument setting, tranquillity and allowing better access for people and a richer environment for wildlife.

Our latest assessment of the impact of the proposed scheme on the OUV of WHS is attached as part of our response. As the scheme progresses and moves into the next stage of consultation and beyond we welcome Highways England's move to draw on wider scientific and archaeological expertise.

At present, the surface route of the A303 constitutes a very significant barrier to wildlife and prevents connectivity between the chalk grassland to the north and south of the road. This results in a high number of casualties of species from barn owl to brown hare. The removal of this road would allow the creation of a 'bigger, better and more joined up' landscape as outlined in the Government's State of Nature report 2016.

We acknowledge the challenges involved with planning new road infrastructure that takes into account the needs of the local community in the context of an internationally important landscape. Whilst we support many aspects of the consultation proposals, our detailed assessment work has raised significant concerns about the western portal of the proposed twin-bored tunnel, both in terms of its vertical and horizontal alignment within the Stonehenge landscape (including its potential impact on the midwinter solstice sunset alignment) and the proximity of the portal to the Normanton Down Barrow Group

The three key points that we would like to make in response to the public consultation are summarised below.

- Firstly, the proposed tunnel scheme would succeed in removing the majority of the damaging and intrusive surface A303 and its traffic from the Stonehenge WHS, thereby re-connecting the landscape to the benefit of many of the monuments as well as people and wildlife.

- Secondly, the tunnel's eastern portal would allow for the reinstatement of the line of the Stonehenge Avenue; done sensitively this would be a major improvement on the present surface road. As per our attached response to the consultation questions, we strongly support these aspects of the proposals.

- Thirdly, and as indicated above, we are very concerned regarding the proposed location of the western portal and the alignment of that portal and the road that travels onwards and beyond the WHS. We are very concerned in particular that;

    - The portal's proximity to, and impact on, the Normanton Down barrow group – one of the key groups of ceremonial and funerary monuments for which the WHS is designated – would have a substantial adverse impact on the OUV of the WHS.
    - The alignment (both vertically and horizontally) of the western portal and the road after it leaves the portal and passes though the WHS and on to Winterbourne Stoke needs significant improvement. This is needed in order to ensure their alignment, as well as their design, is right for this internationally-important place, an issue which will surely be addressed in detail as part of the Development Consent process.

In addition to the above, you will see that we have made comments of various levels of detail on other parts of the consultation proposals, including the eastern tunnel portal and proposed road junctions, as well as in relation to nature conservation, landscape and visual amenities and public access.

In conclusion, we believe that with careful and sensitive design, a bored tunnel of sufficient length to allow for the proposed location of the eastern portal east of the Avenue as well as to address the issues with the portal to the west, could transform the Stonehenge landscape with significant benefits to the OUV of the WHS. We would urge Highways England to consider in detail the points that we have made in response to the current consultation. As one of the world's most recognisable and truly iconic places it will also be important for Highways England to have regard to feedback from the delegation from the UNESCO World Heritage Centre and their heritage advisors ICOMOS, following their recent visit to the WHS.

We look forward to continuing to work in partnership with English Heritage Trust and Historic England to engage further with Highways England and its consultants, and other stakeholders, as the design of the scheme is progressed.

Yours faithfully

Ian Wilson
Assistant Director Operations, National Trust

Note: This letter should be read in conjunction with the enclosed document titled: '*Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017 (Snashall, Young, January 2017) and our response to the consultation questions.*

National Trust

A303 STONEHENGE CONSULTATION

MARCH 2017

Response to consultation questions

Note: This response should be read in conjunction with the enclosed document titled: '*Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017 (Snashall, Young, January 2017) and the letter attached to this consultation response.*

1. To what extent do you agree with our proposed option?

We are pleased to have the opportunity to submit a consultation response to the Highways England proposed option which we recognise represents the best opportunity in a generation to tackle the blight of the road that dominates the landscape of Stonehenge and in doing so have a significant positive impact on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS).

We **tend to agree** with the focus on the proposed option, with its more direct route including a twin-bored tunnel of at least 2.9km. We note that while the Highways England evaluation and modelling showed the southern route (F10) would have had significant benefits to the WHS, it was removed from further consideration because it did not perform well enough against transport and economic objectives; it would have significant environmental impacts, and would not be as effective in reducing traffic in local villages.

In respect of the proposed bored tunnel option, we **strongly agree** with the removal of a substantial section of the existing A303 from the central part of the Stonehenge WHS. The prehistoric landscape is currently split in two by the A303 with tens of thousands of vehicles passing through the Stonehenge landscape every day. The heavy traffic and constant noise from the road compromises the enjoyment and understanding of the WHS, and severs both the visual relationships and access between monuments in the northern and southern halves of the WHS including the monument itself. Removing the A303 with a twin-bored tunnel would remove its substantial adverse impacts on the central part of the Stonehenge WHS, improving the setting of numerous Neolithic and Bronze Age monuments within the WHS as well as Stonehenge itself, all of which are attributes of its OUV. Indeed, finding a solution to the existing A303 is a specific action within the WHS Management Plan, which we are committed to delivering with partner organisations.

In addition, the removal of the existing A303 would reconnect the part of the landscape north of the A303 (and the monuments it contains) with those to the south, with significant benefits for public access. Members of the public would have much

greater opportunity to use existing rights of way and open access land to explore the landscape and monuments to the south. It would also remove a very significant barrier to wildlife, which prevents connectivity between the chalk grassland to the north and south of the road. This results in a very high number of casualties of species from barn owl to brown hare. The removal of this road would allow the creation of a 'bigger, better and more joined up' landscape as outlined in the Government's State of Nature report 2016.

We note that we are still in the early stages of the design of an appropriate solution and all comments we provide in this document (and the associated letter) are given in the expectation of the delivery of a considered, high quality solution for this internationally important site.

To summarise our position in respect of other aspects of the proposed scheme:

- We **strongly agree** with the reinstatement of the line of the Stonehenge Avenue, subject to certain provisos (as per our response to question 2 below).

- We **strongly disagree** with the proposed position of the western portal of the twin-bored tunnel, which we consider requires significant improvement (as per our response to question 3).

- We consider that more work needs to be done with regards to the alignment and design of the road as it leaves the Western portal and bypassing Winterbourne Stoke to explore which options would most benefit the OUV of the WHS and designated heritage assets (see under question 4). As more detail on this is made available we will respond accordingly.

- We have made brief comments on the proposed road junctions at the eastern and western boundaries of the WHS (see questions 5 and 6), although again we await further detail in due course.

2. To what extent do you agree with our proposed location of the eastern portal?

We **strongly agree** with the reinstatement of the line of the Stonehenge Avenue. The proposed location of the tunnel's eastern portal would allow the line of this ancient processional route leading to the Stonehenge monument to be reinstated where it is currently severed by the existing A303. This major improvement in respect of the location of the eastern portal is not something that previous road proposals would have achieved. It would be highly beneficial to the OUV of the World Heritage Site and would greatly reduce the impact of the road east of King Barrow Ridge. In addition, whilst a large part of our landholding is already open for public access, we believe the removal of the road could present opportunities to improve public access through the existing network of paths and bridleways and increase enjoyment and understanding of the WHS at Stonehenge.

However, although the proposed reinstatement of the line of the Avenue is a big step forward, it is critical that the infrastructure is designed and located sensitively with regards to impacts on the OUV of the WHS if this improvement is to be properly realised. For example, it will be important to understand the impacts on the restored line of the Avenue of traffic entering the eastern tunnel portal, which may give rise to visual, aural and light pollution that could undermine the heritage benefits. There would need to be careful consideration of the distance between the restored line of the Avenue and the eastern portal and how suitable mitigation might be put in place. We understand from Highways England presentations that the 'working assumption' is to avoid external lighting at the tunnel portals as well as on the road outwith the tunnel portals within the WHS.

In addition, the eastern portal and the road outwith the tunnel portal will need to be carefully designed to enable public access to, and engagement with, the area around King Barrow Ridge.

Finally, in respect of this scheme, we urge Highways England to conduct detailed environmental impact assessment and evaluation in order to fully understand and in particular to avoid any potential direct or indirect impacts on the nationally significant Mesolithic site at Blick Mead.

3. To what extent do you agree with our proposed location of the western portal?

Our assessment work has identified that moving the western portal south of the existing A303 does have significant benefits to the OUV of the WHS. However, the proposed location of the western portal for the tunnel and the road outwith the tunnel portal within the WHS needs significant improvement. This is due to both the portal's proximity to and impact on the Normanton Down Barrow Group – one of the key groups of ceremonial and funerary monuments for which the WHS is designated – and the impacts of both the portal's and road's vertical and horizontal alignment.

The consultation's Technical Appraisal Report states that the western portal location would be "sited optimally to the west of the Normanton Down Barrow Group", and it appears to give considerable weight to the portal being positioned such that the road would no longer be visible from Stonehenge. The report also indicates that route option 1S should have a greater beneficial effect than 1N, as the former "avoids important archaeological remains and uses local topography to better fit into the landscape". Finally, notwithstanding the above statements (which we address below), the report acknowledges that the western portal has the potential to cause substantial harm to the Normanton Down barrow Group and other important monuments, which would adversely impact the OUV of the WHS.

From a Trust perspective, the scheme must be tested in accordance with UNESCO/ ICOMOS guidance on whether it would conserve and enhance the OUV of the WHS.

As per our attached assessment of the impact on OUV, we disagree with the Highways England assessment of impacts on the historic environment of route options 1N and 1S. The current alignment of option 1N is unacceptable because of the level of adverse impacts on attributes of OUV, including the fact that it would bisect two newly identified long barrows and a henge type-enclosure. In respect of option 1S, the positioning of the western portal itself is unacceptable. Overall, the attached assessment clearly demonstrates that the western portal as proposed (and the associated surface roads) would cause unacceptable harm to the OUV of the WHS.

In light of our assessment of the impact of the proposed scheme on the OUV of the WHS, we would strongly advise that the western portal/exit point for traffic is moved further away from the Normanton Down Barrow Group to minimise the highly adverse impacts of the western portal of the current scheme on the WHS, and that further amendments are made to the proposals as discussed in the attached assessment. The extent to which these amendments would reduce or avoid adverse impacts on OUV could then be re-assessed.

Other issues:

- Any long distance views of the new dual carriageway in the western part of Stonehenge WHS should also be considered in the detailed design and mitigation.

- Linked to the above, any potential adverse impacts of the western portal location and road alignment with the WHS or lighting outwith the WHS on the midwinter solstice sunset alignment should be considered and avoided or appropriately mitigated in the detailed design, in order to avoid an adverse impact on the OUV of the WHS. We do, however, note that the existing A303 has a significant impact on the landscape as it relates to the midwinter solstice sunset alignment and as such its removal will have a positive impact on this attribute of the OUV of the WHS.

- More generally, measures to avoid, reduce or mitigate the impacts of noise and light pollution should be pursued, including the type of road surfacing and the detailed design of any cutting. From presentations by Highways England to the World Heritage Site Steering Committee and Partnership Panel we note that the ‘working assumption’ is to avoid external lighting at the tunnel portals and of the road within the WHS. We strongly support this. This is a key issue both from a visual perspective and also for European protected species of bats which are known to hunt over the Stonehenge landscape and are known to be adversely affected by lighting.

- The potential impacts on local communities affected by the route from the western portal out of the World Heritage Site should be considered.

- Any impacts on the stone curlew a rare and endangered species vulnerable to disturbance which is known to be on the RSPB reserve of Normanton Down should also be considered.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

We consider that more work needs to be done with regards to the route from the western portal and bypassing Winterbourne Stoke to explore which options would cause least harm to designated heritage assets and provide an appropriate solution for both the local community and the natural environment.

In respect of the specific route options under consultation, our assessment has shown that 1N as currently constituted would have a highly adverse impact on the OUV of the WHS – splitting as it does the newly recognised Diamond Group of monuments. Our comments under question 3 above are however relevant, and some additional detailed points relating to the impact on the OUV of the WHS are summarised below.

In respect of option 1N, we consider it would be damaging to raise the A360 into an embankment, as this would cause adverse visual impacts on multiple attributes of OUV. It is also considered that the proposed 1.5 metre deep cutting as the route passes through the Diamond Wood towards the western boundary of the WHS is too shallow; as currently designed, it would not adequately mitigate the adverse impacts on the visual relationships between multiple key attribute groups within the WHS. To do this the depth of any cutting should be sufficient to allow HGVs to pass without disrupting the sight lines between monuments.

In respect of option 1S, it is not clear from the Technical Appraisal Report paragraphs 8.2.15 and 8.2.16 whether the new dual carriageway would pass under or over the A360 at the proposed junction between the two. Any existing tree screening should be considered as a temporary feature in the landscape that could be removed. To mitigate to some degree the adverse visual impacts on attributes of OUV, the A360 should pass at its current height with the A303 in cutting of sufficient depth to allow HGVs to pass without visual impact to monuments at the western end of the WHS. The proposed 7 metre high embankment (where 1S changes from a left hand to a right hand curve) would also have an adverse impact on attributes of OUV within the WHS (including the visual relationships between the newly recognised Diamond Group and Lake Barrow Group, and between Winterbourne Stoke Barrows and the Lake Group) and would have a detrimental impact on the OUV of the WHS. Instead, it is recommended that visual impacts here could be mitigated by placing the portion of the A303 between the Park and the western portal in a cutting of sufficient depth to allow HGVs to pass without visual impact to monuments at the western end of the WHS.

Finally, as well as the consideration of heritage issues, the potential impacts of the two route options on ecological interests, landscape and visual amenities and public access should also be given in-depth consideration. The ecological interests include designated nature conservation sites of national and international importance (River Avon SAC, River Till SSSI) to the west of the WHS.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

The most important issues from our perspective are the design of the junction, its impacts on the OUV of the WHS, its impacts on landscape and visual amenities, its impacts on ecological interests, buildings of historical interest (Countess Farmhouse and its associated farm buildings are Grade II listed) and the implications for public access (including walkers, cyclists and horseriders). In relation to that last point and as commented earlier, a large part of our landholding is already open for public access but we believe the removal of the road could present opportunities to transform public access through the existing network of paths and bridleways and increase enjoyment of the Stonehenge landscape.

Notwithstanding the focus of this question on the Countess junction, we note that para. 8.5.11 of the Technical Appraisal refers to an opportunity to investigate an alternative junction location at the existing Solstice Park junction to the east. We would encourage further investigating the viability of this alternative junction if this would assist in mitigating the impact of a possible flyover at the Countess roundabout while maintaining local connectivity.

Finally, we also believe this junction should be considered in conjunction with improved access to the WHS. We are acutely aware (and have received feedback from the public and our members) that there is notable sadness with many people that they will not be able to see the Stonehenge Monument from the road. We believe that the design of this junction should allow for access to (and creation of) a short stop off point that allows the public to break their journey and enjoy the view of the Stonehenge landscape. This is something the National Trust has made a commitment to explore as part of any road improvement scheme.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

The most important issues are the same as those listed under the above question, namely junction design, impacts on OUV, landscape and visual impacts, ecological impacts and implications for public access.

In the case of impacts on OUV, there would be a beneficial effect of removing the existing Longbarrow roundabout from the landscape, as it is directly adjacent to (and adversely affects the setting of) the Winterbourne Stoke Barrow Group, which lies on

the north-east side of the existing roundabout. However, in respect of the new junction, we consider that it would be highly beneficial for the new dual carriageway to pass under the A360 which should remain at grade, and that the junction with the A360 would be to the west of the present line of that road.

It is also important to ensure that access to the English Heritage Stonehenge Visitor Centre allows for successful delivery of a world class visitor offer (both during construction and after), while also ensuring the design and location of any A303 /A360 junction or related infrastructure takes the opportunity to significantly reduce the current adverse impact on the Winterbourne Stoke Barrow Group and the OUV of the WHS. This is covered in more detail in the accompanying assessment of the impacts of the proposed scheme on the OUV of the WHS.

7. Do you have any other comments?

We would like to make a number of further points that do not obviously fall under the above questions:

- Para. 8.5.12 of the Technical Appraisal Report states that the existing A303 within the WHS would be closed between Countess Roundabout and Longbarrow Roundabout for general traffic “except for local access from Amesbury”. We anticipate that the majority of the existing A303 and associated interventions (e.g. the embankment at Stonehenge Bottom) over this area will be removed and an appropriate surface cover added that meets the needs of the landscape (and the OUV of the WHS) while being a suitable grade for non-motorised traffic. There should also be suitable access for the farmers adjacent to the road to allow for efficient operation of their agricultural holding and to Stonehenge Cottages.

- We welcome the intention for the surface dual carriageway route to be unlit (para’s 8.6.3 and 8.6.4), given our concerns regarding the potential for light pollution within the WHS and its setting. We require clarification as to whether the same intention is in place for the A360 as it traverses the A303 (i.e. that it would, as currently, remain unlit).

- Para’s 8.11.3 to 8.11.5 refers to embankments that may be needed to carry the proposed dual carriageway. As a general principle the construction of embankments within the WHS would need careful treatment to avoid adverse visual impacts on the setting of heritage assets and to adversely impact on visual relationships between monuments, causing detrimental impacts on the OUV of the WHS.

- We work with four farming families who hold tenancies across the Stonehenge landscape who adapt their commercial farming enterprises where possible to take into consideration the significance of the WHS. Farming land that has such

historic environment significance brings with it additional considerations and we are greatly appreciative of the time and attention our tenant farmers give to consulting with us and seeking additional consents to complete predominately routine farm management works. The current farming systems will require a continued high level of access thorough-out the development and construction of the scheme to facilitate land management. The viability of field sizes, stock management requirements, maintenance of secure boundaries and the need for access to water for grazing sock must also not be overlooked.

Final remarks

The World Heritage Site's Statement of OUV acknowledges that the Stonehenge monument is the, "most architecturally sophisticated prehistoric stone circle in the world". It states that the Stonehenge WHS provides an "outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age". The surviving monuments and their inter-relationships represent a "unique embodiment of our collective heritage".

The attached assessment of the impacts of the proposed scheme on the OUV of the WHS notes that "the image of Stonehenge in its downland landscape is world-renowned", and that "it is an important and enduring symbol of humanity's prehistoric past and an internationally recognised symbol of Britain".

This international significance of Stonehenge and its prehistoric landscape will be an important material consideration when the Development Consent application for the proposed road scheme is submitted. In respect of heritage assets, national planning policy states:

> "In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal"
> [para. 5.129, National Policy Statement for National Networks (December 2014)]

The above extract serves to emphasise the importance of designing a road improvement scheme that minimises conflict with conservation interests in the context of the internationally significant heritage assets. At present, we consider that the proposed scheme does not go far enough to minimise such conflicts.

We are able to support many aspects of the consultation proposals which if designed well could provide significant benefits to the Stonehenge WHS, however, we consider that certain aspects of the proposals – in particular in respect of the western tunnel portal and associated surface roads – require significant improvement in order to

produce a scheme that could successfully negotiate the Development Consent process.

We welcome the approach taken by Highways England to date, which is a significant improvement on previous scheme proposals. We also note that UNESCO have highlighted the importance of high level engagement by Highways England with the community, key partners in the WHS and the wider stakeholder group and we hope that this good practice continues.

We are pleased to have had the opportunity to submit a consultation response to the Highways England proposed option which we recognise represents the best opportunity in a generation to tackle the blight of the road that dominates the landscape of Stonehenge and in doing so have a significant positive impact on the OUV of the WHS.

Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017

Nicola Snashall BA MA PhD MCIfA
National Trust

Christopher Young BA MA DPhil FSA
Christopher Young Heritage Consultancy

January 2017

Historic England

National Trust

Executive Summary

Introduction

In 2014, English Heritage (now Historic England) and the National Trust commissioned an assessment (Snashall, Young 2014) on the potential impact of new road options, including a tunnel, for the A303 within the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage property. Since at that time, there were no detailed proposals, that report considered four possible alternatives and concluded that, of these, an off-line route with a tunnel of 2.9kms length would be the most deliverable solution.

The government remains committed to improving the A303 and to funding sufficient for a tunnel of at least 2.9kms length within the World Heritage property. Highways England are consulting in early 2017 on route options developed since 2014 for this road scheme through the World Heritage property and bypassing Winterbourne Stoke village to the west. This report is an outline assessment of these initial options on the Outstanding Universal Value (OUV) of the World Heritage property. It has been commissioned to assess the impact of the latest road options in the light of updated archaeological information. Major changes in archaeological knowledge since 2014 relating to attributes of OUV of the World Heritage property are summarised in Chapter 2, together with any other relevant changes in the context of the current proposals. Chapter 3 describes the methodology used. Chapter 4 briefly describes the latest road options as far as they are developed and sets out the approach we have adopted. This is followed by the actual assessment of the non-physical impacts of the road options. Chapter 5 assesses the physical impact and a final chapter draws overall conclusions on the likely impact of the options presented and discusses possible mitigation measures. This assessment is still outline and provisional since detailed design of the scheme has not yet been developed at this stage of the Highways England process. It is part of an iterative process design and assessment, and its purpose is to inform Historic England and the National Trust in their consideration of current proposals and their discussions with Highways England.

Based on a number of assumptions, Highways England has proposed a route which would cross the A345 by flyover with grade separated junction at Countess Roundabout. It would enter a tunnel east of the line of the Avenue. The western portal of the tunnel would be south of Normanton Gorse and closer to the Normanton Down Barrow Group than the offline route evaluated in 2014. From the western portal, Highways England is considering two alignments. Both would run through the Diamond copse. D061 would run on a more northerly alignment, crossing the A360 some 700m south of Long Barrow Crossroads. D062 would have a more southerly alignment crossing the A360 at a lower point at the Park. For both routes, the surface sections would be constructed at grade. The A360 would be crossed by a flyover for either the A303 or the A360. This would be 8m high. There would also be a grade separated junction, location to be determined.

Changes in context since 2014

This report reviews changes in the wider context since our last preliminary assessment in 2014 (Chapter 2). It notes that the ICOMOS/ UNESCO Advisory Mission in October 2015 considered that the scheme could have beneficial impacts on the OUV of the World Heritage property, but also noted that *the siting and design of the tunnel portals, approach cuttings, embankments, entry/ exit ramps, mitigation measures and the temporary construction works have the potential to adversely impact OUV* (ICOMOS/ UNESCO 2016, 24).

Since 2014, further archaeological work has been carried out by Historic England as part of their investigation of the southern part of the World Heritage property. Wessex Archaeology have also undertaken assessment and evaluation for Highways England. The most significant results relevant to the OUV of the World Heritage property and that could be impacted by the scheme have been the discovery/ confirmation of the existence of two long barrows and a hengiform monument in the area around the Diamond copse. This has led us to recognise a new key attribute group for this assessment, the Diamond group, located north and west of the Diamond. We have also recognised that the boundaries of the Normanton Down Barrow Group were drawn too tightly for our 2014 assessment. We have extended its boundaries to include Normanton Gorse itself, the Sun Barrow north of that wood, and the unnamed barrow group divided by the current A303 (see Fig. 2 for all key attribute groups).

Methodology

For comparative purposes, potential impacts have been assessed using the same methodology as last time, based on the 2011 ICOMOS Guidance on Heritage Impact Assessment (ICOMOS 2011) (Chapter 3). Separate assessments were carried out for visual and other impacts, looking in detail at the impact of the road proposals on the relationships between key attribute groups (Chapter 4) and for direct physical impacts on physical attributes (Chapter 5). We have also assessed the impact of the proposals on each of the seven principal attributes of OUV (see list on p.7) and on integrity and authenticity of the World Heritage property. Evidence for these evaluations is set out in a series of tables and overall conclusions are discussed in Chapter 6.

This study builds on the work carried out in 2014 by the same authors (Snashall, Young 2014) in assessing options for a bored tunnel solution in the World Heritage property. As far as possible information from that report has not been duplicated here, and this new assessment should be read in conjunction with the earlier report. The earlier report contains additional information on the World Heritage property and fully considers the broader policy context and guidance affecting World Heritage properties. It also contains the initial assessment of the benchmark 4.5kms tunnel and the four options evaluated at the time. These are not repeated in this report.

Conclusions

The starting point for any assessment is the impact of the current A303 and new proposals need to be evaluated against this baseline. The 2014 report established that the current A303 has a severe adverse impact on the OUV of the World Heritage property.

Both the options presented by Highways England (D061 (1) and D062 (1)) would have a less adverse impact than the current situation. On the basis of present knowledge, there would be no direct physical impacts from either option, though further archaeological work would be required to confirm this. The flyover and grade-separated junction with the A345 would have adverse local impacts but not on key attribute groups. At the east end, moving the tunnel portal east of the Avenue is highly beneficial and the impact of the road east of King Barrow Ridge and Coneybury Hill would be greatly reduced. In the central part of the World Heritage property the adverse impacts of the current A303 would be removed entirely except possibly for some distant views from King Barrow Ridge and Coneybury Hill of the surface stretches of road beyond Normanton Gorse.

However, there are issues around the location of the western portal and the surface stretches of road from there to the western boundary of the World Heritage property as currently presented.

Physically D061 (all variants) splits the Diamond key attributes group. The western portal is very close to the Normanton Down Barrow Group while both surface routes have adverse visual and aural impacts on the surrounding Winterbourne Stoke, Normanton Down , Lake and Diamond Groups (nearly a quarter of the identified key attribute groups). Crossing of the A360 is achieved by a bridge 8m high, either of the A303 over the A360 or vice versa, with a grade separated junction. Both alignments (D061 (1) and D062 (1)) are unacceptable in this form.

The 2015 ICOMOS/ UNESCO mission, quoted earlier in this summary, specifically drew attention to the potential for the surface parts of any scheme to have an adverse impact on OUV. Mitigation west of Normanton Down Barrow Group is essential and we have therefore considered five further options for each route (D061 (2-6) and D062 (2-6)) in addition to the Highways England options, considered as D061 (1) and D062 (1).

Both the D061 (1) and D062 (1) routes could be mitigated, and impact on the four western barrow groups reduced by greater concealment of the road by placing it in cutting, crossing the A360 by means of an underpass and by placing any junction with the A360 to the west of the existing line of the A360 (D061 (2) and D062 (2)). Further mitigation would be achieved by moving the apparent western exit from the tunnel by construction of a landbridge/ canopy which reflects the existing landform (D061 (3) – (6) D062 (3) – (6)). This would have the effects of moving the apparent exit away from the Normanton Down Barrow Group, and also of shortening the amount of road visible in the western part of the World Heritage property. The most effective mitigation would be achieved by D061 (6) and D062 (6). However, even in that scenario D061 (all variants) would still divide the Diamond Group, which would be unacceptable.

It has not been possible or appropriate in this report to carry out a full Heritage Impact Assessment of the new proposed route for the A303, since the available information is only in outline. We have had to make a number of assumptions (outlined in Chapter 4) in order to make this assessment. It would in any case be the responsibility of Highways England as the scheme promoter to produce a full Heritage Impact Assessment as an integral part of an iterative design process (as called for by the ICOMOS and UNESCO Advisory Mission). This would allow the scheme to respond to and accommodate further developments in archaeological understanding, and produce a final scheme which ensures the protection of the OUV of the World Heritage property.

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Chapter 1 Introduction

This assessment of the potential impact of road proposals on the Outstanding Universal Value (OUV) of the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage property has been commissioned by Historic England and the National Trust to inform them in their consideration of new road scheme options being developed by Highways England, (D061 (1) and D062 (1)) and in the light of updated archaeological information. This study builds on the work carried out in 2014 by the same authors (Snashall, Young 2014) in assessing options for a bored tunnel solution in the World Heritage property. As far as possible information from that report has not been duplicated here, and this new assessment should be read in conjunction with the earlier report. The earlier report contains additional information on the World Heritage property and fully considers the broader policy context and guidance affecting World Heritage properties. It also contains the initial assessment of the benchmark 4.5kms tunnel and the four options evaluated at the time. These are not repeated in this report.

The 2014 study examined options for improvements to the A303 through the Stonehenge part of the World Heritage property. Assessment covered both direct and indirect physical impacts on the attributes of OUV (including archaeology and visual impact), integrity and authenticity. Since at that time Highways England had not begun work on a route for the A303, it took the form of an assessment of four possible scenarios. These were:

1. Published Scheme on the line of the present A303 with a 2.1kms tunnel, which was the subject of a Public Inquiry in 2004
2. On-line road with 2.5kms tunnel
3. On-line road with 2.9kms tunnel
4. Off line road with 2.9kms tunnel. The eastern portal was proposed on the line of the A303 200m to the east of the top of King Barrow Ridge. Its western portal was c.500m south of the current A303; new dual carriageway then ran in cutting to the western boundary of the World Heritage property, crossing under the A360 some 700m south of Long Barrow Cross Roads.

In addition, it assessed the impact of the existing A303 since this is the baseline for evaluating new road options. It also evaluated the impact of a hypothetical 4.5kms tunnel, proposed by objectors at the 2004 Public Inquiry, as a benchmark. The assessment was based on archaeological knowledge at that time and on a series of assumptions about where a road with tunnel could be constructed and how this might be done.

The conclusion of the 2014 study was that the current A303 has a major adverse impact of very large impact on the OUV, including integrity and authenticity, of the World Heritage property. The 4.5kms tunnel would have a major beneficial impact of very large significance. The Published Scheme for a 2.1kms tunnel could be rated as having a negligible beneficial impact of slight significance. The remaining three options for bored tunnels were rated as having a moderate beneficial impact of large/ very large significance.

Within the ICOMOS HIA methodology (see Chapter 3 below), it was difficult to differentiate the impact of these three bored tunnels on the OUV of the property as a whole. It was possible to

achieve some differentiation by examining the detailed impacts on individual physical attributes. In particular, the four tunnel options affected the Winterbourne Stoke Barrow Group to differing extents by reason of their proximity to the group, by the length of new dual carriageway close to the Group, and by their impact on views to and from the Winterbourne Stoke Group from other physical attributes of OUV, particularly in western parts of the property.

On the basis of the information then to hand the 2.9kms offline tunnel had the most beneficial impact on the World Heritage property, provided that the new road was not too intrusive in views from Lake Barrow Group to Winterbourne Stoke Barrow Group. The next best alternative would be the 2.9kms tunnel online option, followed by the 2.5km option. (Snashall, Young 2014, 76)

Since then, further assessment work has been carried out on the archaeology of the potential road corridor, and Highways England have developed their initial options for a scheme including a tunnel of at least 2.9kms length (D061 (1) and D062 (1)). The east portal is located to the east of the Avenue while the western portal is closer to the Normanton Down Barrow Group than any of the options previously considered. The new dual carriageway in the western part of the property would run at grade and there would be a flyover of 8m high where the two roads crossed. There are two possible routes from the western portal to the A360.

This present report has been commissioned to assess the impact of the latest road options in the light of updated archaeological information. Major changes in archaeological knowledge relating to attributes of OUV of the World Heritage property are summarised in Chapter 2, together with any other relevant changes in the context of the current proposals. Chapter 3 describes the methodology used. Chapter 4 briefly describes the latest road options as far as they are developed and sets out the approach we have adopted. This is followed by the actual assessment of the non-physical impacts of the road options. Chapter 5 assesses the physical impact and a final chapter draws overall conclusions on the likely impact of the options presented and discusses possible mitigation measures. This assessment is still outline and provisional since detailed design of the scheme has not yet been developed at this stage of the Highways England process.

It must be stressed that a full impact assessment, fully compliant with the ICOMOS guidance and with EU and UK regulations for Environmental Impact Assessment (EIA) would be a much larger piece of work. It would require much more supporting material such as a full description of the Stonehenge component of the World Heritage property with a gazetteer of all the sites considered. There would also need to be a much more thorough and detailed analysis of impacts on relationships. This study is an outline assessment intended for the National Trust and Historic England to inform their response to Highways England. It is in no way a full OUV impact assessment which remains to be done in the future, and which will be prepared by Highways England as the scheme promoters.

Chapter 2 Changes in the context

The wider policy context was set out in Chapter 4 of the 2014 report (Snashall and Young 2014, 14 - 25). Government policies on spatial planning and its road programme have not changed significantly since then. Government remains committed to improving the A303 as a major link to the South-West. It has committed funds sufficient for a tunnel at least 2.9kms in length as part of resolving the bottleneck at Stonehenge by dualling the road through the World Heritage property. The government is also committed through its ratification of the World Heritage Convention to the protection of its World Heritage properties 'to the utmost of its own resources' (UNESCO 1972, Article 4). The National Trust and Historic England remain committed to working with Highways England to ensure that what is proposed is appropriate within the provisions of the World Heritage Convention.

There have been three significant developments in the context of the A303 proposals since 2014.

The UK government has involved ICOMOS International and the secretariat of the Convention (the World Heritage Centre) in the planning process for the A303 through invitation of an Advisory Mission which visited the site in October 2015 and published its report in Spring 2016. The mission made a number of important recommendations and concluded:

The mission considers that the project for the relocation of the existing road underground into a "tunnel of at least 2.9k" could readily adopt appropriate well-established construction methods and spatial planning approaches. Hence, with good design and construction controls, and respecting essential archaeological and heritage management measures, the tunnelled length of the road would be expected to have a beneficial impact on the attributes of Outstanding Universal Value (OUV). However, the siting and design of the tunnel portals, approach cuttings/embankments, entry/exit ramps, mitigation measures and the temporary construction works have the potential to adversely impact OUV. These latter aspects of the scheme, in particular, will require rigorous investigation, evaluation, iterative design and assessment if they are to protect the attributes of OUV within the World Heritage site and the surrounding Archaeological Priority Area (APA). (ICOMOS/ UNESCO 2016, 24)

It is planned for there to be further Advisory Missions which should provide a helpful international perspective on the development of proposals for the road.

A considerable amount of archaeological investigation has been carried out since the last report in 2014. This has involved both non-intrusive survey, mainly geophysical prospection, and also some excavation. Work has taken place around the possible location of both portals and on areas that could be affected by new road construction outside the tunnel. This work has been carried out directly by Historic England (as part of a wider programme of archaeological survey and investigation of the portion of the World Heritage property south of the A303) or commissioned by Highways England and carried out by Wessex Archaeology who have long experience of working within the World Heritage property, much of it on the evaluation of road-related proposals.

Relevant work includes:

- Multi-disciplinary archaeological survey and investigation by Historic England as phase 1 of the Stonehenge World Heritage property Southern Landscape Survey. Elements include:
  - Desk-based assessment
  - Aerial Investigation and Mapping
  - Geophysical Surveys
  - Small-scale archaeological investigation
- Archaeological assessment and evaluation undertaken by Wessex Archaeology for Highways England along the potential footprint of aspects of the "working assumption" route for a twin-bored tunnel scheme. Elements include:
  - Extensive geophysical surveys, including both east and west portal locations
  - Archaeological evaluation of the potential western portal location and part of the potential route of the new surface dual carriageway leading from the western portal to the western border of the World Heritage property.

The principal results affecting the assessment of the potential impact of the road scheme are the identification of two Neolithic long barrows and a middle Neolithic hengiform monument in the area adjacent to the Diamond close to the proposed road line from the western portal to the western boundary of the World Heritage property. This has caused us to identify a further key group of monuments including the long barrows and the hengiform north and west of the Diamond and named as the Diamond Group (see Fig. 2 and further below p.8)**.**

The third major change in context is that Highways England will consult in early 2017 on proposed route options for the A303 from Amesbury to Berwick Down, which include revised alignments to avoid the significant Neolithic archaeology noted above. These routes within the World Heritage property are the subject of this outline assessment. They are both off-line from the present route of the A303 and include a tunnel with its eastern portal to the east of the Avenue and its western portal south of Normanton Gorse (Fig. 3). There are two potential alignments from the western portal to the western boundary of the World Heritage property that runs along the A360. The details of the routes are further described in Chapter 4 below.

Chapter 3 Methodology

The evaluation is divided into an assessment of permanent direct and indirect impacts of new road construction resulting in physical loss of the whole or part of archaeological sites and monuments which are attributes of the OUV of the World Heritage property, and of the non-physical impacts on attributes of OUV. This study looks solely at the implications for the World Heritage property. It concentrates on the impact on attributes of OUV and therefore on the property's international values. It does not focus on impacts on cultural heritage of national or local significance except insofar as these also have international significance. It is beyond the study's scope to examine any wider implications, such as, for example, the Winterbourne Stoke bypass or other improvements further west. These clearly will need to be borne in mind both for their impact on heritage assets, natural or cultural, of national or local significance.

Impact assessment

It has not been possible in this report to carry out a full Heritage Impact Assessment of the new proposed route for the A303, since the available information is only in outline. We have had to make a number of assumptions (outlined in Chapter 4) in order to make this assessment. It would in any case be the responsibility of Highways England as the scheme promoter to produce a full Heritage Impact Assessment. This report is intended to inform the position of Historic England and the National Trust in their response to Highways England and their discussions with other key stakeholders.

The basic methodology used has been that recommended in the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (ICOMOS 2011). This has effectively been endorsed by the UNESCO World Heritage Committee through various decisions and therefore provides a model likely to be acceptable to them. It is also similar to the methodology developed in the Highways Agency *Design Manual for Roads and Bridges* which has been tried and tested in England, not least at Stonehenge. One of the key aspects of the ICOMOS methodology is that the impact on OUV has to be assessed as a whole and not atomised into impact on individual attributes which can be misleading. However, in order to reach such an overall assessment it is still necessary to assess impact on individual attributes as the basis for the final conclusions.

Essentially we have focused on the key elements of the ICOMOS HIA methodology:

- Identification of heritage potentially at risk and its contribution to the OUV of the property
- How change or development will impact on OUV, positively or negatively
- How change or development will impact on integrity and authenticity, positively or negatively
- Consideration of how adverse impacts of the scheme might be mitigated

The ICOMOS methodology postulates a scale of values for attributes of:

- Very high
- High
- Medium
- Low
- Negligible
- Unknown

All attributes of OUV considered in this case have been ranked as 'Very High' because they are by definition of international significance.

Impact on these has been scored according to the ICOMOS methodology. The scale of impact of proposed changes has been ranked as:

- No change
- Negligible change
- Minor change
- Moderate change
- Major change

Change can be adverse or beneficial. This gives a nine-point scale with 'neutral' as its central point:

- Major beneficial
- Moderate beneficial
- Minor beneficial
- Negligible beneficial
- Neutral
- Negligible adverse
- Minor adverse
- Moderate adverse
- Major adverse

The significance of the impact of the change is scored as a function of the importance of the attribute and the scale of change. For any feature of international significance (i.e. World Heritage properties and their attributes of OUV) the result of this scoring is as follows:

VALUE OF HERITAGE ASSET	**SCALE & SEVERITY OF CHANGE/IMPACT**				
	No change	**Negligible change**	**Minor change**	**Moderate change**	**Major change**
For WH properties Very High – attributes which convey OUV	**SIGNIFICANCE OF EFFECT OR OVERALL IMPACT (EITHER ADVERSE OR BENEFICIAL)**				
	Neutral	Slight	Moderate/ Large	Large/very Large	Very Large

Fig 1: significance of impacts on World Heritage properties and their attributes (ICOMOS 2011, 9)

According to the ICOMOS HIA Guidance, therefore, any moderate or major impact on an attribute of OUV results in a large or very large beneficial or adverse impact.

This is an unusual HIA in that the property is already affected by a large/ very large adverse impact on its OUV in the form of the present A303, which is to be replaced by the new road. Any reduction of this impact would lessen this damage, though large/ very large adverse impacts to individual

attributes could remain and additional adverse impacts might also be introduced in some instances. The removal of an adverse impact from any attribute so that it no longer exists in the new situation is in fact a positive impact on that attribute and needs to be recorded as such.

This assessment has been carried out for each physical attribute selected for examination in this study. Following that process, it has been necessary to aggregate the results to give an overall assessment of impact on the OUV of the Stonehenge part of the World Heritage property as a whole. This has inevitably involved the use of professional judgement, particularly as gains in one part of the World Heritage property may be accompanied by losses in another.

OUV has been agreed for the whole World Heritage property and attributes were first defined for the Stonehenge component in the 2009 Management Plan which was endorsed by all the key stakeholders (English Heritage 2009a pp28-33). The seven identified attributes, all securely based in the agreed Statement of Outstanding Universal Value (see Appendix 2), are:

1. Stonehenge itself as a globally famous and iconic monument.
2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.
3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.
4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.
5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.
6. 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.
7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

The first two of these are physical attributes consisting of surviving archaeological sites above or below ground. No. 6 singles out the landscape formed by the interrelationship of the physical attributes with their natural environment and thus applies holistically to the whole property. It relates closely to the integrity of the property. Nos. 3 and 5 are about the relationships of the individual physical attributes with the landscape and with each other. No. 4 deals with astronomical alignments and is therefore also about relationships of the physical attributes, in this case with beliefs and their physical expression. No. 7 is about the influence of the physical attributes and their relationships, particularly in the landscape, on artists, architects and other disciplines.

Integrity and authenticity are also deemed by the UNESCO World Heritage Committee to be part of the OUV of the property. The impact of the A303 as it is now, and the changes in that impact on integrity and authenticity resulting from the various bored tunnel options must also be assessed (see pp.52 - 54 below).

The present A303 was assessed in 2014 for its impact on those attributes selected for assessment, supported by field visits as necessary and as time permitted. The scale and system used for measuring impact was that recommended by ICOMOS, as was that used for grading assets. Following that, the same process was applied for the impact of a 4.5kms tunnel. These provided the baseline and a benchmark (one negative and one beneficial) of potential impact of the A303 on the OUV of the World Heritage property. The same process was then applied to the four bored tunnel scenarios provided by English Heritage and the National Trust. Only the impact of permanent changes was assessed. These assessments formed the basis for the 2014 report (Snashall, Young 2014) and the assessment of the impact of the present A303 has been used again in this report as the baseline against which to measure the impacts of the new options (see Chapters 4 and 5).

There are approaching 700 known archaeological sites and monuments within the Stonehenge component of the World Heritage property (Wessex Archaeology 2012). Many of these are physical attributes of the OUV of the site, as the physical remains of Neolithic and Bronze Age funerary and ceremonial monuments and associated sites. They are also parts of other attributes dealing with relationships between them and their landscape. Many of them are now in view of the A303, and/or interlinkages between them are now affected by the A303. Because this is only an outline assessment to inform the position of Historic England and the National Trust, we have not attempted to assess every impact and in any case the design is not yet at a stage to allow such a detailed evaluation.

Non-Physical Impacts

For the part of the study not dealing with the physical impact of new road construction on archaeology we have attempted an assessment of key groups of attributes of OUV (see Chapter 4) with the main focus on visual relationships (Attributes 3, 5, 6). This was addressed in 2014 by selecting 17 key groups of attributes, such as barrow groups and Stonehenge itself, whose relationships are affected by the visible presence or absence of the A303. The intention was that this approach would produce a preliminary but clear result representative of the outcome of a full HIA based on a more detailed scheme proposal. The method of assessing impacts was that recommended by the ICOMOS Guidance (ICOMOS 2011).

This approach was accepted by Historic England and the National Trust and by others, including the ICOMOS/ UNESCO Advisory Mission. Broadly the same approach has also been used for this outline assessment. The identification of the key groups of attributes has been adjusted slightly to reflect the results of archaeological survey work carried out since 2014.

Re-assessment of the Normanton Down Group has suggested that its boundaries were drawn too tightly in the2014 report (in part a product of the dominance of the existing A303 in current thinking). Its boundaries have been extended to the south to include encompass barrows on the side of the valley south of the group of barrows on Normanton Down identified in the 2014 report. Its boundaries have also been extended to the north and west to include Normanton Gorse itself which contains at least one large barrow, the Sun Barrow north of the wood and the so-called unnamed group by the A303 (formerly listed as Group 15). To avoid changes to numbering of remaining groups, this extended Normanton Down Group has been numbered as 14/15 in the list below and in the assessment tables.

As noted above, the discovery of one previously unknown long barrow and the confirmation of the existence of a previously dismissed long barrow (the existence of which had been questioned on the

basis of the interpretation of aerial photographs but which has now been confirmed by excavation) together with the discovery of a previously unknown hengiform monument near to the Diamond wood has led us to identify this dispersed group of monuments as the Diamond Group. It has been numbered as 18. These are the only changes. Otherwise, the list of key groups of attributes remains unchanged.

As previously indicated, a further and full assessment will need to be undertaken by Highways England in due course, and form an integral part of an iterative design process (as called for by the ICOMOS and UNESCO Advisory Mission) allowing schemes to respond to and accommodate further developments in archaeological understanding, as has been the case for this report.

Listed roughly from north-east to south-west, the 17 key groups of attributes are (See Fig. 2):

1. Durrington Wall
2. Woodhenge
3. The Avenue east of King Barrow Ridge
4. Unnamed barrow group either side of this stretch of the Avenue
5. King Barrows (Old and New)
6. Coneybury Henge
7. Coneybury Barrow (King Barrow) south of Coneybury Henge
8. The Cursus E end
9. The Cursus centre
10. The Cursus W end
11. Cursus Barrows
12. Stonehenge
13. Stonehenge Down Barrows

14/15 Normanton Down Barrows, now including the unnamed group either side of the A303

16. Lake Barrows
17. Winterbourne Stoke Barrows
18. The Diamond group

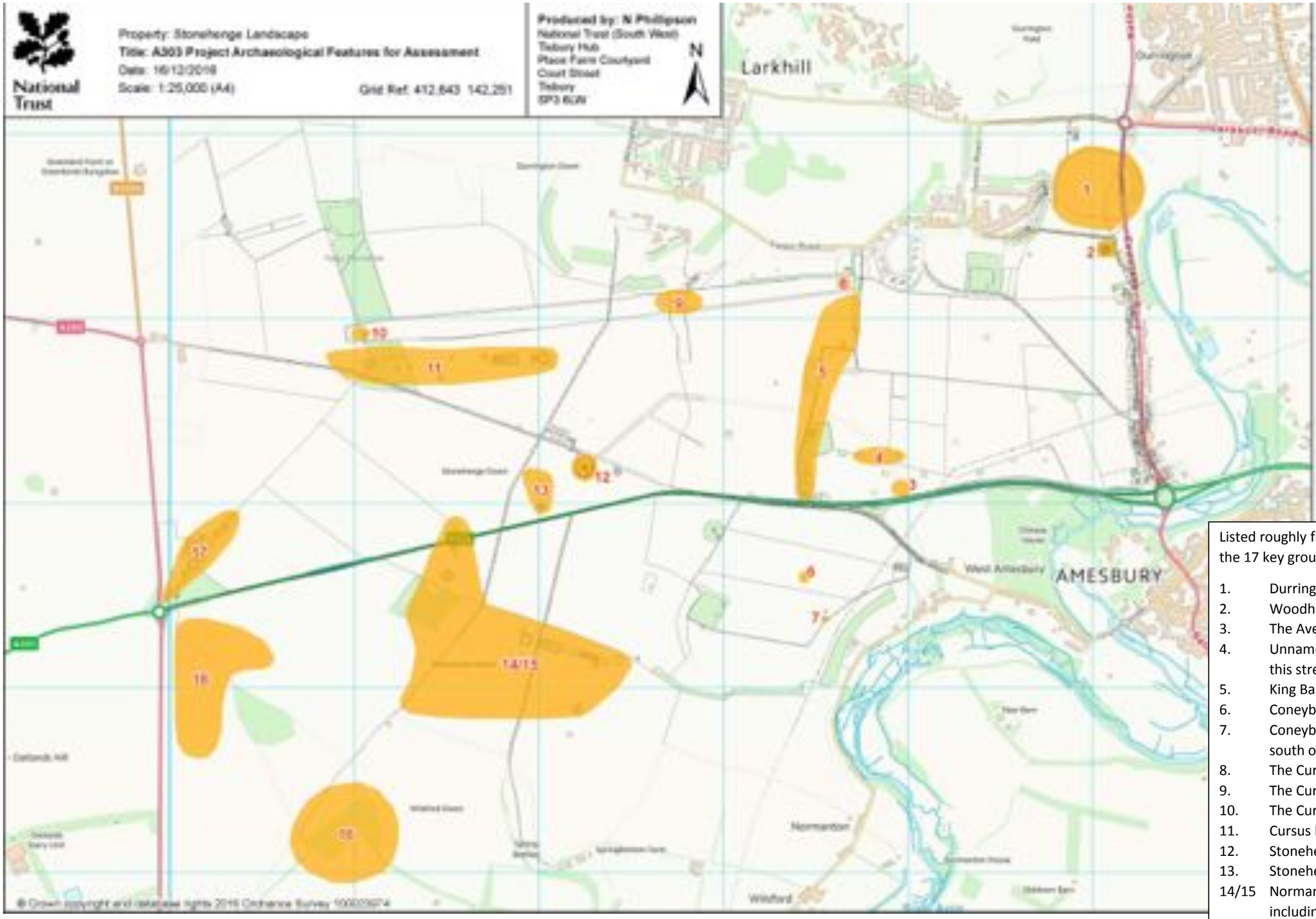

Fig. 2 Key groups of attributes of OUV in the Stonehenge World Heritage property

Listed roughly from north-east to south-west, the 17 key groups of attributes are (See Fig. 2):

1. Durrington Wall
2. Woodhenge
3. The Avenue east of King Barrow Ridge
4. Unnamed barrow group either side of this stretch of the Avenue
5. King Barrows (Old and New)
6. Coneybury Henge
7. Coneybury Barrow (King Barrow) south of Coneybury Henge
8. The Cursus E end
9. The Cursus centre
10. The Cursus W end
11. Cursus Barrows
12. Stonehenge
13. Stonehenge Down Barrows

14/15 Normanton Down Barrows, now including the unnamed group either side of the A303

16. Lake Barrows
17. Winterbourne Stoke Barrows
18. The Diamond group

For linear monuments or extended barrow groups, it has been necessary to select a focus from which to judge visual impact. For the Avenue east of King Barrow Ridge (3), this is the point at which the line of the Avenue crosses the existing A303, and for the associated barrow group to the north of the A303 (4), it is the point at which the Avenue intersects the east-west line of burial mounds. The Cursus is so long, and its visual connections so varied, that it has been divided into three sectors, the high east (8) and west (10) ends, and the low part where it crosses Stonehenge Bottom (9). For barrow groups, we have used the approximate centre as the focal point. Nonetheless, even when it is stated that there is intervisibility between two key attributes, this does not necessarily mean that every part of one key attribute is fully visible from every point of the second one.

Results are based on field observation and map work. They are therefore records of observations made on specific days and are subject to weather and other conditions prevalent on the day. On both days of field visits, the day was dry and visibility was excellent. Access was achieved via rights of way and National Trust permissive open access land where it was not under crop or otherwise inaccessible at the time of field visits (18th November and 13th December, 2016), as was the case, for example with Coneybury Henge (6) or the Diamond (18). In many cases viewsheds are obscured by woodland (in part coniferous), and here reasoned judgements have had to be made as to what should be visible. This is also the case with sites which it was not possible to access physically.

Integrity and Authenticity

The ICOMOS guidance also advises assessment of impact on the integrity and authenticity of the World Heritage property, and this too has been attempted for each option. A baseline for this is provided by the 2009 World Heritage Management Plan which first developed brief assessments of the integrity and authenticity of the World Heritage property (English Heritage 2009).

Direct Physical Impacts

The assessment of the impact of physical damage to archaeological sites caused by new construction work first identified all archaeological sites and monuments which are attributes of the OUV of the World Heritage property which are located either within the footprint, or immediately adjacent to the footprint, of each road option D061 and D062. In line with the Statement of Outstanding Universal Value this has been taken to mean all Neolithic and Bronze Age funerary and ceremonial monuments and associated sites dating to between 3700 and 1600 BC (i.e. Neolithic or Early Bronze Age in date). For the purposes of this study all ring ditches (including undated examples) the existence of which has been certainly established have been assumed to be the relict remains of Early Bronze Age round barrows and therefore to be attributes of OUV of the World Heritage property.

Sites and monuments were identified using the Wiltshire Historic Environment Record (HER) supplemented by information from recent fieldwork, including geophysical surveys and archaeological trenching evaluation conducted by both Historic England and Wessex Archaeology (Historic England 2015 a– d, 2016; Wessex Archaeology 2016 a – g). Potential physical impact on those sites and monuments was then assessed according to the ICOMOS methodology.

Because of the nature of this assessment no distinction has been drawn between scheduled and unscheduled monuments. Only the physical impacts on archaeological sites and monuments that are attributes of the OUV of the World Heritage property have been assessed. Where these are also Scheduled Monuments the Scheduled Monument number has been provided in addition to the

Wiltshire HER reference. Where a Wiltshire HER reference has not yet been assigned the Wessex Archaeology ID has been given. Scatters of surface material and spot finds have been excluded from the assessment as lithic scatters in particular, though varying greatly in density, appear to be ubiquitous across much of the Stonehenge World Heritage property.

Chapter 4 Impact of proposed new scheme for the A303 on the Outstanding Universal Value of the Stonehenge component of the World Heritage property

Assumptions on which assessment is based

Highways England have provided information on their route options for the new A303 through the World Heritage property. The basic assumptions provided by Highways England for the road are that:

1. There will be a tunnel at least 2.9kms long. It will be constructed with two independent tunnel bores between 7m and c.45m deep;
2. The east portal is located east of the Stonehenge Avenue and the west portal to the south of Normanton Down (see Fig. 3);
3. From the western portal there are two alternative routes, D061 running north and D062 south of Winterbourne Stoke village. The road lines diverge north-east of the Diamond and cross the A360 at different points;
4. Outside the tunnel, the road will be a dual carriageway running at grade;
5. The crossings of the A345 and the A360 will be by means of overbridges which will need to be at least 8m above the level of the roads underneath;
6. There will be a grade separated junction on the line of the A360;
7. The road, portal approaches and junctions will be unlit.

This information provides the basis for updating our previous assessment of visual impact of possible tunnel and road routes through the World Heritage property. However, in order to make a meaningful assessment, it is necessary for the authors of this report to make further assumptions about the nature and character of the road and the extent to which it has positive or adverse impacts on the OUV of the World Heritage property. Even if these assumptions are not entirely correct, it should be possible to adjust the assessment of impacts once further more detailed route information becomes available.

Our assumptions to provide further detail for assessment of impact are:

8. The position of the portal face is located by the cross hairs of the symbol used on the maps provided by Arup Atkins Joint Venture on behalf of Highways England (Fig**3**);
9. At the portal face, the total width of the roads etc. will be 45m; a 30m cut and cover section back from the face of the portal is likely to be required for construction reasons before the required depth of cover is attained above the bores;
10. The depth of the road surface at the tunnel portals will be at least c.10m below the current ground level in those locations. This should allow sufficient height above the carriageway within the tunnel and for sufficient cover above the tunnel below present ground levels;
11. From the tunnel portal at each end there will be a partial cutting until the surrounding ground levels have dropped to grade for the road. The length of this section of cutting/ partial cutting will depend on the local contours;
12. Outwith these short sections of cutting, the road will run **at grade** except where it has to be embanked on the approach to an overbridge.

The two alternative routes D061 and D062 are identified in Tables 2 and 3 below and in the text as D061 (1) and D062 (1).

A road from the western tunnel portal to the western boundary of the World Heritage property constructed according to these two sets of assumptions will have a major adverse impact on attributes of OUV in the western part of the World Heritage property and a minor or even moderate adverse impact on some attributes as far east as King Barrow Ridge. As part of the identification of potential mitigation measures, we have therefore postulated a number of options for the treatment of D061 and D062. These are identified below as D061 (2) to (6) and D062 (2) to (6).

For all these options, it is assumed:

13. The position of the portal face is located by the cross hairs of the symbol used on the maps provided by Arup Atkins Joint Venture on behalf of Highways England (Fig 3);
14. At the portal face, the total width of the roads etc. will be 45m; a 30m cut and cover section back from the face of the portal is likely to be required for construction reasons before the required depth of cover is attained above the bores ;
15. The depth of the road surface at the tunnel portals will be at least c.10m below the current ground level in those locations. This should allow sufficient height above the carriageway within the tunnel and for sufficient cover above the tunnel below present ground levels.
16. From the tunnel portal at the east end there will be a partial cutting until the surrounding ground levels have dropped to grade for the road.
17. From the tunnel portal at the west end, the road runs in cutting sufficiently deep to hide high Heavy Goods Vehicles and double-decker buses and coaches;
18. The A303 passes under the A360;
19. Any junction with the A360 is west of the boundary of the World Heritage property and does not have slip roads etc. within the property.
20. Removal of existing embankment east of the eastern portal, causeway at Stonehenge Bottom and causeway approaching long barrow crossroads on existing alignment of A303.

Options D061 (3) and D062 (3) assume in addition an apron of 100m from the western portal, Options D061 (4) and D062 (4) one of 200m, and Options D061 (5) and D062 (5) one of 300m. Such aprons in effect provide a landbridge or canopy reflecting the existing landform to the point at which the traffic emerges into the open. A landbridge could be a more affordable option than moving the tunnel portal. With the tunnel portal so close to the Normanton Down Barrows we wished to consider the extent to which such a landbridge over the road could mitigate adverse impacts.

For Options D061 (6) and D062 (6) we have assessed the impact if the western portal is located in the lowest point of the dry valley between Normanton Gorse and the Diamond (or possibly the same effect could be achieved by a longer landbridge to this low point in the valley). This can be considered as equivalent to the position of Portal A1 which was assessed in the 2014 report (Snashall and Young 2014, 30, 75, Figs 3, 7, Table 3, 15, 16) and which was stated to be a significant improvement on any of the other options.

Visual Impact

The methodology for this Heritage Impact Assessment is described in Chapter 3. The scale of assessment used in the 2014 assessment (Snashall and Young 2014, 39) has been used for this report also to ensure as far as possible consistency of approach:

- Impact has been assessed as major of very large significance when the A303 severs a visual connection or is very prominent in a view of one (e.g. the view from Stonehenge to Old and New King Barrows).
- Impact has been assessed as moderate of large/ very large significance where the A303 is visible but does not sever the viewline and is not central in the view.
- Impact is assessed as minor of moderate/ large significance when the A303 is barely visible or a distant backdrop in a view (e.g. the view from Durrington Walls to Woodhenge).
- Where there is no impact, the value has been given as none.

This is a somewhat unusual impact assessment in that we are assessing the impact of the replacement of a road which already has a major adverse impact on the World Heritage property. As in 2014, where an adverse impact is removed or reduced it is scored as a positive impact of the same scale. In Tables 2 and 3 below impacts of the various options have been set out. As a base line, the tables also include the results of the assessment made of the existing A303 in 2014. More detail of this can be found in the 2014 report (Snashall, Young 2014 Chapter 5 *passim*)

Essentially the impact of the new route options for the A303 can be considered in three parts:

1. The section from Countess Roundabout to the east tunnel portal (c.1.3kms);
2. The section in tunnel from the eastern to western portals (c.2.9kms);
3. From the west portal to the western boundary of the World Heritage property for which two alternatives are proposed with potentially differing impacts (D061 c.1.3kms, D062 c.1.9kms).

For each section, impact has been assessed according to the methodology described earlier (see Chapter 3), focusing mainly on the impact of the road on individual key attributes and the relationships between them. Visual links between the key attributes groups are identified in Table 1 (p.19). Since we now have more information on the possible construction of bridges and junctions, these are discussed in the general narrative below. Their impact has been taken into account in the assessment of impacts on individual attributes and in Tables 2 and 3 (pp. 20 – 41) which summarise the impacts of routes D061 and D062 respectively. Direct physical impacts are described and discussed in Chapter 5 below. This assessment only considers impacts on attributes of OUV and on the overall OUV of the World Heritage property. It does not consider impacts on heritage assets of national or local significance that are not relevant to OUV. The following paragraphs summarise the observations set out in the tables. Discussion of the overall impacts on the OUV of the World Heritage property are in the final chapter of this report.

From Countess Roundabout to the east tunnel portal

The new road will cross Countess Road (A345) on a flyover with grade separated junction. The road deck of the bridge will be at 7m to 8m above the highest point of the roundabout below. From there the road follows the existing route through the cutting past Vespasian's Camp and then runs to the new portal position to the north of the existing road and c.100m east of the line of the Avenue as it runs across the flank of King Barrow Ridge towards the River Avon in West Amesbury. This is c.200m east of the eastern portal position assessed in the 2014 report, and around 400m east of the portal position for the 2.1km tunnel scheme considered in 2004. This also means that the road threshold at the new east portal position should be around 10m lower than in the options assessed in 2014. This

has considerable implications for the visibility of the surface stretch of road between the tunnel portal and the existing cutting past Vespasian's Camp, since lowering the level of the road will reduce the visibility of traffic from many viewpoints.

East of that cutting, the principal impact will be that of the flyover and the grade separated junction of which it will be part. While this will be very intrusive in the local landscape, the surrounding topography means that it will be screened from direct view from the identified key groups of attributes of OUV. Its impact on the OUV of the World Heritage property and its attributes will therefore be minimal.

Our calculations suggest that the road level exiting the east portal of the tunnel should be c.85m Above Ordnance Datum (AOD) though this will need reviewing when more detailed development of a scheme is available from Highways England. The road is likely to be partially in cutting for c.250m before running out across the dry valley west of Vespasian's Camp on an embankment which could be lower than the existing one, depending on the treatment of the farm access road which passes under the A303 at this point.

Overall, the impact on attributes of OUV which now have views of the A303 descending from King Barrow Ridge towards Countess Road (A345) will be positive. Around 600m of the most visible part of the road where it climbs up the eastern approach to King Barrow Ridge will now be in tunnel. The line of the Avenue will no longer be severed by a major road and it would be possible to present its route at this point in some way. Even on the surface stretch of the road, traffic should be less obvious because the level of the road should be lower. Tables 2 and 3 therefore show the impact on attributes of OUV along and to the east of King Barrow Ridge and Coneybury Hill to be positive. This stretch of road is not visible from west of that ridge.

From the east portal to the west portal

This stretch of road would be entirely in tunnel from the east side of King Barrow Ridge to south of Normanton Gorse. This would effectively remove all current impacts of the A303 from the central section of the World Heritage property around Stonehenge itself. This would be a major beneficial impact of very large significance on a large number of key attributes of OUV including the Stonehenge monument. Depending on the design of the road from the western portal to the western boundary of the World Heritage property, there could be adverse impacts through distant views of that surface section from Coneybury Hill, and possibly from King Barrow Ridge. For further discussion of the impacts of this surface section of the road, please see below.

From the west portal to the western boundary of the World Heritage property on the A360

Highways England have presented two alternative options here. The tunnel portal for both of these is located c.100m south of Normanton Gorse and about 300m from Bush Barrow, the best known barrow in the Normanton Down Group. The two routes diverge about 500m from the portal. D061 then runs through the northern part of the Diamond copse and then up a gentle slope to cross the A360 about 700m south of the Longbarrow Crossroads junction (and the Winterbourne Stoke Barrow Group). D062 runs through the southern part of the Diamond copse and then goes south-west transversely across a shallow dry valley to cross the A360 where the latter drops down into a

small valley 1.1 kms south of Long Barrow Crossroads. As currently presented by Highways England, both routes would be at grade and the crossing over the A360 would be by an overbridge combined with a grade separated junction. Unlike the Countess Road junction on the eastern edge of the World Heritage property, the A360 is high and prominent and can be seen from many parts of the site. For D061 (1) and D062 (2) this would be equally true whether the A303 passes above the A360 or *vice versa.*

The principal advantage of a new route to the south of the present line of the A303 is that it takes the road away from the very sensitive Winterbourne Stoke Barrow Group. This was a major reason why the previous 2014 assessment of the impact of road lines found an offline option in roughly this location to be the most positive alternative. However, the portal for that option was located further from Normanton Down at a lower height AOD and the whole route outside of the tunnel was assumed to have been in cutting to the western boundary of the World Heritage property. It would have gone under the A360 rather than over it, the A360 remaining at grade.

Despite the advantages of moving the line of the road away from Winterbourne Stoke Barrow Group, construction of the new A303 at grade with a grade-separated junction to include an overbridge across the A360 (or *vice versa*) will have a major adverse impact of very large significance on a number of key attribute groups. The D061 (1) route will actually split the newly identified Diamond Group and both routes would be very visually intrusive if constructed as presented. The overbridges (certainly for D061 (1)) could be visible from Coneybury Hill and possibly from the King Barrows. That for D62 (1) may be less obtrusive because it is sited lower in the landscape. Having grade-separated junctions on the line of the A360 would add greatly to the adverse impact because of the increased visual intrusion of slip roads and so forth. The portal is also very close to the Normanton Down Barrows with an adverse visual impact. Having the road at grade would also greatly increase noise in this part of the World Heritage property which is currently relatively peaceful. It is likely that the impact on nearby key attributes would be so severe as to be unacceptable despite benefits elsewhere in the World Heritage property.

Part of the ICOMOS HIA methodology is to consider mitigation measures to lessen adverse impacts. We have considered a number of possible approaches which are assessed in Tables 2 and 3 (D061 (2-6) and D062 (2-6)).

An important basic element to all five alternatives is that the road should run in a cutting deep enough to conceal high vehicles throughout. Ideally the upper parts of the banks should be sloping to minimize the impact of the cuttings within the landscape. Having the road in cutting would reduce its impact in views across it, for example from the Winterbourne Stoke Barrow Group to the Lake Barrow Group. The reduction in impact would not be so great when looking along the line of the cuttings but there would probably be some reduction. From a direct physical impact perspective, considered in Chapter 5 of this report (following non-physical impact tables), this would cause no further impact than would be expected at grade, based on current knowledge ahead of further assessment work.

The second approach is to add a canopy/ land bridge over the road as it exits from the western portal. Options 3, 4, and 5 for both D061 and D062 consider adding canopy/land bridges of 100m,

200m and 300m respectively. This would push the apparent end of the tunnel out from Normanton Gorse and further away from the Normanton Down Barrow Group, and particularly from Bush Barrow on Byway 12. This would reduce noise and visibility of the road in the vicinity of Normanton Down. It would also ameliorate the adverse visual impact on some of the views between key attributes across the line of the road.

We also assessed the impact of placing the tunnel portal or extending a canopy/ landbridge to an equivalent position to that modelled in the 2014 report (Options D061 (6) and D062 (6)). This would place the portal in the lowest part of the dry valley south-west of Normanton Gorse about 350m from the portal location proposed by Highways England. This would reduce adverse impacts more than the shorter canopy/land bridge options and also align the road better vertically for placing it in cutting. It is possible that a similar outcome might be achieved by extending a canopy or landbridge to this point.

Overall, it is considered that the adverse impact of constructing the new A303 road at grade and with an overbridge across the A360 (or *vice versa*) is severe and likely to be unacceptable. Using an underpass and placing the new A303 road all in cutting sufficiently deep to conceal high vehicles could lessen impact to an acceptable level, given benefits elsewhere in the World Heritage property. We consider that all variants of D062 would have a lesser impact than those of D061. There are two reasons for this. Generally, D061 runs along higher ground and crosses the A360 at a higher and more visible point than D062. More specifically, D061 splits the Diamond Group. This would be a severe negative impact to the group. Despite this, the impact of a surface route and overbridge for D062 (1) as currently presented by Highways England would still be too severe to be acceptable.

A further option, which we have not assessed in the tables, would be to place the tunnel portal in the lowest point of the dry valley south-west of Normanton Gorse (as discussed above) and to run the road in a curve around the southern corner of the Diamond wood to an underpass below the A360 at the same point as for D062. Curving the route would reduce impact on views along the line of the route of the new road, as well as taking it further away from the Diamond Group of key attributes which might be expected to reduce impacts further if assessed similarly.

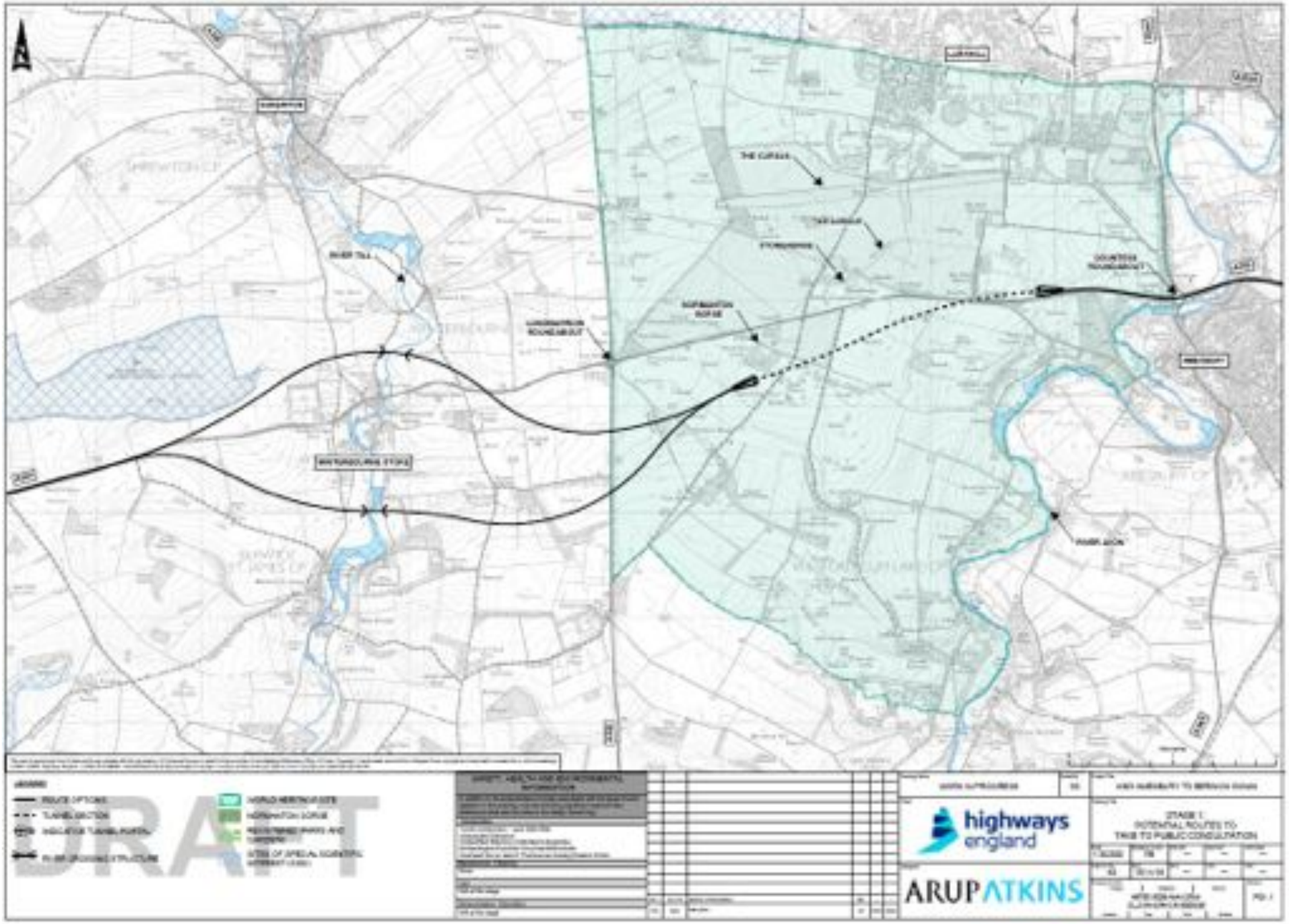

Fig.3 Potential routes to take to consultation in January 2017 (reproduced by permission of Highways England and Arup Atkins joint venture)

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	16	17	18
Table 1: Visual links between key attributes **Y = link exists** **N = no link**		Durrington Walls	Woodhenge	Avenue E of King Barrow	Barrow group	King Barrows (Old & New)	Coneybury Henge	Coneybury Barrow	Cursus E end	Cursus centre	Cursus W end	Cursus Barrows	Stonehenge	Stonehenge Down	Normanton Down	Lake Barrows	Winterbourne Stoke	The Diamond
1	Durrington Walls		Y	Y	Y	N	Y	Y	N	N	N	N	N	N	N	N	N	N
2	Woodhenge	Y		Y	Y	Y	Y	Y	N	N	N	N	N	N	N	N	N	N
3	Avenue E of King Barrow Ridge	Y	Y		Y	Y	Y	Y	N	N	N	N	N	N	N	N	N	N
4	Barrow group near Avenue	Y	Y	Y		Y	Y	Y	N	N	N	N	N	N	N	N	N	N
5	King Barrows (Old & New)	N	Y	Y	Y		Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y
6	Coneybury Henge	Y	Y	Y	Y	Y		Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y
7	Coneybury Barrow	Y	Y	Y	Y	Y	Y		Y	Y	N	Y	Y	Y	Y	Y	Y	Y
8	Cursus E end	N	N	N	N	N	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
9	Cursus centre	N	N	N	N	N	Y	Y	N		N	N	Y	N	N	N	N	N
10	Cursus W end	N	N	N	N	Y	N	N	Y	N		Y	N	N	N	N	N	N
11	Cursus Barrows	N	N	N	N	Y	Y	Y	Y	N	Y		Y	Y	N	N	Y	N
12	Stonehenge	N	N	N	N	Y	Y	Y	Y	Y	N	Y		Y	Y	Y	N	N
13	Stonehenge Down Barrows	N	N	N	N	Y	Y	Y	Y	N	N	N	Y		Y	N	N	N
14/15	Normanton Down Barrows	N	N	N	N	Y	Y	Y	Y	N	N	N	Y	Y		Y	Y	Y
16	Lake Barrows	N	N	N	N	Y	Y	Y	Y	N	N	N	Y	N	N		Y	Y
17	Winterbourne Stoke Barrows	N	N	N	N	Y	Y	Y	Y	N	N	Y	N	N	Y	Y		Y
18	The Diamond	N	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	Y	Y	

Table 2 Visual impact of existing A303 road and route D061 in the Stonehenge World Heritage Property

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D061 (1)	D061 (2)	D061 (3)	D061 (4)	D061 (5)	D061 (6)
Durrington Walls								
1. Durrington Walls	Woodhenge	Minor Adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
2. Durrington Walls	Avenue E of King Barrow Ridge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
3. Durrington Walls	Barrows nr Avenue	Moderate adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
4. Durrington Walls	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
5. Durrington Walls	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Woodhenge								
6. Woodhenge	Durrington Walls	None	None	None	None	None	None	None
7. Woodhenge	Avenue E of King Barrow Ridge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
8. Woodhenge	Barrows nr Avenue	Moderate adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
9. Woodhenge	King Barrows (Old & New)	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
10. Woodhenge	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
11. Woodhenge	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Avenue E of King Barrow Ridge								

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
12. Avenue E of King Barrow Ridge	Durrington Walls	None	None	None	None	None	None	None
13. Avenue E of King Barrow Ridge	Woodhenge	None	None	None	None	None	None	None
14. Avenue E of King Barrow Ridge	Barrows nr Avenue	None	None	None	None	None	None	None
15. Avenue E of King Barrow Ridge	King Barrows (Old & New)	None	None	None	None	None	None	None
16. Avenue E of King Barrow Ridge	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
17. Avenue E of King Barrow Ridge	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Barrows near Avenue east of King Barrow Ridge								
Barrows nr Avenue	Durrington Walls	None	None	None	None	None	None	None
19. Barrows nr Avenue	Woodhenge	None	None	None	None	None	None	None
20. Barrows nr Avenue	Avenue E of King Barrow Ridge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
21. Barrows nr Avenue	King Barrows (Old & New)	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
22. Barrows nr Avenue	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
23. Barrows nr Avenue	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
King Barrows (Old and New)								

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
24. King Barrows (Old and New)	Woodhenge	None	None	None	None	None	None	None
25. King Barrows (Old and New)	Avenue E of King Barrow Ridge	Moderate adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
26. King Barrows (Old and New)	Barrows nr Avenue	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
27. King Barrows (Old and New)	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
28. King Barrows (Old and New)	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
29. King Barrows (Old and New)	Cursus E end	None	None	None	None	None	None	None
30. King Barrows (Old and New)	Cursus W end	None	None	None	None	None	None	None
31. King Barrows (Old and New)	Cursus Barrows	None	None	None	None	None	None	None
32. King Barrows (Old and New)	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
33. King Barrows (Old and New)	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
34. King Barrows (Old and New)	Normanton Down Barrows	Major adverse	Moderate beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
35. King Barrows (Old and New)	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
36. King Barrows (Old and New)	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D061 (1)	D061 (2)	D061 (3)	D061 (4)	D061 (5)	D061 (6)
37. King Barrows (Old and New)	The Diamond	Major adverse	Moderate adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Major beneficial
Coneybury Henge								
38. Coneybury Henge	Durrington Walls	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
39. Coneybury Henge	Woodhenge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
40. Coneybury Henge	Avenue E of King Barrow Ridge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
41. Coneybury Henge	Barrows nr Avenue	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
42. Coneybury Henge	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
43. Coneybury Henge	Coneybury Barrow	None	None	None	None	None	None	None
44. Coneybury Henge	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
45. Coneybury Henge	Cursus Centre	Major adverse	Major Beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
46. Coneybury Henge	Cursus Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
47. Coneybury Henge	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
48. Coneybury Henge	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
49. Coneybury Henge	Normanton Down Barrows	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
50. Coneybury Henge	Lake Barrows	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
51. Coneybury Henge	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
52. Coneybury Henge	The Diamond	Major adverse	Minor adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Major beneficial
Coneybury Barrow								
53. Coneybury Barrow	Durrington Walls	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
54. Coneybury Barrow	Woodhenge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
55. Coneybury Barrow	Avenue E of King Barrow Ridge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
56. Coneybury Barrow	Barrows nr Avenue	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
57. Coneybury Barrow	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
58. Coneybury Barrow	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
59. Coneybury Barrow	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
60. Coneybury Barrow	Cursus Centre	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
61. Coneybury Barrow	Cursus Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
62. Coneybury Barrow	Stonehenge	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
		adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
63. Coneybury Barrow	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
64. Coneybury Barrow	Normanton Down Barrows	Moderate adverse	Minor adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
65. Coneybury Barrow	Lake Barrows	Minor adverse	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
66. Coneybury Barrow	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Moderate adverse	Moderate adverse	Major beneficial	Major beneficial
67. Coneybury Barrow	The Diamond	Major adverse	Minor adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Cursus East End								
68. Cursus E end	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
69. Cursus E end	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
70. Cursus E end	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
71. Cursus E end	Cursus W end	None	None	None	None	None	None	None
72. Cursus E end	Cursus Barrows	None	None	None	None	None	None	None
73. Cursus E end	Stonehenge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
74. Cursus E end	Stonehenge Down Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
75. Cursus E end	Normanton Down	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
	Barrows	adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
76. Cursus E end	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
77. Cursus E end	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
78. Cursus E end	The Diamond	Major adverse	Minor adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Cursus Centre								
79. Cursus Centre	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
80. Cursus Centre	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
81. Cursus Centre	Stonehenge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Cursus West End								
82. Cursus W end	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
83. Cursus W end	Cursus E end	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
84. Cursus W end	Cursus Barrows	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
Cursus Barrows								
85. Cursus Barrows	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
86. Cursus Barrows	Coneybury Henge	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
		adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
87. Cursus Barrows	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
88. Cursus Barrows	Cursus E end	None	None	None	None	None	None	None
89. Cursus Barrows	Cursus W end	None	None	None	None	None	None	None
90. Cursus Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
91. Cursus Barrows	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
92. Cursus Barrows	Winterbourne Stoke Barrows	None	None	None	None	None	None	None
Stonehenge								
93. Stonehenge	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
94. Stonehenge	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
95. Stonehenge	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
96. Stonehenge	Cursus E end	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
97. Stonehenge	Cursus Centre	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
98. Stonehenge	Cursus Barrows	None	None	None	None	None	None	None
99. Stonehenge	Stonehenge Down Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**
100. Stonehenge	Normanton Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
101. Stonehenge	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Stonehenge Down Barrows								
102. Stonehenge Down Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
103. Stonehenge Down Barrows	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
104. Stonehenge Down	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
105. Stonehenge Down Barrows	Cursus E end	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
106. Stonehenge Down Barrows	Cursus Barrows	None	None	None	None	None	None	None
107. Stonehenge Down Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
108. Stonehenge Down Barrows	Normanton Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Normanton Down Barrows								
109. Normanton Down Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
110. Normanton Down Barrows	Coneybury Henge	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
111. Normanton Down Barrows	Coneybury Barrow	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D061 (1)	D061 (2)	D061 (3)	D061 (4)	D061 (5)	D061 (6)
112. Normanton Down Barrows	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
113. Normanton Down Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
114. Normanton Down Barrows	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
115. Normanton Down Barrows	Lake Barrows	None	None	None	None	None	None	None
116. Normanton Down Barrows	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Moderate adverse	Moderate adverse	Moderate adverse	Major beneficial
117. Normanton Down Barrows	The Diamond	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Minor adverse
Lake Barrows								
118. Lake Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
119. Lake Barrows	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
120. Lake Barrows	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
121. Lake Barrows	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
122. Lake Barrows	Stonehenge	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
123. Lake Barrows	Normanton Down Barrows	Moderate adverse	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Minor adverse
124. Lake Barrows	Winterbourne Stoke Barrows	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D061 (1)	D061 (2)	D061 (3)	D061 (4)	D061 (5)	D061 (6)
125. Lake Barrows	The Diamond	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
Winterbourne Stoke Barrows								
126. Winterbourne Stoke Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
127. Winterbourne Stoke Barrows	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
128. Winterbourne Stoke Barrows	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
129. Winterbourne Stoke Barrows	Cursus E end	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
130. Winterbourne Stoke Barrows	Cursus Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
131. Winterbourne Stoke Barrows	Normanton Down Barrows	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Minor adverse	Minor adverse
132. Winterbourne Stoke Barrows	Lake Barrows	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
133. Winterbourne Stoke Barrows	The Diamond	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
The Diamond Group								
134. The Diamond Group	King Barrows (Old and New)	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
135. The Diamond Group	Coneybury Henge	Moderate adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
136. The Diamond Group	Coneybury Barrow	Moderate adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse

This table measures the scale of the visual impact of the present A303 and of the likely impacts of the route D061 as proposed and of options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D061 (1)	D061 (2)	D061 (3)	D061 (4)	D061 (5)	D061 (6)
137. The Diamond Group	Cursus E end	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Moderate adverse
138. The Diamond Group	Normanton Down Barrows	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
139. The Diamond Group	Lake Barrows	None	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
140. The Diamond Group	Winterbourne Stoke Barrows	Major adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse

Table 3 Visual impact of existing A303 road and route D062 in the Stonehenge World Heritage Property

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D062 (1)	D062 (2)	D062 (3)	D062 (4)	D062 (5)	D062 (6)
Durrington Walls								
1. Durrington Walls	Woodhenge	Minor Adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
2. Durrington Walls	Avenue E of King Barrow Ridge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
3. Durrington Walls	Barrows nr Avenue	Moderate adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
4. Durrington Walls	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
5. Durrington Walls	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Woodhenge								
6. Woodhenge	Durrington Walls	None	None	None	None	None	None	None
7. Woodhenge	Avenue E of King Barrow Ridge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
8. Woodhenge	Barrows nr Avenue	Moderate adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
9. Woodhenge	King Barrows (Old & New)	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
10. Woodhenge	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
11. Woodhenge	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Avenue E of King Barrow Ridge								

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
12. Avenue E of King Barrow Ridge	Durrington Walls	None	None	None	None	None	None	None
13. Avenue E of King Barrow Ridge	Woodhenge	None	None	None	None	None	None	None
14. Avenue E of King Barrow Ridge	Barrows nr Avenue	None	None	None	None	None	None	None
15. Avenue E of King Barrow Ridge	King Barrows (Old & New)	None	None	None	None	None	None	None
16. Avenue E of King Barrow Ridge	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
17. Avenue E of King Barrow Ridge	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Barrows near Avenue east of King Barrow Ridge								
18. Barrows nr Avenue	Durrington Walls	None	None	None	None	None	None	None
19. Barrows nr Avenue	Woodhenge	None	None	None	None	None	None	None
20. Barrows nr Avenue	Avenue E of King Barrow Ridge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
21. Barrows nr Avenue	King Barrows (Old & New)	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
22. Barrows nr Avenue	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
23. Barrows nr Avenue	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
King Barrows (Old and New)								

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
24. King Barrows (Old and New)	Woodhenge	None	None	None	None	None	None	None
25. King Barrows (Old and New)	Avenue E of King Barrow Ridge	Moderate adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
26. King Barrows (Old and New)	Barrows nr Avenue	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse
27. King Barrows (Old and New)	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
28. King Barrows (Old and New)	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
29. King Barrows (Old and New)	Cursus E end	None	None	None	None	None	None	None
30. King Barrows (Old and New)	Cursus W end	None	None	None	None	None	None	None
31. King Barrows (Old and New)	Cursus Barrows	None	None	None	None	None	None	None
32. King Barrows (Old and New)	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
33. King Barrows (Old and New)	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
34. King Barrows (Old and New)	Normanton Down Barrows	Major adverse	Moderate beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
35. King Barrows (Old and New)	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
36. King Barrows (Old and New)	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D062 (1)	D062 (2)	D062 (3)	D062 (4)	D062 (5)	D062 (6)
37. King Barrows (Old and New)	The Diamond	Major adverse	Moderate adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Major beneficial
Coneybury Henge								
38. Coneybury Henge	Durrington Walls	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
39. Coneybury Henge	Woodhenge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
40. Coneybury Henge	Avenue E of King Barrow Ridge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
41. Coneybury Henge	Barrows nr Avenue	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
42. Coneybury Henge	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
43. Coneybury Henge	Coneybury Barrow	None	None	None	None	None	None	None
44. Coneybury Henge	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
45. Coneybury Henge	Cursus Centre	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
46. Coneybury Henge	Cursus Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
47. Coneybury Henge	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
48. Coneybury Henge	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
49. Coneybury Henge	Normanton Down Barrows	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D062 (1)	D062 (2)	D062 (3)	D062 (4)	D062 (5)	D062 (6)
50. Coneybury Henge	Lake Barrows	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
51. Coneybury Henge	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
52. Coneybury Henge	The Diamond	Major adverse	Minor adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Major beneficial
Coneybury Barrow								
53. Coneybury Barrow	Durrington Walls	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
54. Coneybury Barrow	Woodhenge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
55. Coneybury Barrow	Avenue E of King Barrow Ridge	Major adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
56. Coneybury Barrow	Barrows nr Avenue	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
57. Coneybury Barrow	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
58. Coneybury Barrow	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
59. Coneybury Barrow	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
60. Coneybury Barrow	Cursus Centre	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
61. Coneybury Barrow	Cursus Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
62. Coneybury Barrow	Stonehenge	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
		adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
63. Coneybury Barrow	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
64. Coneybury Barrow	Normanton Down Barrows	Moderate adverse	Minor adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
65. Coneybury Barrow	Lake Barrows	Minor adverse	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
66. Coneybury Barrow	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Moderate adverse	Moderate adverse	Major beneficial	Major beneficial
67. Coneybury Barrow	The Diamond	Major adverse	Minor adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Cursus East End								
68. Cursus E end	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
69. Cursus E end	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
70. Cursus E end	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
71. Cursus E end	Cursus W end	None	None	None	None	None	None	None
72. Cursus E end	Cursus Barrows	None	None	None	None	None	None	None
73. Cursus E end	Stonehenge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
74. Cursus E end	Stonehenge Down Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
75. Cursus E end	Normanton Down	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
	Barrows	adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
76. Cursus E end	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
77. Cursus E end	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
78. Cursus E end	The Diamond	Major adverse	Minor adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Cursus Centre								
79. Cursus Centre	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
80. Cursus Centre	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
81. Cursus Centre	Stonehenge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
Cursus West End								
82. Cursus W end	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
83. Cursus W end	Cursus E end	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
84. Cursus W end	Cursus Barrows	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
Cursus Barrows								
85. Cursus Barrows	King Barrows (Old & New)	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
86. Cursus Barrows	Coneybury Henge	Major	Major	Major	Major	Major	Major	Major

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
		adverse	beneficial	beneficial	beneficial	beneficial	beneficial	beneficial
87. Cursus Barrows	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
88. Cursus Barrows	Cursus E end	None	None	None	None	None	None	None
89. Cursus Barrows	Cursus W end	None	None	None	None	None	None	None
90. Cursus Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
91. Cursus Barrows	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
92. Cursus Barrows	Winterbourne Stoke Barrows	None	None	None	None	None	None	None
Stonehenge								
93. Stonehenge	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
94. Stonehenge	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
95. Stonehenge	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
96. Stonehenge	Cursus E end	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
97. Stonehenge	Cursus Centre	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
98. Stonehenge	Cursus Barrows	None	None	None	None	None	None	None
99. Stonehenge	Stonehenge Down Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D062 (1)	D062 (2)	D062 (3)	D062 (4)	D062 (5)	D062 (6)
100. Stonehenge	Normanton Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
101. Stonehenge	Lake Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Stonehenge Down Barrows								
102. Stonehenge Down Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
103. Stonehenge Down Barrows	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
104. Stonehenge Down	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
105. Stonehenge Down Barrows	Cursus E end	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
106. Stonehenge Down Barrows	Cursus Barrows	None	None	None	None	None	None	None
107. Stonehenge Down Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
108. Stonehenge Down Barrows	Normanton Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
Normanton Down Barrows								
109. Normanton Down Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
110. Normanton Down Barrows	Coneybury Henge	Moderate adverse	Major beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
111. Normanton Down Barrows	Coneybury Barrow	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
112. Normanton Down Barrows	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
113. Normanton Down Barrows	Stonehenge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
114. Normanton Down Barrows	Stonehenge Down Barrows	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
115. Normanton Down Barrows	Lake Barrows	None	None	None	None	None	None	None
116. Normanton Down Barrows	Winterbourne Stoke Barrows	Major adverse	Major beneficial	Major beneficial	Moderate adverse	Moderate adverse	Moderate adverse	Major beneficial
117. Normanton Down Barrows	The Diamond	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Minor adverse
Lake Barrows								
118. Lake Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
119. Lake Barrows	Coneybury Henge	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
120. Lake Barrows	Coneybury Barrow	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
121. Lake Barrows	Cursus E end	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
122. Lake Barrows	Stonehenge	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
123. Lake Barrows	Normanton Down Barrows	Moderate adverse	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Minor adverse
124. Lake Barrows	Winterbourne Stoke	Major	Major	Moderate	Moderate	Moderate	Moderate	Moderate

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	**To**	**Current A303**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
	Barrows	adverse	adverse	adverse	adverse	adverse	adverse	adverse
125. Lake Barrows	The Diamond	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
Winterbourne Stoke Barrows								
126. Winterbourne Stoke Barrows	King Barrows (Old & New)	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
127. Winterbourne Stoke Barrows	Coneybury Henge	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
128. Winterbourne Stoke Barrows	Coneybury Barrow	Major adverse	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
129. Winterbourne Stoke Barrows	Cursus E end	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
130. Winterbourne Stoke Barrows	Cursus Barrows	Moderate adverse	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
131. Winterbourne Stoke Barrows	Normanton Down Barrows	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Minor adverse	Minor adverse
132. Winterbourne Stoke Barrows	Lake Barrows	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
133. Winterbourne Stoke Barrows	The Diamond	Major adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
The Diamond Group								
134. The Diamond Group	King Barrows (Old and New)	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
135. The Diamond Group	Coneybury Henge	Moderate adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse

This table measures the scale of the visual impact of the present A303 and of the likely impacts of D062 as proposed and of the options for mitigation. The significance of these impacts is a function of their scale and of the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

View from	To	Current A303	D062 (1)	D062 (2)	D062 (3)	D062 (4)	D062 (5)	D062 (6)
136. The Diamond Group	Coneybury Barrow	Moderate adverse	Major adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse	Moderate adverse
137. The Diamond Group	Cursus E end	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Moderate adverse
138. The Diamond Group	Normanton Down Barrows	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
139. The Diamond Group	Lake Barrows	None	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
140. The Diamond Group	Winterbourne Stoke Barrows	Major adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse	Minor adverse

Table 4 Physical impacts on archaeological sites and monuments that are attributes of OUV: eastern to western property boundaries (D061)

Wilts. HER Pref. Ref. Scheduled Monument No. ***Wessex ID***	**Site name / description**	**Impact**	**Comments**
WA ID 4512	Ring Ditch. Very weakly positive curvilinear anomaly detected by gradiometer survey.	Minor adverse	This may be the last vestiges of a Bronze Age round barrow. – if so it would appear to be severely truncated / plough damaged.
SU14 SW796	Feature previously identified as a ring ditch on the basis of a single aerial photograph.	No change	No further trace has ever been found. Now interpreted as an error in plotting the NGR. Not believed to exist in this location. (Included here for the sake of completeness).
SU14 SW11A	Neolithic pit	No change	Found by Faith Vatcher in 1967 during a watching brief undertaken prior to changes to the current A303. Believed to have been wholly destroyed
WA ID 4315	Penannular ring ditch / hengiform with Beaker associations (cutting a pit containing Middle Neolithic cremation deposits).	No change	No direct physical impact to archaeological asset. Though outside of the proposed construction corridor the close proximity of the monument to the construction corridor would require measures to be put in place to avoid any slight risk of unintended direct physical impacts.

Table 5 Physical impacts on archaeological sites and monuments that are attributes of OUV: eastern to western property boundaries (D062)

Wilts. HER Pref. Ref. Scheduled Monument No. ***Wessex ID***	**Site name / description**	**Impact**	**Comments**
WA ID 4512	Ring Ditch. Very weakly positive curvilinear anomaly detected by gradiometer survey.	Minor adverse	This may be the last vestiges of a Bronze Age round barrow. – if so it would appear to be severely truncated / plough damaged.
SU14 SW796	Feature previously identified as a ring ditch on the basis of a single aerial photograph.	No change	No further trace has ever been found. Now interpreted as an error in plotting the NGR. Not believed to exist in this location. (Included here for the sake of completeness).
SU14 SW11A	Neolithic pit	No change	Found by Faith Vatcher in 1967 during a watching brief undertaken prior to changes to the current A303. Believed to have been wholly destroyed.

Table 6 Physical impacts on archaeological sites and monuments that are attributes of OUV: eastern portal to eastern property boundary

Wilts. HER Pref. Ref. Scheduled Monument No. ***Wessex Archaeology ID***	**Site name / description**	**Impact**	**Comments**
WA ID 4512	Ring Ditch. Very weakly positive curvilinear anomaly detected by gradiometer survey.	Minor adverse	This may be the last vestiges of a Bronze Age round barrow. – if so it would appear to be severely truncated / plough damaged.
SU14 SW796	Feature previously identified as a ring ditch on the basis of a single aerial photograph.	No change	No further trace has ever been found. Now interpreted as an error in plotting the NGR. Not believed to exist in this location. (Included here for the sake of completeness).
SU14 SW11A	Neolithic Pit	No change	Found by Faith Vatcher in 1967 during a watching brief undertaken prior to changes to the current A303. Believed to have been wholly destroyed.

Table 7 Physical impacts on archaeological sites and monuments that are attributes of OUV: western portal to western property boundary (D061)

Wilts. HER Pref. Ref. Scheduled Monument No. ***Wessex ID***	**Site name / description**	**Impact**	**Comments**
WA ID 4315	Penannular ring ditch / hengiform with Beaker associations (cutting a pit containing Middle Neolithic cremation deposits).	No change	No direct physical impact to archaeological asset. Though outside of the proposed construction corridor the close proximity of the monument to the construction corridor would require measures to be put in place to avoid any slight risk of unintended direct physical impacts.

Table 8 Physical impacts on archaeological sites and monuments that are attributes of OUV: western portal to western property boundary (D062)

Wilts. HER Pref. Ref. Scheduled Monument No. ***Wessex ID***	**Site name / description**	**Impact**	**Comments**
None identified	N/A	No change	

Chapter 5 Physical impacts of new road construction on archaeological features of Outstanding Universal Value

The methodology used to assess the physical impacts on archaeological sites and monuments that would occur as a result of the construction of bored tunnel D061 (1-6) and D062 (1-6) together with their associated above ground dual carriageway and related infrastructure is set out in Chapter 3 Methodology (above). The results of that assessment are set out on a location by location basis in Tables 6 to 8. These results have then been aggregated (Tables 4 and 5) to show the permanent impacts of the construction of the various options. All of the impacts assessed are adverse as destruction of physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites that are themselves an attribute of OUV can only be a negative impact. The assessment of whether the impact is negligible, minor, moderate or major is necessarily a matter of subjective professional judgement. Factors taken into consideration when making that assessment included:

- The proportion of the site or monument affected;
- The degree to which the part of the site or monument would be affected; this could range between minor surface disturbance and wholesale destruction;
- The condition of the site or monument at present.

In accordance with the 2011 ICOMOS HIA Guidance, as all of the archaeological features identified as subject to physical impacts are attributes of OUV and therefore of high importance negligible impacts will be of slight significance; impacts of minor scale will be of moderate / large significance; impacts of moderate scale will be of large / very large significance and major impacts will be of very large significance.

In summary the number of archaeological attributes of OUV that are impacted is low for all options, though it should be noted that the routes of neither D061 or D062 have yet been subject to archaeological evaluation west of their point of divergence. The highest level of adverse physical impacts would result from the road outwith the eastern portal location. Based on current information, no direct physical impacts would result from the putative positioning of alignments D061 or D062 on the western side. The two western portal and road alignment options could therefore be assessed as having an impact of no change of neutral significance to the World Heritage Property. The proposed eastern portal location and associated road alignment could be assessed as having a negligible adverse impact of slight significance to the World Property.

As alignment D061 effectively splits the two recently identified long barrows and the northern boundary of its alignment may run within 30 to 40 metres of the middle Neolithic hengiform there is some risk of unintended direct physical impacts from construction. Though measures could be put in place to avoid, reduce or mitigate these during construction, the more effective conservation measure (based on the options assessed in this report) with regard to direct physical impacts would be the selection of alignment D062 which would wholly avoid the risk of any construction impacts on all of these monuments.

Chapter 6 Conclusions

The 2015 ICOMOS/ UNESCO Advisory Mission said:

…with good design and construction controls, and respecting essential archaeological and heritage management measures, the tunnelled length of the road would be expected to have a beneficial impact on the attributes of Outstanding Universal Value (OUV). However, the siting and design of the tunnel portals, approach cuttings/embankments, entry/exit ramps, mitigation measures and the temporary construction works have the potential to adversely impact OUV. These latter aspects of the scheme, in particular, will require rigorous investigation, evaluation, iterative design and assessment if they are to protect the attributes of OUV within the World Heritage site and the surrounding Archaeological Priority Area (APA). (ICOMOS/ UNESCO 2016, 24*)*

This report should be seen as one strand of that iterative approach to assessment suggested by ICOMOS and UNESCO – in this case to inform the National Trust and Historic England. It has not just assessed the options presented by Highways England but has tested a number of variants as potential mitigation of the adverse impacts of some aspects of those options. The results and discussions on which they are based are set out in Chapter 4, covering visual and other non-physical impacts, and Chapter 5 which dealt with direct physical impacts.

This chapter develops the results of those assessments and presents conclusions on overall impacts on OUV. It first summarises the overall impacts of Highways England's proposed options (D061 (1) and D062 (1)) and the additional options identified in this report on the seven attributes of OUV and on the integrity and authenticity of the World Heritage property. We then attempt to develop an overall assessment of the impact of these options on the OUV of the World Heritage property.

The seven identified attributes of OUV are:

1. Stonehenge itself as a globally famous and iconic monument.
2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.
3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.
4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.
5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.
6. 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.
7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

The following assessment for each attribute summarises first the impact of the present A303 and then assesses the potential impact of the 12 options identified above (the Highways England proposals for D061 (1) and D062 (1) plus five further mitigation proposals for each, identified by us).

Table 9 summarises this discussion. It sets out our assessment of the overall impact of the present A303, and of the D061 (1) and D062 (1) routes presented by Highways England on the seven attributes of OUV, integrity and authenticity, together with our suggested options for mitigation. The last two rows of the table give an overall assessment of the impact on the OUV of the World Heritage property of the existing A303 and for the new options.

Within the ICOMOS HIA methodology, it is difficult to differentiate the impact of the possible mitigation options. It is possible to obtain some further understanding of the impacts on visual relationships between key attribute groups and of direct physical impacts by examining the detailed impacts on individual attributes as set out in numerical form in Tables 9 & 10. While Table 10 may appear somewhat mechanistic, it does provide a further means of analysing the differences between options when read in conjunction with Table 9.

1 Stonehenge itself as a globally famous and iconic monument

The image of Stonehenge in its downland landscape is world-renowned. It is an important and enduring symbol of humanity's prehistoric past and an internationally recognised symbol of Britain. This iconic view has long been adversely impacted by the roads close to it. Heavy traffic in particular mars the view and distracts visitors from it. Since 2013, the closure of the A344 next to the monument has lessened the visual and aural impact of traffic. The adverse impacts of heavy traffic on the A303 remain, particularly in views to the east up King Barrow Ridge. This affects both views of the monument itself, and also views from the monument of its place in the landscape, as well as causing an adverse aural impact.

This is a major adverse impact on the monument of very high significance. All options assessed here would remove this impact and would constitute a major beneficial impact on the monument. However, the Highways England options' (D061 (1) and D062 (1)) assumption for roads at grade and overbridges at the junction with the A360 could interfere with long views across Stonehenge towards the west and the southwest.

2. **The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.**

The A303 is close to many of the physical attributes of OUV but, as far as is known, has had direct physical impacts on comparatively few of them. During the construction work during the previous widening of the A303, a Later Neolithic pit containing a decorated chalk plaque and almost certainly of ceremonial significance was discovered by Faith Vatcher close to King Barrow Ridge. It is possible that the A303 may have destroyed other attributes of OUV when it was first constructed or during subsequent modifications. Nonetheless the A303 is a prominent feature in the setting of many surviving physical attributes of OUV, and so has adverse visual impacts on them. Visual impacts in the context of the relationship of the sites and monuments to the landscape, and their relationship to each other (attributes 3, 5 and 6) are dealt with below. General setting impacts are dealt with in this section.

The major existing physical impacts on the physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites from east to west are:

- The Avenue east of King Barrow Ridge has been severed by the existing A303. It is probable that nothing survives beneath the footprint of the existing A303 but removal of the road would allow the line of the Avenue to be better appreciated.
- On the west slope of King Barrow Ridge a round barrow has been partially removed by the remodelling of the single carriageway part of the road in the late 1960's.
- The road also passes between a long barrow to its south and two round barrows to its north in the small unnamed barrow group which is a northern extension of the Normanton Down Barrow Group (attribute 14/ 15). Evaluation by Wessex Archaeology for the 2004 Published Scheme showed that the long barrow had been badly disturbed, though not by construction of the A303 (Leivers, Moore 2008, 19-21). Similarly, their work showed that the road had not disturbed the round barrow on the north side of the A303 (Leivers, Moore 2008, 30-31).

At present there is a major adverse visual impact of very large significance on the setting of these monuments. More generally, the current A303 has a major adverse impact of very large significance on the setting of all monuments from which it is visible.

The work carried out by Wessex Archaeology to inform development of previous attempts at road improvements involved intensive field survey and trial trenching along the line of the A303. While a variety of new archaeological features were discovered, few of them were identifiable as attributes of OUV (Leivers, Moore 2008).

The results of recent work have led to the confirmation/ discovery of two new long barrows and a hengiform monument in the area close to the Diamond (Historic England 2015 a-d, 2016; Wessex Archaeology 2016 a – g). This has led to the recognition of this group of monuments as a new key attribute group which has to be taken into account in this assessment. This is particularly apposite to all D061 options which divide the group but also affects assessment of all D062 options which pass close to its southern limits.

The present impact of the road on the Avenue east of King Barrow Ridge and on the truncated barrow on the western slope of the ridge must be recognised as major adverse impacts on attributes of OUV, and of very large adverse significance for those particular attributes. The impact on the long Normanton Gorse Longbarrow and round barrows within the Normanton Down Barrow Group is an adverse one since the road divides what was once a coherent barrow group. This is a major adverse impact of very large significance for those attributes, as is that on the setting of other sites in view of the A303, giving a major adverse impact of very large significance for the property as a whole.

The removal of the road in all D061 and D062 proposals (1-6) would free the barrow on the west slope of King Barrow Ridge and allow better treatment of it in the future. The siting of the east portal east of the Avenue would remove a major adverse impact of very large significance on that attribute. Removal of the existing road would allow the elements of the Normanton Down Barrow Group next to the current road line to be linked visually with the rest of its Group. Moving the western tunnel exit south of Long Barrow Cross Roads would greatly improve the immediate setting of the Winterbourne Stoke Barrow Group. This would be a major beneficial impact for that attribute. It would however be adversely offset by construction of the new road at grade in full view of the

group and by the construction of an overbridge above the A360. The impact of the D061 options on the Diamond Group has already been mentioned above.

Any overall assessment of the impact on this attribute of the OUV of the World Heritage property has to balance the very positive gains to many sites against the continued adverse impacts on others and potentially the creation of new adverse impacts in the area south of the Winterbourne Stoke Barrow Group. For D061 (1) and D062 (1) (i.e. at grade options) the overall impact on the physical archaeological evidence of the OUV of the World Heritage property can probably be calculated as only a minor beneficial change of moderate/ large significance. All D061 options must be judged as having an adverse impact on this attribute because it divides the Diamond Group. The more the road can be removed from sight by a canopy/land bridge, cuttings and passing under the A360, the greater the beneficial impact would become. For options D062 (2 – 5), the benefit of the change would be moderate of large/ very large significance, and for option D062 (6), which would place the whole road even lower, it would be a major beneficial change of very large significance.

3. **The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.**

This attribute is discussed further below with attributes 5 and 6.

4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.

A number of sites within the World Heritage property are aligned on the midsummer sunrise and midwinter sunset axis. Of these, the only one affected by the A303 is the midsummer sunrise/ midwinter sunset solstitial axis at Stonehenge itself. This midwinter sunset occurs south-west of the monument behind an apparent horizon outside the World Heritage property to the west. The axis crosses the line of the current A303 slightly to the east of the junction of the road with Byway 12 and then passes through the Sun Barrow north of Normanton Gorse. The lights of traffic along the present road adversely affect the ability to observe the midwinter sunset so that there is currently an adverse impact, probably to be assessed as minor, with a moderate adverse significance according to the ICOMOS HIA scale. Direct impact on the line of the axis will cease with either D061 or D062 options, and Highways England have indicated that the new road will not be lit which is a definite plus in this context. The closer the tunnel portal/ traffic exit point from any landbridge/ canopy is to Normanton Down Barrow Group, the more likely it is that light pollution from traffic itself will be problematic in observing the midwinter sunset, particularly if the road up to the A360 is at grade and then rising to a bridge over the A360. The at grade options for D061 and D062 (D061 (1) and D062 (1)) can therefore be assessed as minor beneficial change of moderate/ large significance, but the options with a canopy/land bridge and cuttings postulated in this report can be assessed as moderate beneficial change of large/ very large significance.

3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.

5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.

6. 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.

All these attributes are essentially about the visual relationships of physical attributes within the World Heritage property. The siting and visibility of the A303 can affect the ability to understand and appreciate the relationship of monuments to the surrounding landscape (Attribute 3). The road can also affect the ability to appreciate the way in which these monuments form a landscape without parallel (Attribute 6). Lastly and most directly, the road interferes visually with relationships between monuments which are themselves attributes of OUV (Attribute 5).

Study of visual relationships has focused primarily on this last aspect but, in doing so, also demonstrates the extent to which the road affects the ability to appreciate and understand the other two relationship-based attributes. To some extent therefore, assessment of Attribute 5 has been used as a proxy for assessing Attributes 3 and 6. Any of the variants of D061 or D062 would create major beneficial change of very large significance in the central areas of the World Heritage property from King Barrow Ridge and Coneybury Hill around Stonehenge itself as far west as Normanton Gorse. East of King Barrow Ridge visibility of the road will be greatly reduced and can probably be assessed also as major beneficial change of very large significance in this area.

At the western end the beneficial change introduced by either route D061 (1) or D062 (1) would be greatly reduced by their visibility and by an overbridge at the junction with the A360. A number of new major adverse impacts of very large significance are introduced between the barrow groups of Winterbourne Stoke, Normanton Down, Lake and the newly recognised Diamond barrow group. All variants of D061 split the Diamond Group resulting in what could be an unacceptable adverse impact. These impacts could be avoided for D061 and mitigated for D062 by developing and adopting one of the proposals for D062 Options 2 – 6 with the least negative impacts accruing from Option 6. With appropriate design this would probably be assessed only as a minor adverse change of moderate/large significance

Balancing out these beneficial and negative impacts across the whole World Heritage property, the overall impact using surface routes for either D061 or D062 can be assessed as moderate beneficial change of large/ very large significance. For D062 the more the western stretch of road can be concealed, the greater the benefit will become. However because of the severance of the Diamond Group by all variants of D061 the level of adverse impacts in this area could be considered unacceptable.

7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

Stonehenge in particular has been the subject of numerous artists, including J M W Turner, and figures in many books, both fiction such as *Tess of the D'Urbervilles* and academic works. It has also inspired many architects from Inigo Jones onwards and has been the subject of antiquarian and archaeological study and speculation for more than three hundred years. The present A303 is highly visible in many views in the landscape and must be a deterrent to artistic appreciation. On the other hand, the view of Stonehenge from vehicles descending from King Barrow Ridge to Stonehenge Bottom is highly appreciated by many, though it would still be possible to appreciate it on foot. Overall, the existing A303 should probably be judged to have a minor adverse impact of moderate/ large significance on this attribute. All variants of D061 and D062 would remove the A303 from the key views which have inspired artists and others over the years. This can be judged as a minor beneficial change of moderate/ large significance.

Integrity

Integrity is part of one of the three pillars of OUV. According to the *Operational Guidelines*

Integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes. Examining the conditions of integrity, therefore requires assessing the extent to which the property:

a) includes all elements necessary to express its Outstanding Universal Value;

b) is of adequate size to ensure the complete representation of the features and processes which convey the property's significance;

c) suffers from adverse effects of development and/or neglect.(UNESCO 2015 paras 87-88)

For cultural properties, *the physical fabric of the property and/or its significant features should be in good condition, and the impact of deterioration processes controlled. A significant proportion of the elements necessary to convey the totality of the value conveyed by the property should be included. Relationships and dynamic functions present in cultural landscapes, historic towns or other living properties essential to their distinctive character should also be maintained* (UNESCO 2015 para 89).

The agreed Statement of Outstanding Universal Value says that *the presence of busy main roads through the World Heritage property impacts adversely on its integrity*. It also says that *the A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape*. The integrity of the property was further evaluated in the 2009 Management Plan (English Heritage 2009, 33-4), which noted the major adverse impact of the A303 and A344, and also noted that more intensive use of the roads had had an impact on the visual integrity of the property since it was inscribed in 1986. The A344 has now been partially removed but the concerns with the impacts of the existing A303 are reflected in the current Management Plan ((Simmonds & Thomas, 2015)

The A303 has visual, aural and access impacts on the World Heritage property:

<u>Visual</u>: this is the most apparent impact on integrity since, as noted above, the existing A303 cuts across the landscape and disrupts many visual links and the ability to appreciate the landscape as a whole. At times when the traffic is heavy or even stationary it can have a very high impact on visual aspects of this part of the property.

<u>Aural</u>: traffic noise can be considerable at Stonehenge itself and elsewhere along the line of the A303. The extent of the impact can vary according to weather conditions and the amount of traffic but is often oppressive and can sometimes be heard at some distance from the A303. The reduction of traffic noise resulting from the closure of the A344 is notable away from the A303.

<u>Access</u>: in many ways the greatest adverse impact of the A303 on the integrity of the property is its role as a barrier between the whole north and south of the World Heritage property. There are no controlled crossing points of the A303 within the World Heritage property. While the A303 is crossed by Byway 12, actually crossing the road is very dangerous in most traffic conditions. Access to the World Heritage property for most visitors is *de facto* confined to its northern part. Most visitors, indeed, are probably unaware that around two thirds of the Stonehenge portion of the World Heritage property is south of the A303

Overall the impact of the existing A303 on the integrity of the World Heritage property is major adverse of very large significance. Either of the alternatives now under consideration would improve

the integrity of the property. All would greatly improve the ability to access all parts of the World Heritage property by removing significant lengths of the existing A303. They would also reduce aural and visual impact where the road would be in a tunnel.

The present proposals would reunite the World Heritage property for much of the length of the road, allowing access across the former line of the present A303 between the Avenue in the east and Normanton Gorse in the west. This would be a very substantial improvement. Noise levels would be greatly reduced where the A303 is placed in a tunnel, though aural impact could be greater than at present where new dual carriageway is created even if in a cutting. Visual impact of the A303 would be removed where the A303 is placed in a tunnel. These would be major beneficial change.

However, where the road was not in a tunnel, there would be stretches of new dual carriageway. These would have an adverse impact on the OUV of the World Heritage property, particularly if built on the surface. So overall, there would probably be moderate to major beneficial change of large or very large significance.

Authenticity

Authenticity is about the truthfulness of the evidence for OUV and the ability to appreciate that evidence. The *Operational Guidelines* (UNESCO 2015, para 79 - 86) list a number of tests for authenticity including form and design, materials and substance, location and setting, and spirit and feeling. Authenticity was first assessed in the 2009 Management Plan (English Heritage 2009, 32-33) and this assessment was expanded to cover Avebury in the 2015 Management Plan for the whole World Heritage property (Simmonds, Thomas, 2015, 35-7). The impact of the road on materials and substance and form and design is comparatively limited (see discussion of Attribute 2 above). The road has a greater impact on location and setting and spirit and feeling. It is a dominant feature in many views of the World Heritage property with an adverse impact on the setting of the property and both its visual and aural impact is disruptive to the spirit and feeling of the property.

Overall, the existing A303 has a major adverse impact, of very large significance, on the authenticity of the property. The current options can be assessed as moderate beneficial change of large/ very large significance for the options D061 (1) & D062 (1) presented by Highways England, moving towards a major beneficial change the more the road can be concealed by a canopy/land bridge, cutting and underpasses under the A360.

Overall impact of the existing A303 and the proposed D061 and D062 schemes

On the basis of the information currently to hand it is clear that any of the variants of D061 and D062 would achieve a reduction of adverse impacts to the OUV of the World Heritage property **as a whole over the existing A303**. The reduction would be least for D061 (1) & D062 (1) because of their impact at the western end on relationships between the Winterbourne Stoke, Normanton Down, Lake and Diamond Barrow Groups. The fact that all variants of D061 would divide the Diamond Group is an additional adverse impact. On the basis of current knowledge, the risk of physical impact on attributes of OUV appears to be negligible; however further archaeological assessment and evaluation is required to confirm this.

At the east end, the gains for any of the options are very considerable, as they are for the central section of the World Heritage property. The overbridge and grade separated junction at Countess Road would have adverse impacts locally but these would not affect attributes of OUV. East of King

Barrow Ridge, the re-uniting of the Avenue would be a very positive benefit and the visual impacts of the road would be greatly reduced by placing parts of it in tunnel and by lowering the level of the road AOD between the tunnel portal and Vespasian's Camp. The adverse impacts of the existing A303 would be entirely removed in the central parts of the property, apart from some distant views across to the western boundary.

However, when we consider the western end and the area of the World Heritage property bounded by the A360, the Winterbourne Stoke Barrow Group, the Normanton Down Barrows and the Lake Barrow Group, and containing the Diamond Group we see there are issues here. The location of the western portal, the construction of the new road from the western portal to the A360 at grade, with an overbridge over the A360 (or vice versa) and grade-separated junction would cause a major adverse impact of very large significance. These negative impacts would clearly lower the beneficial impact of the new A303 to the World Heritage property overall.

All variants of D062 (even D062 (1)) are less intrusive than any version of D061 since the latter divide the Diamond Group and cross the A360 at a higher point. Our analysis above shows that the adverse impacts on the group of attributes in the western part of the World Heritage property could be reduced by measures to move the western portal/ exit point for traffic further away from the Normanton Down Barrow Group, perhaps by the use of a canopy/land bridge, and by placing the road in cutting sufficiently deep to hide high vehicles. It would be essential that the new road passed under the A360 and that any junction with the A360 should be to the west of the present line of that road.

The adverse impacts at the western end could be most effectively reduced by moving the portal position or extending a canopy/ landbridge to the lowest part of the dry valley between Normanton Gorse and the Diamond, considered equivalent to the position proposed for the offline western portal in 2014 (Snashall, Young 2014 30, Figs 3 and 7).Additional mitigation might be achieved by rerouting the road around the southern tip of the Diamond. This has not been assessed as an option, but would keep the route as much as possible in lower ground, while building the road on a curve would minimise the adverse effects of views along the line of the cutting itself.

The 2015 ICOMOS/ UNESCO mission, quoted at the beginning of this chapter, specifically drew attention to the potential for the surface parts of any scheme to have an adverse impact on OUV. This may give some guidance on how the World Heritage Committee itself might respond to such adverse impacts and how they should be considered here. The mitigation measures outlined above, depending on which were adopted would reduce the adverse impact on these western attributes to somewhere between a moderate adverse impact of large significance (D061 (1) and D062 (1)) and a minor adverse impact of moderate significance (D062 (6)). The adverse impact of D061 (1) and D062 (1) on the Winterbourne Stoke, Normanton Down, Lake and Diamond Groups is considerable. Such an impact on between a fifth and a quarter of the key attribute groups used for this assessment is unacceptable despite benefits elsewhere in the World Heritage property.

All variants of D061 have the additional adverse impact that they split the Diamond Group, thus severing internal relationships between attributes of OUV within the group which we believe could be an unacceptable adverse impact.

Mitigation of D062 (1) is likely to be essential if the western parts of its route are to be acceptable in terms of impact on attributes of OUV. Impact on the four western barrow groups could be mitigated by greater concealment of the road by placing it in cutting, crossing the A360 by means of an underpass and by placing any junction with the A360 to the west of the existing line of the A360 (D062 (2)). Further mitigation would be achieved by moving the apparent western exit from the tunnel by use of landbridges/ canopy which reflected the existing landform (D062 (3) – (6)). This would have the effects of moving the apparent exit away from the Normanton Down Barrow Group, and particularly from Bush Barrow, and also of shortening the amount of road visible in the western part of the World Heritage property. The most effective mitigation would be achieved by D062 (6).

This is an outline assessment as it has not been possible in this report to carry out a full Heritage Impact Assessment of the new proposed route for the A303, since the available information is only in outline. It is the responsibility of Highways England as the scheme promoter to produce a full Heritage Impact Assessment as an integral part of an iterative design process (as called for by the ICOMOS and UNESCO Advisory Mission) allowing schemes to respond to and accommodate further developments in archaeological understanding, and a final scheme which ensures the protection of the OUV of the World Heritage property progressed.

Table 9 Overall Assessment of impacts on Outstanding Universal Value of the World Heritage property

This table measures the scale of impact of the present A303 and of proposed changes to the A303. The significance of these impacts is a function of their scale and the importance of the asset affected. As attributes of Outstanding Universal Value, all the features and relationships here are of very high importance. This means that a current impact or future change of minor scale is of moderate/ large significance, a moderate one is of large/ very large significance, and a major impact is of very large significance.

		D061						D062					
	A303 now	**D061 (1)**	**D061 (2)**	**D061 (3)**	**D061 (4)**	**D061 (5)**	**D061 (6)**	**D062 (1)**	**D062 (2)**	**D062 (3)**	**D062 (4)**	**D062 (5)**	**D062 (6)**
Attribute of Outstanding Universal Value													
1 Stonehenge itself as a globally famous and iconic monument	Major adverse	Moderate beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Moderate beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial	Major beneficial
2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.	Major adverse	Minor beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Major beneficial	Minor beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Major beneficial
4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.	Minor adverse	Minor beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Minor beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial	Moderate beneficial
3. The siting of Neolithic and Bronze Age sites in relation to the landscape. 5. The siting of Neolithic and Bronze Age sites in relation to each other. 6. The disposition, physical remains and settings of the key Neolithic and Bronze Age sites of the period, forming a landscape without parallel.	Major adverse	Minor beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Major beneficial	Minor beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Moderate/Major beneficial	Major beneficial
7. The influence of the attributes of OUV and their landscape settings on architects, artists, historians, archaeologists and others.	Minor adverse	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial	Minor beneficial
Integrity	Major adverse	Minor beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Major beneficial
Authenticity	Major adverse	Minor beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Moderate/ Major beneficial	Major beneficial
Overall assessment of impact on the Outstanding Universal Value of the Stonehenge component of the World Heritage property	**Major adverse**	**Minor beneficial**	**Moderate/Major beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Moderate beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Moderate/ Major beneficial**	**Major beneficial**
Overall assessment of the significance of the impact on the Outstanding Universal Value of the Stonehenge component of the World Heritage property	**Very large negative**	**Moderate positive**	**Large positive**	**Large positive**	**Large positive**	**Large positive**	**Very large positive**	**Moderate positive**	**Large positive**	**Large positive**	**Large positive**	**Large positive**	**Very large positive**

Table 10: Numerical outcomes of impact assessment on Outstanding Universal Value of the World Heritage property

	Current A303	D061 (1)		D061 (2)		D061 (3)		D061 (4)		D061 (5)		D061 (6)		D062 (1)		D062 (2)		D062 (3)		D062 (4)		D062 (5)		D062 (6)	
1 Durrington Walls	-14	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11	-2	+11
2 Woodhenge	-14	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13	0	+13
3 Avenue East of King Barrow Ridge	-8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8
4 Barrows near Avenue East of KBR	-14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14	0	+14
5 King Barrows (Old & New)	-37	-7	+27	-4	+30	-4	+30	-4	+30	-4	+30	-4	+32	-7	+27	-4	+30	-4	+30	-4	+30	-4	+30	-4	+30
6 Coneybury Henge	-53	-2	+47	0	+49	0	+49	0	+49	0	+49	0	+49	-2	+47	0	+49	0	+49	0	+49	+0	+49	0	+50
7 Coneybury Barrow	-56	-6	+44	0	+53	-3	+49	-3	+49	0	+53	0	+53	-6	+44	0	+53	-3	+49	-3	+49	-3	+53	0	+53
8 Cursus East end	-33	-2	+29	0	+33	0	+33	0	+33	0	+33	0	+33	-2	+29	0	+33	0	+33	0	+33	0	+33	0	+33
9 Cursus Centre	-11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11	0	+11
10 Cursus West end	-8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8	0	+8
11 Cursus Barrows	-19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19	0	+19
12 Stonehenge	-27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27	0	+27
13 Stonehenge Down Barrows	-23	0	+24	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23	0	+23
14/15 Normanton Down Barrows	-29	-4	+26	-4	+25	-7	+21	-7	+21	-7	+21	-2	+25	-4	+26	-4	+25	-7	+21	-7	+21	-7	+21	-2	+25
16 Lake Barrows	-27	-12	+16	-10	+16	-9	+16	-9	+16	-9	+16	-8	+16	-12	+16	-10	+16	-9	+16	-9	+16	-9	+16	-8	+16
17 Winterbourne Stoke Barrows	-30	-12	+18	-9	+18	-9	+18	-9	+18	-8	+18	-8	+18	-12	+18	-9	+18	-9	+18	-9	+18	-8	+18	-8	+18
18 The Diamond	-22	-26	0	-24	0	-24	0	-24	0	-24	0	-23	0	-26	0	-24	0	-24	0	-24	0	-24	0	-23	0
Sub-total adverse / beneficial	-425	-73	+342	-53	+358	-58	+350	-58	+350	-54	+354	-47	+360	-73	+341	-53	+358	-58	+350	-58	+350	-57	+350	-47	+359
Sub-total aggregate	-425	+269		+305		+292		+292		+300		+313		+268		+305		+299		+292		+293		+308	
Direct archaeological impacts	Not assessed	-2		-2		-2		-2		-2		-2		**-2**		-2		-2		-2		-2		-2	
Total adverse / beneficial	-425	-75 / +342		-53 / +358		-58 / +350		-58 / +350		-54 / +354		-47 / +360		-73 / +341		-53 / +358		-58 / +350		-58 / +350		-57 / +350		-47 / +359	
Total Aggregate	**-425**	**+269**		**+303**		**+290**		**+290**		**+298**		**+311**		**+266**		**+303**		**+291**		**+290**		**+299**		**+310**	

Numeric values have been ascribed on the following basis:		
Major adverse	**-4**	This table attempts a numeric representation of the outcomes of the assessment of impacts on visual links between key attribute groups (discussed in Chapter 4) and direct physical impacts (discussed in Chapter 5). **It should be read in conjunction with Table 9 and Chapter 6: Conclusions.**
Moderate adverse	**-3**	
Minor adverse	**-2**	
Negligible adverse	**-1**	
No change	**0**	
Negligible beneficial	**+1**	
Minor beneficial	**+2**	
Moderate beneficial	**+3**	
Major beneficial	**+4**	

Appendix 1 Brief for outline assessment of the impacts on the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites World Heritage property of a bored tunnel option of at least 2.9km in length and associated surface infrastructure

1. BACKGROUND

Over the course of 2014, EH (as was) and the National Trust engaged with the Department for Transport (DfT) on a feasibility study for the improvement of the A303 within the Stonehenge World Heritage Site (WHS). A long-running traffic bottleneck with increasingly severe congestion, this section of the A303 has been the subject of numerous, failed attempts to secure a road improvement, including a 2.1km tunnel scheme that was approved at Public Inquiry in 2004 but never implemented.

A preliminary, outline assessment of the impacts on the Outstanding Universal Value (OUV) of the WHS was jointly commissioned by EH & NT to inform our respective positions on the feasibility study[1] .This work identified that a fully bored tunnel of between 2.5 and 2.9km had the potential to resolve the traffic issues while not only protecting the OUV of the WHS but also offering significant potential benefits to it. DfT were advised accordingly in a joint EH/NT letter signed by our respective CEOs in August 2014, which led to the December 2014 announcement that the Govt. would invest in a bored tunnel of at least 2.9km – the most beneficial of the tunnel scenarios assessed by EH & NT.

Since then, we (as Historic England), EH and NT have continued to work together to provide the scheme promoters Highways England with ongoing constructive advice, including the hosting of an initial Advisory Mission by UNESCO & ICOMOS to familiarise them with the WHS landscape and the nascent proposals in October 2015. The subsequent mission report was constructive and cautiously positive. Importantly, it saw the potential for the tunnel scheme to be a global exemplar in the development of infrastructure within a WHS.

The recommendations of the mission report have had a significant influence on Highways England's thinking with the emerging proposals. We have advised them on the best way to implement the mission recommendations and thus devise a scheme fit for the WHS. In parallel with this, extensive archaeological assessment, survey and evaluation of much of the potential tunnel scheme route has been undertaken, which has advanced our understanding of the possible impacts on archaeology and the OUV of the WHS.

Highways England is now moving towards their first phase of public consultation on the developing scheme, which will run early in 2017. In parallel with this, DCMS has invited a second UNESCO & ICOMOS Advisory Mission to run concurrently in January. It is appropriate at this juncture to review the preliminary, outline assessment of impacts on the OUV on the WHS in light of the growth in our understanding of the nature of the emerging scheme and of its potential impacts upon archaeology and the WHS. This is so that we can both offer formal advice to

[1] *Preliminary Outline Assessment of the impact of A303 Improvements on the Outstanding Universal Value of the Stonehenge Avebury and Associated Sites World Heritage property*, English Heritage & National Trust, July 2014

Highways England during the public consultation and offer informed advice to UNESCO & ICOMOS on our view of the proposals as they currently stand.

Since the time of the 2014 Preliminary Outline Assessment there have been further advances in our archaeological understanding of the WHS which gives us a greater insight into the significance of the WH property and its landscape. Relevant work includes:

- Multi-disciplinary archaeological survey and investigation by Historic England as phase 1 of the Stonehenge WHS Southern Landscape Survey. Elements include:
    - Desk-based assessment
    - Aerial Investigation and Mapping
    - Geophysical Surveys
    - Small-scale archaeological investigation
- Archaeological assessment and evaluation undertaken by Wessex Archaeology for Highways England along the potential footprint of aspects of the "working assumption" route for a twin-bored tunnel scheme. Elements include:
    - Extensive geophysical surveys, including both east and west portal locations
    - Archaeological evaluation of the potential western portal location and much of the potential route of the new surface dual carriageway leading from the western portal to the western border of the WHS

A further development since 2014 has been the invitation by UK Govt. to the World Heritage Centre (WHC) and their heritage advisors ICOMOS International to engage with the emerging road improvement scheme and provide ongoing advice. An initial Advisory Mission to familiarise with the WHS and the broad thrust of proposals was hosted in October 2015. The subsequent mission report of April 2016 was constructive and cautiously positive about the scope for an appropriate tunnel scheme within the WHS.

The report can be accessed via http://whc.unesco.org/en/list/373/documents/ and the consultant should have regard to the conclusions and recommendations set out in that document when undertaking the assessment.

2. SCOPE OF THIS OUTLINE ASSESSMENT

The outline assessment will consider the impact upon the OUV of the WHS of the tunnel option of at least 2.9km, its surface infrastructure and its anticipated construction impacts insofar as relevant information is available at this stage. The assessment should take as its starting point the 2014 Outline Assessment and identify any changes in assessment of impacts since then in the light of improved understanding of the archaeology and the development of the concept (s) for removing the A303 as far as possible from the surface of the World Heritage property.

The outline assessment should also consider the impacts on the OUV of the WHS of dual carriageway construction within the WHS outwith both the eastern and western portal locations of this option. The work will have the benefit of the results of preliminary engineering data, draft visualisations and archaeological assessment and evaluation.

As with the 2014 Outline Assessment, an integrated assessment is required but will be prepared through two commissions working closely together. The work will incorporate two separate studies. **Part 1** is a review of the *direct and indirect* impacts resulting in physical loss of the whole or part of archaeological sites and monuments which are attributes of the OUV of the WHS. This will be undertaken by Dr. Nick Snashall, NT Archaeologist for Stonehenge & Avebury WHS. This work is being directly undertaken by NT and does **not** from part of the work to be commissioned under this Brief.

The work to be commissioned via this Brief (Part 2) will consider the relative *direct and indirect* impacts, but not including physical impacts on archaeological features (covered in Part 1 of the review), of each option upon the OUV of the WHS in light of current policy, guidance and understanding of significance. In particular it will comply with the 2011 ICOMOS guidance on Heritage Impact Assessments in Cultural World Heritage Properties.

However both studies are of equal importance in arriving at outline conclusions in terms of OUV impacts. Both aspects of the work will be integrated into one report by the author of the assessment and Dr Snashall. As part of this commission, the author of the assessment commissioned via this Brief will work in conjunction with Dr Snashall to produce a draft integrated report, reflecting the full range of factors affecting the tunnel option, and integrating the results of the two studies outlined above.

The work will consider the information presently available for the tunnel option with regard to the Statement of Outstanding Universal Value, including its assessments of integrity, authenticity and its definition of needs for future management and protection, taking into account the articulation in the 2015 WHS Management Plan of Attributes identified in the SOUV. It will also have regard to impacts on setting (aural and visual, including lighting) and access insofar as relevant information is available within the constrained timescale necessary to complete the work.

The results of relevant archaeological, evaluation and investigation will be made available to the consultant, along with all available, relevant information on the engineering and design aspects of the “working assumption” route, including printed large-scale maps & plans as available. Some of this information will derive from Historic England and the National Trust, but the chief source will be the scheme promoters Highways England and their consultants in the Arup-Atkins Joint Venture (AAJV).

Where such information is not available, the assessment will caveat its conclusions accordingly.

The assessment report should summarise the context in which it has been commissioned and the methodology adopted. For the commissioned work the consultant will be supplied with a map/plan (and as much supporting information as possible) showing the proposed location of the tunnel portals and new surface road from the western portal to the edge of the WHS. The results of archaeological assessment and evaluation will also be provided so that the consultant is aware of the extent of survey and nature of relevant archaeology that may relate to the OUV of the WHS encountered during the fieldwork.

3. TIMESCALE

This rapid outline assessment will take place in a compressed timescale made necessary by a number of drivers. Historic England is seeking corporate approval for the position recommended by staff in relation to the forthcoming public consultation exercise by Highways England. A meeting of the Historic England Commission is scheduled for mid-December – the results of the revised outline OUV impact assessment will feed into the briefing for HE Commission. Simultaneously, the UK Govt. has invited a second Advisory Mission by UNESCO & ICOMOS, which will take place in January 2017. The deadline for supplying the briefing pack to the international bodies in advance of the Mission is 16th December 2016. In order to assimilate the results of the preliminary OUV assessment within this briefing pack and to inform the HE corporate position **it is essential that we have the results of the study in hand by Friday 9th December 2016**.

The outline assessment report will be provided in digital format to Historic England and the National Trust, plus two hard bound copies supplied to Historic England.

Cost details removed

4 MONITORING

The Historic England Inspector of Ancient Monuments, Phil McMahon, and the National Trust A303 Project Manager, Cassandra Genn, will monitor the work. Due to the very short timescale involved, it is not envisaged that formal monitoring meetings will take place during the course of the work, beyond a meeting (date to be arranged) to discuss the preliminary findings before report is completed for delivery on 9th December.

Day-to-day monitoring will take place via an email circle. All correspondence and draft reports etc. should be circulated to each member of the project steering group, which will comprise Cassandra Genn, Dr Nick Snashall (National Trust) and Phil McMahon (Historic England). In the event of an urgent matter arising, the Consultant should contact one or more of the members. Contact details for relevant personnel are:

Contact details removed

5 CONFIDENTIALITY

All information disclosed by one party to the other either before or after the date of this Agreement in connection with any Services or business dealings between the parties that is clearly identified at or after the point of disclosure as confidential or should reasonably be regarded as obviously of a confidential nature ('Confidential Information') shall be regarded as confidential and each party shall procure that its personnel and third parties to which Confidential Information is disclosed treat such information as confidential.

The above shall not apply to:

- any information that is in the public domain other than by a breach of this Agreement;
- any disclosure of Confidential Information to a third party to the extent that such disclosure is legally required by a court or relevant regulatory body

Appendix 2 Statement of Outstanding Universal Value for Stonehenge, Avebury and Associated Sites World Heritage property

Property	Stonehenge, Avebury and Associated Sites
State Party	United Kingdom of Great Britain and Northern Ireland
Id. N°	373bis
Date of inscription	1986 – 2008

Brief synthesis

The World Heritage property Stonehenge, Avebury and Associated Sites is internationally important for its complexes of outstanding prehistoric monuments. Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments, and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between *circa* 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.

The World Heritage property comprises two areas of Chalkland in southern Britain within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. Each area contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue, the Cursuses, Durrington Walls, Woodhenge, and the densest concentration of burial mounds in Britain. At Avebury they include Windmill Hill, the West Kennet Long Barrow, the Sanctuary, Silbury Hill, the West Kennet and Beckhampton Avenues, the West Kennet Palisaded Enclosures, and important barrows.

Stonehenge is one of the most impressive prehistoric megalithic monuments in the world on account of the sheer size of its megaliths,the sophistication of its concentric plan and architectural design, the shaping of the stones - uniquely using both Wiltshire Sarsen sandstone and Pembroke Bluestone - and the precision with which it was built.

At Avebury, the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.

There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.

Criterion (i): The monuments of the Stonehenge, Avebury and Associated Sites demonstrate outstanding creative and technological achievements in prehistoric times.

Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world. It is unrivalled in its design and unique engineering, featuring huge horizontal stone lintels capping the outer circle and the trilithons, locked together by carefully shaped joints. It is distinguished by the unique use of two different kinds of stones (Bluestones and Sarsens), their size (the largest

weighing over 40 t) and the distance they were transported (up to 240 km). The sheer scale of some of the surrounding monuments is also remarkable: the Stonehenge Cursus and the Avenue are both about 3 km long, while Durrington Walls is the largest known henge in Britain, around 500 m in diameter, demonstrating the ability of prehistoric peoples to conceive, design and construct features of great size and complexity.

Avebury prehistoric stone circle is the largest in the world. The encircling henge consists of a huge bank and ditch 1.3 km in circumference, within which 180 local, unshaped standing stones formed the large outer and two smaller inner circles. Leading from two of its four entrances, the West Kennet and Beckhampton Avenues of parallel standing stones still connect it with other monuments in the landscape. Another outstanding monument, Silbury Hill, is the largest prehistoric mound in Europe. Built around 2400 BC, it stands 39.5 m high and comprises half a million tonnes of chalk. The purpose of this imposing, skillfully engineered monument remains obscure.

Criterion (ii): The World Heritage property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age. The monuments and landscape have had an unwavering influence on architects, artists, historians and archaeologists, and still retain a huge potential for future research.

The megalithic and earthen monuments of the World Heritage property demonstrate the shaping of the landscape through monument building for around 2000 years from *circa* 3700 BC, reflecting the importance and wide influence of both areas.

Since the 12th century when Stonehenge was considered one of the wonders of the world by the chroniclers Henry de Huntington and Geoffrey de Monmouth, the Stonehenge and Avebury Sites have excited curiosity and been the subject of study and speculation. Since early investigations by John Aubrey (1626-1697), Inigo Jones (1573-1652), and William Stukeley (1687-1765), they have had an unwavering influence on architects, archaeologists, artists and historians. The two parts of the World Heritage property provide an excellent opportunity for further research.

Today, the property has spiritual associations for some.

Criterion (iii): The complexes of monuments at Stonehenge and Avebury provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. Together with their settings and associated sites, they form landscapes without parallel.

The design, position and interrelationship of the monuments and sites are evidence of a wealthy and highly organised prehistoric society able to impose its concepts on the environment. An outstanding example is the alignment of the Stonehenge Avenue (probably a processional route) and Stonehenge stone circle on the axis of the midsummer sunrise and midwinter sunset, indicating their ceremonial and astronomical character. At Avebury the length and size of some of the features such as the West Kennet Avenue, which connects the Henge to the Sanctuary over 2 km away, are further evidence of this.

A profound insight into the changing mortuary culture of the periods is provided by the use of Stonehenge as a cremation cemetery, by the West Kennet Long Barrow, the largest known Neolithic stone-chambered collective tomb in southern England, and by the hundreds of other burial sites illustrating evolving funerary rites.

Integrity

The boundaries of the property capture the attributes that together convey Outstanding Universal Value at Stonehenge and Avebury. They contain the major Neolithic and Bronze Age

monuments that exemplify the creative genius and technological skills for which the property is inscribed. The Avebury and Stonehenge landscapes are extensive, both being around 25 square kilometres, and capture the relationship between the monuments as well as their landscape setting.

At Avebury the boundary was extended in 2008 to include East Kennet Long Barrow and Fyfield Down with its extensive Bronze Age field system and naturally occurring Sarsen Stones. At Stonehenge the boundary will be reviewed to consider the possible inclusion of related, significant monuments nearby such as Robin Hood's Ball, a Neolithic causewayed enclosure.

The setting of some key monuments extends beyond the boundary. Provision of buffer zones or planning guidance based on a comprehensive setting study should be considered to protect the setting of both individual monuments and the overall setting of the property.

The survival of the Neolithic and Bronze Age monuments at both Stonehenge and Avebury is exceptional and remarkable given their age – they were built and used between around 3700 and 1600 BC. Stone and earth monuments retain their original design and materials. The timber structures have disappeared but postholes indicate their location. Monuments have been regularly maintained and repaired as necessary.

The presence of busy main roads going through the World Heritage property impacts adversely on its integrity.The roads sever the relationship between Stonehenge and its surrounding monuments, notably the A344 which separates the Stone Circle from the Avenue.At Avebury, roads cut through some key monuments including the Henge and the West Kennet Avenue. The A4 separates the Sanctuary from its barrow group at Overton Hill.

Roads and vehicles also cause damage to the fabric of some monuments while traffic noise and visual intrusion have a negative impact on their settings. The incremental impact of highway-related clutter needs to be carefully managed.

Development pressures are present and require careful management. Impacts from existing intrusive development should be mitigated where possible.

Authenticity

Interventions have been limited mainly to excavations and the re-erection of some fallen or buried stones to their known positions in the early and mid-twentieth century in order to improve understanding. Ploughing, burrowing animals and early excavation have resulted in some losses but what remains is remarkable in its completeness and concentration. The materials and substance of the archaeology supported by the archaeological archives continue to provide an authentic testimony to prehistoric technological and creative achievement.

This survival and the huge potential of buried archaeology make the property an extremely important resource for archaeological research, which continues to uncover new evidence and expand our understanding of prehistory.Present day research has enormously improved our understanding of the property.

The known principal monuments largely remain *in situ* and many are still dominant features in the rural landscape. Their form and design are well-preserved and visitors are easily able to appreciate their location, setting and interrelationships which in combination represent landscapes without parallel.

At Stonehenge several monuments have retained their alignment on the Solstice sunrise and sunset, including the Stone Circle, the Avenue,Woodhenge, and the Durrington Walls Southern Circle and its Avenue.

Although the original ceremonial use of the monuments is not known, they retain spiritual

significance for some people, and many still gather at both stone circles to celebrate the Solstice and other observations. Stonehenge is known and valued by many more as the most famous prehistoric monument in the world.

There is a need to strengthen understanding of the overall relationship between remains, both buried and standing, at Stonehenge and at Avebury.

Protection and management requirements

The UK Government protects World Heritage properties in England in two ways: firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act, and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected through the Government's designation of individual buildings, monuments, gardens and landscapes.

Government guidance on protecting the Historic Environment and World Heritage is set out in National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. The protection of the property and its setting from inappropriate development could be further strengthened through the adoption of a specific Supplementary Planning Document.

At a local level, the property is protected by the legal designation of all its principal monuments. There is a specific policy in the Local Development Framework to protect the Outstanding Universal Value of the property from inappropriate development, along with adequate references in relevant strategies and plans at all levels. The Wiltshire Core Strategy includes a specific World Heritage Property policy. This policy states that additional planning guidance will be produced to ensure its effective implementation and thereby the protection of the World Heritage property from inappropriate development. The policy also recognises the need to produce a setting study to enable this. Once the review of the Stonehenge boundary is completed, work on the setting study shall begin. The Local Planning Authority is responsible for continued protection through policy development and its effective implementation in deciding planning applications with the management plans for Stonehenge and Avebury as a key material consideration. These plans also take into account the range of other values relevant to the site in addition to Outstanding Universal Value. Avebury lies within the North Wessex Downs Area of Outstanding Natural Beauty, a national statutory designation to ensure the conservation and enhancement of the natural beauty of the landscape.

About a third of the property at both Stonehenge and Avebury is owned and managed by conservation bodies: English Heritage, a non-departmental government body, and the National Trust and the Royal Society for the Protection of Birds which are both charities. Agri-environment schemes, an example of partnership working between private landowners and Natural England (a non-departmental government body), are very important for protecting and enhancing the setting of prehistoric monuments through measures such as grass restoration and scrub control. Much of the property can be accessed through public rights of way as well as permissive paths and open access provided by some agri-environment schemes. Managed open access is provided at Solstice. There are a significant number of private households within the property and local residents therefore have an important role in its stewardship

The property has effective management plans, coordinators and steering groups at both Stonehenge and Avebury. There is a need for an overall integrated management system for the property which will be addressed by the establishment of a coordinating Stonehenge and Avebury

Partnership Panel whilst retaining the Stonehenge and Avebury steering groups to enable specific local issues to be addressed and to maintain the meaningful engagement of the community. A single property management plan will replace the two separate management plans.

An overall visitor management and interpretation strategy, together with a landscape strategy needs to be put in place to optimise access to and understanding of the property. This should include improved interpretation for visitors and the local community both on site and in local museums, holding collections excavated from the property as well as through publications and the web. These objectives are being addressed at Stonehenge through the development of a visitor centre and the Interpretation, Learning and Participation Strategy. The updated Management Plan will include a similar strategy for Avebury. Visitor management and sustainable tourism challenges and opportunities are addressed by specific objectives in both the Stonehenge and Avebury Management Plans.

An understanding of the overall relationship between buried and standing remains continues to be developed through research projects such as the "Between the Monuments" project and extensive geophysical surveys. Research Frameworks have been published for the Site and are regularly reviewed. These encourage further relevant research. The Woodland Strategy, an example of a landscape level management project, once complete, can be built on to include other elements of landscape scale planning.

It is important to maintain and enhance the improvements to monuments achieved through grass restoration and to avoid erosion of earthen monuments and buried archaeology through visitor pressure and burrowing animals.

At the time of inscription the State Party agreed to remove the A344 road to reunite Stonehenge and its Avenue and improve the setting of the Stone Circle. Work to deliver the closure of the A344 will be complete in 2013. The project also includes a new Stonehenge visitor centre. This will provide world class visitor facilities including interpretation of the wider World Heritage property landscape and the removal of modern clutter from the setting of the Stone Circle. Although substantial progress is being made, the impact of roads and traffic remains a major challenge in both parts of the World Heritage property. The A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape. A long-term solution remains to be found. At Avebury, a World Heritage Site Traffic Strategy will be developed to establish guidance and identify a holistic set of actions to address the negative impacts that the dominance of roads, traffic and related clutter has on integrity, the condition and setting of monuments and the ease and confidence with which visitors and the local community are able to explore the wider property.

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Wessex Archaeology 2016g *A303 Amesbury to Berwick Down Wiltshire: Archaeological Trial Trench Evaluation*

The Prehistoric Society

From: Alexander Gibson <A.M.Gibson1@bradford.ac.uk>
Sent: 27 February 2017 10:23
To: A303Stonehenge
Subject: Consultation
Attachments: PrehistoricSocietyStonehengeResponsel.docx

Please find attached the response of the Prehistoric Society to the recent consultation regarding the proposed A303 Stonehenge Amesbury to Berwick Down road improvements.
I would be grateful if you could acknowledge receipt.
Yours
Alex Gibson

Alex Gibson BA PhD FSA FSA (Scot) MCIfA
Reader in British Prehistory
School of Archaeological Sciences, University of Bradford, UK BD7 1DP
00 44 (0)1274 235385

Hon President: The Prehistoric Society www.prehistoricsociety.org/
Membre d'honneur du Conseil d'administration de la Société Préhistorique Française

THE PREHISTORIC SOCIETY
SINCE 1935

The leading organisation for people interested in prehistory

Mr C Taylor
Director for Complex Infrastructure
Highways England

27th February 2017

A303 Stonehenge: Amesbury to Berwick Down January 2017 Public Consultation

Response of the Prehistoric Society

The Prehistoric Society (hereafter 'The Society') promotes the preservation of and research into all aspects of human prehistory. The Society applauds Highways England's intention to improve the visitors' visual experience at Stonehenge by removing the A303 either to the south of the World Heritage Site or via a new tunnel running under the WHS. We also appreciate the infrastructure and congestion issues that the scheme is intended to address. We also respect the aspirations of the National Trust and English Heritage as landowners and custodians of the area. Our response addresses archaeological issues and in particular how the proposals affect the Outstanding Universal Value of the WHS of which Stonehenge and other nationally important Scheduled Ancient Monuments are parts.

The Stonehenge landscape is internationally iconic and must be considered one of, if not the most significant archaeological landscape in Britain. Its designations, significance and value could not be greater, therefore whilst the attempt to remove the A303 from within the landscape is greatly welcomed, the potential harm to the landscape posed by the new proposals must be carefully weighed against the public benefits that would accrue from the removal of the road.

1 Options Presented at the Consultation

Three route options were presented at the public consultation

- Option 1N – tunnel with the road exiting west and running to the north of Winterbourne Stoke
- Option 1S – tunnel with the road exiting west and running to the south of Winterbourne Stoke.
- Option 2 – (F10) road running to the south of Amesbury and to the south of the WHS joining Option 1S to the south of Winterbourne Stoke.

2 The Society's Preferred Routes

Option 2 (F10)

Archaeologically, The Society supports Option 2 (F10) as the preferred solution as it completely avoids the WHS. Nevertheless it has not been comprehensively evaluated and the route may cause significant harm to other archaeological deposits or sites. We would urge that this route is more fully evaluated from an archaeological perspective.

Options 1N & S

The Society's preference is for minimal impact within the WHS and therefore Options 1N and 1S are unacceptable in their current form due to the siting of the portals. Nevertheless, The Society regards Option 1S as the next preferred route. There appear to be fewer archaeological implications on this route (though we have concerns – see below) and Option 1S is only acceptable to the Prehistoric Society if changes to the siting and positioning of the western portal are addressed including any archaeological effects that may result from any road or tunnel re-design and re-routing.

Option 1N is not acceptable to The Society. This route has the same western portal position as Option 1S but then passes close to and with adverse visual and aural impact on known nationally important Scheduled Ancient Monuments that constitute the Winterbourne Stoke barrow cemetery, the barrows on Winterbourne Stoke Down and the Coniger tumuli. Although not within the WHS, these monuments nevertheless form part of the wider Stonehenge landscape and may be argued to constitute its true western edge. Therefore the potential negative archaeological impact appears greater than for the southern route.

3 Option 1S Concerns

a. The eastern portal as presently proposed would not be visible from Stonehenge itself and utilises the existing route of the current A303 dual carriageway, but it still lies within the area of the WHS. We welcome the commitment to site the eastern portal to the east of The Avenue but it is close to and will have a negative visual and aural impact on the line of the Avenue, Vespasian's Camp and the Mesolithic site at Blick Mead. The Society reserves judgement on the position of this portal until more detailed plans are available and a full understanding of its likely impact has been assessed.

b. The western portal lies to the south-west of Stonehenge and lies directly on the midwinter solisticial alignment as seen from the circle. Although the portal itself does not appear to be visible from the circle, the light pollution from approaching vehicle headlights and any proposed portal streetlighting will negatively impact on the visual experience of the midwinter solstice (the most important alignment at Stonehenge) and it will cause harm to the significance of the Outstanding Universal Value of the WHS. The Society feels that this is unacceptable.

c. The position of the western portal also involves new-build road construction over virgin ground within the WHS and in particular the dry valley to the south of the Winterbourne Stoke barrow cemetery and to the west of the Normanton Down barrow group. This dry valley is of the highest value: the rich burials concentrated almost exclusively along its sides declare the valley to have been the focus of high status interest during the Early Bronze Age. Furthermore, road construction at this point will have a considerable negative visual impact on the Winterbourne Stoke and Normanton Down barrow groups which both share horizon positions from this valley.

4 Recommendations

At the ICOMOS/UNESCO consultation in October 2015, it was recommended by The Society that no part of the tunnel should be visible from or lie within the WHS (NB NOT just Stonehenge) and the Society still maintains this view therefore a longer tunnel is essential to protect the significance and integrity of the WHS.

The western portal must be moved outside the WHS to avoid new-build within an untouched and important area of the WHS. Failure to do so would create a dangerous international precedent in diminishing the importance of the status of World Heritage Sites.

Jet fans (as used on some lengthy Alpine tunnels). should be installed in the elongated tunnel to avoid the need for visually impacting ventilation shafts.

Should Option1 be the only route that will be considered by Government, we wish to be involved in advising on final locations and designs of the portals, and suitable archaeological mitigation of the harm that will accrue to the significance of the WHS, both through archaeological fieldwork and publication, and the wider public benefits of increasing interpretation and understanding through improved public access.

Yours faithfully

Dr Alex Gibson BA PhD FSA FSA(Scot) MCIfA
Hon President
On behalf of the Prehistoric Society

Response ID ANON-BABJ-X6Q3-1

Submitted to **A303 Stonehenge**
Submitted on **2017-02-27 10:09:38**

Introduction

Name

Name:
Alex Gibson

Postcode

Postcode:
BD7 1DP

Email

Email address:
a.m.gibson1@bradford.ac.uk

Postal address

Address:
School of Archaeological Sciences
University of Bradford
Bradford
BD7 1DP

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Prehistoric Society

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Response of the Prehistoric Society
The Prehistoric Society (hereafter 'The Society') promotes the preservation of and research into all aspects of human prehistory. The Society applauds Highways England's intention to improve the visitors' visual experience at Stonehenge by removing the A303 either to the south of the World Heritage Site or via a new tunnel running under the WHS. We also appreciate the infrastructure and congestion issues that the scheme is intended to address. We also respect the aspirations of the National Trust and English Heritage as landowners and custodians of the area. Our response addresses archaeological issues and in particular how the proposals affect the Outstanding Universal Value of the WHS of which Stonehenge and other nationally important Scheduled Ancient Monuments are parts.
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Jet fans (as used on some lengthy Alpine tunnels). should be installed in the elongated tunnel to avoid the need for visually impacting ventilation shafts.
Should Option1 be the only route that will be considered by Government, we wish to be involved in advising on final locations and designs of the portals, and suitable archaeological mitigation of the harm that will accrue to the significance of the WHS, both through archaeological fieldwork and publication, and the wider public benefits of increasing interpretation and understanding through improved public access.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
But with the concerns raised in Q1 response

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
See response in Q1

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
See response to Q1

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

The Ramblers

Response ID ANON-BABJ-X6WT-8

Submitted to **A303 Stonehenge**
Submitted on **2017-02-23 14:48:16**

Introduction

Name

Name:
Tim Lewis

Postcode

Postcode:
SN8 1QJ

Email

Email address:
timwhlewis@gmail.com

Postal address

Address:
Durran House
Beckhampton
Marlborough
SN8 1QJ

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Ramblers

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
The construction of a tunnel would make the whole WHS site much more accessible to all visitors, however we favour the northern bypass of Winterbourne Stoke over the southern one, see below

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
As far as we can see, its siting would not affect any rights of way so we are supportive

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
As with the eastern portal

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The southern bypass goes through a much more attractive and more populated area than the northern one, namely the southern Till valley, and would have a negative effect on two rights of way (byways WSTO4 and 6B), as opposed to three for the southern option (footpaths BSJA6 & 8, and byway BSJA3). It is not

clear what action is proposed to divert or extinguish these rights of way should the bypass proceed, but it appears that at least one of the byways affected by the northern bypass would pass underneath its elevated section and would thus not be affected by it.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
That no rights of way be affected

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
That no rights of way be affected

7. Do you have any other comments?

Q7:
No

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

The Salisbury Museum

Response ID ANON-BABJ-X6P2-Y

Submitted to **A303 Stonehenge**
Submitted on **2017-02-28 17:47:07**

Introduction

Name

Name:
Adrian Green

Postcode

Postcode:
SP1 2EN

Email

Email address:
adriangreen@salisburymuseum.org.uk

Postal address

Address:
The Salisbury Museum
The King's House, 65 The Close

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
The Salisbury Museum

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
We believe the proposals represent the best compromise to achieve the desired outcomes of easing traffic congestion on the A303, improving the setting around Stonehenge, enhancing the local environment and facilitating better access to the South-West. The position of the A303 with regard to Stonehenge, the chronic congestion on the road and the impact this is having on the surrounding environment is a national disgrace (as the visitor facilities were at Stonehenge itself). Any proposals in this highly sensitive landscape will have a negative impact, for example the tunnel is too short and should avoid all of the World Heritage Site, but we believe that the need for change far outweighs these concerns. These proposals, and the funding allocated by government, represent a once-in-a-generation opportunity to gain consensus and move forward.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
The eastern portal appears to be sited to avoid the Avenue and minimise the impact on archaeology within the WHS. The line of the A303 leading up to the portal follows the line of the existing A303 and this is to be welcomed. Clearly further archaeological work needs to be undertaken to fully understand the impact that the portal will have in this location.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to disagree

Please provide any comments to support your answer for question 3:
The western portal appears to open very close to the barrow cemetery at Normanton Down. This includes a series of important early Bronze Age burial mounds including the Bush Barrow. Ideally the tunnel portal would be further to the west beyond the line of the A360 to avoid this sensitive area , but if the tunnel can only be 2.9 kms long and avoid the Avenue to the east of Stonehenge then the western tunnel portal will have to be in this location. The advantage in placing the portal in this area is that it can use the natural drop in the land to avoid it being directly visible from Stonehenge - something that would not be possible on the

current line of the A303. As with the eastern portal more archaeological investigation needs to be done to understand the impact that the tunnel portal will have in this area and what strategies will be used to mitigate this. Our final point here is that there is a concern that the line of the road entering the tunnel will be on the axis for the winter solstice at Stonehenge and lights from cars entering the tunnel at night will pollute the sky in this area. We think this needs to be investigated further.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
The southern of the two routes looks preferable from an archaeological perspective as it keeps the road away from known scheduled archaeological sites including the Coniger Barrow cemetery, Winterbourne Stoke Down Romano-British Village and Winterbourne Stoke East round barrow cemetery and earthwork enclosure on Fore Down. The only negative impact is that the southern route might create some light pollution as the approach to the west tunnel portal aligns with the winter solstice axis at Stonehenge. There may need to be some strategies to mitigate this issue.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The works here should remain on the existing footprint of the road to avoid damaging any adjacent monuments – such as the Ratfyn Barrow in Amesbury.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Neither proposed location appears to be in an archaeologically sensitive area within the WHS. If the southern bypass route is selected it is possible that it will be on the alignment for the winter solstice axis so may present problems in terms of light pollution, plus the junction might be visible on the horizon from Stonehenge. There may need to be some strategies to mitigate these issues. Further work will clarify the situation.

7. Do you have any other comments?

Q7:
Further details about Salisbury Museum

• Founded in 1860.
• The museum has archaeological collections of international importance including many artefacts from Stonehenge and the surrounding landscape. The archaeology collection is Designated by the Arts Council as being of national importance.
• Salisbury Museum is the repository for archaeological finds from the Stonehenge part of the World Heritage Site.
• The museum has provided the majority of finds that are on loan to the Stonehenge Visitor Centre.
• All the archaeological finds generated by the construction works for this scheme will eventually be deposited with Salisbury Museum. The museum will make a charge to offset the costs of the long term storage of this archaeological material.
• Our principal concern is with the preservation of the archaeological landscape.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Please note that the contact details for all correspondence regarding the consultation is the Director of Salisbury Museum:

Adrian Green
The Salisbury Museum
The King's House
65 The Close
Salisbury
SP1 2EN

The Secular Order of Druids

highways england

08 MAR 2017

256

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name: WALLY DEAN, CHOSEN CHIEF of SECULAR ORDER OF DRUIDS BAGGOE

Postcode:

Email: wallysociety@yahoo.co.uk

Postal address: FLAT 1, ABBEYMOUNT, SILVER STREET GLASTONBURY

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? SECULAR ORDER OF DRUIDS

D) A303/A345 Countess junction

This is the first roundabout on the way from London on the A303 and a major bottleneck. We plan to replace this with a new junction that separates the traffic going east-west along the A303 from traffic going north-south along the A345 Countess Road.

The layout of this junction has not been confirmed but it could involve the A303 being carried on a flyover above the existing roundabout.

For more information on this junction please refer to page 39 of the Public Consultation Booklet.

5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?

WILL WATCH WITH INTEREST HOW UGLY IT MAY BE.

E) A303/A360 Longbarrow junction

There would be a new junction located between the existing A360 and Winterbourne Stoke that would separate traffic going east-west along the A303 from traffic going north-south along the A360. It would also connect Winterbourne Stoke to the A360 and the new A303.

The layout of this junction has not been confirmed as its arrangement will be determined by the choice of bypass for Winterbourne Stoke.

For more information on this junction please refer to page 44 of the Public Consultation Booklet.

6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?

THE DESECRATION OF ANCIENT BURIAL GROUNDS. LIGHT POLLUTION
ALSO TUNNEL WILL FUNNEL NOISE OUT IN ONE SPOT.

7. Do you have any other comments?

THERE WILL BE PROTESTS SIMILAR TO TWYFORD DOWN, NEWBURY, AND STANDING ROCK!

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

- Received a letter from Highways England ☐
- Received an email ☐
- Social media (e.g. Facebook or Twitter) ☐
- Newspapers or magazines ☐
- Posters or other outdoor advertising ☐
- TV or radio ☐
- Other online/website sources ☐
- Word-of-mouth ☑
- Local authority ☐
- Other source ☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

WASTE OF TAX PAYERS MONEY

Continued over

B) Western portal

The proposed location for the western portal would be to the south west of Normanton Gorse, putting it out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the western portal please refer to page 42 of the Public Consultation Booklet.

3. To what extent do you agree with our proposed location of the western portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 3

TOO CLOSE TO THE STONES
THE PORTAL HAS BEEN SUGGESTED TO EXIT
IN THE CENTRE OF A BARROW CEMETERY
ALSO LIGHT INTERFERENCE WILL AFFECT
THE MID WINTER SUNSET.
TOTALLY UNEXCEPTABLE!!

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	[ ]
Option 1S– A southern bypass of Winterbourne Stoke	[ ]
No preference	[x]

Please provide any comments to support your answer for Question 4

ANY TUNNEL AVOIDING ROADSCHEME
HAS MY VOTE.

Continued over

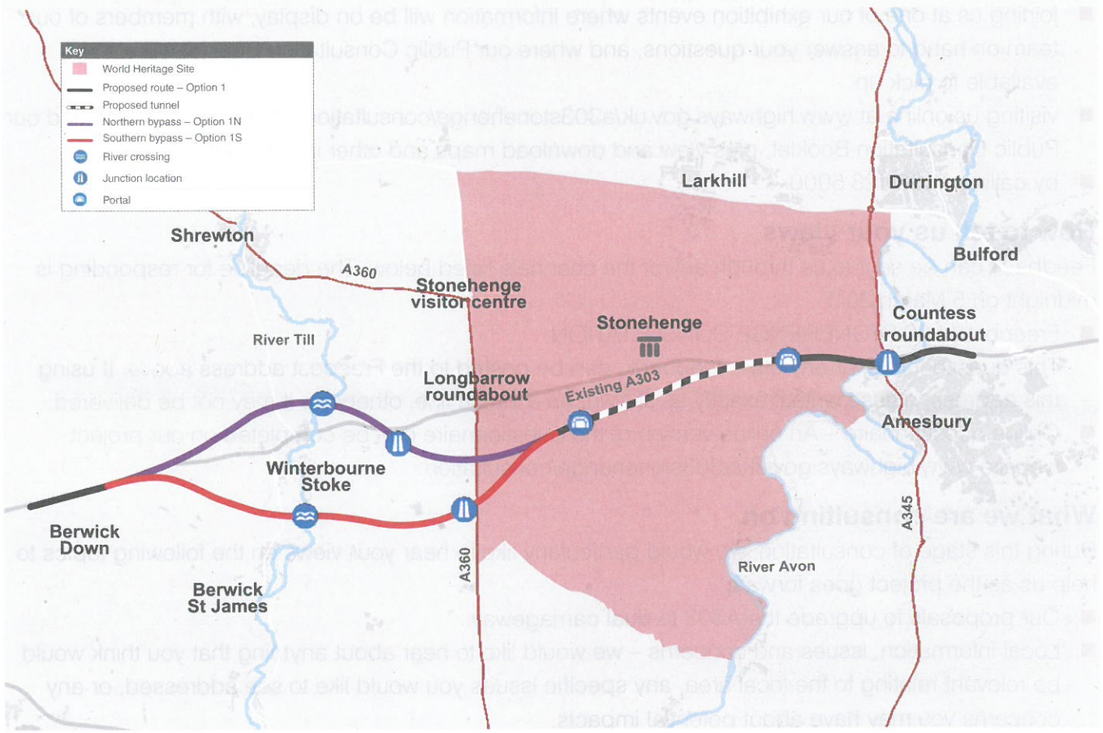
A303 Stonehenge - The proposed option

On the evidence of our assessment to date, we are proposing a route for the A303 Amesbury to Berwick Down scheme that would comprise:

- a 1.8 mile tunnel with approach roads within the Stonehenge, Avebury and Associated Sites World Heritage Site
- a bypass of Winterbourne Stoke either to the north or south of the village
- improvements to the existing junctions between the A303 and the intersecting A345 and A360

For more information on how we arrived at our proposed option please refer to Chapter 6 of the Public Consultation Booklet.

The proposed option is shown on the plan below.



1. To what extent do you agree with our proposed option?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 1

THE SHORT OR LONG OF IT IS.
THAT IT IS UNDERCONSIDERATION THAT THE HIGHWAYS AGENCY BE RESPONSIBLE FOR RIPPING APART A LIVING HISTORIC LANDSCAPE.
THEIR NAMES WILL ENTER HISTORY AS DESECRATORS

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [ ] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [x] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

TOO CLOSE TO BLACKS MEAD WATERTABLE WHICH FEEDS THE SPRING.
WAS RECENTLY PROVEN TO BE THE OLDEST SETTLEMENT FOUND IN UK.

Continued over

Trail Riders Federation (TRF)

Response ID ANON-BABJ-XGWS-R

Submitted to **A303 Stonehenge**
Submitted on **2017-01-30 19:59:05**

Introduction

Name

Name:
Brian Gavin

Postcode

Postcode:
RH18 5BU

Email

Email address:
bjcj.gavin2@hotmail.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
TRF Trail Riders Federation

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
Whatever scheme is approved I would urge you to consider the views of the TRF.I have ridden many of the trails in this area and would like to be able to continue.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Don’t know

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
Pls take note of TRF (Trail Riders Federation) comments.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Trail Riders Federation (TRF) - Oxford

Response ID ANON-BABJ-X6KZ-2

Submitted to **A303 Stonehenge**
Submitted on **2017-03-02 22:38:59**

Introduction

Name

Name:
Ilse Lambert

Postcode

Postcode:
SN8 2LQ

Email

Email address:
pixiepoes@gmail.com

Postal address

Address:
24 Downsmead
Baydon
Marlborough

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
TRF Oxford

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
We agree that the A303 desperately needs to be upgraded to a dual carriageway to ease the traffic congestion in the area, and that Winterbourne Stoke sorely needs a bypass. The proposals address these problems and a tunnel, rather than the widening of the existing A303, would enhance the WHS and benefit vulnerable road users enjoying the WHS.

The consultation document promises to preserve and protect the PROW network - see TAR 8.5.2. However, the proposal to replace the existing A303 through the WHS with a 'green' byway, which cannot be used by motorised vehicles, goes against this promise. It would isolate Byway AMES11 by turning it into a dead-end Byway and disconnect both Byways AMES 12 and 11 from the wider BOAT network in the area.

Moreover, the creation of a 'restricted' green byway through the WHS also goes against Strategic Objective 17 of the Wiltshire Local Transport Plan (i.e. to improve access to Wiltshire's countryside and provide a more useable unlicensed rights of way network). Any proposal for the Stonehenge area should protect the rights of ALL PROW users, not just the non-motorised ones. Extinguishing vehicular rights from existing A303 through the WHS means the loss of an important BOAT link road and limits the BOAT network.

Our main concern is that if the BOAT network becomes disconnected (e.g. through creating dead end Byways, or removing links between Byways), motorcycle trail riders will increasingly be forced onto main roads, increasing the risk of them being involved in traffic incidents. Motorcycle riders are vulnerable road users, already disproportionately represented in collision statistics. If motor vehicle rights are extinguished on the whole length of the A303 in the WHS, trail riders will be compelled to seek an alternative route to connect BOATs, via either the A360 or A345 - both of which have a historically high collision rate, with motorcycle riders in particular having been seriously injured or killed.
This consultation has the opportunity to create a safer BOAT network, but it can just as easily make the Stonehenge area a more dangerous place for trail riders.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
No objections.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
As long as the portal does not negatively affect Byway AMES12, we have no objections to the position of this portal.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
We have no preference either way and believe the best judges as to which bypass would be more beneficial, are the residents of Winterbourne Stoke themselves.

We do hope however that the continuity and integrity of the PROW network will be kept intact. Any rights of way crossing the new bypass should be given adequate infrastructure to ensure a safe crossing by all types of users, appropriate to that kind of PROW.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
None.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
None.

7. Do you have any other comments?

Q7:
The Public Rights of Way network is not limited to non-motorised use only. Your proposal promises to protect the rights of ALL PRoW users. Hopefully you can make the area safer for all of us, including those who use motorised vehicles.
Thank you.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
The whole consultation has been very well presented. All information provided has been very clear and easily available. A job well done.

Trail Riders Fellowship (TRF)

Response ID ANON-BABJ-XGWE-A

Submitted to **A303 Stonehenge**
Submitted on **2017-01-30 19:41:06**

Introduction

Name

Name:
Reuben Alcock

Postcode

Postcode:
BA4 6PL

Email

Email address:
reuben.alcock@btinternet.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Trail Riders Fellowship (TRF)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
As a keen & responsible user of Byways Open To All Traffic (BOATS) with mechanically propelled vehicles (road legal 4x4 & trail motorcycle) I am concerned about the impact the proposal will have on the BOATS surrounding the WHS. I hope the intention is NOT to close these routes, but to concentrate on the A303 itself.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Transwilts Community Interest Company

Response ID ANON-BABJ-XGG4-9

Submitted to **A303 Stonehenge**
Submitted on **2017-01-24 16:30:56**

Introduction

Name

Name:
Paul Johnson

Postcode

Postcode:
SN12 7NY

Email

Email address:
pauljohnson@transwilts.org

Postal address

Address:
Well House Manor
48 Spa Road
Melksham
SN12 7NY

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Transwilts Community Interest Company

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The Option 2 Route Corridor is much preferred to Option 1 tunnel. The southern route has substantial economic benefits not considered in your study, the benefits to the southern Salisbury economy are substantial. Importantly the route corridor F passes between Boscombe Down Airfield and Porton Down Science Park which is a potential future Park & Ride Rail Station site for both congestion relief for Salisbury and a key future rail connection to London. A P&R site at Wilton is already under consideration and the Porton Science Park site is anticipated to provide the second P&R congestion relief site. The A303 route F provides an opportunity to establish a connection with the A388 and accelerate the provision of the Porton P&R Station which will have enormous long term benefit on the Wiltshire economy. The Porton Science Park is key part of the Swindon and Wiltshire Local Enterprise economic plan and construction has started.
The cost savings in Option 2 can be partially invested in an architecturally outstanding and attractive crossing of the River Avon in the Woodford Valley.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
The Option 2 Route Corridor F provides junctions with A360, A345, A338 to feed access to Salisbury. We want benefits of visitors TO Wiltshire as well as expediting visitors THROUGH Wiltshire to the SW economy. The southern route supports visitors to Stonehenge, the proposed Artillery Museum at Larkhill and the Magna Carta in Salisbury City Cathedral, as well as travelling to Southampton and the coast.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Travel Watch South West CIC

Response ID ANON-BABJ-X3S7-4

Submitted to **A303 Stonehenge**
Submitted on **2017-03-05 16:43:38**

Introduction

Name

Name:
Bryony Chetwode

Postcode

Postcode:
DT7 3RN

Email

Email address:
secretary@travelwatchsouthwest.org

Postal address

Address:
South Watch
Harcombe
Lyme Regis
Dorset
DT7 3RN

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
TravelWatch SouthWest CIC

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to disagree

Please provide any comments to support your answer for question 1:

Consultation Response
The TravelWatch SouthWest Response to the A303 Stonehenge Amesbury to Berwick Down Consultation

5 March 2017

TravelWatch SouthWest
Response to the A303 Stonehenge Amesbury to Berwick Down consultation, March 2017

TRAVELWATCH SOUTHWEST CIC
TravelWatch SouthWest was established in 2001 as The South West Public Transport Users' Forum (SWPTUF) to promote the interests of public transport users in the South West of England (comprising the counties of Devon, Dorset, Gloucestershire and Somerset and the unitary authorities of Bath and North East Somerset, Bournemouth, Bristol, Cornwall, North Somerset, Plymouth, Poole, South Gloucestershire, Swindon, Torbay and Wiltshire) - the Forum became a Community Interest Company, limited by guarantee, in August 2005. SWPTUF adopted the trading name of TravelWatch SouthWest in June 2006 and the Community Interest Company changed name to TravelWatch SouthWest CIC in November 2008.

Membership of the TravelWatch SouthWest CIC is open to every 'not-for-profit' organisation in the South West of England whose sole or principal purpose is to represent the users of any public transport service or to promote the development of public transport services - membership is also open to other 'not-for-profit' organisations' in the South West England who represent the interests of particular groups of public transport users e.g. the disabled or the elderly. TWSW currently has over one hundred affiliated organisations.

TWSW, which is a social enterprise company, acts as an advocate for passengers to lobby for the improvement of public transport in the region and works closely with local authorities, local enterprise partnerships, business organisations and other stakeholder groups - with the dissolution of the former Rail Passengers Committee for Western England in July 2005, TWSW is the representative body for public transport users throughout the South West of England.

TWSW response to the A303 Stonehenge tunnel proposals

Travelwatch South West supports the aim to reduce congestion and improve safety on key routes to the South West.
It is aware of the need to improve connectivity to and from the SW, and accepts that the plans for the A303, to create an “expressway” would eliminate the changes from dual carriageway to single, and thus reduce the congestion experienced at the existing pinch points. It will also increase the overall capacity of the route.

Figures presented to the Taunton based preliminary consultations in 2015/16 predict that dualling the A303 to standards of the envisaged expressway will cause at least a 20% increase in traffic, with some local increases up to 40%.

The A303 serves a number of purposes:
(a) local connections for the predominantly rural area around the Stonehenge World Heritage site
(b) medium distance journeys between Yeovil/Salisbury to the west and Andover/ Basingstoke to the east
(c) a longer distance route from Exeter/Taunton to the London area
This scheme addresses the issues associated with (c) above, and to a certain extent is designed to relieve local “rat running”.

It is not clear, however, how the new road will meet the needs of the local economy and address the constraints that the A303 already creates for the provision of local access and dependable public transport services. We fear that the reduction of crossing points in the interests of safety on the expressway will have potential for further disruption of local links.

We draw particular attention to those bus routes operating on a north-south axis

For example: Wilts & Dorset’s X2 service between Devizes & Salisbury at Winterbourne Stoke;
Wilts & Dorset’s X4 and X5 services between Larkhill/Bulford and Salisbury and between Swindon
& Salisbury respectively in the vicinity of Durrington Totterdown, and the high frequency services between Andover & Salisbury that are jointly operated by Stagecoach and Wilts & Dorset, again in the vicinity of Durrington Totterdown.
As such it will not encourage alternatives to the private car.

We have particular concerns about the impact on existing rural businesses and activities: for example the southern route offered much improved potential for access to Porton Science Park: along with a Park and Ride there for Salisbury, with connection to the Boeing development at Boscombe Down. \these would be examples of wider benefits for local businesses and communities.

There is no doubt of the importance of the Stonehenge site in its downland setting for attracting tourists and related businesses, and any damage to the site, and to the overall setting and atmosphere is damage not only to our obligations under the UN designation, but also to these local rural business activities.
The tunnel as proposed will begin and end within the internationally designated World Heritage site, and will require extensive earth moving and engineering processes in areas where new archaeology is constantly being found.
We are concerned that no details are shown of the lighting and information gantries that will be associated with this route upgrade. There should be more information prepared for any consultation to enable wider awareness of the changes to the local landscape that this will entail

In summary, while accepting that improved travel options are desirable for the far south west, we have concerns that this expensive proposal will not improve economic and social well-being as it is envisaged, and that the value for money exhibited is fragile.
We commend a holistic transport approach to the needs of the far south west, specifically a major upgrade for the parallel rail route from Exeter and Salisbury with provision of adequate and attractive parking at railheads along the route to encourage optimised inter-modal travel, connectivity to the principal airports, and better alternatives to the use of the private car
To this end we are also aware of the scope for the DfT to ensure that the new SW Rail Franchise, due to start later this year (2017) is designed to enable the Exeter-Salisbury-London route to alleviate the additional pressures on the strategic network that will be created during the enhancements envisages for the A303, M3 and M4 over the next decade.

We support the government's aims of improving opportunities for access within a healthy economy while reducing damaging emissions and protecting the World Heritage site. However we have some concern that without consideration of alternative provision, as recommended above, this proposal could be damaging to these essential policies.

Vinita Nawathe 5 March 2017

Chair, TravelWatch SouthWest CIC
secretary@travelwatchsouthwest.org

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to disagree

Please provide any comments to support your answer for question 2:
Please see earlier comments supplied in answer to Question 1

3. To what extent do you agree with our proposed locationof the western portal?

Tend to disagree

Please provide any comments to support your answer for question 3:
Please see earlier comments supplied in answer to Question 1

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
Please see earlier comments supplied in answer to Question 1

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Creating ease of traffic for public transport passengers and further information Please seen in earlier comments supplied in answer to Question 1

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Please see earlier comments supplied in answer to Question 1 and a desire to see road investment obviate difficulties for public transport users and operators.

7. Do you have any other comments?

Q7:
Yes. I again refer you to our comments in question 1.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

TV or radio

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Yes, Thank you for involving TWSW - we would like to be involved in interdisciplinary meetings in future, where regional connectivity is considered together with social and economic patterns of strain and future development. A wider regional spatial strategy.

Trf

Response ID ANON-BABJ-X6Z4-B

Submitted to **A303 Stonehenge**
Submitted on **2017-03-02 23:14:19**

Introduction

Name

Name:
Emmett b

Postcode

Postcode:
Sw61ds

Email

Email address:
Emmettburje01@yahoo.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Trf

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
Any restristion on our rights to freedom of movement we object to strongly.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
Strongly disagree

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
Same

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
That no restristion on common byways are changed

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Access for byway users nainted

7. Do you have any other comments?

Q7:
Yes we were born to ride & would like more choices other than flavours of ice cream!

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

University of Buckingham and Blick Mead Project

Response ID ANON-BABJ-XGD2-4

Submitted to **A303 Stonehenge**
Submitted on **2017-02-07 13:10:19**

Introduction

Name

Name:
Professor David Jacques

Postcode

Postcode:
cb7 4bl

Email

Email address:
david.jacques@buckingham.ac.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
University of Buckingham and Blick Mead Project

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
1) Hydrology isn't mentioned
2) Blick Mead isn't mentioned
3) Mesolithic isn't mentioned
4) Visual and other impacts on Vespasian's Camp, Blick Mead and Amesbury Abbey are not mentioned

As a result the proposals are ill informed at present.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Strongly disagree

Please provide any comments to support your answer for question 2:
The eastern portal lies close to Vespasian's Camp. No visual impacts have been made from the Camp's nationally important western side which contains exceptionally well preserved Iron Age ramparts.

The proposals for a flyover/embankment at Countess roundabout needed to carry traffic to the tunnel are ill thought out at present. They do not mention the long term Mesolithic and transitional Mesolithic/Neolithic site at Blick Mead which has a sequence of 18 radio carbon dates dating from the late 8th millennium BC to the mid 4th and is situated close to Countess and on the short route to the eastern portal. The organics there will be crucial for later dating and appreciation of the World Heritage Site.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
I'm aware from colleagues (Josh Pollard, Mike Heyworth) that other archaeology teams have major concerns about Neolithic and Bronze Age archaeology being vulnerable at the western end.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
1) Protecting the nationally important site at Blick Mead, ascertaining how far it spreads in this area and protecting that too.
2) Hydrology needs to be stringently assessed.
3) Concerned that HE time frame is too short for this assessment work to be properly undertaken.
4) Concern that the budget for the tunnel will not be able to accommodate extra costs like this and the assessment work will not be properly done.
5) Showing respect to the local community of Amesbury who have helped the Blick Mead dig effort so much and who have planning permission for a new History Centre that will be key to the town's regeneration

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
1) To provide a balanced 'for and against' argument. At the moment HE is spending too much time selling one pov. It seems to be putting all its energies into getting the result it wants.

7. Do you have any other comments?

Q7:
This month's (Feb 2017) article on Blick Mead in 'Current Archaeology Magazine' sums up the results and discoveries at the site and their significance for the Stonehenge World Heritage site therein see - https://reader.exacteditions.com/issues/55158/spread/18

Our joint letter to the Times about the tunnel infrastructure at the at the eastern end posing a threat to the archaeology in and around Blick Mead wa picked up by the Times editorial see - http://www.thetimes.co.uk/article/ancient-v-modern-6blhnbpzh

The signatories to it were Professor Nick Branch (Reading University), Dr Barry Bishop (Lithics Society), Professor Tony Brown (Southampton University), Professor Vince Gaffney (Bradford University and British director of the Stonehenge Hidden Landscapes Project), and Professor Peter Rowley-Conwy (Durham University).

We have specific concerns about how the hydrology will be measured in and around the Blick Mead basin, how far that measuring will be undertaken, who will be doing it and what the time scale for doing it will be.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
1) You have put more energy into getting the result you want than consulting and listening.
2) It is regrettable that the local landowners at Blick Mead have not been consulted about visual impacts.
3) The radio advertisments for HE are not balanced and are incessant!
4) The Blick Mead project should have had stakeholder status and it hasn't.
5) You should not be so defensive, stops the 'sales pitch', and instead properly engage and communicate better.
6) You should explain to the public that you are putting in evaluation trenches rather than trying to cover that up. Don't treat people like fools.
7) It needed to be made clearer that this process will go on for longer than the now 3 weeks deadline.

Vale Coaches

Response ID ANON-BABJ-X6EK-D

Submitted to **A303 Stonehenge**
Submitted on **2017-02-26 11:42:13**

Introduction

Name

Name:
Mark young

Postcode

Postcode:
DT10 2PY

Email

Email address:
markandrewyoung@btinternet.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Vale Coaches

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Neither agree nor disagree

Please provide any comments to support your answer for question 1:
The hold ups at Stonehenge are due to the roundabouts at either end, the new roundabout that was altered has not worked, I believe roundabouts are to keep traffic flowing so why put traffic lights on them ?
Surely if a flyover was put at the westbound end for the visitors centre the traffic would flow straight through, and remove the traffic lights on countess roundabout the A303 would run freely in both directions ?

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Neither agree nor disagree

Please provide any comments to support your answer for question 2:
As a trial would it be suggestible to put hedge row or screen to block cars view of Stonehenge

3. To what extent do you agree with our proposed locationof the western portal?

Not Answered

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Letting the traffic flow e.g. No traffic lights

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Social media (e.g. Facebook or Twitter)

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Wadworth and Co Ltd

Response ID ANON-BABJ-XGKR-B

Submitted to **A303 Stonehenge**
Submitted on **2017-02-15 10:42:48**

Introduction

Name

Name:
Charles Bartholomew

Postcode

Postcode:
SN101SP

Email

Email address:
cjeb@wadworth.co.uk

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wadworth and Co Ltd

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
We own a pub in the beautiful village of Berwick St James.
We believe the Southern route would have a very negative affect on the village and our pub The Boot Inn.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:
The Northern By pass of Winterbourne Stoke would be less invasive to the villages of Winterbourne Stoke and Berwick St James .

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Waves training Solutions

highways england

501

14 JAN 2017

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

More information about the consultation can be found by:

- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123 5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name: LOUISE WHITINGS

Postcode: SP3 4TF

Email: familywhiting73@gmail.com

Postal address

This is optional but providing your email or postal address will allow us to update you with any news on this consultation.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? WAVEI TRAINING SOLUTIONS + SCOTTWOOD LOCAL FARM PARTNERSHIP

Please provide any comments to support your answer for Question 1

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	☐
Option 1S– A southern bypass of Winterbourne Stoke	☑
No preference	☐

Please provide any comments to support your answer for Question 4

LIVING at SPRUTT - the NORTHERN ROUTE EFFECTS US ~~NOT~~ THE MOST.

IT IS A WONDERFUL VIEW THAT THE NORTHERN ROUTES GOES THROUGH AND THIS WILL BE EFFECTED.

I BELIEVE THE SOUTHERN ROUTE AFFECTS LESS People than the NORTHERN ROUTE - IT DOES NOT GO NEAR PROPERTY AS THE NORTHERN ROUTE DOES.

IT IS HIDDEN MORE ON THE SOUTHERN ROUTE

7. Do you have any other comments?

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☑
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☑
Posters or other outdoor advertising	☐
TV or radio	☑
Other online/website sources	☐
Word-of-mouth	☑
Local authority	☐
Other source VILLAGE	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

I THINK THE MAPS, THE INTERACTIVE MAPS + ALLOWS TO SEE WAS FANTASTIC ALLOWING ELEMENT TO BE FULLY INFORMED

West Amesbury Residents Group

Response ID ANON-BABJ-X8ZW-G

Submitted to **A303 Stonehenge**
Submitted on **2017-01-23 16:28:13**

Introduction

Name

Name:
Mr David Horne

Postcode

Postcode:
SP4 7BH

Email

Email address:
davidhorne194@btinternet.com

Postal address

Address:
Half Acre
West Amesbury
Salisbury
Wiltshire
SP4 7BH

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
West Amesbury Residents Group

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:
So much money has been spent over 20 years or so with nothing actually being achieved and it is time for reaching a solution that will get something done towards alleviating the traffic problem rather than consulting and talking about it whilst the problems become significantly worse day by day.

However, this needs to be considered in its overall context - that of the whole of the World Heritage Site as a single entity and not just the immediate periphery of Stonehenge.

In this regard Highways England need to consider all vehicular access/egress points affecting the WHS and not just the Trunk and Main Roads falling within their remit. Overall responsibility surely rests with the ultimate Authority.

Our specific concern is that of C42 between Amesbury and Salisbury - a very busy minor road, a National Cycle Route giving access to the whole of the WHS Southern Boundary, and being abused by heavy traffic for which it is wholly unsuited. The "Authority" - Wiltshire Council - appear to be blinded to any practical solutions because of "lack of money" but the current traffic problems and future prospects (if nothing is done) look very grim indeed.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:
The Portal concept design should be in keeping and that on Page 43 top line third from left with grass embankments would be favoured.

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:
Consistent with our thoughts on Eastern Portal.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Tends to take traffic furthest away from Stonehenge immediate environs but questions of design and construction costs?

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Both roads need to be free flowing and a flyover would appear to be most appropriate. We as Residents will have to connect to A303(W) at this junction but a small price to pay for the relief from heavy traffic using Church Street, Stonehenge Road and the feeder road on to A303 as at present.

However, C42 is currently being used as a "relief road" from both A345 and A360 at various times and there is significant concern that this is unlikely to improve even with the Tunnel - both during and after it construction. We need weight and width restrictions in addition to strictly enforceable speed limits.

You will note from Figure 7 on Page 37 that West Amesbury is the actual co Site of "The Avenue's" riverside starting point where it then shortly crosses over C42 itself.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Through passage in both directions via bridge(s)/underpass.

7. Do you have any other comments?

Q7:
Please address issues with C42. I would be available for discussion regarding details of our concerns relative thereto.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
I have been unable to attend. Hard Copy brochure received and much appreciated.

Wilton Fly Fishing Club

highways england

22 FEB 2017 1847

A303 Stonehenge questionnaire

Highways England is consulting at an early stage on options to upgrade the A303 between Amesbury and Berwick Down, past Stonehenge, to dual carriageway. This form is to help you give us feedback on our proposals during our public consultation. The deadline for responses to this consultation is 5 March 2017.

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- joining us at one of our exhibition events where information will be on display, with members of our team on hand to answer your questions, and where our Public Consultation Booklet will also be available to pick up
- visiting us online at www.highways.gov.uk/a303stonehenge/consultation where you can also find our Public Consultation Booklet, plus view and download maps and other information
- by calling 0300 123.5000.

How to tell us your views

Feedback can be sent to us through any of the channels listed below. The deadline for responding is midnight on 5 March 2017.

- Freepost A303 STONEHENGE CONSULTATION.
  This questionnaire, or any other feedback, can be posted to the Freepost address above. If using this address, please write it exactly as shown, on a single line, otherwise it may not be delivered.
- Online questionnaire – An online version of the questionnaire can be completed on our project website www.highways.gov.uk/a303stonehenge/consultation.

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- Our proposals to upgrade the A303 to dual carriageway.
- Local information, issues and concerns – we would like to hear about anything that you think would be relevant relating to the local area, any specific issues you would like to see addressed, or any concerns you may have about potential impacts.

About you

Name	ADRIAN SIMMONS
Postcode	SP2 0PG
Email	riverkeeper@tiscali.co.uk
Postal address *This is optional but providing your email or postal address will allow us to update you with any news on this consultation.*	Keeper's Cottage, Manor Farm Lane, Great Wishford, Salisbury, Wiltshire.

Are you responding on behalf of an organisation? ☑ Yes ☐ No

If yes, which organisation? WILTON FLY FISHING CLUB.

Please provide any comments to support your answer for Question 1

I only agree with the proposed option if the Winterbourne Stoke By Pass is the NORTHERN OPTION

See Q4 Page 5.

Key features of the proposed option

A key feature of the proposed option is the location of the tunnel portals. Our assessment has identified indicative locations for the portals.

A) Eastern portal

The proposed location for the eastern portal would be to the east of King Barrow Ridge and where the line of The Avenue crosses the existing A303, ensuring the portal is out of sight from Stonehenge.

For more information on how we arrived at the proposed location of the eastern portal please refer to page 41 of the Public Consultation Booklet.

2. To what extent do you agree with our proposed location of the eastern portal?

- [x] Strongly agree
- [ ] Tend to agree
- [ ] Neither agree nor disagree
- [ ] Tend to disagree
- [ ] Strongly disagree
- [ ] Don't know

Please provide any comments to support your answer for Question 2

C) Winterbourne Stoke bypass

The village of Winterbourne Stoke is cut in two by the A303. Our proposed option includes two possible routes for the bypass; to the north (Option 1N) or to the south (Option 1S) of the village.

For more information on the two possible routes for the bypass please refer to page 45 of the Public Consultation Booklet.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

(please indicate your preference with a X)

Option 1N – A northern bypass of Winterbourne Stoke	[X]
Option 1S– A southern bypass of Winterbourne Stoke	[ ]
No preference	[ ]

Please provide any comments to support your answer for Question 4

The River Till is only a 'Winterbourne' upstream of the A303 so any impact on it and the more limited wildlife that it supports is far less than the SOUTHERN ROUTE. The River Till is dry for more than 6 months of the year North of Winterbourne Stoke. In contrast South of W/S there is more permanent flow through habitat rich water meadows + wet woodlands.
The Northern Route only passes over Grazing meadows which are far less 'Bio-Diverse'. Also W/Stoke will still benefit even if the by Pass is the Northern Route. By Contrast Berwick St James will be ruined by noise + visual impact as well as the public paths in the area and profuse wildlife

7. Do you have any other comments?

Great consideration is being given to Archeology and Stonehenge etc but some thought is now due to the 'Present' members of the Human Race!

8. Feedback on this consultation

How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England	☐
Received an email	☐
Social media (e.g. Facebook or Twitter)	☐
Newspapers or magazines	☐
Posters or other outdoor advertising	☐
TV or radio	☐
Other online/website sources	☑
Word-of-mouth	☑
Local authority	☐
Other source	☐

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Yes the open consultation at Manor Barn, Winterbourne Stoke on 27th Jan was very good with lots of info & helpful staff.

Response ID ANON-BABJ-XGM5-G

Submitted to **A303 Stonehenge**
Submitted on **2017-02-02 11:38:07**

Introduction

Name

Name:
Robert Male

Postcode

Postcode:
SP2 0DY

Email

Email address:
rmale123@virginmedia.com

Postal address

Address:
24 Victoria Road Wilton Wiltshire
SP2 0DY

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wilton Fly Fishing Club

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Tend to agree

Please provide any comments to support your answer for question 1:

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to agree

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Tend to agree

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1N – a northern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
I am writing on behalf of the Wilton Fly Fishing Club, which has fishing rights on the River Till, and a strong interest in the ecological and amenity value of the river.

The river Till north of the village is a true winterbourne and is dry for up to half the year. The local ecology, while it is distinctive and valuable, is much restricted by the lack of permanent water. Birds such as heron, water rail, little grebe and kingfisher are not resident in this area, nor are water voles and many invertebrate species that require permanent water. The riparian plant community is similarly restricted, particularly where cattle graze the water meadows.
I have heard of a plan by the Environment Agency to restore the river channel upstream of the existing A303, but am not sure if this will happen.
The amenity value of the northern valley is limited – there is little public access and few footpaths, and much of the land is intensively farmed.

By contrast the valley south of Winterbourne Stoke has permanent water for most of its length in most years. (Please see the attached data from Wessex water). Its local ecology is notably diverse and many riparian and associated species are resident and breeding. The river holds rare species including the brook lamprey and Desmoulin's Whorl snail. The valley is part of the Salisbury Plain SSSI and also a Special Area of Conservation.
Local anglers, the Environment Agency and the Wild Trout Trust continue to carry out improvement work on the river channel and banks, increasing the abundance and diversity of species, and the value of the river as a salmonid spawning stream. Brown trout and Salmon ascend the Till regularly to spawn, and any risk to water quality (e.g. from road runoff and drainage) would be a serious setback.
The amenity value of the southern valley is higher, as there is better access for recreational activities and many local people and visitors enjoy this peaceful and varied little landscape. The proposed by-pass would be intrusive both visually and through inevitable noise.
A Northern routing would minimise these possible detrimental impacts.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
Improved traffic flow.
Consideration of cycle traffic.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
Improved traffic flow.
Consideration of cycle traffic.

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Word-of-mouth

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
The public consultation meeting at Winterbourne Stoke was well organised and valuable.
The Photo impressions and videos of the proposed structures were very useful.

Wiltshire Archaeological & Natural History Society (WANHS)

Response ID ANON-BABJ-X3GW-R

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 21:33:30**

Introduction

Name

Name:
David Dawson

Postcode

Postcode:
SN10 1NS

Email

Email address:
david.dawson@wiltshiremuseum.org.uk

Postal address

Address:
Wiltshire Museum
41 Long Street
Devizes
SN10 1NS

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wiltshire Archaeological and Natural History Society

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
No, we do not agree with the proposed option. Our preferred option would be the surface route south of the WHS (Option 2 Route F10). This would maximise the benefits to the WHS through the removal of the trunk road and associated traffic and in doing so would have minimal impact on the archaeology of the WHS. Importantly, it would alleviate three of our concerns ie that severance of the northern and southern parts of the Stonehenge landscape should be avoided, that the setting of the barrow cemeteries should be improved and that there will be access and circulation to key archaeological sites in the WHS. It is also a distinctly cheaper option with a major cost saving (estimated £500m).
We recognise that this option would have negative impacts elsewhere including on the open landscape which forms part of the setting of the WHS. Inevitably the area through which Option 2 passes has not been subjected to the same amount of archaeological research and survey and it is highly likely that significant archaeological and environmental impacts would be identified along the route.
If Option 2 were to be selected after this consultation, then we would expect detailed studies and impact assessments to be completed and a new consultation opened on the details of this scheme.
The remainder of this response are comments on Option 1 which, as indicated, we do not agree.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Tend to disagree

Please provide any comments to support your answer for question 2:
No. We would prefer the portal to be located outside the WHS.
We welcome, however, the location of the portal being to the east of the Avenue, allowing the re-connection of this important route at a future date. We note that there is an archaeological assessment currently under way and that the results are not available at the time of writing. However, it would appear that the location of the portal has been chosen to minimise archaeological impact. We would expect a detailed study on local hydrology to inform the detailed design stage to ensure that there is no impact on water-logged deposits alongside the River Avon. There are sensitive peat deposits in the valley of the River Avon as well as important Mesolithic sites, including Blick Mead. There is a danger that the location of the portal will seriously affect the setting of the Park of Amesbury Abbey

and the Nile Clumps. The detailed design of the portal must seek to avoid impact on this historic landscape.

3. To what extent do you agree with our proposed locationof the western portal?

Strongly disagree

Please provide any comments to support your answer for question 3:
No, we do not agree with the proposed location of the western portal. This is a highly sensitive location within the World Heritage Site.
The maps provided in the consultation documentation do not adequately show the extent of the Normanton Down barrow cemetery. Several of the most important barrows, including Bush Barrow, lie outside the marked area and there are several barrows within Normanton Gorse. This downplays the impact of the portal on the barrow cemetery.
Normanton Gorse, as an area of woodland, is a relatively recent feature within the Stonehenge landscape. While it may screen the portal now, the woodland may be cleared at a future date, leaving the portal without suitable screening.
We note that geophysical survey or evaluation has not been carried out around Normanton Gorse or to the east of the wood known as the Diamond. The find of a Saxon spearhead close to the portal location suggests that there could be either a Saxon cemetery or secondary burials in an un-located Bronze Age barrow. Substantial Saxon cemeteries have been difficult to locate using geophysics in advance of development at sites at Bulford and Tidworth.
The portal location is close to the RSPB stone curlew reserve on Normanton Down and there is a risk of disruption to nesting birds.
The portal location is close to the alignment of the winter solstice when seen from the Avenue and Stonehenge as well as being overlooked by the Sun barrow which is seen as an axial marker. Similarly, the proposed junction with the A360 is on this alignment. While we welcome the commitment to ensure that there is no surface lighting at the portal, there is a risk to dark skies within the WHS, particularly at the A360 junction. Astronomical alignments form part of the Outstanding Universal Value of the WHS recognised by UNESCO. The introduction of a dual carriageway in this section of the Stonehenge landscape would have substantial negative impacts. It is important that the open southern approach to the WHS is preserved as well as the open landscape between the remarkably well-preserved Lake and Winterbourne Stoke barrow cemeteries. Both of these cemeteries were formed around important long barrows and there are a further five within sight of the proposed location of the western portal. This is an unprecedented number of long barrows and reflects the importance of this area in the Neolithic period. The presence of important round barrow cemeteries, including that on Normanton Down, indicates that the significance of the area continued throughout the Bronze Age.
As a result, we feel that the portal should be located further to the west of the proposed location. We would prefer the portal to be located outside the WHS, but recommend that the portal should be located to the west of the linear boundary ditch that runs to the south east of the Longbarrow roundabout (SU105413 to SU105405) and forms the western edge of the Diamond plantation. The construction of a portal and road to the west of this area would require complete excavation including of topsoil in advance of the destruction of a section of important but levelled Bronze Age field systems. These are likely to incorporate settlement evidence contemporary with the later phase of Stonehenge. This would provide an opportunity to understand more about the archaeology of this part of the landscape but it should not be taken lightly.
We note that the longer the length of the tunnel, the more likely it is that ventilation shafts would be required. It is unlikely that an acceptable location and design for an obtrusive ventilation shaft could be found between Kings Barrow Ridge and Normanton Down. This factor may be key for deciding the length of the tunnel. It is essential that the tunnel is bored from the eastern portal to at least beyond Normanton Down, but this may not be necessary for an extended covered section to the west of this area, subject to possible disturbance to nesting stone curlews and archaeology located in this area.

Parts of the proposed route west of Normanton Down are shown as on an embankment. While this may preserve archaeology by burying it, it will add a visually intrusive element to the landscape which is contrary to one of our key principles noted above. An embanked road will be an invasive and unwelcome addition to the landscape.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Option 1S– a southern bypass of Winterbourne Stoke

Please provide any comments to support your answer for Question 4:
Our initial view is that we prefer the southern of the two routes (1S). This would minimise the impact on open landscape and the SSSI at Parsonage Down. It will also minimise impact on known archaeology, particularly the Iron Age and Roman settlements to the north of Winterbourne Stoke and the visual impact on the Conygar Barrow cemetery.

However, this route would require a junction between the A303 and A360 to the south of the Longbarrow junction and our comments on question 6 are relevant here. If this junction were to prove to be problematic, then we would recommend the northern route (1N).

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
The junction should maximise the use of existing disturbed area and minimise the introduction of new embankments. It is important to preserve the setting of nearby monuments such as Ratfyn barrow and Vespasian's Camp. The consultation document mentions the junction at Solstice Park. The area around this, particularly to the north and west, is archaeologically sensitive and so only the existing road network should be utilised.
We would expect a detailed study on local hydrology to inform the detailed design stage to ensure that there is no impact on water-logged deposits alongside the River Avon.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
If the southerly option (IS) is chosen, then the proposed location for this junction lies on the Winter solstice sunset alignment (see comments on question 3). At this location traffic heading east along the A303 would be facing directly at Stonehenge, with the danger of headlights being visible at the monument and the junction being visible on the horizon. The proposed layout appears to indicate that sections of the road and the junction will be raised above present ground level which increases the possibility of light pollution.
At this stage there is not enough information presented to understand what the impact of the junction might be. If the impacts are significant, then this would

present a very strong justification for selecting the northerly route for the bypass (option 1N).

7. Do you have any other comments?

Q7:
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

Our response
This response has been drafted by a working group established by our Board of Trustees. A draft of this document was circulated to all members and updated following their responses. The final version of this response has been agreed by the Board of Trustees.

Key Principles and Issues
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 with the WHS landscape

Archaeological Archives
Archaeological stores in museums in Wiltshire are currently full and there is a backlog of at least 2,500 boxes of archives from developer-funded sites. This backlog includes archives from previous excavations linked to the A303. We and Salisbury Museum are working in partnership with Wiltshire Council to find a solution to this issue. Any road scheme must include provision for the full costs of long-term archaeological storage of archives resulting from excavation and survey.

General Comments
We welcome the commitment of the Government to:-
• Unite the two parts of the Stonehenge landscape divided by the A303
• Take the historic environment, including archaeology, into account
• Conduct an open consultation process
• Allocate substantial funding
Our views, set out in this document, relate to cultural heritage and environment and do not address other issues.
We note that the results of recent and on-going evaluations such as those close to the proposed location of both the eastern and western portal are not yet available to us and were not available to Highways England at the point when the decision of the preferred route was taken. It is therefore premature to be proposing portal locations in advance of the results of this work being available. We would welcome confirmation that the results of all the latest research in the Stonehenge landscape have been taken into account, including the leading-edge geophysics research of the Stonehenge Hidden Landscape project. We would expect this to include an assessment of the extent to which archaeology survives below layers of colluvium, particularly in dry valleys in the chalk.
We note that there are a number of areas where details are not available at this stage, including the design of road junctions and the location of working areas that could have substantial impacts.
The route of the A303 is itself part of the historic environment and its line should be preserved, perhaps as a right of way, and including milestones and other historic features.

In summary, the Wiltshire Archaeological and Natural History Society feels that Southern Route (Option 2) is the best option to preserve and enhance the Outstanding Universal Value of the Stonehenge part of the World Heritage Site. In response to the proposal for tunnelling the A303 past Stonehenge (Option 1), we have offered significant and constructive suggestions to mitigate the impact of scheme on the WHS. We look forward to commenting further as the scheme evolves.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received a letter from Highways England

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Wiltshire Fishery Association

Response ID ANON-BABJ-X62N-W

Submitted to **A303 Stonehenge**
Submitted on **2017-02-28 12:52:32**

Introduction

Name

Name:
Tom Davis

Postcode

Postcode:
SP11 8BE

Email

Email address:
Tom.Davis@redsedge.com

Postal address

Address:

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wiltshire Fishery Assocation

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Not Answered

Please provide any comments to support your answer for question 1:
Our comments are confined to the question of the two options for the Winterbourne Stoke bypass. Please proceed to that section.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Not Answered

Please provide any comments to support your answer for question 2:

3. To what extent do you agree with our proposed locationof the western portal?

Not Answered

Please provide any comments to support your answer for question 3:

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

Not Answered

Please provide any comments to support your answer for Question 4:
We have strong reservations against Option 1S , the southern bypass for the following reasons.
1) Option 1S would have significantly greater negative impact on the River Till (Hampshire Avon) SAC and SSSI, than Option 1N. The length of SAC/SSSI crossed and therefore directly impacted is approximately 4 times that of the northern route Option 1N since the SAC/SSSI is much wider where the route crosses it. The 1S alignment crosses the river at a point well below the perennial head (the most downstream point to which the winterbourne normally dries), where water is present all year round and where biodiversity and richness of both aquatic and riparian habitat is much greater. Atlantic salmon (one of the six features of designation of the Avon SAC) have been known to spawn here, and native Brown Trout which are a BAP (Biodiversity Action Plan) species, routinely come here to spawn every winter. In contrast, the point at which the northern route Option 1N crosses the River Till is well above the perennial head and the river bed is dry for 6 months of the year or more. Here the biodiversity and richness of both aquatic and riparian habitat is much poorer. Both mammal (including otter and water vole), and bird populations are much higher in the southern perennial part of the River Till than they are in the drying reaches to the north of the current A303.

2) The Alignment of Option 1N does pass fairly close to the southernmost boundary of the Parsonage Down National Nature Reserve. However Parsonage Down is in a seriously degraded state due to poor management, and in any case the majority of the Reserve slopes away to the north and would therefore be protected from noise and visual impact from the road. Furthermore the River Till (Avon) SAC which would be badly impacted by the alternative Option 1S carries a much higher status in terms of protection priority.
3) Option 1S would have a significantly greater negative impact upon the landscape character and amenity through noise and the visual impact of the viaduct and embankments than would the northern route 1N. From a personal perspective it would ruin the ambience of one of the few remaining quiet and peaceful valleys in the area which is regularly fished and walked for recreation. In contrast the location of the Option 1N alignment is already impacted by the existing A303 and is above the highest point at which the river is fished.
4) The Highways Agency staff I met at the consultation event at Winterbourne Stoke stressed that neither Option 1S nor 1N carried/exhibited any particular priority over the other in engineering or economic terms. However the consultation booklet suggests that the northern route 1N would require crossing of the existing A303 necessitating traffic controls during construction, whereas the southern route Option 1S would not. It is highly unlikely that this whole project could be constructed without affecting traffic flow on the existing A303 in a number of locations from time to time. As such any traffic controls at this crossing point would simply be one of a number of others. Furthermore it is far more preferable to carry a temporary negative but reversible impact for a number of months than to endure a permanent and irreversible negative impact that would arise from adoption of the southern Option 1S.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:

7. Do you have any other comments?

Q7:

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Not Answered

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:

Wiltshire Trail Riders' Fellowship (TRF)

Response ID ANON-BABJ-X6ZZ-H

Submitted to **A303 Stonehenge**
Submitted on **2017-03-03 08:23:59**

Introduction

Name

Name:
James Higgs

Postcode

Postcode:
SN10 3UE

Email

Email address:
j@meshiggs.com

Postal address

Address:
11 Massey Road
Devizes
Wiltshire
SN10 3UE

Are you responding on behalf of an organisation?

Yes

If yes, which organisation?:
Wiltshire Trail Riders' Fellowship (TRF)

A303 Stonehenge - the proposed option

1. To what extent do you agree with our proposed option?

Strongly disagree

Please provide any comments to support your answer for question 1:
The proposals both enhance and respect the Stonehenge World Heritage Site, whilst improving road safety for most vulnerable user groups.

However, we object to the proposed creation of a ‘traffic-free byway’ on the A303 and instead request that the right to use a motor vehicle is conserved on the 400m section of A303 between Amesbury byways 11 and 12, as was granted by:

‘THE A303 TRUNK ROAD (STONEHENGE BYWAY) (PROHIBITION OF MOTOR VEHICLES) ORDER 200’

and pursuant to the recommendations made by Planning Inspector Michael Ellison within paragraphs 10.245 and 10.640 of his 2004/05 report to the Secretary of State.

Key features of the proposed option

2. To what extent do you agree with our proposed locationof the eastern portal?

Don’t know

Please provide any comments to support your answer for question 2:
No comment.

3. To what extent do you agree with our proposed locationof the western portal?

Don’t know

Please provide any comments to support your answer for question 3:
No comment.

4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?

No preference

Please provide any comments to support your answer for Question 4:
We have no preference either way and think that this is a matter best decided by local residents in conjunction with Highways England.

We request that rights of way bisected by any new bypass be given adequate infrastructure to conserve the right for the public to use them by whatever rights subsist, including (where appropriate) the provision of new, dedicated routes and safe passage for all types of user.

5. What are the most important issues for you aswe develop our proposals for the A303/A345 Countess junction?

Q5:
No comment.

6. What are the most important issues for you aswe develop our proposals for the A303/A360 Longbarrow junction?

Q6:
No comment.

7. Do you have any other comments?

Q7:
Please ensure that the section of redundant A303 between Amesbury byways 11 and 12 is either dedicated as a byway open to all traffic or retained as a ‘green’ road, as this will both conserve and improve public rights of way connecting Salisbury Plain to the Woodford Valley.

Extinguishing motor vehicle rights of use on this 400m section of A303 would compel such users to seek an alternative route via either the A360 or A345, which both have a historically high collision rate where motorcyclists in particular have been disproportionately represented amongst those either killed or seriously injured.

Feedback on this consultation

8. How did you hear about this consultation? (Please tick all that apply)

Received an email

Other source:

9. Do you have any feedback on this consultation – events, information provided, advertising etc?

Q9:
Thank you for being so proactive in contacting interested parties.

Wiltshire Wildlife Trust

From: Stephen Davis <stephend@wiltshirewildlife.org>
Sent: 03 March 2017 16:37
To: A303Stonehenge
Subject: A303 Stonehenge consultation response
Attachments: A303 Consultation Reponse 030317.docx

For the Attention of Highways England

Kind regards

Stephen

Stephen Davis
Head of Conservation

Phone: 01380 725670 ext 284
DDI: 01380 736075
Mobile:
E-mail: stephend@wiltshirewildlife.org
Wiltshire Wildlife Trust Ltd | Elm Tree Court Long Street | Devizes | Wiltshire | SN10 1NJ

Wales.Registered Charity number 266202. Registered Office Elm Tree Cour, Long Street, Devizes, Wiltshire SN10 1NJ

Highways England

3rd March 2017

A303 Amesbury to Berwick Down - public consultation

Thank you for the opportunity to comment on the above consultation.

The proposal presents opportunities for the restoration of internationally important chalk grassland habitat and species within the Stonehenge World Heritage site. While preserving the landscape setting of the Stones this clearly presents an opportunity to enhance the chalk landscape for biodiversity aligned with the principles of the Lawton Review of, more, bigger, better and more connected wildlife sites.

While purely not a biodiversity issue, I would have thought that preserving the integrity of the World Heritage Site ought to be of paramount importance and a pre-requisite of any scheme, favouring a long bore tunnel, spanning the breadth of the World Heritage Site. However in relation to this proposal;

Mitigation requirements

There will need to be a comprehensive mitigation package to offset the identified damaging impacts on biodiversity, maximising opportunities for the restoration of biodiversity in the wider chalk landscape within and outside of the World Heritage site.

River Till SSSI

As presented the scheme clearly identifies impacts on important nature conservation sites, particularly the River Till SSSI. By nature of the water flow regime and the adjacent wet meadow habitats where the Southern option route crosses the river, it would appear that the environmental impacts of the southern option are significant.

The River SSSI citation (16th August 2000) states that the river is significant for the following habitat covered by The European Community Directive 92/43/EEC, on The Conservation of Natural Habitats and of Wild Fauna and Flora - The Habitats Directive:

> Floating vegetation of *Ranunculus* of plain and sub-mountainous rivers (Annex I)
>
> It also supports the following species:
>
> Bullhead *Cottus gobio* (Annex IIA)
> Desmoulin's whorl snail *Vertigo moulinsiana* (Annex IIA)
> Atlantic salmon *Salmo salar* (Annex IIA, Va)
> Otter *Lutra lutra* (Annex IIA)

The most recent SSSI condition assessment for the river undertaken by Natural England (13/12/2010) states that both SSSI units have been;

'identified within the River Restoration Strategy as requiring action to address channel modifications. The wider River Restoration Strategy is agreed, works on ground started within the SSSI, and joint NE/EA/IDB commitment to continuing implementation of the strategy. However, the process depends on ongoing availability of resources and action on the ground in the longer term; hence the remedy for this unit must be considered at risk'.

The River Till SSSI is clearly considered to be at risk of not meeting a favourable condition as required by the EU Habitats Directive, due to lack of resource investment.

Mitigation in relation to the road proposals should contribute significantly to the implementation of the requirements of the River Restoration Strategy, to ensure that the River Till is returned to and subsequently maintained in a favourable condition. The requirement for this should apply to either option. The River Till is a tributary of the Rive Wylye, part of the River Avon SAC. Mitigation should extend to consider the overall condition of the River Avon SAC, specifically as the impacts and/or enhancements on the River Till will affect the River Wylye, a short distance downstream.

In the wider landscape there are a number of County Wildlife Sites all of which require management to support their wildlife interest. Enhancing their biodiversity interest along with the opportunities presented for chalk grassland restoration would be entirely in line with the principles of the Lawton Review supported by Government.

There are significant biodiversity benefits that could be achieved in the restoration of habitats within the chalk landscape for terrestrial wildlife, including for mammals (eg. bats), farmland birds, butterflies, and species within the riverine ecosystem, including, fish, plants and invertebrates.

The Trust hasn't had the opportunity to scrutinise all of the details of this proposal, but it would be keen to be kept informed and to contribute to the thinking around the development of a comprehensive biodiversity strategy for the World Heritage Site, in response to the impacts identified by this proposal.

Regards

Stephen Davis

Stephen Davis
Head of Conservation

World Heritage Centre/ International Council on Monuments and Sites (ICOMOS)

United Nations
Educational, Scientific and
Cultural Organization

Organisation
des Nations Unies
pour l'éducation,
la science et la culture

World Heritage **41 COM**
Patrimoine mondial

Paris, 27 June / 27 juin 2017
Original: English

**UNITED NATIONS EDUCATIONAL,
SCIENTIFIC AND CULTURAL ORGANIZATION**

**ORGANISATION DES NATIONS UNIES
POUR L'EDUCATION, LA SCIENCE ET LA CULTURE**

**CONVENTION CONCERNING THE PROTECTION OF THE WORLD
CULTURAL AND NATURAL HERITAGE**

**CONVENTION CONCERNANT LA PROTECTION DU PATRIMOINE
MONDIAL, CULTUREL ET NATUREL**

WORLD HERITAGE COMMITTEE / COMITE DU PATRIMOINE MONDIAL

Forty-first session / Quarante-et-unième session

**Krakow, Poland / Cracovie, Pologne
2-12 July 2017 / 2-12 juillet 2017**

Item 7 of the Provisional Agenda: State of conservation of properties inscribed on the World Heritage List and/or on the List of World Heritage in Danger

Point 7 de l'Ordre du jour provisoire: Etat de conservation de biens inscrits sur la Liste du patrimoine mondial et/ou sur la Liste du patrimoine mondial en péril

MISSION REPORT / RAPPORT DE MISSION

Stonehenge, Avebury and Associated Sites (United Kingdom of Great Britain and Northern Ireland) (373bis)
Stonehenge, Avebury et sites associés (Royaume-Uni de Grande-Bretagne et d'Irlande du Nord) (373bis)

31 January – 3 February 2017

Report on the joint World Heritage Centre / ICOMOS Advisory Mission to

Stonehenge, Avebury and Associated sites

31 January – 3 February 2017

ICOMOS
international council on monuments and sites

United Nations
Educational, Scientific and
Cultural Organization

in cooperation with
UNESCO's World Heritage Centre

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Executive summary

A joint ICOMOS/UNESCO advisory Mission was undertaken from 31 January to 3 February 2017 to the Stonehenge component of the "Stonehenge, Avebury and Associated Sites", inscribed on the World Heritage List in 1986 (WH property). This advisory Mission, conducted at the invitation of the State Party (SP, signatory to the 1972 World Heritage Convention, namely the United Kingdom of Great Britain and Northern Ireland), concerned the proposed A303 Amesbury to Berwick Down road Scheme and its potential impacts on the Stonehenge World Heritage property and its Outstanding Universal Value (OUV). This Mission followed a previous Mission carried out in October 2015 and whose report, released in April 2016, has served the SP in its planning and decision making process in relation to this scheme. Both Missions are part of an ongoing process of consultation with international advisors, to ensure that any scheme advanced by the SP would, besides addressing the traffic issues raised:

- contribute to the conservation and enhancement of the WH property by improving access both within and to the site; and
- contribute to the enhancement of the historic landscape within the WH property, to improve biodiversity along the route, and to provide a positive legacy to communities adjoining the road.

The intention is that these objectives would be achieved in a manner which does not negatively affect or compromise the OUV of the WH property.

The Mission has responded in the following ways to the aims and objectives of the Terms of Reference set to the Mission by the SP (reproduced in full in Annex 1).

Terms of Reference

On the basis of briefings on the following, the complete package of which will be made available to the WHC and ICOMOS by Tuesday 20th December at the latest, the mission will consider:

- Progress by the UK State Party, Highways England and heritage partner organisations on the implementation of the recommendations of the April 2016 Mission report, responding to all points raised in that document.

The Mission considers that the SP and its organisations have been responsive to most recommendations of the first Mission. This successful implementation is manifest with regards to decisions concerning the emplacement of the Eastern Portal (to the east of the 'Avenue'). As for the organisation of the heritage bodies (HE, NT, EHT and WCAS) into a Heritage Monitoring and Advisory Group (HMAG), the implementation is only partial, pending the creation, as recommended and expected by the Mission, of a proactive "scientific committee" including academics and representation from learned societies.

- The results of archaeological assessment and evaluation of possible route alignments, potential tunnel portal locations and possible associated new surface road within the WH property.

The Mission took note of archaeological assessments, both intrusive and non-intrusive, carried out at the corner of A303 / A360, as well as on the A303 in the area of the 'Avenue'. In terms of heritage protection, these assessments have been successful in identifying further monuments on the west of the WH property and in confirming the attributes of OUV of the area, as an aid to design decisions on the possible placement of the Western portal, should a tunnel option proceed.

The Mission understands that archaeological work to inform the developing scheme route has been undertaken by Wessex Archaeology, commissioned by Arup Atkins Joint Venture (AAJV) for Highways England and that Historic England's research within the WH

property has not been undertaken to inform road proposals, but that the results of Historic England's research have been made available to Highways England to inform their archaeological strategy. Some operational questions remain on the connections and calibration of these two inter-related research streams. There are also some problems with access to the terrain, which is apparently withheld by some landowners and which disrupts the sequence and planning of operations.

- The likely effects upon the attributes OUV of the WH property of potential tunnel portal sites and possible associated new surface road in the various options being considered, and as articulated in HIAs.

The HIAs undertaken for the State Party and considered by the Mission were: *Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 1 Report;* and *Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 2 Report.*

The Mission considers that the evaluations and assessments in these HIAs and the preliminary HIAs undertaken for Historic England and the National Trust by Snashall & Young (2014, 2017) identify that an alternative route (the F010) would have a lesser impact on the OUV of the WH property than the tunnel options currently under consideration and that the currently-proposed placement (option D061-62) would cause considerable damage to the OUV of the WH property, through adverse effects on the archaeological remains, on their landscape attributes, and on setting and visibility.

The re-positioning of the eastern tunnel portal to the east of the 'Avenue', on-line on the current path of the A303 road but still within the World Heritage property, will bring some benefits to the Stonehenge landscape. Further refinements in the position are needed to ensure that impacts on OUV are avoided or mitigated. A location closer to the Countess roundabout should be considered, especially with regards to approach routes and infrastructure during construction, (bearing in mind other archaeological features in the vicinity, including the Mesolithic Blick Mead and the Iron Age Vespasian's Camp).

The Mission notes that the governance and decision making processes carried on by the SP (the developer Highways England and its commercial entity AAJV) is sophisticated, but has concluded that the manner in which the criteria are being applied do not give enough weight to the heritage priority required for a WH property, and specifically the preservation of its OUV, as required by the obligations of the State Party under the World Heritage Convention. The Highways England territorial planning process for the removal of the A303 aims at a major priority: to benefit traffic and development to the Southwest of the country, leading to the currently proposed Stonehenge traffic solutions (tunnel D061 and D062, or surface route F010). The design of the scheme within the WH property and road network development must however reconcile this target with avoiding adverse impact on the OUV of the World Heritage property in all its components.

The SP should therefore be encouraged to further explore the F010 route option, as an alternative that will bring significant benefits to the whole WH property and the wider Stonehenge Landscape.

- Feedback on what kind of heritage-centred steering mechanism to ensure quality control at all stages of decision making is being set up or can be set up.
- The potential benefits to the WHS made by any archaeology identified during archaeological assessment and evaluation of potential tunnel portal sites and associated new surface road within its boundary and to wider research in the property on an ongoing basis

The Mission took note of the creation of the HMAG and the MOU between the official heritage bodies (following the recommendations of the first Mission published in April 2016). The Mission regrets that these steps have not been conducted to completion. The mission recommends that to ensure the participation of academics and representatives from learned societies in the HMAG, the proposed "scientific committee" should be established as previously proposed. This will also help in ensuring a wider perception that the World Heritage property is not receiving the best possible attention, in terms of heritage enhancement and protection. A stronger mechanism, drawing notably on international expertise, should be established, and be in a position, for example, to counter the fixation of the length of the tunnel to 2.9 km only, as proposed by AAJV in options D61-62.

The recommendation of the first Mission regarding the HMAG scientific committee should therefore be fully implemented by the SP, especially in relation to its upstream role.

- The whole asset life design of the proposed options within the WH property and road network development and longer term impact on the region.

The Mission remarked that engineering and design questions were still at an initial stage, and that clarifications were requested upstream. This is for example the case with the length of the proposed tunnel, which involved not only heritage issues and costs, but also technical considerations such as ventilation shafts. Regarding the long term impacts, the Mission noted that the SP has not yet undertaken thorough studies in anticipation of "the day after", when (and if) a tunnel or bypass is operational and the Stonehenge landscape is reunited.

The Terms of Reference further indicates that the Mission shall provide advice on a number of specific matters, as follows:

- The measures that the UK State Party, Highways England and heritage partner organisations have taken, or have in progress, to respond to and implement the recommendations of the April 2016 Mission report

A number of priority recommendations have been implemented by the SP, such as 4.1.1 & 4.1.3. However, the second Mission considers that the order of priority of the recommendations implemented by the SP was inadequate and did not ensure an appropriate upstream process to fully protect the WH property and its OUV.

- The impact of the emerging scheme proposals on the OUV of the WH Property based upon the partial information available at the time of the mission in the design process, which comprises:

- The results of archaeological and other assessments and evaluation of potential tunnel portal sites and possible associated new surface road within the WH property in relation to the attributes of OUV
- The draft route of a potential tunnel schemes and associated new surface road within and adjacent to the WH property
- Initial computer-generated visualisations of aspects of potential new infrastructure, including tunnel portals, vertical alignment, cuttings and embankments
- Available Cultural Heritage Impact Assessments

The Mission extensively discussed the scheme proposals including those (F010) The results of those discussions are outlined in this report.

- Relevant technical and engineering aspects of the potential scheme as available at this stage of development

This matter was not addressed by the Mission, in view of the current status of the potential schemes and focus on potential impact on the OUV of the WH property.

- Relevant technical and planning aspects regarding the whole asset life design of the scheme within the WH property and road network development and longer term impact on the region.

  This matter was not addressed by the Mission, in view of the current status of the potential schemes and focus on potential impact on the OUV of the World Heritage property.
- Evaluate additional expertise, consultation, desk review, TOR evaluation, skills assessment, advisory mission, technical assistance if need be.
- How best the World Heritage Centre and its Advisory Bodies can offer advice on the impact on the OUV of the WH property in light of the reporting process to the annual World Heritage Committee and statutory timescales of the Development Consent Order (DCO) application, as the plans to address the problems caused by the existing A303 trunk road traffic are further developed over the coming years

The Mission urged the SP to work further in order to identify satisfactory solutions to the A303 traffic issues that would not compromise the OUV of the WH property, and that would abide by the SP's international obligations in these matters. To this end, the joint ICOMOS/UNESCO advisory Mission readily endorses the SP's request to ensure the further engagement and availability of international advisors in subsequent Missions, with terms of references and a calendar to be jointly fixed. ICOMOS and UNESCO stand by the SP in this challenging and complicated process of ensuring that solutions to the A303 traffic issues are done in full respect of the WH property and its OUV.

Section 9 of this Mission report provides detailed recommendations and associated commentary. The following items are the key recommendations.

1. The Mission recommends that the F010 option be further explored as an alternative for further studies as it would have a significantly lesser impact on the OUV of the WH property than the tunnel options currently under consideration.

2. The Mission recommends that if the D061/D062 were still to be pursued as an option:

   a) an extension of the tunnel should be considered so that the Western portal would be located outside the WH property to avoid its negative impacts on the OUV of the property, its landscape, monuments and archeological richness, and the Western portal and associated approach road are located so that they would not pose any threat to the property or its setting;

   b) if a longer tunnel is considered, the SP should undertake a comprehensive Heritage Impact Assessment, which addresses all attributes of OUV, including archaeological and landscape integrity, visibility and noise factors, and incorporating a landscape impact study focusing on the inter-visibility and visual envelopes (viewshed) of the Western portal and highway locations to determine the necessary length of the tunnel that will not harm the OUV of the property and its setting.

   c) the location of the Eastern portal which is to be repositioned, on-line on the current path of the A303 road but to the east of the important prehistoric feature known as the 'Avenue', linking the Stonehenge monument to the river Avon, be

further refined in order to ensure that potential impacts on OUV are avoided. A location closer to the Countess roundabout should be considered, especially with regards to approach routes and infrastructure during construction, (bearing in mind other archaeological features in the vicinity, including the Mesolithic Blick Mead and the Iron Age Vespasian's Camp).

3. The Mission recommends that the already constituted Heritage Monitoring Advisory Group, be immediately completed and strengthened with a fully operational "Scientific Committee".

4. The Mission recommends that a sustainable tourism strategy of presentation and promotion of the WH property be developed as soon as possible with the view 1) to frame the mitigation measures, such as the loss of direct visual access of Stonehenge Monument, into a wider context; 2) to ensure that the economic benefits related to the WH property are spread to the community and the wider county and 3) to ensure the lasting conservation of the site.

5. The Mission recommends that the SP and bodies involved agree to set up an open forum, gathering stakeholders, local communities, civil society representatives, citizens and all interested parties, as a place to engage into a constructive dialogue driven by the overarching strategy of the Management Plan, i.e. "achieving the correct balance between conservation, access, the interest of the local community and the sustainable use of the Site".

6. The Mission recommends that the project programme and the expectations of all major participants should be adjusted to align with the World Heritage Committee timeframe and process, through careful attention to the 'triggers' which instigate statutory timeframes and deadlines.

1. Introductory statements

1.1 Acknowledgments

The ICOMOS/UNESCO Advisory Mission – henceforth the Mission – wishes to express its gratitude to the State Party (The United Kingdom of Great Britain and Northern Ireland, henceforth the SP), and more specifically to the Department of Culture, Media and Sports (DCMS) and Historic England (HE), as well as to the National Trust (NT), English Heritage Trust (EHT) and Wiltshire County Archaeology Service (WCAS), for their excellent preparatory work, for the provision of ample documentation, and for enabling the Mission to be carried out in optimal conditions. Without mentioning all the individuals concerned (see list below) special thanks are due to Phil McMahon (HE) and to Nicola (Nick) Snashall (NT) for their coordination and responsiveness. As well, the SP and the various organisations involved are to be commended for the serious and wholehearted attention they have given to the first Mission report. While some of the initial recommendations were not fully followed through, or were only partially responded to, the clear willingness exhibited by the SP to respond, rely on and take on board the ICOMOS/UNESCO advice deserves special mention. In this respect, this could well provide an exemplary model of an interactive consultation process between State Parties and ICOMOS/UNESCO.

1.2 Aims and Mandate of the February 2017 Mission

1.2.1 The role and objective of this second "advisory" Mission, undertaken at the request of the SP, is to comment and provide advice on the ongoing process by which proposals are implemented and eventually promoted with regards to the A303 ABD scheme, as they relate to the OUV of the WH property.

More specifically, the SP has indicated (in its TOR document, PM, dated 13 January 2017, see Annex 1), that it sees the aim of this Mission to reach or address the following objectives:

- To feed back to the WHC and ICOMOS on the measures taken, planned, or in progress, to implement the recommendations of the April 2016 Mission report on archaeological heritage management, governance and decision making processes, territorial planning process and benefits, and long term traffic prediction and on the whole asset life design of the scheme within the WH property and road network development.

- To seek the advice of the WHC and ICOMOS on current progress with the emerging scheme proposal within and adjacent to the WH property based on work undertaken to inform its potential heritage impacts, including upon its OUV;

- To brief the Mission on the nature, timetable and phasing of the UK statutory planning process for nationally significant infrastructure projects and specifically the Development Consent Order (DCO) process under which the detailed scheme proposal would be put out for consultation and considered by the UK Planning Inspectorate;

• Examine what kind of heritage-centred steering mechanism will be put in place to ensure quality control at all stages of decision making.

• To agree on effective means of future engagement with ICOMOS (need for additional expertise, consultation, desk reviews, TOR evaluation, skills assessment, advisory mission, technical assistance) within the DCO consultation and examination process and, and to agree on a feasible timetable for such engagement, taking account of the fixed, statutory timeframe within which the DCO must work and of the fixed cycle of World Heritage Committee meetings. These are important considerations, as the DCO statutory process cannot be paused or halted to allow for additional consultation and the World Heritage Committee must also have the opportunity to consider the scheme, albeit outside of the UK statutory planning process.

The same document further states that the Mission shall provide advice on:

- The measures that the UK State Party, Highways England and heritage partner organisations have taken, or have in progress, to respond to and implement the recommendations of the April 2016 Mission report
- The impact of the emerging scheme proposals on the OUV of the WH property based upon the partial information available at the time of the mission in the design process, which comprises:
  - The results of archaeological and other assessments and evaluation of potential tunnel portal sites and possible associated new surface road within the WH property in relation to the attributes of OUV
  - The draft route of a potential tunnel schemes and associated new surface road within and adjacent to the WH property
  - Initial computer-generated visualisations of aspects of potential new infrastructure, including tunnel portals, vertical alignment, cuttings and embankments
  - Available Cultural Heritage Impact Assessments
- Relevant technical and engineering aspects of the potential scheme as available at this stage of development
- Relevant technical and planning aspects regarding the whole asset life design of the scheme within the WH property and road network development and longer term impact on the region.
- Evaluate additional expertise, consultation, desk review, TOR evaluation, skills assessment, advisory mission, technical assistance if need be.
- How best the World Heritage Centre and its Advisory Bodies can offer advice on the impact on the OUV of the WH property in light of the reporting process to the annual World Heritage Committee and statutory timescales of the Development Consent Order (DCO) application, as the plans to address the problems caused by the existing A303 trunk road traffic are further developed over the coming years

1.2.2 Disclaimer on the Advisory nature of the Mission

It is important to state outright – in view notably of various comments made following the publication of the first Mission report in April 2016 – that the Mission's remit is not to approve or endorse any proposal, let alone to speak authoritatively on behalf of ICOMOS/UNESCO or to anticipate in any way the official responses of these organisations, including the decisions of World Heritage Committee in this matter. The

comments and recommendations made by the Mission in this report aim to provide advice, highlight considerations, assess potential impacts and processes, and advance proposals relating to heritage management on possible routes and options that might be taken by the SP regarding the A303 Amesbury to Berwick Down scheme.

Even if the comments provided here appear to reach a level of detail commensurable with specific design scheme, these comments should not be taken in any way to indicate any endorsement or support for a particular proposal.

The advisory nature of the Mission is reinforced by the express indication by the SP in the 2017 Briefing Pack and during the Mission that the A303 ABD scheme is currently only at its outline stage, with no fully designed proposals. These will be completed following an announcement by the SP Government on the choice of preferred route in mid-2017, leading to the statutory public consultation planned for late 2017. Opportunities for changes and refinements of the scheme and its detail do therefore exist in the framework of this process.

1.2.3 The 'Non-Statutory Public Consultation Exercise' (12.01-05.03.2917)

The ICOMOS/UNESCO Mission unfolded (31.01- 3.02.2017) in parallel with an exercise of non-statutory public consultation launched by the SP, lasting from 12 January to 5 March 2017 (see https://highwaysengland.citizenspace.com/cip/a303-stonehenge/, and https://www.gov.uk/government/consultations/a303-stonehenge). The consultation put forward one proposed option (option 1), a 2.9km tunnel with two alternative approach roads D061 and D062 (North or south of Winterbourne Stoke at the Western exit of the tunnel). It also set out information on why other options had not been taken forward, including a bypass route to the south (option 2).

Results of this consultation are being analysed by the SP and will be made available soon.

This non-statutory public consultation exercise was mentioned in the SP Terms of references, and its contents and process were presented by the SP (notably on Day 2) and commented on during the Mission. Since the timing of the Mission coincided with that of the public consultation, it was not able to provide its views upstream; likewise, since the public responses received are still being processed, the Mission cannot comment on any results of this consultation.

It should however be noted that the procedures and contents of this non-statuary public consultation exercise – including the presentation of the route options D061 and D062 (North or south of Winterbourne Stoke at the Western exit of the tunnel), and the mention a tunnel 2.9km long (not "at least") – have obviously shaped the public responses, many of which were transmitted or copied to UNESCO, ICOMOS and members of the Mission (see sections 2.3 and 2.4 below).

Put otherwise, public response and reactions to the A303 ABD scheme are largely dependent on the information made available in this non-statuary public consultation exercise. This was not necessarily the case with responses from academics who had worked at Stonehenge and with heritage organisations with members who had worked at Stonehenge. However, so far as the proposed emplacements of the tunnel portals are

concerned, specific discussions and comments depend on the information made available in the non-statuary public consultation.

The SP may require some further comments and feedback on the consultation process, especially in view of the statutory consultation that is required as part of the DCO process. This could be an item for any further ICOMOS/UNESCO Mission.

1.2.4 Purpose of the Advisory Mission Report

The main purpose of the Mission has been defined in the Terms of Reference which focused on "the proposed dualling and tunnelling of the A303 within the World Heritage Property, between Amesbury and Berwick Down". However, consideration of all possible corridors and routes and their respective comparative advantages or impacts (including Heritage Impact Assessment) occured ***after*** the first Mission took place and the results of these considerations and assessments formed part of the Mission briefing. The current Mission has therefore been mindful of broader options, as well as the current tunnel proposal, with a view to facilitating an outcome which provides significant benefits to the Stonehenge landscape and/or removes impact on the OUV of the WH property.

The Mission wishes to clarify what is exactly at stake in considering the impact on the OUV of the proposed scheme routes project. The position along which the tunneling will restore the visual integrity of one part of the Stonehenge WH property should be considered along with the consequential loss of physical integrity of the archaeological layers of the property which will be caused by the tunnel approach roads, as well as the loss by the public of direct visual access to Stonehenge, which might be perceived as a value for sharing this heritage, although not overtly part of its OUV. These are the issues that need to be assessed by HIAs, prepared in accordance with the applicable ICOMOS Guidance, and based on the best possible knowledge of the overall property in relation to its OUV, so that any impact on OUV can be clearly understood and assessed before any decisions are taken.

2. Context and background

2.1 - Statement of OUV:

The World Heritage Property: Stonehenge, Avebury and Associated Sites

The World Heritage property Stonehenge, Avebury and Associated Sites was inscribed on the World Heritage List in 1986. It is amongst the earliest properties inscribed on the List and the site reflects the changing history of conservation and interpretation approaches as well as World Heritage criteria and procedures. The site spreads out on a very large area, mainly agricultural land, a vast hilly landscape punctuated with a few settlements, and a series of main roads, secondary roads and earth roads.

Brief synthesis:

Stonehenge, Avebury and Associated Sites2 is internationally important for its complexes of outstanding prehistoric monuments. Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world, while Avebury is the largest. Together with inter-related monuments and their associated landscapes, they demonstrate Neolithic and Bronze Age ceremonial and mortuary practices resulting from around 2000 years of continuous use and monument building between circa 3700 and 1600 BC. As such they represent a unique embodiment of our collective heritage.

The World Heritage property comprises two areas of Chalkland in southern Britain within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. Each area contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue, the Cursuses, Durrington Walls, Woodhenge, and the densest concentration of burial mounds in Britain. At Avebury they include Windmill Hill, the West Kennet Long Barrow, the Sanctuary, Silbury Hill, the West Kennet and Beckhampton Avenues, the West Kennet Palisaded Enclosures, and important barrows.

Stonehenge is one of the most impressive prehistoric megalithic monuments in the world on account of the sheer size of its megaliths, the sophistication of its concentric plan and architectural design, the shaping of the stones - uniquely using both Wiltshire Sarsen sandstone and Pembroke Bluestone - and the precision with which it was built.

At Avebury, the massive Henge, containing the largest prehistoric stone circle in the world, and Silbury Hill, the largest prehistoric mound in Europe, demonstrate the outstanding engineering skills which were used to create masterpieces of earthen and megalithic architecture.

There is an exceptional survival of prehistoric monuments and sites within the World Heritage property including settlements, burial grounds, and large constructions of earth and stone. Today, together with their settings, they form landscapes without parallel. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age.

Criterion (i):
The monuments of the Stonehenge, Avebury and Associated Sites demonstrate outstanding creative and technological achievements in prehistoric times.
Stonehenge is the most architecturally sophisticated prehistoric stone circle in the world. It is unrivalled in its design and unique engineering, featuring huge horizontal stone lintels capping the outer circle and the trilithons, locked together by carefully shaped joints. It is distinguished by the unique use of two different kinds of stones (Bluestones and Sarsens), their size (the largest weighing over 40 t) and the distance they were transported (up to 240 km). The sheer scale of some of the surrounding monuments is also remarkable: the Stonehenge Cursus and the Avenue are both about 3 km long, while Durrington Walls is the largest known henge in Britain, around 500 m in diameter, demonstrating the ability of prehistoric peoples to conceive, design and construct features of great size and complexity.
Avebury prehistoric stone circle is the largest in the world. The encircling henge consists of a huge bank and ditch 1.3 km in circumference, within which 180 local, unshaped standing stones formed the large outer and two smaller inner circles. Leading from two of its four entrances, the West Kennet and Beckhampton Avenues of parallel standing stones still connect it with other monuments in the landscape. Another outstanding monument, Silbury Hill, is the largest prehistoric mound in Europe. Built around 2400 BC, it stands 39.5 m high and comprises half a million tonnes of chalk. The purpose of this imposing, skilfully engineered monument remains obscure.

Criterion (ii):
The World Heritage property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2000 years, from the early Neolithic to the Bronze Age. The monuments and landscape have had an unwavering influence on architects, artists, historians and archaeologists, and still retain a huge potential for future research.
The megalithic and earthen monuments of the World Heritage property demonstrate the shaping of the landscape through monument building for around 2000 years from circa 3700 BC, reflecting the importance and wide influence of both areas.
Since the 12th century when Stonehenge was considered one of the wonders of the world by the chroniclers Henry de Huntington and Geoffrey de Monmouth, the Stonehenge and Avebury Sites have excited curiosity and been the subject of study and speculation. Since early investigations by John Aubrey (1626-1697), Inigo Jones (1573-1652), and William Stukeley (1687-1765), they have had an unwavering influence on architects, archaeologists, artists and historians. The two parts of the World Heritage property provide an excellent opportunity for further research.
Today, the property has spiritual associations for some.

Criterion (iii):
The complexes of monuments at Stonehenge and Avebury provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. Together with their settings and associated sites, they form landscapes without parallel.
The design, position and interrelationship of the monuments and sites are evidence of a wealthy and highly organised prehistoric society able to impose its concepts on the environment. An outstanding example is the alignment of the Stonehenge Avenue (probably a processional route) and Stonehenge stone circle on the axis of the

midsummer sunrise and midwinter sunset, indicating their ceremonial and astronomical character. At Avebury the length and size of some of the features such as the West Kennet Avenue, which connects the Henge to the Sanctuary over 2 km away, are further evidence of this.

A profound insight into the changing mortuary culture of the periods is provided by the use of Stonehenge as a cremation cemetery, by the West Kennet Long Barrow, the largest known Neolithic stone-chambered collective tomb in southern England, and by the hundreds of other burial sites illustrating evolving funerary rites.

Integrity

The boundaries of the property capture the attributes that together convey Outstanding Universal Value at Stonehenge and Avebury. They contain the major Neolithic and Bronze Age monuments that exemplify the creative genius and technological skills for which the property is inscribed. The Avebury and Stonehenge landscapes are extensive, both being around 25 square kilometres, and capture the relationship between the monuments as well as their landscape setting.

At Avebury the boundary was extended in 2008 to include East Kennet Long Barrow and Fyfield Down with its extensive Bronze Age field system and naturally occurring Sarsen Stones. At Stonehenge the boundary will be reviewed to consider the possible inclusion of related, significant monuments nearby such as Robin Hood's Ball, a Neolithic causewayed enclosure.

The setting of some key monuments extends beyond the boundary. Provision of buffer zones or planning guidance based on a comprehensive setting study should be considered to protect the setting of both individual monuments and the overall setting of the property.

The survival of the Neolithic and Bronze Age monuments at both Stonehenge and Avebury is exceptional and remarkable given their age – they were built and used between around 3700 and 1600 BC. Stone and earth monuments retain their original design and materials. The timber structures have disappeared but postholes indicate their location. Monuments have been regularly maintained and repaired as necessary.

The presence of busy main roads going through the World Heritage property impacts adversely on its integrity. The roads sever the relationship between Stonehenge and its surrounding monuments, notably the A344 which separates the Stone Circle from the Avenue. At Avebury, roads cut through some key monuments including the Henge and the West Kennet Avenue. The A4 separates the Sanctuary from its barrow group at Overton Hill. Roads and vehicles also cause damage to the fabric of some monuments while traffic noise and visual intrusion have a negative impact on their settings. The incremental impact of highway-related clutter needs to be carefully managed.

Development pressures are present and require careful management. Impacts from existing intrusive development should be mitigated where possible.

Authenticity

Interventions have been limited mainly to excavations and the re-erection of some fallen or buried stones to their known positions in the early and mid-twentieth century in order to improve understanding. Ploughing, burrowing animals and early excavation have resulted in some losses but what remains is remarkable in its completeness and concentration. The materials and substance of the archaeology supported by the archaeological archives continue to provide an authentic testimony to prehistoric technological and creative achievement.

This survival and the huge potential of buried archaeology make the property an extremely important resource for archaeological research, which continues to uncover new evidence and expand our understanding of prehistory. Present day research has enormously improved our understanding of the property.

The known principal monuments largely remain in situ and many are still dominant features in the rural landscape. Their form and design are well-preserved and visitors are easily able to appreciate their location, setting and interrelationships which in combination represent landscapes without parallel.
At Stonehenge several monuments have retained their alignment on the Solstice sunrise and sunset, including the Stone Circle, the Avenue, Woodhenge, and the Durrington Walls Southern Circle and its Avenue.
Although the original ceremonial use of the monuments is not known, they retain spiritual significance for some people, and many still gather at both stone circles to celebrate the Solstice and other observations. Stonehenge is known and valued by many more as the most famous prehistoric monument in the world.
There is a need to strengthen understanding of the overall relationship between remains, both buried and standing, at Stonehenge and at Avebury.

Protection and management requirements
The UK Government protects World Heritage properties in England in two ways: firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act, and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected through the Government's designation of individual buildings, monuments, gardens and landscapes.
Government guidance on protecting the Historic Environment and World Heritage is set out in National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. The protection of the property and its setting from inappropriate development could be further strengthened through the adoption of a specific Supplementary Planning Document.
At a local level, the property is protected by the legal designation of all its principal monuments. There is a specific policy in the Local Development Framework to protect the Outstanding Universal Value of the property from inappropriate development, along with adequate references in relevant strategies and plans at all levels. The Wiltshire Core Strategy includes a specific World Heritage Property policy. This policy states that additional planning guidance will be produced to ensure its effective implementation and thereby the protection of the World Heritage property from inappropriate development. The policy also recognises the need to produce a setting study to enable this. Once the review of the Stonehenge boundary is completed, work on the setting study shall begin.
The Local Planning Authority is responsible for continued protection through policy development and its effective implementation in deciding planning applications with the management plans for Stonehenge and Avebury as a key material consideration. These plans also take into account the range of other values relevant to the site in addition to Outstanding Universal Value. Avebury lies within the North Wessex Downs Area of Outstanding Natural Beauty, a national statutory designation to ensure the conservation and enhancement of the natural beauty of the landscape.
About a third of the property at both Stonehenge and Avebury is owned and managed by conservation bodies: English Heritage, a non-departmental government body, and the National Trust and the Royal Society for the Protection of Birds which are both charities. Agri-environment schemes, an example of partnership working between private landowners and Natural England (a non-departmental government body), are very important for protecting and enhancing the setting of prehistoric monuments through measures such as grass restoration and scrub control. Much of the property can be accessed through public rights of way as well as permissive paths and open access provided by some agri-

environment schemes. Managed open access is provided at Solstice. There are a significant number of private households within the property and local residents therefore have an important role in its stewardship

The property has effective management plans, coordinators and steering groups at both Stonehenge and Avebury. There is a need for an overall integrated management system for the property which will be addressed by the establishment of a coordinating Stonehenge and Avebury Partnership Panel whilst retaining the Stonehenge and Avebury steering groups to enable specific local issues to be addressed and to maintain the meaningful engagement of the community. A single property management plan will replace the two separate management plans.

An overall visitor management and interpretation strategy, together with a landscape strategy needs to be put in place to optimise access to and understanding of the property. This should include improved interpretation for visitors and the local community both on site and in local museums, holding collections excavated from the property as well as through publications and the web. These objectives are being addressed at Stonehenge through the development of a visitor centre and the Interpretation, Learning and Participation Strategy. The updated Management Plan will include a similar strategy for Avebury. Visitor management and sustainable tourism challenges and opportunities are addressed by specific objectives in both the Stonehenge and Avebury Management Plans.

An understanding of the overall relationship between buried and standing remains continues to be developed through research projects such as the "Between the Monuments" project and extensive geophysical surveys. Research Frameworks have been published for the Site and are regularly reviewed. These encourage further relevant research. The Woodland Strategy, an example of a landscape level management project, once complete, can be built on to include other elements of landscape scale planning.

It is important to maintain and enhance the improvements to monuments achieved through grass restoration and to avoid erosion of earthen monuments and buried archaeology through visitor pressure and burrowing animals.

At the time of inscription the State Party agreed to remove the A344 road to reunite Stonehenge and its Avenue and improve the setting of the Stone Circle. Work to deliver the closure of the A344 will be complete in 2013. The project also includes a new Stonehenge visitor centre. This will provide world class visitor facilities including interpretation of the wider World Heritage property landscape and the removal of modern clutter from the setting of the Stone Circle. Although substantial progress is being made, the impact of roads and traffic remains a major challenge in both parts of the World Heritage property. The A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape. A long-term solution remains to be found. At Avebury, a World Heritage Site Traffic Strategy will be developed to establish guidance and identify a holistic set of actions to address the negative impacts that the dominance of roads, traffic and related clutter has on integrity, the condition and setting of monuments and the ease and confidence with which visitors and the local community are able to explore the wider property.

The wider landscape of the WH property as a whole should be considered when addressing the potential impact on OUV and not only the Scheduled monuments as specific concerned components of the OUV, *a.i.* Stonehenge monuments and surroundings monuments. Likewise, the integrity of the wider landscape of the WH property is to be considered and not only the Scheduled monuments. Consequently, the *Vision for the Stonehenge and Avebury World Heritage Site*, as defined in the Management Plan, which has clearly set out the full range of attributes of OUV, should be the guiding document for ensuring the OUV of the whole property is sustained.

2.2 Summary of the First Mission Recommendations (October 2015 – Report April 2016)

A first ICOMOS/UNESCO Advisory Mission took place on 27-30 October 2015, at the request and invitation of the SP, following the December 2014 announcement by the UK Government that as part of its attempts to solve the long-running traffic problems along the A303 ABD trunk road it explored several options, including that of investing in a bored tunnel "at least 2.9 km" long. The report of the Mission was subsequently released to the SP, and made available in April 2016 on the UNESCO website as a downloadable PDF file (http://whc.unesco.org/en/documents/141037/, and http://whc.unesco.org/en/list/373/documents).

At the time of the first Mission, no precise plans existed regarding roads or tunnel portals, and the only relatively specific data provided was the notion of a tunnel "at least 2.9 km long". This notion was reached on the basis of potential portal placements (A1 and E) as suggested on predominantly heritage grounds by English Heritage (now English Heritage and Historic England) and the National Trust; (see comments in section 6.2 in the present report). Moreover, other options than a bored tunnel had clearly been explored, including different corridor routes that would bypass the WH property.

The aim of that first Mission was to familiarise the international advisors with the WH property, and with the scope and challenges presented the Scheme, including its potential impact on the WH property's OUV. As the Mission report indicated,

> *What is at stake here is not a technical issue in terms of either engineering or archaeology. Technically speaking the situation is fairly standard. The challenge is the process, the setting up of governance, monitoring systems and operational mechanisms, which will allow for high quality results and international standards to ensure an outcome that respects OUV.*

The first Mission did provide some comments on the proposed or hypothetical placement of the portals, and made the case that the OUV of the WH property would be better served and enhanced by placing the eastern portal (if at all a tunnel was to be bored) to the east of the Avenue – a proposition that was subsequently endorsed by the SP (see section 6.2, 6.3 below). The first Mission Report also indicated its concerns regarding the western portal and its potential adverse impact.

Given however the initial and preliminary nature of the scheme, more attention was dedicated by the first Mission to issues of process, standards, governance, operations and monitoring surrounding the WH property and its OUV – issues involving the State Party, the developer Highways England (a state owned company) a range of heritage bodies as well as local residents, interest groups, academics and other stakeholders.

The first Mission concluded that:

> *The mission considers that the project for the relocation of the existing road underground into a "tunnel of at least 2.9k" could readily adopt appropriate well-established construction methods and spatial planning approaches. Hence, with good design and construction controls, and respecting essential archaeological and heritage management measures, the tunnelled length of the road would be expected to have a beneficial impact on the attributes of Outstanding Universal Value (OUV). However, the siting and design of the tunnel portals, approach cuttings/embankments, entry/exit ramps, mitigation measures and the temporary*

construction works have the potential to adversely impact OUV. These latter aspects of the scheme, in particular, will require rigorous investigation, evaluation, iterative design and assessment if they are to protect the attributes of OUV within the World Heritage site.

In addition, the Mission made a range of recommendations. The main ones are listed here:
1) Establish a heritage-centred steering mechanism between the Heritage bodies and including scientific experts, dealing with monitoring and MOU.
2) Set up a role for further joint UNESCO /ICOMOS missions to advise on OUV protection and enhancement.
3) Provide organogram of the SP actors involved.
4) Include of best practices in technology for BIM and virtual visualisation.
5) Ensure the involvement of Landscape architect.
6) Align Heritage Impact Assessment (HIA) with the Development Consent Order (DCO) process.
7) Undertake studies on visitor changes in numbers and behaviour.
8) Review and implement international best practice for highway and tunnel design.
9) Address issues of temporary construction and efficiency in logistics.
10) Clarify and formalise relations between heritage bodies, as well as interactions between the developer and archaeological management. Ensure that heritage bodies are as vigorous and proactive as possible in defending heritage ad OUV, including in the context of commercial archaeology.
11) Review elements of communication strategy.

These first Mission recommendations were addressed by the SP in the time stretch between the missions, though not all the responses were fully addressed. A discussion of the SP responses is provided in section 3 below.

2.3 Reactions by the civil society

In the weeks before the Mission took place, before and after the non-statutory public consultation exercise was launched (see section 1.4.3 above), the World Heritage Centre was the destination of a strong campaign from the civil society, including associations such as the *Stonehenge Alliance*.

While some elements of the public have expressed strong support for the project, and for the concept of a tunnel, strong opposition has also been expressed. The main claim was against the road scheme proposals to replace the current A303 “by a twin bore tunnels with long and deep tunnels entrance cuttings and up to 1.6 Km of new 4-lane dual carriageway at surface level within the World Heritage Site, along with huge new grade-separated junctions either side of it”. The majority of the emails used standard text. However, some messages were more detailed especially on a) the potential impact of the proposed south route option D 062 on the solstice alignment; b) the methods and techniques used to conduct archaeological surveys at the proposed location of the tunnels entrance points; c) the public consultation on the tunnel route within the WH property only; d) the impact on the night sky landscape of streetlights; e) potential conflicts of interests of members of the Heritage Monument Advisory Group; f) knock-on effects on Avebury of the loss of visibility of Stonehenge from the road.

The Mission raised these issues openly during its meetings, notably with the developers Highway Highland and with the Heritage bodies (HE, NT, EHT, WCAS). Some specific

responses, such as those related to the quality and the location of the archaeological excavations surveys or the alignment of the proposed western portal on the winter solstice are addressed further in the report.

The overall impression of the Mission is that the (as yet informal) response provided by the State Party to the public consultation and campaign is not yet fully satisfactory, as although the State Party treats all representations seriously, the objections to the project were characterized as coming exclusively from activists, who have sustained 'in principle' objects to the project. While it is acknowledged that engagement with representatives from civil society about the project extends back for years, it appeared to the Mission members who met with some of these civil society groups, that more transparency including for a more encompassing, better informed public consultation on all route options would have been beneficial to the reception by the public and by academics. The strong, continuing campaign underlines the lack of inclusion in the decision process of representatives from civil society, especially of informed movements of *amateurs* or of learned societies and academics.

2.4 Governance and consensus building among stakeholders (Historic England, National Trust, English Heritage, Highways England, Wiltshire Council,)

They are at least seven bodies involved: DCMS, HE, NT, EHT, WC, HiE and AAJV. All these bodies were represented and the Mission had opportunities to discuss extensively formally and informally with each of them. However, in accordance with the Terms of Reference for the Mission, no exchange occurred with representatives of the civil society, despite the strong campaign and by contrast with the previous Mission, when an extensive and useful process of such encounters occurred. This approach was adopted on the basis that full stakeholder consultation was taking place as part of Highways England's public consultation exercise. However, the Mission concluded that future advisory missions by ICOMOS/UNESCO should adopt an open and inclusive process and therefore should include structured meetings on the latest development of the scheme with civil society, professional archaeologist experts, local communities and other stakeholders.

The good governance system is a crucial aspect of the development project and was a priority recommendation of the first advisory Mission. Since then, the A303 Amesbury to Berwick Down *Heritage Monitoring & Advisory Group (HMAG)* has only been partially constituted (see section 3.2 and 4.2, 4.3 below). The membership and the terms of reference of this board of experts have been provided in the 2017 Briefing Pack for the second advisory Mission, including representatives of HE, NT, EHT and WCAS. All of those members were present during the meetings of the first day of the Mission. The situation of the HMAG was presented by the Cultural Heritage work stream Leader of AAJV and Historic England. The SP is to be commended for setting up this Group. Although it was indicated during the Mission that the Group had weight, that relevant discipline specialists were involved and that individual positions are made public, the Group has limitations. Although it was requested that the mechanism be heritage-centred, its membership should not be limited to official heritage bodies, but should include also independent professionals and academics. The role of the HMAG includes advice and setting the standards and approving the scope of archaeological work associated with the scheme, but not broader decision making. The HMAG, including the proposed "scientific committee' can provide a very valuable heritage-centred steering mechanism which can also contribute to ensuring transparency in a highly sensitive and symbolic context. The role of the scientific

committee whose membership and role was unclear before the Mission remains somewhat unclear.

Consequently, the Mission concluded that the SP should review the membership and the mandate of the current HMAG to include academic archaeologists, representatives of learned archaeological societies, or groups such as ASAHRG. Also, it should be clarified again that the ultimate mandate of such mechanism is not limited to managing aspects *for the benefit* of the OUV of the WH property, but to ensure that the OUV of the property **is** fully maintained particularly including its integrity and authenticity.

Furthermore, and considering the strong campaign from civil society, the Mission recommends that the SP and bodies involved agree to set up a consultative arrangement such as an open forum, gathering stakeholders, local communities, civil society representatives, citizens and all interested parties, as a place to present the communities concerns and engage into a constructive dialogue driven by the overarching strategy of the Management Plan, i.e. "achieving the correct balance between conservation, access, the interest of the local community and the sustainable use of the Site".

3. Responses by the SP to the recommendations of the first Mission (April 2016 report)

3.1 As already indicated, the SP and its agencies addressed some of the ICOMOS/UNESCO recommendations following the first Mission. Many of the responses given in the 2017 Briefing Pack can be taken as such, and do not require much in the way of comments (see section 2.2. above for the main recommendations). There are however aspects that need to be reconsidered or that do not appear to have been addressed , notably concerning the following two points – "Issues of archaeological organisation and quality control" (point 3.2 below), "Visitor Numbers and behaviour" (point 3.3 below). Relevant aspects, alongside of course other issues emerging from the second Mission, will be presented in section 4, 5 and 6 below

3.2 On "Issues of archaeological organisation and quality control".
(Recommendations 1.1, 3.2, 3.3 and 3.1 of the first Mission, responded to in points 5.2 and 5.14 of the 2017 Briefing Pack).

3.2.1 The SP and its agencies have taken a series of measures to ensure that proper oversight and control is exercised on archaeological and heritage operations within the WH PROPERTY and the A303 ABD scheme. The creation of a "A303 ABD Heritage Monitoring and Advisory Group" – henceforth HMAG – is a welcome step, as is the Memorandum of Understanding proposed between the main heritage bodies.

3.2.2 Some issues remain to be address or considered. These include (a) the decisional and control capacity of the HMAG, especially in relation to the archaeological operators on the ground and (b) the composition of the HMAG

3.2.3 The following are quotes from the 2017 Briefing Pack (p.16).

> **HMAG (Board of Experts)**
> 5.2.2 HMAG (Board of Experts) will provide **advice and support** with regard to the archaeological and wider heritage impacts of the project's design, assessment, implementation and mitigation. Where **supplementary advice and expertise** are required HMAG will request additional advice from members of the Scientific Committee (see below).
>
> **Scientific Committee**
> Membership
> 5.2.6 Membership of the Scientific Committee comprises the following:
> - Heritage Monitoring & Advisory Group; and
> - Additional subject matter experts in the archaeology of the Stonehenge landscape. Membership **to be** confirmed separately. CVs **will be** made available.
> Purpose
> 5.2.7 At the request of HMAG (Board of Experts) members of the Scientific Committee **will b**e invited to **provide additional subject matter advice** and expertise **on particular issues relating to the archaeological and wider heritage impacts** of the project's design and implementation in relation to the Neolithic & Bronze Age of the Stonehenge landscape and the consequent impact on the OUV of the WHS.

3.2.4 It was reiterated orally during the Mission – by WCAS in particular, as well as HE and NT – that decision-making role and capacity to impose requirements by HMAG are

actually stronger that the wording of "advice and support" might imply. Nevertheless, and although it is acknowledged that the initiators and decision-takers are the curatorial bodies: Historic England, Wiltshire Council and additionally for their own land, the National Trust, the archaeological reports of the operations already carried out (and annexed to the 2017 Briefing Pack) are regularly couched in terms that suggest influence is also exerted by the developers – Highways England – or on their behalf AAJV, who tender and contract archaeological work, both non-intrusive and intrusive, to commercial companies such as Wessex Archaeology.

This question of the initiation, oversight and planning of archaeological work on the A303 ABD scheme will be returned to in sections 4.2 and 4.3 below.

3.2.5 As it is presented, the HMAG is composed of four national and local official heritage bodies (EH, NT, EHT and WCAS), and a "scientific committee". Two issues remain unclear: (a) at present, the "scientific committee" does not exist, and its members have apparently **not yet** been identified, contacted or confirmed, (b) the actual circumstances in which their "supplementary advice and expertise" will be called for are not specified. This results in major problem of timing and sequencing, insofar as decisions are in the process of being taken and works have commenced, without the benefit of input from the scientific committee.

As further dealt with in sections 4.2 and 4.3 below, this situation is of concern in several respects. The archaeological component of the project may not enjoy the full benefit of all available guidance and advice. There is also a risk to perceptions of the reliability of the heritage assessment process, and also the overall confidence of both the professional archaeological community and the wider public. In this respect, archaeological operations undertaken as part of the project should benefit from guidance from an HMAG which is fully established as proposed, including a functional scientific committee.

3.3 – Issue of visitor numbers and behaviour

(Recommendation 2.3 of the first Mission, responded to in point 5.9 of the "2017 Briefing pack").

3.3.1 The initial recommendation was to study and understand the potential changes in visitor numbers and behaviour that may occur upon the opening up the landscape with a tunnel scheme, and the impacts of these changes on OUV.

3.3.2 The following are quotes from the 2017 Briefing Pack (p. 27-28).

> 5.9. 1 English Heritage (EH) and National Trust (NT) **will work** together to establish potential changes in visitor numbers and behaviour that may occur by opening up the landscape with a tunnel scheme. **Once the likely impact has been established,** EH and NT will work together to understand the impact this might have on current visitor operations, the need for new forms of access and interpretation and both organisations will need to identify measures to mitigate negative impacts on OUV and in the environs of the WH PROPERTY.
>
> Timescales
>
> 5.9.7 It is expected that this work would take **12-18 months to complete** but this will be an iterative process and reviewed against the progress of the Highways England project development. Implementation of access and interpretation outcomes would follow.
>
> Funding

5.9.8 **The cost and funding of this work is to be established**. The expertise and in-house resources of EH and NT will be utilised where possible and discussions are underway with Highways England and AAJV to establish what information or resources they could provide.

3.3.3 It may be that the initial recommendation was not clearly formulated, but the Mission considers that the responses given here are inadequate, notably with regards to the proposed timing of the study and its as yet undecided funding. The SP appears not to have sufficiently measured the importance and urgency of:

(a) an adequate preparedness to the eventuality, in less than 10 years from now, that a tunnel or a bypass opens and operates in a reconfigured Stonehenge landscape; or

(b) the ability to demonstrate already now, to official bodies and agencies, to academics, stakeholders and the wider public (including opponents of the scheme), that the SP is actually anticipating and planning ahead on this matter. This will be further addressed below.

4 – Assessing Impacts on OUV and Attributes of OUV

The OUV of the WH property and its attributes are clearly set out in Section 2 above and relate to the idea of an archaeological landscape that is more than a random assembly of sites but is seen increasingly to be a landscape of organised or related sites – both spatially and visually.

As any potential projects should be considered for their impact on this landscape, through HIAs, it is essential that such assessments are based on the best possible data related to knowledge of the archaeological landscape.

As a general initial comment, it must be stressed and acknowledged that the assessment of the archaeological landscape, as well as its individual components, as part of a Heritage Impact assessment (HIA) represents a major and indeed crucial challenge in the A303 scheme, relating both directly and indirectly to impact on OUV, including integrity and authenticity. This is a matter about which the SP is indeed well aware.

It is also acknowledged that approach roads at the end of any proposed tunnels will irreversibly impact on the integrity of the complexes of monuments at Stonehenge as an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. The shaping of the landscape through monument building for around 2000 years demonstrated the importance of the intangible and spiritual links of monuments, such as the alignment of the Stonehenge Avenue and the Stonehenge stone circle on the midsummer sunrise and midwinter sunset.

Far from impacting on the integrity, the A303 scheme should aim to restore the integrity of the landscape.

4.1 Preliminary Archaeological Assessment

4.1.1

As a further initial comment, it is worth recalling here the disclaimer made above (section 1.2.2) regarding the advisory nature of the Mission: as indicated there " Even if the comments provided here appear to reach a level of detail commensurable with specific design scheme, these comments should not be taken in any way to indicate any endorsement or support for a particular proposal". This is all the more the case that no decisions have yet been made by the SP, and neither route nor specific design are yet determined, let alone any DCO.

A range of archaeological operations, both non-intrusive and intrusive, have been carried out in relation to the currently proposed A303 tunnel option (as discussed below, section 4.2.2). The results of these investigations have been incorporated into the Heritage Impact Assessments undertaken for the scheme, on behalf of the State Party: "*Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 1 Report*", and "*Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 2 Report*". The archaeological investigation results also informed the preliminary Heritage Impact Assessment study, "Stonehenge A303 improvements: outline

assessment of the impacts on the OUV of the WH property of potential route options presented by Highways England for January 2017" carried out by N. Snashall & C. Young (Snashall & Young 2017) as a follow-up of their 2014 report (Snashall & Young 2014), which informed Historic England's and the National Trust's own position in relation to options under consideration.

These archaeological assessments and undertakings can be considered in two complementary ways (a) their contribution to heritage impact assessments with regards to the WH property' OUV, and heritage management, and (b) their contribution to scientific knowledge.

4.1.2 So far as heritage management is concerned, the archaeological work already carried out seems to be making a contribution to towards the overall impact assessment process.

The Heritage Impact Assessments undertaken for the scheme, on behalf of the State Party initially considered seven options (iteration 1), then a refined selection of three options (iteration 2), including the F010 option. Although the F010 option was identified as having the least potential impact on the OUV of the WH property, the alternative tunnel options were put forward for public consultation. Nevertheless, the archaeological investigation and HIA process have resulted in some concept and design changes.

This is the case with the proposed emplacement of the Eastern Portal, which, following the first Mission report, has been relocated to the east of the "Avenue" in order to reduce heritage impacts on the WH property' OUV (Route D061-62 in Figure 4.1- 4.3).

This may also become the case with propositions regarding the Western Portal emplacement, where archaeological and heritage considerations may influence forthcoming revised propositions and decisions.

4.1.3 Archaeological works commissioned by Highways England to inform scheme proposals have been undertaken in accordance with specifications agreed with, and signed off by, Historic England, Wiltshire Council Archaeological Service, and where it affects their land, the National Trust. The archaeological work has been undertaken following methodologies, with aims and oversight being clearly set out and followed through.

What appears less well established is the capacity of these archaeological undertakings to build on academic work already undertaken. One of the main challenges that should be addressed further is the need for the highest possible standards of archaeological operations on the WH property. This is also important for the wider A303 ABD project. No decisions have yet been made on the final route and no road building, tunnelling or engineering activity has occurred – except for archaeological investigations and evaluations. Besides reinforcing the actual archaeological activities, resulting from intrusive and non-intrusive investigations (on site and in the lab), it is essential to ensure that no archaeological work on the WH property, its setting and the A303 ABD road scheme could be perceived as being potentially sub-standard.

4.1.4 Such perceptions about archaeological operations and standards have featured among a wider range of issues raised by members of the public, civil society and other stakeholders to ICOMOS and to the WHC and UNESCO concerning the Stonehenge tunnel project.

Several of these comments represent highly knowledgeable queries and concerns about field procedures, sampling and recording. Further comments have expressed concern over the access, perusal and good use actually made by the operators involved of previously generated information (be it the HER managed by WCAS, national databases, publications in regional, national or international academic venues, or in the 'grey literature' available locally or through ADS).

It is important that the archaeological work undertaken as part of the project continue to occur in accordance with the code of conduct and standards of Chartered Institute of Archaeologists and be transparently demonstrated to meet or exceed standards for academic archaeological work. This objective may be assisted by:

a) recruiting the HMAG scientific committee, as soon as possible with both ASAHRG and academic researchers fully involved; and
b) ensuring that the standard of archaeological work at the WH property meets the standards demanded of research excavations, and not those, necessarily different in their aims, practice and yes, costs, that apply in some areas of commercial archaeology. This would also mean to follow and implement the recent report published for the WHS management by Wessex Archaeology "A Research Framework for the Stonehenge, Avebury and Associated Sites World Heritage Site: Research Agenda and Strategy" (Leivers & Powell 2016):

http://www.stonehengeandaveburywhs.org/assets/Research-Agenda-and-Strategy-1.pdf

4.2 Process and structure

4.2.1 On the operators on the ground

As reported in the 2017 Briefing Pack and presented during the Mission, a range of archaeological operations, both non-intrusive and intrusive, have recently been carried out in relation to the A303 ABD Scheme by two operators, HiE-AAJV-WE, and HE.

One is the Highways England commissioned AAJV, through their contractors Wessex Archaeology, who have been working in the South-East corner of the A303 / A360 and to the East of the Stonehenge monument (SW1, SW2, SE1 and NE1, NE2 in Figure 1a).

The geophysical (non-intrusive) work by Wessex Archaeology for AAJV is detailed in their report "A303 Amesbury to Berwick Down. A303 Geophysical Survey Report. Interim Draft. Arup Atkins Joint Venture. HE551506-AA-EHR-SWI-RP-YE-000006, P02, S4, 20/12/2016" (pp. 446 ff. in the Complete Briefing Pack).

The trial excavations (intrusive evaluation) undertaken by Wessex Archaeology for AAJV were undertaken within area SWI and SW2 – see "A303 Amesbury to Berwick Down. A303 Archaeological Evaluation. Report Interim Draft. Arup Atkins Joint Venture, HE551506-AA-EHR-SWI-RP-YE-000005, P01.2, Interim Draft" (pp. 581 ff. in the Complete Briefing Pack). It is indicated there that anticipated evaluation (intrusive) could not be carried out in some areas because access was denied (see section 4.4. below).

The other entity engaged in archaeological operations within the WH property in relation to the A303 ABD scheme is Historic England, through its own archaeology excavation and Analysis team – see "Historic England. Excavation and Analysis. HE7238 - Stonehenge Southern WH property Survey Assessment Report" (pp. 66 ff. in the Complete Briefing

Pack). Although HE's archaeological research has not been undertaken to inform Highways England's route selection and design work, The HE team has been undertaking non-intrusive survey and intrusive evaluations in two adjacent areas to South-East corner of the A303 / A360 (Diamond Field Borland's farm and Diamond Field Druid's Lodge) as well as West Amesbury Farm (see Figure 1b) (see figures in p. 339 and 366 of the Complete Briefing Pack). This work has been carried out as part of and in continuation of the Stonehenge Southern WHS Survey project (HE7238), a research project led and funded by HE to explore and better understand the archaeological resources of the Stonehenge WH property that lie south of the current A303 road.

Notwithstanding the coordinating role of the HMAG, and that Historic England's archaeological team and Highways England's archaeological consultants and contractors were well aware and informed of each other's operations, no comprehensive map of archaeological operations related to the A303 ABD scheme undertaken so far has was provided to the Mission – a map that would include both intrusive and non-intrusive work by ALL operators. The Mission reiterates the importance of calibrating and harmonising the work and results of ALL operators involved in the A303 ABD scheme, to ensure that both heritage and research needs are best served.

4.2.2 Availability of information on archaeological operations and results.

Every effort should be made to make as much information on archaeological operations and results available as speedily and readily as possible for academic researchers and for the general public. This includes interim and technical reports of various non-intrusive and intrusive evaluation activities, as well as excavations. The Mission has been advised that all reports on archaeological works undertaken as part of the scheme will be released to the public at the point they have been reviewed and signed off by both the contracting body and HMAG. The survey and investigation reports belong to Highways England and will be made fully and publicly available without restriction on their use. When these documents are released, the information within them will feed into the HER (Historic Environment Record, SMR), by whom, at whose financial costs and responsibility?

4.3 Heritage Impact Assessments standards

However good the archaeological survey work is, it still needs to be used effectively in HIAs and thus related to OUV and attributes of OUV.

The Mission considers that the evaluations and assessments in both HIAs undertaken for the State Party (Iterations 1 and 2) and the preliminary HIAs undertaken for Historic England and the National Trust by Snashall & Young (2014, 2017) identify that an alternative route (the F010) would have a lesser impact on the OUV of the WH property than the tunnel options currently under consideration and that the currently-proposed placement (option D061-62) would cause considerable damage to the OUV of the WH property, through adverse effects on the archaeological remains, on their landscape attributes, and on setting and visibility.

The Mission considers that the preliminary HIA by Snashall & Young (2014, 2017) makes it clear that, so far as the proposed Western portal is concerned, the currently-proposed placement (option D061-62) would cause considerable damage to the OUV of the WH

property, through adverse effects on the archaeological remains, on their landscape attributes, and on setting and visibility.

The Mission notes that the Governance and decision making processes carried on by the SP (the developer Highways England and its commercial entity AAJV) is sophisticated, but has concluded that the manner in which the criteria are being applied does not give enough weight to the heritage priority required for a WH property, and specifically to sustaining OUV, an obligations of the State Party under the World Heritage Convention. The Highways England territorial planning process for the removal of the A303 aims at a major priority; to benefit traffic and development to the Southwest of the country, leading to the proposed Stonehenge traffic solutions (tunnel D061 and D062). The design of the scheme within the WH property and road network development must however reconcile this operational objective with avoiding adverse impact on the OUV of the WH property and it is therefore not appropriate for the F010 option to have been discounted prior to the public consultation held on the scheme proposals. The Mission has consciously and appropriately considered and made comment on the F010 option, notwithstanding that this option was not overtly included as part of the Advisory Mission's Terms of Reference.

The Mission notes that all HIAs undertaken for the project should comply with the requirements and procedures set in the ICOMOS 2011 Heritage Impact Assessment Guidance and should also engage with the specific obligations of the SP under the World Heritage Convention. In particular it should be noted that benefits arising from changes in some parts of the property cannot outweigh negative impacts on OUV arising from impacts elsewhere.

4.4 Access and ownership

4.4.1 In the course of the Mission, it has become clear that some archaeological and heritage assessment related works could not be carried out at present, owing to the continuing lack of consent from the private landowner concerned, especially to the south of the A303 (see David Roberts, Andrew Valdez-Tullett and Alice Forward, "HE7238 - Stonehenge Southern WHS Survey Assessment Report", Historic England Excavation and Analysis (p. 76 of the Briefing Pack, as well as p. 266). Other archaeological reports provide further evidence of this, when for example it is stated that "The proposed evaluation of part of NE2 did not go ahead at this stage due to access constraints" in AAJV, A303 Archaeological Evaluation Report Interim Draft, HE551506-AA-EHR-SWI-RP-YE-000005 P01.2, Interim Draft, joined in the Complete Briefing pack, p. 581) and see Figure 1a).

Unlike the central area of the WH property (owned by HE, NT, EHT), both the proposed portal locations (East and West) are situated on privately owned land. The Mission considers that this state of affairs (which includes uncertain access to land for archaeological evaluation purposes) is detrimental to well-informed heritage impact assessment, because archaeological information that can inform decisions on tunnel routes, portal placements, access road and infrastructure hubs, is not available at an appropriate juncture of the decision-making process.

Indeed, the Mission considers that the implications of these access issues could have a flow-on impact on the credibility of existing and future HIAs if it were to transpire that access for thorough archaeological evaluation in the framework of HIAs may is secured too late for informed and impartial decision making processes.

5 - Corridor selection and route options around the World Heritage property

The following text is a summary of the process set out by Highways England (HiE) and reflect their views and what the State Party has set out as of January 2017 and it follows the Technical Appraisal Report (on line) prepared by AAJV to serve as public information. It is a synthesis made by the mission from a larger text which is presented in annex 4.

This section summarizes the existing problems and constraints in the study area of the existing A303 between Amesbury and Berwick Down, including the long lasting problems created by the existing A303 road passing through the heart of the Stonehenge, Avebury and Associated Sites World Heritage property (WH property), within 165 meters of the ancient stone circle and is bases on the Report which details the identification, sifting and appraisal of 8 corridors, then 7 route options considered, and finally 3 options. The procedures to determine the advantages and disadvantages of each route selected is also explained here.

A Power Point was also presented by the Highways England and AAJV, (Feb 2nd 2017) focusing on the development and appraisal of options for the many solutions that have been put forward to solve the A303 route. This with the Technical Appraisal Report are the two sources used in this section to explain the corridor selection and route options that led to the three alternatives presently under public consultation in January/ February 2017, in order to reach a final choice as an alternative to A303.

The Mission's opinions comments are only presented in 5.6 where a diagnosis of the problem of route selection from the Stonehenge OUV point of view as the State Party selection process was based on weighing up many parameters of which OUV was only one aspect.

5.1-The Highways England (HiE) Scheme Requirements

The Technical Report and the power point which summarized it was presented by AAJV and both started by announcing the Highways England requirements for the traffic solution.Highways England had the following objectives for the new road:

- Transport: to create a high quality route that resolves current and predicted traffic problems and contributes towards the creation of an Expressway between London and the South West;
- Economic growth: in combination with other schemes on the route, to enable growth in jobs and housing by providing a free flowing and reliable connection between the East and the South West peninsula;
- Cultural heritage: to contribute to the conservation and enhancement of the WH property by improving access both within and to the site; and
- Environment and community: to contribute to the enhancement of the historic landscape within the WH property, to improve biodiversity along the route, and to provide a positive legacy to communities adjoining the road.

Other concerns were also stated by HiE for the future road from which the mission underlines:
The strategic route will be redirected so as to reduce its site and sound impacts on the WH PROPERTY. *The redirected route will treat archaeological features with sensitivity and*

will protect the Outstanding Universal Value (OUV) of the WH PROPERTY. It will seek to minimise any damage to or loss of archaeology.

These intentions are important because they present clear principles serving as the basis for the selected road and the impact on the landscape around the iconic stone circle and the landscape belonging to the WH property which the mission had to analyse.

5.2 - Route Selection process

For the route selection process an identification of earlier corridor options was done where a wide range of proposed solutions to traffic problems on the A303 at Stonehenge over many years was identified. A review was undertaken of some 60 route options that have been proposed by Government, stakeholders and the public in the past. These options were grouped into a series of corridors which contained route options with similar characteristics. This resulted in eight corridors, representing the groups of route options.

The objective of this phase of the selection process (Design Fix A) was to undertake a multi- criteria assessment of the eight corridors and ultimately to recommend corridor(s) to be taken forward for further consideration.
The assessment and appraisal methodology used the following three criteria:

a) Highways England Requirements.
b) Web-based Transport Appraisal Guidance's (WebTAG) Early Assessment and Sifting Tool (EAST).
c) National Policy Statement for National Networks (NPSNN) environmental aspects.

And the outcomes of the appraisal are resumed in four major comments of interest for the Mission:

A) Surface route options within the WH property (Corridors B, C and E)
B) Tunnelled Routes within the WH property (Corridor D)
A tunnelled route through the WH property would reduce severance within the WH property and improve the setting of key assets such as Stonehenge. The surface elements may cause adverse effects on the character of the WH property but it is considered that substantial harm can be avoided by locating the tunnel portals far away from the WH property core.
C) Surface Routes outside the WH property (Corridors A, F (north and south) and G)
On balance, the harmful impacts would outweigh the benefits associated with the removal of the A303 through the WH property.
D) Corridor F surface route options to the south of the WH property would remove the A303 from the WH property in its entirety. Surface route options to the south of the WH property would also offer a less direct route for through traffic and would therefore offer reduced transport benefits. More traffic would also remain or divert onto local roads (rat running), giving rise to adverse impacts on local villages and communities.

On the basis of the initial assessments, as summarised above the better performing corridor options were identified. Corridors A, B, C, E and G were not taken forward for further consideration. This left tunnel options within Corridor D and surface options within Corridor F (north) and Corridor F (south) being taken forward for further consideration in Design Fix B. Ultimately, a single Option 1 tunnel route running from the east past Stonehenge was selected, which then divided into Option 1N and Option 1S to offer a choice of northern or southern bypass for the village of Winterbourne Stoke.

At this point discussion with the Highways England representative and AAJV clarified that other projects in the South area of the WH property dealing with the military airport and new location for a major industrial investments were being considered and the possibility of Corridor F (south) had for that reason to take a longer route.

The procedure for the selection of the routes included an assessment of the seven options corridors against the National Policy Statement for National Networks and this considered the necessary areas of assessment as pointed below:

- Air quality.
- Carbon emissions.
- Biodiversity.
- Waste management.
- Civil and military aviation and defence interests.
- Coastal change.
- Dust, odour, artificial light, smoke, steam.
- Flood risk.
- Land instability.
- The historic environment (this includes impacts on WH PROPERTY).
- Land use including open space, green infrastructure, and greenbelt.
- Noise and vibration.
- Impacts on transport networks.
- Water quality and resources.

5.3- Commentary on Impacts

Tunnel based routes within Corridor D would still include portals and a section of above ground dual carriageway within the WH property which impacts on the landscape. Highways England consider that it would nevertheless bring substantial benefits for the WH property arising from the closure of the A303 to the south of Stonehenge, reducing severance within the WH property and the impact of traffic in the WH property. Overall, it is considered that the potential exists for the benefits to outweigh the harm.

As far as the impact on the landscape, at grade routes within Corridors A, B, C, and D have the potential to impact on the high quality landscape surrounding the circles, rings, avenue and cursus and a number of visual receptors in local communities such as Durrington, Shrewton Amesbury, Larkhill, and Winterbourne Stoke.

In summary according to HiE all corridors scored poorly when assessed against the Landscape criteria, with Corridors E, F (south), and G performing the worst due to the high quality landscape of the AONB and a high number of sensitive visual receptors

Corridor D, which includes tunnel sections within the WH property, scored best when assessed against the noise criteria, with corridors A and E performing the worst due to communities experiencing increases in noise levels.

Corridor D would reduce transport costs, improve regional connectivity, support the visitor economy and provide journey time savings compared to the existing situation. Corridor D had a good fit against the CSRs, particularly economic growth and transport, with the best overall fit of all the corridors. Similarly, the corridor scored the best of all corridors against environmental criteria and EAST. This corridor offers reduced severance

and potential to enhance the WH property and is the best performing corridor of all that were assessed. It was therefore recommended that Corridor D was taken forward for further consideration.

Corridor F (North) has a good fit with the CSR for cultural heritage and offers reduced severance and potential enhancement within the WH property by avoiding direct impact upon it. It was recommended that Corridor F (north) was taken forward for further consideration.

In terms of landscape both D061 and D062 would have a moderate adverse effect with scope for further mitigation during design development. For F010 the magnitude of change and the sensitivity of the high quality rural landscape along the approximate 21.5 km length and the visual impacts of the highly intrusive crossings of the Upper Avon Valley and River Till, would result in a substantive adverse effect on the landscape with limited scope for mitigation.

For the historic environment, both route options D061 and D062 would result in an overall neutral score compared with a large beneficial effect for F010. In terms of the WH property, F010 would also result in a large beneficial effect, whilst D061 would result in a slight/moderate beneficial effect and D062 a slightly greater moderate beneficial effect. These differences arise from the routing of D062 west of the western portal where it avoids important archaeological remains and uses local topography to better fit into the landscape of the WH.

The following table provides the results of the assessment of the seven option corridors for each of the route options.

Fig 5.1- Client (HiE) Scheme Requirements summary table (Source: Technical Appraisal Report, Atkins Arup 2016)

Document	Client Scheme Requirements	D061	D062	F010
Client (HiE) Scheme Requirements	Transport: to create a high quality route that resolves current and predicted traffic problems and contributes towards the creation of an Expressway between London and the South West	3	3	2
	Economic growth: in combination with other schemes on the route, to enable growth in jobs and housing by providing a free flowing and reliable connection between the East and the South West peninsula	3	3	2
	Cultural heritage: to contribute to the conservation and enhancement of the WH property by improving access both within and to the site	2	2	3
	Environment and community: to contribute to the enhancement of the historic landscape within the WH property, to improve biodiversity along the route, and to provide a positive legacy to communities adjoining the road	3	3	2

All route options would improve journey quality, reliability and safety for through traffic. However, F010 is expected to encourage more traffic to use local roads adjacent to communities to the north of the existing A303, resulting in adverse severance effects.

However, F010, due to its greater length, has the potential to result in significant loss of priority habitats and associated biodiversity. Benefits of route options D061 and D062 would include a shorter scheme in terms of its length, landscape reconnection and habitat restoration, leading to a reduction in road fatalities and increase in wildlife movement relative to route option F010.

All three options would result in a net beneficial effect on noise. However F010 has the potential for a larger beneficial noise effect than D061 or D062 due to the reduced noise impact of the existing A303 on Amesbury.

Current appraisal guidance (WebTAG) does not monetise or seek to quantitatively value impacts on historic environment. It instead relies on qualitative scores. In some respects, the value of cultural heritage assets is intangible and will remain unquantifiable. However, techniques exist which seek to monetise the value that people place on cultural heritage assets and the PowerPoint and the Technical Report both presented the willingness to pay methodology and results.

5.4. Willingness to pay survey: methodology and results

The Willingness to Pay Research presented by HiE was undertaken only on the basis of the tunnelled option (Route Option D061). A contingent valuation study was undertaken to provide a more balanced quantitative assessment of value for money. The aim of this study was to understand the value that visitors to the WH property, A303 users, and UK residents put on the removal of the A303 from its current location within the WH property, in relation to noise reduction, increased tranquillity, visual amenity and reduced landscape severance in the WH property.

The survey responses have been used to generate estimates of the aggregate willingness to pay of the UK population as a whole or, put another way, the overall value that society attributes to these benefits. It was considered that responses to the survey were highly influenced by impacts on Stonehenge itself as the most recognisable monument in the World WH property.

The contingent valuation study involved undertaking face to face surveys at the Visitor Centre as well as on-line surveys with a stratified sample of UK residents. The research considered three separate populations:

- Stonehenge Visitors.
- A303 Road Users.
- General population.

The Results of the inquiry are summarized below:

Fig 5.4- Respondents 'Willing to Pay' for the Proposed Scheme (Source: Technical Appraisal Report, Atkins Arup 2016)

	Visitors	Road users	General population
Willing to pay to move the road	67.4%	67.4%	59.2%
Requiring compensation for the removal of the road	0.5%	2.1%	2.3%
Neither willing to pay nor requiring compensation	32.2%	30.5%	38.4%
Total	100%	100%	100%

Those willing to pay something for the proposed improvement were asked how much willing to pay an increase in annual taxes over a three-year period to support the scheme.

In summary, the aggregate net benefit for visitors to Stonehenge is £24m, for road users it is £51m, and for the general population it is £1.1 billion. Combining these together results in an estimated aggregate net present value of £1.3 billion (2016 prices and values) for the removal of the section of the A303 for a tunnel.

Fig 5.5. Aggregate Willingness to Pay/Accept (Source Technical Appraisal Report, Atkins Arup 2016)

Group	WTP/WTA variable	%	Relevant Population	Mean (£ Net Present Value)	Aggregation to national level
Visitors	Annual tax	67%	363,776	£68	£24m
	Compensation (one off)	0.5%	2,517	£188	
Road Users	Annual tax	67%	854,212	£22	£51m
	Compensation (one off)	2%	27,204	£81	
General Population	Annual tax	59%	31,653,894	£14	£1,251m
	Compensation (one off)	2%	1,229,012	£58	
Total net present value (2016 prices and values)					£1,326m
Total net present value (2010 prices and values)					£992m

It should also recognised that, in practice, the willingness to pay values cover a range of impacts not necessarily limited to historic environment. The values generated by the surveys are likely to capture impacts on noise, air quality landscape and amenity, as well as impacts on historic monuments. In overview, the willingness to pay research provides an assessment of the public value attributed to removing the road from the WH property. It provides a partial assessment of the benefits of the scheme which complements qualitative assessment based on expert opinion. Nonetheless, understanding the value that people place on the benefits of the scheme, the research helps us to better understand the trade-offs between cost and impact.

5.5- Highways England position summary

In respect of cultural heritage impacts, Highways England considers that all options would deliver transformative benefits for parts of the WH property by improving the setting of scheduled monuments, including Stonehenge itself, and by removing the physical barrier that currently divides the Site into two parts.

As noted, for all options, the benefits of removing the road from the WH property need to be balanced against the negative impacts of the construction of a new or widened surface highway in an otherwise rural environment. As for heritage impacts, quantifying such effects is highly challenging.

In relation to construction, design and management (CDM) safety assessment, route options D061 and D062 would involve significant tunnel construction, a highly specialised and technically complex activity. This would be considered a significant construction risk activity, but was assessed as manageable by a competent contractor. Route option F010 would involve the construction of significant viaducts over the River Avon and the River Till, which would require significant amount of working at height, another significant but manageable construction risk.

In regards to the scheme programme, route options D061 and D062 could be delivered to meet the road investment strategy (RIS) programme dates and achieve a start on site by March 2020. Route option F010 would require additional survey information leading to a 12 month delay relative to route options D061 and D062, and thus would achieve a later start on site date of approximately March 2021.

In conclusion, based on the more detailed WebTAG assessment and appraisal of the sifted best performing route options for corridors D and F, and the fit with the scheme objectives, the following route options are proposed to be taken forward to Stage 2 for public consultation and further appraisal, with no significant characteristics differentiating the two options:

- Route option D061: Approximately 2.9km length tunnel with route running north of Winterbourne Stoke, eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse to minimise visual impact to and from Stonehenge.

- Route Option D062: Approximately 2.9km length tunnel with route running south of Winterbourne Stoke, eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse to minimise visual impact to and from Stonehenge.

The mission was also informed that:

1- The estimated cost of the 2.9km tunnel is £1.4 billion; and
2- If the tunnel is 4.5km it would cost £2 billion.

5.6- Mission comments on the overall options selection process and criteria

From the point of view of the mission and the inscription of the WH property on the World Heritage List, the OUV is the key consideration, although it is recognised that HiE also takes into consideration many other factors which seem to be given equal weight. This problem was addressed during the discussion and the Mission pointed out that the option D061 and D062 highways crossing the WH property would have a highly damaging impact on OUV and that this key issue could not be outweighed by all other criteria and detailed justification put forward by HiE.

Corridor F surface route options to the south of the WH property which would remove the A303 from the WH property in its entirety presented a preferable solution for the WH property and impact on OUV. The SP responded that a surface route option to the south of the WH property would also provide a less direct route for through traffic and would therefore offer reduced transport benefits. Another issue on this route option was pointed out as more traffic would also remain or divert onto local roads (rat running), giving rise to adverse impacts on local villages and communities.

The mission recalled that the submission by various organisations contesting the tunnel suggests that these adverse impacts could be overcome, so this argument led to a new information about the non-willingness to develop the F010 longer surface solution: HiE clarified that a major project in the South area of the WH property near the airport runway within the military area was been considered as the future location for a major industrial investments, affecting therefore the length of Corridor F (south) that had for this reason to go further away and become a longer route. Nevertheless, the F010 option (even if longer) warrants further consideration.

As for the tunnel solution, notwithstanding the evaluations in the HIAs, the mission considers that HiE presents an over-emphasis on the benefits to OUV, or more-specifically, benefits to the setting of the monuments in the central area of the WH property and understates the dis-benefits to the WH property of the tunnel/approach highways option – for instance it is said on p.3 of the Highways England 2016 Technical Appraisal Report that: *B) Tunnelled Routes within the WHS (Corridor D) A tunnelled route through the WHS would reduce severance within the WHS and improve the setting of key assets such as Stonehenge [by this is meant the main henge monument not the whole WH component]. The surface elements may cause adverse effects on the character of the WHS but it is considered that substantial harm can be avoided by locating the tunnel portals far away from the WH Site core*

This suggests that improving the setting of the Stonehenge monument by removing A303 is considered to be an improvement while adverse impact elsewhere in the WH property could be mitigated by putting the portal away from the central area so that it was not visible from the main henge monument.

The mission clarified that the whole WH property landscape had to be taken into account in assessing adverse impact and that the harm/ benefit consideration was relevant, but did not solve the negative impact on the OUV of the whole WH property. The proposed approach highways to the tunnel (outside the proposed portals, but within the WH property) would harm the OUV of the WH property.

The willingness to pay research presented by Highways England is an innovative procedure to help the evaluation of a major change in the area of the WH property, which affects the whole population of the UK as they will have to pay for this improvement. The final result is given in money value and adds arguments to the decision to be undertaken and may enrich the diagnosis of this second Mission, though only the tunnel was considered in the inquiry so the F010 proposal was set aside.

Since the estimated cost of the 2.9km tunnel construction is 1.4 billion, the willingness to pay survey has given an encouraging estimated aggregate net value of £1.3 billion (2016 prices and values) for the removal of the section of the A303 for a tunnel. The full length of the tunnel to cross the width of the WH property would be 5.6km with an estimated cost in excess of 2 billion which is almost the double of the ‘willingness to pay’ amount. This discussion is further presented in section 6.4.

Another factor was discussed when comparing F010 solution and D01/ D02; the former taking much longer to finish (Route Option F010 would require additional survey information leading to a 12 month delay relative to Route Options D061 and D062, and thus would achieve a later start on site date of approximately March 2021) thus affecting the

Development Consent Orders (DCO) timeline. It was explained by HiE that "when considering an application for development consent, the Secretary of State considers its benefits including for economic growth, job creation, and environmental improvement. This will be considered against adverse impacts of the scheme including long-term cumulative impacts. Such applications are required to be supported by a business case prepared in accordance with Treasury Green Book principles." This approach had resulted in a clear preference for the tunnel, though the mission considered that the F010 solution had less impact, and was better fitted to preserve the OUV of the WH property.

The assessment methodology used to asses options, takes a broad approach, recognising the uniqueness of Stonehenge and its international importance, but also weighing up impacts on the many different individual monuments affected, either positively or negatively, by the scheme. The mission emphasised that impact on ALL attributes of the OUV of the WH property, including its landscape and the relationships between the monuments within it, not just the changes to the landscape around Stonehenge itself, require consideration. While the central area of the WH property area would benefit, the area of the portals and the associated approach roads would significantly impact upon the attributes of OUV.

For a World Heritage property, a simple balance between positive and benefit impacts is not appropriate. The appropriate 'test' is not whether or not there is a net benefit to OUV or other heritage values, but rather whether the outcome has an adverse impact on OUV. The prime objective should be to avoid adverse impacts on OUV. If impacts on OUV are unavoidable, that could be a basis for deciding not to proceed with the project. Thus the issue of balance for WH properties has to be constrained by the fact that however great the benefits of a project, these cannot compensate for irreversible impacts on OUV.

The ICOMOS *Guidance for the preparation of Heritage Impact Assessments* (2011) notes impacts on OUV can be positive – such as public benefits – as well as negative. But positive impacts cannot outweigh negative impacts. The mission report must focus on potential adverse effects on OUV of the WH property and especially on irreversible impacts.

The Mission recognises that the State Party and its relevant authorities under national planning structures need to balance a range of issues and factors in making decisions regarding the proposed project and that there are potential public access and landscape benefits. However, the mission considers that:

- The F010 option should be explored further as an alternative (even if it will take a longer route and a longer time frame) for further studies; and it costs far less.
- in view of the impact of the western tunnel portal on the WH property's OUV, the two options D061 and D062 are effectively the same solution.
- D061-062 would cause considerable damage to the OUV of the WH property, through adverse effects of the Western Portal and approach road on the archaeological remains, on their landscape attributes, and on visibility and the wider setting.
- that the re-positioning of the eastern tunnel portal to the east of the 'Avenue', but still within the WH property, is an improvement, but is not an ideal solution; further refinements in the position are needed to ensure that impacts on OUV are avoided or mitigated. A location closer to the Countess roundabout should be considered, (bearing in mind other archaeological features in the vicinity, including the Mesolithic Blick Mead and the Iron Age Vespasian's Camp).
- should a tunnel option remain under consideration, an extension of the tunnel should be considered so that the Western Portal should be located outside the WH

property to avoid its negative impacts on the OUV of the property, its landscape, monuments and archeological richness.

6- Proposed tunnel lengths and portal placements

6.1 Design fixes and costs

6.1.1 As stated in the 2017 Briefing Pack, a decision has been reached at the Design Fix C stage, that the:

> "(2.2.9). Design Fix C assessed the route options identified in Design Fix B. The assessment started with a review of the three 4.5km tunnel options and determined that these were not deliverable within the Government's **prescribed terms and objectives** set out in the Road Investment Strategy and therefore did not constitute viable options. These route options were then discounted from further assessment"

The Mission would appreciate a brief explanation (or a reminder, if the information has already been provided) regarding these "prescribed terms and objectives"? Why and how were these criteria not met for the explored 4.5 km options? How are these criteria quantified, and particularly whether and how they are related to any issues of costs? Presumably the same criteria apply to shorter tunnel options, and they need to be explicitly stated.

The estimated actual construction costs of the tunnel were given, and they do not increase proportionally as the underground stretch tunnel length increases. From the Highways England Technical Appraisal Report 2016 and the presentation of Feb 2nd discussed in section 5, the estimated cost is as follows:

> 1- The estimated cost of a 2.9km tunnel is £1.4 billion
> 2- If the tunnel is 4.5km, it would cost is £2 billion
> 3- As far as the Mission could gather if the tunnel is extended by 0.9km westward, for a total length of 3.8km, its estimated cost would be £1.78 billion.

6.2 Process of design propositions and decision-making

6.2.1 An overview of the changing proposals, from prior to the first Mission through the intervening 14 months to the second Mission, makes it possible to better understand the range and sequence of considerations brought to play regarding the tunnel length and portal placements. These considerations are essentially heritage-related, economic, and technical.

6.2.2 An 'initial' state of affairs emerged following the December 2014 announcement by the UK Government that it would invest in upgrading the A303 ABD into a dual carriageway, including by its tunnelling on the perimeter of the WH property (see section 2.1 above). This announcement has led to several preliminary propositions by Highways England, the scheme developer. These included a "short" tunnel (being 2.1 km in length), as well as a longer tunnel, but one that would have been cut-and-cover rather than bored – that is, which is dug down from the surface over its whole length. This was quite rightly considered totally inacceptable by the official SP heritage bodies (HE, EHT) and the National Trust. The 2.1 km proposal was the subject of a public inquiry in 2004 and was recommended by the inquiry Inspector in his report published in 2005, but the UK Government cancelled the scheme in 2007.

6.2.3 English heritage agencies and institutions have proactively engaged with the issue, in order to provide to Highways England an answer to the question: "if a (bored) tunnel was to be built of a length inferior to 4.5 km, where would its portals be best placed on heritage grounds?" This 'best placement' was reached upon a complex factoring of predominantly heritage consideration, bearing on the assessment of adverse and beneficial effects to the WH property and its OUV. A study was carried out in 2014 by Nicola Snashall (NT) and Christopher Young (former EH – HE), and a number of potential locations were suggested by English Heritage (as it was then). As presented to the 2015 Mission, the more compelling locations in terms of heritage were identified as 'E' to the East ('online' – that is, on the path of the actual, single carriageway, A303) and 'A1' to the West (i.e. 'offline', to the south of the current A303). See Figure 2. The measured distance between these two points is of 2.9km – hence the proposal and proposal by the SP to build a bored tunnel "at least 2.9km long".

6.2.4 In October 2015, the first ICOMOS/UNESCO Advisory Mission raised serious misgivings about the location of the Eastern portal. It was considered of paramount importance to be able to recover the integrity of "The Avenue", an early Bronze Age path that leads from the Stonehenge monument to the Avon River (and clearly an integral part of the WH property OUV). While the Avenue is currently cut by the A303, the removal of this road will enable to recover its line (if not original fabric which is understood to have been destroyed by the construction of the present A303 road), provided that the Eastern tunnel portal was bored further to the East of it (and not to the west of it, as is point 'E', separating it from the Stonehenge monument).

The location for the Eastern portal is still under consideration, although the resulting eastward re-location was presented in the 2017 Briefing Pack presented to the current Mission. It has also been included in the documents of the non-statutory public consultation (run by Highways England from 12 January to 5 March 2017) as routes D061, D062 (see Figures 4.1-4.3 and section 1.4.3 above).

6.2.5 Studying the preparatory documents for the second UNESCO/ICOMOS Mission, and through inquiries during the Mission itself, it has become clear to the Mission members that, in the subsequent reiterations of the proposed routes (corridor D 061 - 062) a highly important design decision has taken place: since it was agreed to relocate the placement of the Eastern portal some 400 meters (as estimated on scaled Figure 3) eastwards (so as to 'reunite' the Avenue with the monument), a design decision was taken to <u>move correspondingly by 400 metres eastwards the placement of the Western portal</u> (initially proposed at A1, as discussed above). In other words, the length of the tunnel was considered to be fixed, at 2.9km: just like a piece of string, the moving of one end (eastwards) necessarily moves the other, in the same direction. This is illustrated through a map provided in a document produced by AAJV and entitled "A303 Amesbury to Berwick Down Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" Iteration 1 Report, HE551506-AA-GEN-SWI-RP-YE-000003, P3.0, 15th December 2016" appended to the complete 2017 Briefing Pack on pp. 730-791 (followed by appendices). The map in question is Figure 4: Corridor D route options p. 790, reproduced here as (Figure 3).

A comparison of Figure 2 (A1 in Snashall & Young 2014), Figure 3 (this AAJV produced map) and Figure 4.1-4.3 (from the non-statutory public consultation PDF document) shows that the AAJV Map – with the eastwards shift of the two portals clearly marked, and the

designation D061-62, is the one that has been put forwards in the public consultation – and commented on by various stakeholders.

The first Advisory Mission commented on the difficulties of a Western portal being sited within the WH property. Given the importance of the overall archaeological landscape of the property, the tunnel portals and approach roads would be a major change that could have severe consequences to the OUV of property.

The Mission has concluded that if a tunnel solution were ultimately to be pursued, as part of the iterative design process, an extension of the tunnel should be considered so that the Western Portal and its associated approach road would be located appropriately outside the WH property to avoid its negative impacts on the OUV of the property, including its landscape, monuments and archeological richness, or its setting; and, although the re-positioning of the eastern tunnel portal to the east of the 'Avenue', (but still within the WH property), is an improvement, it is not yet an ideal solution; and further refinements in the position are needed to ensure that impacts on OUV are avoided or mitigated. A location closer to the Countess roundabout should be considered (bearing in mind other archaeological features in the vicinity, including Blick Mead and Vespasian's Camp).

6.2.6 As one of the useful outcomes of this discussion regarding tunnel length and portal placements, an additional issue (on top of heritage and economic considerations) was identified, that of technical considerations. As indicated to the Mission orally by the Highways England, over a certain length of tunnel (- Such as? Is it 3, 4, 4.5 Km? What does it depend on? How can that be affected? -) it is necessary to provide the tunnel with ventilation through vertical shafts (in addition to that 'naturally' induced by traffic flow, or by a ventilation system at the portals). This technical requirement was apparently considered by the heritage bodies (though this does not appear in the documents provided), who requested to ensure that no such ventilation shafts would be placed within the WH property.

The Mission requests further clarification on this possible technical constraint, and on its possible role in limiting the length of the proposed tunnel. The Mission requests confirmation as to the reality of the requirement by the heritage bodies – that there be no ventilation shafts on the WH property – and the degree to which this request has contributed to rule out the 4.5 Km option discussed above. Further to that, it is requested that the SP and the heritage bodies weigh the benefits of a longer tunnel against the necessity of accepting one or two ventilation shafts with the WH property – a provisional HIA could be carried out, in view of assessing how might such shaft(s) be judiciously and sensitively located so as to have no or minimal impacts on heritage assets, on landscape, on visibility, on visitor safety and enjoyment etc. Furthermore different tunnel construction options might be considered that require less ventilation shafts.

6.3 Specific comments on the proposed Eastern and Western tunnel portals locations and approach roads

6.3.1 On the Eastern Portal.

The Mission notes that the recommendation of the April 2016 with regards to the recovery of the prehistoric 'Avenue' was taken on board. All proposals made subsequently, including in the non-statutory public consultation, have explicitly placed the Eastern portal to the East of the Avenue. Some documents, including the press release of the heritage

bodies, explicitly relate this decision to the first ICOMOS/UNESCO Mission report (see Annex 3).

The SP and its heritage bodies will nonetheless need to remain particularly vigilant, as further decisions are taken and plans proceed, that a full heritage impact assessment is carried out in the area, and that both the portal and its access route and construction infrastructure have no adverse effect on heritage assets that contribute to OUV. This needs to be emphasised because the area to the east of the Avenue within the WH property contains several heritage assets, some well know such as Vespasian's Camp, others in the course of being investigated, such as Blick Mead (Mesolithic). Concerns about these heritage assets have already been expressed by respondents to the public consultation.

6.3.2 On the Western Portal and its associated approach road.

The location of the Western Portal as currently proposed (e.g. in the non-statutory public consultation documents) is the subject of major criticism. In addition to various comments by professional archaeologists and other stakeholders, this Western portal proposal is also subject to considerable scrutiny by Snashall & Young 2017, in their preliminary HIA.

The objections raised by the above bodies and stakeholders to the current proposition D061-062 for both the portal and the almost 2km approach road concern issues of integrity to the archaeological landscape, as well as inter-visibility of the monument which are presented in section 6.4 and overall to impact on OUV. In addition, other objections are related to the presence of newly discovered or confirmed archaeological remains in the A303/ A360.

Indeed, as indicated above (section 4.1) the non-intrusive and intrusive evaluation work already carried out by AAJV and their sub-contractor Wessex Archaeology, as well as by Historic England has brought in some new results, which have been synthesised in Snashall & Young 2017. As indicated in their figure 2 ("Key groups of attributes of OUV", reproduced here as Figure 5) these include the occurrence of two long barrows and a hengiform monument in the area around the Diamond copse (n° 18 in the figure), and the broadening of the boundaries of the Normanton Down Barrow Group (n° 14/15).

The conclusions of the Snashall & Young 2017 report is that both routes D061 and D062 have to various degree adverse impacts on OUV, and cannot be as such accepted. This assessment by Snashall & Young 2017 served as the basis for the joint position statement by HE, NT and EHT following the non-statutory public consultation (Annex 3) whereby "The western tunnel portal location as shown in the consultation documents need significant improvement" (though no specific mention was made here of the highly adverse impact of the approach road).

The ICOMOS/UNESCO Mission fully endorses the reservations expressed by the heritage bodies – and those expressed even more forcefully by the professional archaeological community and the wider public as well – regarding the negative impact on OUV of currently proposed Western Portal (D061-62) and its associated approach road.

6.4 Landscape impact at the western tunnel portal

The impact on OUV should cover both archaeological sites and their disposition and inter-visibility in the landscape therefore the landscape analysis is not separate from archaeology During the mission a video simulation was shown where the dynamics of the highway

“erupting” out of the tunnel on the proposed western portal within the WH property landscape could be seen with a bird’s eye view. The vision of the traffic dynamics, the embankments required to create a landscape surface, flat enough for the road levelling and highways’ smooth slopes, impressed the whole audience because of the considerable earth movements that this construction would require within the limits of the inscribed WH property.

It was noted that the video was generic, and did not reflect this specific scheme in any way in the portrayed use of embankments. However, from a landscape architecture point of view, the earth works of a highway with embankments are always an impacting procedure in any landscape, let alone one where every archaeological assessment is likely to reveal much information on a time period spanning from the Neolithic to the Romans.

The afternoon of that day, a visit on-site to different visual important points took place. Highways England, National Trust, Historic England and English Heritage pointed out the approximate place where the 2.9km tunnel would emerge, and this only confirmed the landscape impact and the harm that the western portal location decision as currently proposed (fig 6.4.1) would cause to the integrity of the WH property's complete landscape.

A photograph taken near Long Barrow (fig .6.4.2) shows the project director pointing to the estimated location where the Western portal will emerge (fig 6.4.3), to the east of the woodland patch called "the Diamond". In both proposed routes D061 and D062), the portal will destroy part of this forest. The exact location of this photograph is shown in point 5 in the map fig.6.4.1, and a view of this open landscape allowed the mission to understand the visual proximity of the Stonehenge circle to the many barrows and Neolithic remains, establishing a network of inter-visible landmarks that compose this rich landscape.

As seen from the photographs of the visit (fig.6.4.4) and the map the landscape presents green rolling hills, clumps of forest, a pig production area (fig 6.4.5), edges along the walks and from many points of view the barrows, the *Cursus*, and the circle are visible.

The removal of the A303 would finally unite this whole landscape within the WH property and that visitors will be able to (finally) enjoy this unique landscape without any disturbance, being able to walk from Stonehenge circle to Normanton barrows or along the Avenue and hiking the whole length of the Cursus, then the SP is improving much of the WH property as a united landscape.

This would allow visitors to appreciate and perceive this WH property as it was built during the millennia of ritual and religious use. However, in this case the cutting by a highway of this united landscape with the final 900m of outside open highway will just damage again the silence, the quietness and the view of this unique WH landscape.

6.5 Visitors access and control

6.5.1 As indicated above in dealing with the SP's responses to the 2016 recommendations, (section 3.3.), it is urgent that more be understood and planned with regards to **"the day after"**, when and once the tunnel is open and operational and the landscape is "reunited". Question of access and control, the centralising position of the Stonehenge visitor centre (EHT) and other means of access to the land (NT) need already now to be anticipated – and shown to be taken seriously.

- The SP will want to ensure that it can deliver on its heritage promises, that burying the A303 in a tunnel (or through constructing a bypass) has heritage benefits in addition to traffic ones, and that whole Stonehenge landscape is made more accessible for a greater number.

- At the same time, the SP will want to ensure that proper protection and control measures are designed and applied, in a situation when the A303 (surface) is no longer here to serve as a 'natural' protective barrier and channel for Stonehenge related traffic.

- Some precise questions of access routes, car parks (paying? protected?), facilities and shops (with possibly local benefits) can be anticipated, as well as a diversity of access to Stonehenge, including a diversity of physical routes as well as narratives.

- Particular attention should be paid to the Avenue, and the Eastern Tunnel portal. With the link between the Stonehenge monument and the river Avon 'recovered', it can be expected that the Avenue, the stretches that remains and those that can be re-united, will generate further public and tourist attention, be it in the context of special events and processions (solstices) or on a more recurrent basis. Measure should be in place to ensure that enjoyment and appreciation of these features does not compromise their integrity in any way.

6.5.2 - The issue of **the 'free road-glimpse' of the Stonehenge monument** that will be lost needs to be taken seriously and address properly. The Mission recommends to the SP, as part of its anticipation and preparation ahead of the completion of longer Tunnel, or a bypass, to undertake- a comparative study of the 'public visibility' of selected sites and monuments, in urban settings or in the countryside, including (1)- all the WH property in the UK, (2) – the top 10 (or 15, 20, however relevant) most visited EHT and NT sites, and (3) the top 10 (or 15, 20, however relevant) most visited heritage sites in the UK (non EHT or NT)). Such a study will seek to assess how many and how such sites and monuments are (a) visible without entry (payment, control) and (b) at all visible, and to what degree from through road or public paths, without detours or specific deviations.

Such a study, involving heritage and tourism professionals, will serve to assess for its worth the important claim on the loss of the Stonehenge 'free view from the road'.

6.5.3 – **Between Stonehenge and Avebury**. All of the major monuments owned & cared for by the National Trust in both the Stonehenge and Avebury parts of the WH property are accessible for free and are permissive open access land, open 24 hours a day, 7 days a week, all year round. However, there an urgent need for better coordination between the two heritage bodies (EHT and NT) responsible for the management of the WH property, which appear to be behaving here somewhat like competitors for money-spending customers, rather than as partners in the custodianship and enhancement of what is a single WH property with a single overarching management plan. Instead of ignoring each component, or reluctantly parting with information ("we have run out of brochures and they have not yet restocked us", "sorry no map, but you'll need to drive northwards about 40 minutes" – paraphrases of answers given to the Mission expert at the Stonehenge information desk), it should be expected of these heritage agencies (and especially EHT, which oversees the visitor centre) to consider both components as if they were 'their own', with possibilities and encouragement of tie-in visits.

6.5.4 – Stonehenge-Avebury. The existing management mechanisms and process, (under which NT and EHT are active participants in the WH property governance structure –

comprising ASAHRG, the WHS Committees, WHS Partnership Panel, WHS Liaison Group and multiple WHS-focused task and finish groups) should be reviewed and refined to ensure that the two teams work better together, alongside of course the Wiltshire authorities and local stakeholders, to ensure that as smooth connections as possible are being made and reinforced between the Stonehenge and the Avebury components, in terms of visitor information (both on-site and upstream on the respective websites, with links etc.), access, facilities, experience, interpretation.

This process could be implemented within the framework of the MOU as recommended by the First Mission (recommendation 3.1). The SP has indeed set up subsequently a Memorandum of Understanding regarding the relationships and modes of collaboration between the heritage bodies (HE, NT, EHT and WCAS) (see point 5.14 of the Briefing Pack). Within the remit covered by this MOU (5.14.8, 5.14.9) should be added a working group specifically concerned with the links between the Stonehenge and the Avebury components of the property.

This connection between the Stonehenge and Avebury components is all the more relevant for two reasons:
1) Recent research and interpretation rightly emphasize the "landscape" dimension, which should address the inter-connectedness of the components of the WH property (e.g. Salisbury, Old Sarum, Devizes, Stonehenge and Avebury, Silbury hill, and more….).
2) The eventuality of the A303 ABD infrastructure project materialising will clearly cause considerable disruptions during construction. Visitor behaviour may well take new patterns and seek different routes and sites: the specific ways in which Avebury may be included in the circuit (with all the potential risks incurred in visitors upsurge) needs to be thought-out and agreed, with from the onset all national and local heritage bodies and stakeholders.

7 - Management Plan and sustainable tourism strategy

7.1 - Sustainable tourism strategy

The consideration of the WH property in its entirety (Stonehenge and Avebury) is a prerequisite to any mitigation measure to the current development project. Indeed, to resolve a traffic problem or to restore the integrity of the WH property does not imply the same approach. Up to now, it seems that the resolution of the traffic problem, by dualling the lines of the A303 and boring a tunnel, is presented as a project of restoration of the visual integrity of the WH property, therefore directly enhancing the OUV of the property. On the contrary, any change of the situation on which the adopted OUV was defined should be carefully considered on the property as a whole, including on the overall integrity and authenticity of the property and not on specific components of the OUV, ie: Stonehenge monuments and surroundings monuments. The wider landscape of the WH property is to be considered and not only the scheduled monuments. Therefore, the mitigation measures of the proposed project must address the traffic flows and the visitor flows in the property as a whole, *Stonehenge, Avebury and Associated monuments*. Two members of the Mission requested to go to Avebury on the last day of the mission and met with the local stakeholders with the view to understand the global situation and draft appropriate recommendations.

The visit to Avebury and the meeting with the local stakeholders confirmed the need to take into consideration more closely the Vision developed for the site in the 2015 Management Plan and to consider the impact of the change induced by the A303 project on the Vision itself (p.10 of the MP) and the subsequent management priorities. It is worth to recall that the Management Plan stated : "*given the density of the known archaeology, there is considered to be great potential for new discoveries within the WHS, and the protection of the archaeology and the landscape is given a high priority in development control decision within the WHS*" (MP, p.18).The 2015 Management Plan (the first joint Stonehenge and Avebury WH Site Management Plan) must be the reference document on which to ground the review of the heritage impact assessments and of the mitigation measures in all their aspects. In addition to the OUV and its attributes, key notions put forward by the MP should be used to this aim such **the landscape** in all its features and **the national and local values of the property**.

It is important to acknowledge that UNESCO policies and internationally agreed objectives, which should be reflected in the State Party management approach, are fully included in the Management Plan, including *Visitor Management and Sustainable Tourism* as a key management issue and opportunity. However, a WH property Sustainable Tourism Strategy is still to be developed.

Consequently, the mission recommends as a priority that, in line with the priorities of the 2015-2021 Management Plan, a sustainable tourism strategy of presentation and promotion of the WH property be developed as soon as possible with the view 1) to frame the mitigation measures, such as the loss of direct visual access of Stonehenge Monument, into a wider context; 2) to ensure that the economic benefits related to the WH property are spread to the community and the wider county and 3) to ensure the lasting conservation of the site.

The Mission further recommends that, in the same spirit, stakeholders meetings and public consultation about the Stonehenge scheme should be extended to Avebury and north of Wiltshire areas.

8 - Future Consultation, Engagement and Advice

Having regard to the requests in the Terms of Reference for the Mission to consider appropriate mechanisms for future consultation, advice and engagement, and how the World Heritage Centre and its Advisory Bodies can offer advice on the impact on the OUV of the WH property in light of the reporting process to the annual World Heritage Committee and statutory timescales of the Development Consent Order (DCO) application, as the plans to address the problems caused by the existing A303 trunk road traffic are further developed over the coming years, the Mission has concluded that the program of consultation, engagement and advice should continue.

There should be a process of ongoing consultation and discussion between the World Heritage Centre, ICOMOS (as Advisory Body) the State Party, the excavation and analysis team of Historic England, Highways England, the AAJV and Wessex Archaeology, and the HMAG, in order to facilitate the best possible outcome for the property.

A program of ongoing advisory Missions is warranted. One of the aims set by the Mission has been "To examine ways by which ICOMOS/UNESCO can offer further upfront advice as the project develops".

The Mission considers that a further Mission concerning the A303 ABD Scheme sets up a new 'consultative' process with stakeholders, local communities, residents, civil society, Stonehenge alliance, ICOMOS UK as well as professional archaeologists, academics and universities etc. During the first Mission in October 2015, such a "surgery" has proven very successful – including a 15 minutes presentation by a range of stakeholders to expose their views and gain a better understanding of their position. Given the development of the scheme and its growing precision of the Scheme, and prior to any decisions being taken, such a renewed consultation process in the framework of a joint ICOMOS/UNESCO Mission would prove very useful.

The timing and unfolding of such follow-up missions remain to be determined with the SP, in function of the calendar related to the A303 ABD scheme – DCO, Governmental decision, and also in function of the requirements of the World Heritage Centre and the World Heritage Committee.

The State Party needs to accept that for this iconic WH property it would be appropriate to adjust the project program and the expectations of all major participants to align with the World Heritage Committee timeframe and process, through careful attention to the ‘triggers’ which instigate statutory timeframes and deadlines. It would not be appropriate for the relevant SP Minister to take any decision without enabling the Committee inputs to inform that decision. The Mission notes that while there will be a State of Conservation report considered at the next Session of the Committee (after which the Committee Decision should guide the State Party and its agencies in how to proceed), that this need not preclude the Minister receiving advice and information earlier, but would require a longer timeframe for final decisions than is currently intended.

9. Conclusions and recommendations

9.1 Conclusions

A joint ICOMOS/UNESCO Advisory Mission was undertaken on the 31 January – 3 February 2017 concerning the A303 Amesbury to Berwick Down road Scheme and its impacts on the Stonehenge WH property and its OUV. Issues of traffic surrounding Stonehenge are long-drawn affair. The single carriageway stretches of the A303 within the WH property perimeter have long proved to represent (a) a hindrance to the flow of traffic in a major artery to the South-West of the country, and (b) an adverse impact on the Stonehenge monument (165m distant from the road) in terms of noise and pollution, and also on the wider Stonehenge landscape, its integrity and its enjoyment.

Like the preceding Mission in October 2015 (reported in April 2016), this Mission was undertaken at the request of the SP in order to obtain insights and advice on the ongoing process by which propositions are fleshed out and eventually promoted with regards to the A303 ABD Scheme. It must be emphasized that it is not the aim of this Mission to approve or endorse any proposals or to anticipate official responses by ICOMOS, UNESCO, or the World Heritage Committee.

In a Briefing Pack, the SP provided comprehensive information and documentation relating to:

1) its responses and actions upon the recommendations of the First Mission, and

2) the various measures undertaken since the first Mission (October 2015) in terms of choice of operator (AAJV) by the developer (HiA), and subsequently in terms of design, scheme development, route selection, Heritage Impact Assessment, and archaeological intrusive and non-intrusive operations.

The Mission took place during a phase of non-statutory public consultation (12.01 – 5.03.2017) launched by the SP and the scheme developer Highways England. Specific consideration of this consultation process was not part of the remit of the Mission: it is worth noting however that the information and proposals released as part of this public consultation was the one that was available to most stakeholders, academics and wider public – and that it is on the basis of this information that comments and reactions were formulated.

The Mission appreciated the investment, commitment and goodwill demonstrated by the SP and its agencies and officers. However, the Mission also noted weaker aspects in the process by which the findings of the HIAs and the OUV of the WH property and its attributes were integrated and taken into account in the decision-making mechanisms.

As well, for the tunnel option, specific proposals regarding portal locations made by the SP pose considerable threats to OUV. These weaknesses, addressed throughout this report and further discussed in the form of recommendations below, concern such aspects as the scientific reinforcement and credibility of HIA measures (both Archaeology and Landscape related), the transparency of the decision process, and the proposed location of the tunnel portals. Although commitment to a bored tunnel of "at least 2.9 km" long has been reiterated since the onset of the current process (2014), and although the SP’s heritage bodies and the National Trust seem well conscious of the need for considerable flexibility in this respect, to avoid threats to OUV, this may not be fully the case with the scheme' developers and their consultants.

Regarding the currently proposed locations of the tunnel portals (if such a tunnel is to go ahead), the Mission has reached the following conclusions. The location of the Eastern portal as proposed (including in the non-statutory consultation) – is situated within the boundaries of the WH property. Its repositioning to the east of the important prehistoric feature known as the 'Avenue', linking the Stonehenge monument to the river Avon, clearly follows heritage and OUV considerations, and as such is to be welcomed. Nevertheless further refinements in the position are needed to ensure that impacts on OUV are avoided or mitigated. A location closer to the Countess roundabout should be considered, especially with regards to approach routes and infrastructure during construction, (bearing in mind other archaeological features in the vicinity, including Blick Mead and the Vespasian's Camp).

The location of the Western portal as currently proposed (including for the purpose of the non-statutory public consultation) is also situated within the boundaries of the WH property. This placement is highly likely to bring adverse impacts to a range of archaeological monuments on its course, and to the wider landscape inter-visibility relations of the WH property elements and thus to impact adversely and unacceptably on its OUV. This conclusion rejoins and reinforces the misgivings expressed by the SP heritage bodies, both during the Mission and in their joint position statement of 8 February (Annex 3).

The Mission urges the SP to work further in order to identify satisfactory solutions to the A303 traffic issues that would not comprise the OUV of the WH property, and that would abide by the SP's international obligations in these matters. To this end, the joint ICOMOS/UNESCO advisory Mission readily endorses the SP's request to ensure the further engagement and availability of international advisors in subsequent Missions, with terms of references and a calendar to be jointly fixed. ICOMOS and UNESCO stand by the SP in this challenging and complicated process of ensuring that solutions to the A303 traffic issues are done in full respect of the OUV of the WH property.

9.2 Recommendations

Following the 3 days of on-site visit and interactions with SP representatives, developers, heritage bodies and other stakeholders, the joint ICOMOS/UNESCO advisory Mission puts forward a series of recommendations.

These are presented here in sequence, dealing first with recommendation following from the previous Mission, with recommendation related to current developments, and with recommendations for further involvement in the process. For that reason there is some overlap.

9.3 **Recommendations following from the first mission**:

9.3.1 Recommendation proposed in relation to section 3.2 above.

The Mission recommends:

-That (a) the "HMAG scientific committee" be immediately fully constituted, and ensured to include independent scientific experts (i.e. unrelated to the 4 official bodies or agencies already implicated), such as university based academic researchers (e.g. from London, Southampton, or Bournemouth) and representatives of the "Avebury and Stonehenge

Archaeological and Historical Research Group" (ASAHRG) – as per requirements of the just published "Research framework document" (Leivers & Powell 2016).

-That (b) the scientific committee be implicated, upstream, in all matters that it considers relevant and within its areas of expertise, and not be limited to punctual or "additional advice" at the instigation and judgement of the HMAG official bodies.

-That (c) the "HMAG scientific committee" has the time, availability and access to all the information necessary in order to proactively ensure that all archaeological operations undertaken on the WH property (and indeed on the A303 ABD Scheme as a whole) are not limited to mitigation considerations in the framework of commercial, developer-led archaeology, but abides by academic standards and contribute also to ongoing research agendas and the generation of new knowledge.

9.3.2 Recommendation proposed in relation to section 3.3 above.
The Mission recommends:

-That the SP takes all the necessary steps to adequately study visitor behaviour and their changes as likely to occur in the eventuality of a tunnelled A303 road, or a bypass, and a reconfigured Stonehenge landscape. The proposed study, logically to be undertaken by the heritage bodies, should be launched as soon as possible, including its scoping, identification of in house or external expertise, and its funding by the developer. It should also include research and study, including surveys and questionnaires, leading to a thorough understanding of the issue of the "loss of visibility" of the Stonehenge monument by passing motorists.

9.4 Recommendations related to current developments

9.4.1 Recommendation proposed in relation to section 4.4 above.
The Mission recommends:

-That all the A303 ABD Scheme related Heritage Impact Assessment and archaeological evaluation work, both non-intrusive and intrusive, is undertaken to standards requested of the academic research projects undertaken in the same area. This includes the availability of skills and personnel, the appropriate use of mechanical and of manual tools, and appropriate sampling and analysis strategy etc. The scheme's developer and the heritage bodies should take on board the required duration and costs of these measures.

-That in the event that the project proceeds in a manner which requires further archaeological investigation then the SP should take all the necessary measures to ensure by all possible means that the archaeological operations undertaken on the A303 ABD – both within and outside the WH property perimeter – fulfil their dual mission, which is to provide well-established and potentially decisive heritage assessment, and also take the unique, unrepeatable opportunity to contribute research generated knowledge about the past. This objective may be assisted by:

a) recruiting the HMAG scientific committee, as soon as possible with both ASAHRG and academic researchers fully involved; and
b) ensuring that the standard of archaeological work at the WH property meets the standards demanded of research excavations, and not those, necessarily different in their aims, practice and yes, costs, that apply in some areas of commercial archaeology. This would also mean to follow and implement the recent report published for the WHS management by Wessex Archaeology "A Research Framework for the Stonehenge, Avebury and Associated Sites World Heritage Site: Research Agenda and Strategy" (Leivers & Powell 2016):

http://www.stonehengeandaveburywhs.org/assets/Research-Agenda-and-Strategy-1.pdf

9.4.2 Recommendations proposed on section 5.
The Mission recommends:
-That the F010 option should be further explored as an alternative (even if it will take a longer route and a longer time frame) for further studies as it would have a much lesser impact on the OUV of the WH property (and also will cost considerably less);

- The SP should inform WH Centre, as per paragraph 172 of the *Operational Guidelines*, about the large industrial project near the military airport south of the WH property that could impact on the F010 road lay out but also on the property nearby.

-That, if a longer tunnel was to be pursued as an option, an extension of the tunnel should be considered so that the Western portal and its associated approach road would be appropriately located outside the WH property to avoid negative impacts on the OUV of the property, including its landscape, monuments and archeological richness, or its setting. The SP should undertake a comprehensive Heritage Impact Assessment for the portal and approach road placement which addresses archaeology, the visibility and noise factors incorporating a landscape impact study focusing on the inter-visibility and visual envelopes (viewshed) of the Western portal and highway locations. These studies should support a solution that avoids impact on the OUV of the WH property.

- That, while the re-positioning of the eastern tunnel portal to the east of the 'Avenue', but still within the WH property, is an improvement, it is not an ideal solution, and further refinements in the position are needed to ensure that impacts on OUV are avoided or mitigated. A location closer to the Countess roundabout should be considered, (bearing in mind other archaeological features in the vicinity, including the Mesolithic Blick Mead and the Iron Age Vespasian's Camp).

9.4.3 Recommendation proposed in relation to section 6.2 above.
The Mission recommends, if longer tunnel options are pursued:
-That the technical options and issues surrounding the ventilation of a tunnel be addressed in good time for decision taking on the length of a tunnel (and the placement of the portals). The needs for ventilation and the range of possible solutions should be understood upstream, including the opportunities provided (in terms of tunnel length and costs and the challenges raised (in terms of the placement and intrusiveness of eventual ventilation shafts).

9.4.4 Recommendation proposed in relation to sections 6.3 and 6.4 above.
The Mission recommends, if longer tunnel options are pursued:
-That negative impacts on the WH property and its setting should be avoided, bearing in mind that as an early WH inscription the WH property does not have a buffer zone and the rolling landscape within which it stands is prone to higher impacts from visual intrusions because of very high inter-visibility issues.

-That the SP should ensure that the process of portal location selection and design is more secure and explicit in terms of analysing their impact on OUV, and its attributes encompassing both archaeology and landscape,

-That because any change in the landscape; (and the tunnel portals and their approach roads are a major change); could have severe negative impacts on the OUV of the WH property,

(a) if the D061/D062 were still to be pursued as an option, an extension of the tunnel should be considered so that the Western portal would be located outside the WH property to avoid its negative impacts on the OUV of the property, its landscape, monuments and archeological richness, and the Western portal and associated approach road, are located so that they would not pose any threat to the property or its setting.

- That supported by visual studies (b) new designs are proposed to locate the Western portal and associated approach road so that they do not pose any threat to OUV in line with the SP's commitment to protect and enhance the OUV of the WH property, and that detailed HIAs are undertaken for each proposal.

-That (c) the A303 stretch west of the A360 to Berwick Down benefit from the same attention and standards of evaluation, HIA, archaeology and landscape, as those deployed within the perimeter of the WH property.

9.5 Recommendations for further involvement in the process

Recommendation proposed in relation to section 7 above and the Mission generally:

There should be a process of ongoing consultation and discussion between the World Heritage Centre, ICOMOS (as Advisory Body) the State Party, the excavation and analysis team of Historic England, Highways England, the AAJV and Wessex Archaeology, and the HMAG, in order to facilitate the best possible outcome for the property.

A program of ongoing advisory Missions is warranted. One of the aims set by the Mission has been "To examine ways by which ICOMOS/UNESCO can offer further upfront advice as the project develops", in response to that, and in view of the unfolding of the A303 ABD scheme and its possible future developments.

The Mission recommends that the SP establish a new 'consultative' process, such as an open forum, with stakeholders, local communities, residents, civil society, Stonehenge alliance, ICOMOS UK as well as professional archaeologists, academics and universities to engage into a dialogue with communities concerned.

The timing and unfolding of such follow-up missions remain to be determined with the SP, in function of the calendar related to the A303 ABD scheme – DCO, Government decisions and the requirements of the World Heritage Committee, the World Heritage Committee and ICOMOS.

However the Mission recommends that the project programme and the expectations of all major participants should be adjusted to align with the World Heritage Committee timeframe and process, through careful attention to the ‘triggers’ which instigate statutory timeframes and deadlines.

List of Figures (and sources)

Figure 1a. Site location plan – Wessex Archaeology (p. 625 of complete Briefing Pack). Figure 1 in "A303 Amesbury to Berwick Down. A303 Archaeological Evaluation. Report Interim Draft. Arup Atkins Joint Venture. HE551506-AA-EHR-SWI-RP-YE-000005, P01.2, Interim Draft".

Figure 1b. Site location plan – Historic England (p. 339 of complete Briefing Pack) Figure 1 in Historic England "Stonehenge Southern WHS survey, Diamonds field, Boreland farm, Wiltshire. Report on geophysical surveys, August 2015".

Figure 2. The "2.9 Km" proposal A1-E. From the Snashall & Young 2014 report, reproduced from the ICOMOS/UNESCO First Mission Report.

Figure 3. Corridor D route options (p. 790 of the Briefing Pack). Figure 4 in AAJV, "A303 Amesbury to Berwick Down Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" Iteration 1 Report, HE551506-AA-GEN-SWI-RP-YE-000003, P3.0, 15th December 2016".

Figure 4. 1. Public consultation Booklet January 2017 – Overview
4. 2. Public consultation Booklet January 2017 – Proposed option.
4. 3 Public consultation Booklet January 2017 – Proposed emplacement of Western Portal.
Highways England "A303 Stonehenge. Amesbury to Berwick Down. Public Consultation Booklet – January 2017"

Figure 5. "Key groups of attributes of OUV", p. 10 (Fig.2) in Snashall N. & Young C. 2017, "Stonehenge A303 improvement: outline assessment of the impacts on the Outstanding Universal Value of the World Heritage property of potential route options presented by Highways England for January 2017", HE & NT 2017

Fig 6.4.2. - Pointing to the western portal approximate location seen from Long Barrow

Fig. 6.4.3 - Western portal site at 1 to 30.000 - 2016 by Highways England

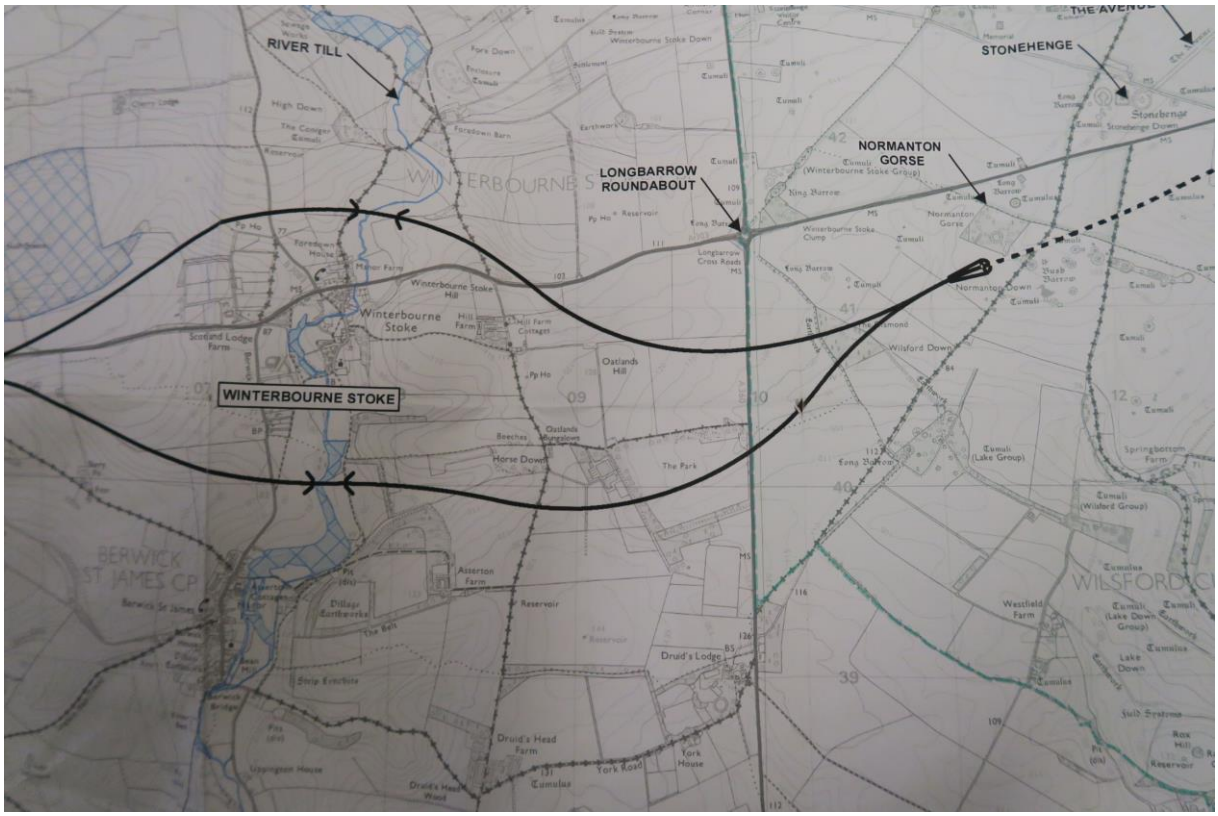

Fig. 6.4.4 - The rolling hills of Stonehenge WH property landscape

Fig. 6.4.5 - Pig farm seen from Long Barrow

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Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 1 Report

Heritage Impact Assessment in relation to the Outstanding Universal Value of the Stonehenge, Avebury and Associated Sites WHS - Undertaken in accordance with the 2011 ICOMOS "Guidance on Heritage Impact Assessments for Cultural World Heritage Properties" - Iteration 2 Report

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Annexes

1 - Terms of reference for the present mission

2.1 - Unfolding of the Mission

2.2- List of present: contributors, abbreviations, names of bodies and their roles

3 - Position statement from Historic England, National Trust and English Heritage on Highways England's public consultation on route options for the A303 road improvement scheme in the Stonehenge world heritage site (8 February 2017, see https://historicengland.org.uk/whats-new/news/historic-england-english-heritage-national-trust-on-proposed-a303-stonehenge-tunnel

4 - Summary of Highways England Technical Appraisal Report

Annex 1

Terms of reference for the present mission

UNESCO AND ICOMOS - second Advisory Mission to the Stonehenge Component of the Stonehenge, Avebury and Associated Sites World Heritage Site

Consideration of WHS landscape and OUV issues in relation to emerging draft proposals to improve the A303 trunk road running through the WH Property

Context

In December 2014 the UK Govt. announced that it would invest in a bored tunnel of at least 2.9km in length to solve the long-running traffic problems along the A303 trunk road within the WH Property. The removal of the damaging surface A303 from within the WHS has been a long-held ambition of the UK Govt., due to the chronic traffic congestion and serious harm the current road is causing to its Outstanding Universal Value (OUV). This is not only due to the noise, pollution and distraction of heavy traffic, but also due to the effective severance of the bulk of the WH Property to the south of the current A303 from the northern part of the Property containing Stonehenge and other major ceremonial sites and monuments.

Historic England, together with the National Trust and English Heritage, are engaging closely with the scheme promoters Highways England, in the interests of securing a scheme which has the optimum benefits for the WHS. In recognition of the need for any scheme proposal to demonstrate to the World Heritage Committee (the Committee) that it would not impact adversely on the Outstanding Universal Value of the WH Property in addition to resolving the traffic issues, we have initiated an ongoing process of engagement with both ICOMOS International (hereafter ICOMOS) and the World Heritage Centre (WHC). The overarching future aim of this engagement over the period of scheme design and assessment is to ensure that the scheme promoters and designers have the benefit of iterative advice from the Centre and ICOMOS throughout the process, to achieve the best result for the WHS and in doing so to satisfy the Committee that significant benefits for the WHS will be achieved.

The UK State Party invited UNESCO and ICOMOS to make an initial Advisory Mission in October 2015, so that the international experts could provide initial advice on archaeological and tunnel processes based on a familiarity with the Stonehenge component of the WH Property and its heritage/OUV, and an understanding of the broad thrust of the potential scheme (given that no plan proposals were in existence at that time). The mission also provided an opportunity for its experts to meet and gain an impression of the views of a wide range of stakeholders with an interest in the WHS and the A303.

The report of the October 2015 Mission was published in April 2016 and was welcomed by the State Party as a constructive engagement with the overall project by the international advisers. The report contained a comprehensive set of recommendations on the overall project processes based upon the information available at that early stage. Now that Highways England are progressing through a series of initial 'design fixes[1]' for a potential scheme ahead of the first tranche of public consultation early in 2017, the time is right to invite the WHC and ICOMOS to return to the WH Property and advise upon the emerging scheme.

Purpose of the Proposed Advisory Mission

The second proposed Advisory Mission has five main strands:

- To feed back to the WHC and ICOMOS on the measures taken, planned, or in progress, to implement the recommendations of the April 2016 Mission report (on

[1] Design Fixes are stage gateways in the process of route options selection and the evolution of a draft scheme design

archaeological heritage management, governance and decision making processes, territorial planning process and benefits, and long term traffic prediction and on the whole asset life design of the scheme within the WHS and road network development.

- To seek the advice of the WHC and ICOMOS on current progress with the emerging scheme proposal within and adjacent to the WHS based on work undertaken to inform its potential heritage impacts, including upon its OUV;

- To brief the Mission on the nature, timetable and phasing of the UK statutory planning process for nationally significant infrastructure projects and specifically the Development Consent Order (DCO) process under which the detailed scheme proposal would be put out for consultation and considered by the UK Planning Inspectorate;

- Examine what kind of heritage-centred steering mechanism will be put in place to ensure quality control at all stages of decision making.

- To agree on effective means of future engagement with ICOMOS (need for additional expertise, consultation, desk reviews, TOR evaluation, skills assessment, advisory mission, technical assistance) within the DCO consultation and examination process and, and to agree on a feasible timetable for such engagement, taking account of the fixed, statutory timeframe within which the DCO must work and of the fixed cycle of World Heritage Committee meetings. These are important considerations, as the DCO statutory process cannot be paused or halted to allow for additional consultation and the World Heritage Committee must also have the opportunity to consider the scheme, albeit outside of the UK statutory planning process.

Forthcoming public consultation exercise

Highways England is currently preparing for a non-statutory public consultation on its proposed route options, to commence in early 2017. Although this phase of public consultation is not a statutory requirement of the DCO, Highways England as the scheme promoter is committed to demonstrating best practice throughout the development of emerging scheme proposals.

This public consultation exercise will set out details of Highways England's work in sifting route options down to its proposals for public consultation and set out the supporting technical information which is available at this stage. This will include preliminary engineering information and the results of the archaeological assessment and evaluation of the Highways England's proposals and HIA.

The public consultation exercise must therefore be robust, unbiased and comprehensive, in the spirit of the DCO process the proposed scheme will later enter. Given the extensive nature of this forthcoming public consultation, it is not proposed to revisit the stakeholder consultation sessions which formed part of the 2015 Mission. The full range of stakeholders engaged in 2015 will be consulted by Highways England through January and February 2017 as part of a much wider-ranging consultation process.

The mission may provide guidance and technical expertise on the terms of reference of this non-statutory consultation process and include the results of the consultation in a heritage centred steering mechanism.

Terms of Reference

On the basis of briefings on the following, the complete package of which will be made available to the WHC and ICOMOS by Tuesday 20th December at the latest, the mission will consider:

- Progress by the UK State Party, Highways England and heritage partner organisations on the implementation of the recommendations of the April 2016 Mission report, responding to all points raised in that document.

- The results of archaeological assessment and evaluation of possible route alignments, potential tunnel portal locations and possible associated new surface road within the WH Property.

- The likely effects upon the attributes OUV of the WHS of potential tunnel portal sites and possible associated new surface road in the various options being considered, and as articulated in HIAs

- Feedback on what kind of heritage-centred steering mechanism to ensure quality control at all stages of decision making is being set up or can be set up.

- The potential benefits to the WHS made by any archaeology identified during archaeological assessment and evaluation of potential tunnel portal sites and associated new surface road within its boundary and to wider research in the property on an ongoing basis

- The whole asset life design of the proposed options within the WHS and road network development and longer term impact on the region.

- The nature of the Development Consent Order (DCO) process under which the detailed scheme proposal would be considered by the UK Planning Inspectorate, the statutory timescales for DCO, and the comprehensive nature of public consultation ahead of DCO submission.

The UK State Party and UNESCO will work to agree how best the WHC and ICOMOS can offer upstream advice on the protection of the OUV of the WHS. As the plans to address the problems caused by the existing A303 trunk road traffic continue to be developed over the coming years, Highways England as scheme developers will ensure budgetary provision will be made available to facilitate this upstream process. This should allow provision for additional expertise, consultation, desk review, TOR evaluation, skills assessment, advisory mission, technical assistance if needed.
The Mission shall provide advice on:

- The measures that the UK State Party, Highways England and heritage partner organisations have taken, or have in progress, to respond to and implement the recommendations of the April 2016 Mission report

- The impact of the emerging scheme proposals on the OUV of the WH Property based upon the partial information available at the time of the mission in the design process, which comprises:

    - The results of archaeological and other assessments and evaluation of potential tunnel portal sites and possible associated new surface road within the WHS in relation to the attributes of OUV

    - The draft route of a potential tunnel schemes and associated new surface road within and adjacent to the WHS

    - Initial computer-generated visualisations of aspects of potential new infrastructure, including tunnel portals, vertical alignment, cuttings and embankments

    - Available Cultural Heritage Impact Assessments

- Relevant technical and engineering aspects of the potential scheme as available at this stage of development

- Relevant technical and planning aspects regarding the whole asset life design of the scheme within the WHS and road network development and longer term impact on the region.

- Evaluate additional expertise, consultation, desk review, TOR evaluation, skills assessment, advisory mission, technical assistance if need be.

- How best the World Heritage Centre and its Advisory Bodies can offer advice on the impact on the OUV of the WHS in light of the reporting process to the annual World Heritage Committee and statutory timescales of the Development Consent Order (DCO) application, as the plans to address the problems caused by the existing A303 trunk road traffic are further developed over the coming years

Mission Report

A Report is to be submitted by the Mission team. **It is essential that this report be provided by the end of March 2017**. This will allow UK authorities and stakeholders to understand the WHC and ICOMOS's advice in time for it to be considered alongside the results of public consultation and incorporated within a report to be submitted to the Secretary of State for Transport in early May 2017 The Report will address the items listed in the terms of reference above, with a specific focus on the potential impacts on the OUV of the WHS of the proposed tunnel project and on possible traffic planning & design options.
It is an essential criterion of this Mission that the report is delivered within the timescale identified, due to the very short window of opportunity to incorporate the conclusions of the Mission within the report to the Secretary of State.
Contractual note – the report of the Advisory Mission should be delivered by the WHC to the Department for Culture, Media & Sport, acting as the UK State Party to the World Heritage Convention, who may choose to share it with the UK Permanent Delegation.

Information to be provided by the State Party in advance of the Advisory Mission – to be made available to the WHC and ICOMOS by 20th December 2016 at the latest

- As background for the 2017 Mission team, we will provide a copy of the full Briefing Pack supplied in advance of the October 2015 Advisory Mission, together with follow-up documents provided after the mission visit. We will also, for completeness, include a copy of the April 2016 Mission report.

- A briefing report setting out the measures taken, planned, or in progress, to implement and respond to the recommendations of the April 2016 Mission report. This will be a detailed report which will respond to each of the recommendations made in that document.

- Archaeological assessment and evaluation reports from fieldwork undertaken at potential tunnel portal sites and associated new surface road, including geophysical survey reports, desk-based assessment and archaeological field evaluation.

- Geotechnical and ground investigation reports to enable understanding of relevant non-heritage related engineering technical constraints or opportunities

- Maps showing the draft road-line for the bored tunnel and associated new surface road within and adjacent to the WH Property

- Initial computer-generated visualisations of aspects of potential new infrastructure, including tunnel portals, vertical alignment, cuttings and embankments

- Cultural Heritage Impact assessments of the proposed options on the attributes of OUV.

- Relevant technical and planning aspects regarding the whole asset life design of the scheme within the WHS and road network development and longer term impact on the region.

- Feedback on what kind of heritage-centred steering mechanism to ensure quality control at all stages of decision making is being set up or can be set up.

- A more detailed briefing pack on the Development Consent Order (DCO) process than was supplied for the initial Advisory Mission, setting out aspects of the application process, the comprehensive nature of public consultation, the examination process and timescales/key milestones in the programme for A303 Stonehenge. This briefing pack will allow delegates the opportunity to gain an initial understanding of the processes ahead of a presentation and discussion of the DCO during the Mission

ITINERARY

Day one, Tuesday 31st January 2017

- **Late AM** – Arrival in Wiltshire by Isabelle Anatole-Gabriel and Christina Castel-Branco. Collection arranged from local transport hub and afternoon spent on familiarisation tour of Stonehenge component of the WH Property – to include Stonehenge and visitor centre, Durrington Walls, Woodhenge, Cursus, driving tour of WHS perimeter. Professor Nathan Schlanger will travel directly to Tisbury for late afternoon/early evening.
- **Late afternoon** – Mission team transferred to hotel (The Lamb, Hindon) & settled into accommodation
- **Evening** – **7pm for 7.30 pm**, Venue The Lamb, Hindon welcome dinner incorporating run through of Mission itinerary (guests from Department for Culture, Media and Sport, Highways England, their consultants Atkins Arup Joint Venture (hereafter AAJV), Historic England, English Heritage, National Trust, Wiltshire Council and the Chair of the WHS Partnership Panel (guest list to be circulated in advance of the dinner).

Day two, Wednesday 1st February

- **8.30am** collection from Lamb Inn (PM and CG)
- **9 AM** start at National Trust Tisbury Hub – Welcome & Introductions - NT Tea/coffee
- **9.15 am** First session - DCMS introduce response to 2015 Mission report – followed by presentations from Highways England, AAJV, Historic England, English Heritage, Wiltshire Council and National Trust on measures taken to implement & integrate recommendations – general discussion session, likely to be a half day workshop with a break at 11am for tea/coffee)
- **1pm** Lunch
- **2pm** Continuation/conclusion of first session
- **3pm** Break –tea/coffee
- **3.15pm** Afternoon session - the Development Consent Order process Highways England led – run through, focusing on strong emphasis on pre-app consultation, need for comprehensive and meaningful consultation – the statutory process and its stages – how Amesbury-to-Berwick Down project fits into the process – timescales and opportunities for engagement
- **4.30pm** Questions
- **5.30pm** Transfer to hotel (PM and CG)

Day three, Thursday 2nd February (based at Education Room, Stonehenge Visitor Centre)

- **8.30am** collection from Lamb, Hindon, for transfer to Stonehenge Visitor Centre
- **9AM** – Update from Highways England on options sifting and selection process – discarded options – forthcoming public consultation – then focus on "working assumption" tunnel route within WHS
- **10.45** tea/coffee break
- **11-1130** Presentation on Historic England archaeological survey work within Stonehenge WHS south of the A303 (the Southern WHS Survey, Phase 1)
- **1130-1230** Highways England/Wiltshire Council presentation of results of archaeological assessment & evaluation of potential tunnel portals and new surface road within WHS
- **12.30pm** Presentation of EH, NT, Historic England and WC positions on Highways England's public consultation
- **1pm** Lunch
- **1.30-4.30pm** (max.)– out into WHS landscape – afternoon visiting route of potential tunnel scheme in light of morning session presentations – discussion re archaeological impacts, OUV, engineering and any other issues (informed by earlier discussion)
- **4.30pm** return to VC for tea/coffee/defrost and Questions
- **5.30pm** Transfer to hotel (PM and CG)

Day four, Friday 3rd February

- **9 AM** start at NT Tisbury Hub – wash-up session – opportunity for any initial feedback or observations on presentations or site visit
- **10.45am** tea/coffee break
- **11am** finish with closed session for Mission to have private discussion or opportunity to revisit key points in WHS landscape if required
- **1/1.30pm** (depending on above) Lunch and disperse – Mission guests driven back to local transport hubs. (National Trust)

Costs

Costs will be met locally by Highways England, the scheme promoters

Author – Phil Mcmahon, Inspector of Ancient Monuments, Historic England SW Office, 13th January 2017

Annex 2. 1

Unfolding of the Mission

(31 January – arrival to base, The Lamb B&B, Hindon)

Day 1 - 1st February 2017

Location National Trust Tisbury Hub
Welcome and Introductions (Ian Wilson (NT))

Topic 1 - DCMS response to 2015 Mission report (Hannah Jones - DCMS)
Followed by presentations on measures taken to implement and integrate recommendations: Highways England – Andrew Alcorn; AAJV – Andrew Croft; Historic England – Phil Mcmahon and Henry Owen-John; English Heritage – Jenny Davies; Wiltshire Council – Parvis Khansari and Melanie Pomeroy-Kellinger; National Trust – Ian Wilson, Ingrid Samuel and Nick Snashall

Topic 2 - Development Consent Order process (James Lough - AAJV)
Highways England led run through focusing on:
Pre-application consultation; the need for comprehensive and meaningful consultation; the statutory process and its stages; how the Amesbury-to-Berwick Down project fits into the process; timescales and opportunities for engagement

Day 2 - 2nd February 2017

Location Education Room, Stonehenge Visitor Centre

Topic 1 Update from Highways England on:
Options sifting and selection process – discarded options – forthcoming public consultation then focus on "working assumption" tunnel route within WHS (by Geoff Dodsworth, Andrew Croft and Liz Brown - AAJV).

Topic 2 Presentation on Historic England archaeological survey work within Stonehenge WHS south of the A303 (the Southern WHS Survey, Phase 1) (by David Roberts and Phil Mcmahon - HE).

Topic 3 - Highways England/Wiltshire Council presentation of results of archaeological assessment & evaluation of potential tunnel portals and new surface road within WHS (by Melanie Pomeroy-Kellinger –WCAS & Andrew Croft -AAJV)

Topic 4 - Presentation of Historic England, National Trust and English Heritage's interim position on Highways England's public consultation (by Phil Mcmahon - HE)

Topic 5 - WHS landscape tour – afternoon visiting route of potential tunnel scheme in light of morning session presentations – discussion re archaeological impacts, OUV, engineering and any other issues (informed by earlier discussion)

Day 3 - 3rd February 2017

Location National Trust Tisbury Hub

Topic 1 – Opportunity for any initial feedback or observations on presentations or site visit.

Topic 2 – Travel to Avebury by Cristina Castel-Branco and Isabelle Anatole-Gabriel with NT team. Visit aspects of Avebury Landscape on route – Silbury Hill (with Nick Snashall and Jan Tomlin - NT).

Annex 2. 2

List of present: contributors, abbreviations, names of bodies and their roles

Individuals

ICOMOS mission representatives:
Cristina Castel-Branco - Professor in Landscape Architecture, Centre for Applied Ecology, University of Lisbon, ICOMOS Scientific Committee on Cultural Landscapes
Nathan Schlanger - Professor of Archaeology, Ecole Nationale des Chartes

UNESCO World Heritage Centre representative:
Isabelle Anatole-Gabriel - Chief of the Europe and North America Unit at the World Heritage Centre

Hannah Jones - World Heritage Site and Underwater Policy Advisor, Department for Culture, Media and Sport

Henry Owen-John - Head of International Advice, Historic England
Andrew Vines - Planning Director South West, Historic England
Phil McMahon - Inspector of Ancient Monuments, Historic England
David Roberts - Project Manager, Archaeological Investigation and Excavation, Historic England

Ingrid Samuel - Historic Environment Director, National Trust
Nicola (Nick) Snashall - Archaeologist (Stonehenge and Avebury WHS), National Trust
Ian Wilson - Assistant Director of Operations, National Trust
Cass Genn - Senior Project and Stakeholder Manager (S-W Infrastructure), National Trust
Katherine Ryan - Project Coordinator, National Trust

Tracey Reed - Director of Operations, English Heritage Trust
Heather Sebire - Properties Curator West, English Heritage Trust
Jenny Davies - Acting General Manager, Stonehenge, English Heritage Trust
Sarah Simmonds - World Heritage Site Co-Ordinator, WHS Co-Ordination Unit

Melanie Pomeroy-Kellinger - County Archaeologist, Wiltshire Council
Parvis Khansari - Associate Director, Highways and Transport, Wiltshire Council

Andrew Alcorn - Project Manager, Highways England

Andrew Croft - Cultural Heritage Workstream Lead, Arup Atkins Joint Venture
James Lough - Stakeholder Workstream Lead, Arup Atkins Joint Venture
Geoff Dodsworth - Project Director, Arup Atkins Joint Venture
Liz Brown - Landscape Architect, Arup Atkins Joint Venture

Also present at the Avebury visit (on 3rd February):
Janet Tomlin – General Manager
Eva Stuetzenberger – Visitor Engagement and Enterprises Manager
Hilary Makins – Countryside Manager
Nick Snashall – WHS Archaeologist
Rosamund Cleal – Curator, Alexander Keiller Museum
Katherine Riyan – Senior Project Coordinator
Sarah Simmonds – WHS Partnership Manager
Heather Sebire – English Heritage Properties Curator West

Institutions: abbreviations, and their brief description

AAJV – Arup Atkins Joint Venture. The commercial entity contracted by Highways England to develop route options for the Scheme.

DCMS – Department for Culture, Media & Sport. UK Government department with responsibility for World Heritage Sites in England.

EHT – English Heritage Trust. Charitable body which manages the Stonehenge monument and Visitor Centre, and many other historic locations in England, under licence from Historic England.

HiE – Highways England. UK Government owned company charged with delivering the Road Investment Strategy and the maintenance and operation of England's trunk road and motorway network.

HE – Historic England. UK Government's advisor on the historic environment in England.

ICOMOS – International Council on Monuments and Sites. International non-governmental organisation providing independent expert advice on the protection of cultural and archaeological heritage to UNESCO.

NT – National Trust. A charitable conservation organisation, which owns and manages parts of the Stonehenge WHS.

OUV – Outstanding Universal values – UNESCO World Heritage convention criteria for granting World heritage status.

SP – State Party (to the 1972 convention). Here, the United Kingdom of Great Britain and Northern Ireland.

UNESCO – United Nations Education, Science and Culture organisation.

WHS – World Heritage Site.

WCAS – Wiltshire Council Archaeology Service. A dedicated county archaeological and historic environment advisory service, including HER, provided by the County of Wiltshire as part of its responsibilities.

Annex 3

Position statement from Historic England, National Trust and English Heritage on Highways England's public consultation on route options for the A303 road improvement scheme in the Stonehenge world heritage site (8 February 2017, see https://historicengland.org.uk/whats-new/news/historic-england-english-heritage-national-trust-on-proposed-a303-stonehenge-tunnel

POSITION STATEMENT
FROM HISTORIC ENGLAND, NATIONAL TRUST AND ENGLISH HERITAGE
ON HIGHWAYS ENGLAND'S PUBLIC CONSULTATION
ON ROUTE OPTIONS FOR THE A303 ROAD IMPROVEMENT SCHEME
IN THE STONEHENGE WORLD HERITAGE SITE

Highways England has put forward initial route options for a road improvement within the Stonehenge World Heritage Site (WHS) which include a bored tunnel of at least 2.9km. These options for a potential scheme have been put to public consultation as one stage in an extensive process of pre-application engagement.

We believe that the proposals have the potential to deliver benefits for Stonehenge and its landscape, if sited and designed sensitively. Whilst the overall proposals are to be welcomed for the positive transformation which they could bring to the WHS, there are some aspects of what is currently presented in the consultation documents that will require significant improvement to ensure protection of the WHS.

We welcome the fact that the Government and Highways England invited the UNESCO World Heritage Centre and their heritage advisers ICOMOS back to the WHS for a second visit, to look at the detail of these initial proposals.

The three key points in Historic England, English Heritage and the National Trust's response to the A303 Stonehenge public consultation on route options relate to the principle of the bored tunnel and the two tunnel portals, as follows:

1. Centre Section – the Bored Tunnel

The options include a twin-bored tunnel of at least 2.9km, as committed to in the Government investment announcement of December 2014. This is a key aspect of any scheme which could unlock enormous benefits for Stonehenge and the wider WHS. It would allow the removal of much of the current, damaging surface A303 allowing the reunification of the large part of the WHS to the south of the existing road with the part to its north containing Stonehenge and the other currently accessible major ceremonial monuments. This would restore peace and tranquillity to Stonehenge whilst opening up safe public access to the many monuments and extensive landscape which lies to the south of the current A303.

2. Eastern Tunnel Portal

Highways England's proposals could deliver significant improvements for heritage in the eastern section of the route, where the proposals would allow the course of the Stonehenge Avenue – presently severed by the A303 - to be reunited. It is the first time that Government has recognised the importance of the Avenue in its proposals. It has responded to the advice given by the UNESCO World Heritage Centre and their heritage advisers ICOMOS in their April 2016 report. The proposed scheme is a significant improvement on the previously approved scheme from 2004, which would have worsened the severance of the Avenue by the A303.

3. **Western Section**

The western tunnel portal location as shown in the consultation documents needs significant improvement, due to its proximity to and impact on the Normanton Down barrow group – one of the key groups of ceremonial and funerary monuments for which the WHS is designated. We are presently considering how the western portal proposals might be amended to ensure benefit to this internationally important ancient landscape. We will include constructive comment on this as part of our formal response to the public consultation and will seek Highways England's commitment to improving this aspect of the scheme.

Engagement with international World Heritage experts

We are pleased that Government and Highways England invited the UNESCO World Heritage Centre and their heritage advisers ICOMOS to make a second visit to the Stonehenge landscape to consider the proposed route options. The constructive advice which they provided to Highways England following their initial visit to consider a potential road scheme in 2015 has been valuable in informing the development of the route options to their current form, including moving the location of the eastern portal to reunite the Avenue. This second visit gives them the opportunity to further shape the emerging proposals.

Historic England, English Heritage and the National Trust will be submitting their full responses to this first round of consultation before it closes on 5 March.

A number of public information events are being held for people to give their feedback, and further information is available online at: www.highways.gov.uk/a303stonehenge/consultation

We understand there will be another round of consultation later in 2017 on Highways England's more detailed proposed solution before they submit a Development Consent Order application to the Planning Inspectorate in 2018.

Annex 4

Summary of Highways England Technical Appraisal Report

Extracts from the Technical Appraisal Report - Highways England 2016

The Technical Appraisal Report that was provided by the Highways England project director during the Mission Feb 2nd 2017, is available at the following link:

https://highwaysengland.citizenspace.com/cip/a303-stonehenge/supporting_documents/Volume%201%20%20TAR%20red%201.pdf

From this large 320-page Report, the mission has extracted the sections that concern the selection of the present options to replace the A303.

Pages 2-4

Initial Corridor appraisal – Design Fix A

Identification of corridor options

There have been a wide range of proposed solutions to traffic problems on the A303 at Stonehenge over many years. A review was undertaken of some 60 route options that have been proposed by Government, stakeholders and the public in the past. These options were grouped into a series of corridors which contained route options with similar characteristics.

This resulted in eight corridors, representing the groups of route options described as follows, and illustrated in Appendix B2:

- Corridor A – Surface routes north of the existing A303 (wholly outside WHS).
- Corridor B – Surface routes north of the existing A303 (partially inside WHS).
- Corridor C – Surface routes within 1.0 km of the existing A303 (as the route options pass through the WHS).
- Corridor D – Routes including a tunnel (at least partially within the WHS).
- Corridor E – Surface routes south of the existing A303 (at least partially inside WHS).
- Corridor F (north) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury.
- Corridor F (south) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury, further south than Corridor F (north).
- Corridor G – Surface routes south of the existing A303 (wholly outside WHS) and south of Salisbury.

The objective of this phase of the selection process (Design Fix A) was to undertake a multi-criteria assessment of the eight corridors and ultimately to recommend corridor(s) to be taken forward for further consideration.

The assessment and appraisal methodology used the following three criteria:

a) Client Scheme Requirements.
b) Web-based Transport Appraisal Guidance's (WebTAG) Early Assessment and Sifting Tool (EAST).
c) National Policy Statement for National Networks (NPSNN) environmental aspects.

Key outcomes of the appraisal

Surface route options within the WHS (Corridors B, C and E)

Surface route options within the WHS would offer transport benefits and could be delivered at a lower cost than a tunnelled solution but would be considered unacceptable from a cultural heritage point of view.

A surface route close to the existing A303 would fail to reduce severance within the WHS and would cause substantial harm to the Outstanding Universal Value (OUV) of the site.

Options involving a surface route to the north or south of the existing A303 would reduce the visual and noise impacts of the road on the Stonehenge monument itself but any such route would still affect the character of the WHS and would also cause substantial harm to the OUV of the site.

National Trust and Historic England have identified that a surface route through the WHS has the potential to 'compound and multiply' the harmful effects of the existing A303 and they would be unable to support surface dualling due to these very large adverse effects. They considered the harmful effects to be of such a large scale that it would likely lead to the inclusion of the WHS within the UNESCO's World Heritage "in danger" list and may even lead to the loss of the WHS designation for Stonehenge and Avebury.

Tunnelled Routes within the WHS (Corridor D)

A tunnelled route through the WHS would reduce severance within the WHS and improve the setting of key assets such as Stonehenge. The surface elements may cause adverse effects on the character of the WHS but it is considered that substantial harm can be avoided with appropriate design. A tunnelled route has the potential to contribute to the enhancement of the historic landscape within the WHS. Notwithstanding its high capital cost, a tunnelled route would deliver transport and economic benefits in line with the objectives for the scheme.

Surface Routes outside the WHS (Corridors A, F (north and south) and G)

Because of the location of adjacent settlements, there is limited scope to realign the A303 to the north of the WHS (Corridor A), however, a route that would skirt the northern boundary of the WHS was considered. Such an option would reduce severance within the WHS, but it would also have substantial harmful impacts on other sensitive assets. On balance, the harmful impacts would outweigh the benefits associated with the removal of the A303 through the WHS.

Corridor F surface route options to the south of the WHS would remove the A303 from the WHS in its entirety. This would bring substantial benefits by reducing severance and improving the setting of key assets, including the Stonehenge monument. These benefits would need to be balanced against adverse environmental effects of constructing a longer route within a high quality, unspoilt landscape with the associated loss of habitats.

Surface route options to the south of the WHS would also offer a less direct route for through traffic and would therefore offer reduced transport benefits. More traffic would also remain or divert onto local roads, giving rise to adverse impacts on local villages and communities.

A surface route to the south of Salisbury was also considered (Corridor G). The length of such an option would lead to substantially increased habitat loss and severance compared to other corridors and it would also impact a significant number of communities and designated nature conservation sites. This option, whilst offering improved access to Salisbury would also fail to

reduce journey times for users of the A303 through this section. On this basis, the corridor was not considered to meet the transport and environmental objectives of the scheme.

Better performing corridor options

On the basis of the initial assessments, as summarised above, Corridors A, B, C, E and G were not taken forward for further consideration. This left tunnel options within Corridor D and surface options within Corridor F (north) and Corridor F (south) being taken forward for further consideration in Design Fix B. These are shown in Appendix E and also in Figure 2 below.

Pages 30-31

2.3 Expansion on headline requirements

2.3.1 The CSRs provide an overall framework of objectives. However, to assist with measuring performance against the CSRs, each of the four headline CSRs was expanded to provide a series of more detailed requirements.

Transport

- The road will be designed to modern standards and, in addition, to perform as an Expressway.
- The design of the road and connections with the local network will address issues of congestion, resilience and reliability. It will reduce risk of traffic diverting onto local roads.
- Road safety will be improved to at least the national average for a road of this type.

Economic growth

- The road capacity, together with Non-Motorised User (NMU) provision, will be increased to dual carriageway all-purpose between Amesbury and Berwick Down, linking with existing dual carriageways to the East and West.
- Grade separated junctions will be introduced to create a road that meets Expressway standards, designed to accommodate foreseeable traffic growth.
- Grade separation will also assist traffic and NMU wishing to cross the A303 and so stimulate local economic activity and reduce severance. A-GEN-SWI-RP-CX-000020 | P13, S0 21/12

Cultural heritage

- The existing road will be downgraded as it passes through the WHS for use by non-motorised users and for access.
- The strategic route will be redirected so as to reduce its site and sound impacts on the WHS. The redirected route will treat archaeological features with sensitivity and will protect the Outstanding Universal Value (OUV) of the WHS. It will seek to minimise any damage to or loss of archaeology.
- Grade separated junctions will be introduced in place of at-grade junctions on the A303 within the length of the scheme, improving access onto and off the A303, with well-designed signing to access the WHS.

- Where the road passes through the WHS it will have an iconic identity and be of good design. As far as is practicable and without compromise to safety, the design will seek to accommodate the specific needs of the WHS.
- Learning associated with any excavation within the WHS will be ensured, by working sensitively and in close collaboration with key heritage stakeholders.

Environment and community

- Land no longer forming the public highway within the WHS will be returned to the adjoining landowner. Where practicable and with the permission of the owner, it will be landscaped in accordance with the adjoining land.
- Biodiversity within new landscaping along the route will ensure a net addition over that which exists currently.
- The A303 will bypass Winterbourne Stoke and the existing road will be de- trunked as it passes through the village. This will improve the quality of life for the residents of the village.
  Disruption to road users and local residents during the construction of the scheme will be minimised as far as is reasonably practicable. Also, opportunities for materials re-use will be sought as far as is practicable. Opportunities for mitigating impacts will be actively pursued in close consultation with communities.
- Learning and finds during the development of the scheme will be presented to local schools and communities. Presentations will be given to local and regional forums to raise awareness of the scheme, its timing and the potential economic benefits likely to result from an improved road network, as well as employment and supply chain opportunities during construction.
- The scheme will aspire to achieve a Civil Engineering Environmental Quality Assessment and Award scheme (CEEQUAL) rating of excellent.

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4.3 National policy

National Policy Statement for National Networks (NPSNN)

4.3.1 The NPSNN sets out Government policy for the need for, and delivery of, nationally significant road and rail projects. The policy states that the Government will deliver national networks that meet the long term needs of the country and support a thriving and prosperous economy.

4.3.2 Chapter 2 of the NPSNN sets out the following strategic objectives:

- Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs;
- Networks which support and improve journey quality, reliability and safety;
- Networks which support the delivery of environmental goals and the move to a low carbon economy; and
- Networks which join up our communities and link effectively to each other.

4.3.3 It states a critical need to improve the road network to address congestion, providing safe, resilient and expeditious networks which support social and economic activity. These improvements may also address impacts of networks on quality of life and the environment10. A well-functioning road network is stated as critical to supporting national and regional economies11 .

4.3.4 The Government's policy to address this need is to bring forward enhancements and improvements to the existing network. This includes improvements to trunk roads, in particular dualling of single carriageway strategic trunk roads to increase capacity and improve performance and resilience.

4.3.5 Chapter 3 of NPSNN sets the need for improvements to the road network in the context of wider Government policies. These include:

- Environment and social impacts: networks should be designed to minimise social and environmental impacts and improve quality of life; the principles of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), as well detailed policy set out in Chapter 5 of the NPSNN should be followed to mitigate effects.
- Emissions: the Government supports the switch to Ultra Low Emission Vehicles (ULEVs), and predicts that increases to emissions as a result of improvements to the road network will be very small as a result of current and future commitments to meet legally binding targets.
- Safety: the Government intends to remain a world leader in road safety, and scheme promoters are expected to take opportunities to improve road safety, employing the most modern and effective safety measures where proportionate.
- Technology: innovative technologies will be monitored for their benefits and risks, but are not expected to alleviate the need to address current congestion problems or negate the need for improvements to the road network.
- Sustainable transport: the Government expects applicants to use reasonable endeavours to address the needs of pedestrians and cyclists. This includes investing in locations where the national road network severs communities and where the national road network severs communities and acts as a barrier to cycling and walking by addressing historic problems, retrofitting solutions, and ensuring safety for cyclists on junctions.
- Accessibility: applicants should improve access wherever possible through delivering schemes which take all opportunities for improvements in accessibility for all users, including disabled users, of the strategic road network.
- Road tolling and charging: the Government's policy is not to introduce road pricing for key trunk roads on the strategic road network

4.3.6 Chapter 4 sets out the assessment principles for the consideration of highway schemes. In particular it states that subject to the detailed policies and protections in this NPSNN, and the legal constraints set out in the Planning Act, that there is a presumption in favour of granting development consent for NSIP projects, such as the proposed scheme.

4.3.7 When considering an application for development consent, the Secretary of State will consider its benefits including for economic growth, job creation, and environmental improvement. This will be considered against adverse impacts of the scheme including long-term cumulative impacts. Such applications are required to be supported by a business case prepared in accordance with Treasury Green Book principles.

4.3.8 The policy states that projects subject to The Infrastructure Planning EIA Regulations 2009 should include an environmental statement with the application. As part of this, the impacts from reasonably foreseeable schemes should be considered in the assessment. The maximum extent of the project's possible impact should be assessed where there are details which are yet to be finalised. The policy also sets out that the application should provide sufficient information for the carrying out of an appropriate assessment by the Secretary of State for Transport, where proposals are likely to have a significant effect on a European designated site.

4.3.9 In relation to alternatives, it is stated that all schemes should be subject to an options appraisal, which should also consider viable modal alternatives. However, where schemes were subject to an options appraisal to achieve their status within road investment strategies, option testing may not need to be considered by the decision maker.

4.3.10 The policy requires principles of good design to inform projects from their inception. The design should work to mitigate the impact of the project in terms of the environment, safety and sustaining operational efficiency. Proposed schemes which are fit for purpose and sustainable can contribute towards the area in which they are located; applicants should demonstrate how the design process has contributed to these aims.

4.3.11 Applicants will have to consider climate change adaptation in the siting, location, design, construction and operation of proposed schemes. This includes demonstrating that there are no critical features that will be affected by the effects of climate change in the long term; this is to be based on the Government's climate change risk assessment and consultation with statutory bodies. The policy also sets out that pollution control, nuisance and statutory nuisance, safety, security, and health should be considered by applicants in the design of their schemes.

4.3.12 Chapter 5 of the NPS sets out the assessment framework against which the application will be considered. The contents of this chapter will be used by the decision maker to establish whether the applicant has considered the necessary areas of assessment. The areas which must be considered are outlined below:

- Air quality.
- Carbon emissions.
- Biodiversity.
- Waste management.
- Civil and military aviation and defence interests.
- Coastal change.
- Dust, odour, artificial light, smoke, steam.
- Flood risk.
- Land instability.
- The historic environment (this includes impacts on WHS).
- Land use including open space, green infrastructure, and greenbelt.
- Noise and vibration.
- Impacts on transport networks.
- Water quality and resources.

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Assessment

Introduction

5.2.115 The results of the three assessment components described above and their respective sub-components were analysed in order to form a qualitative judgement on the potential beneficial and adverse impacts, in order to then make a recommendation on whether to progress a corridor for further consideration of route options within that corridor. The results of the overall assessment are provided below.

Assessment against Client Scheme Requirements

5.2.116 The details of the assessment against CSRs are shown in Appendix B4. Table 5-4 provides a summary of the assessment of the corridors using the 5-point scoring system described in the above methodology section.

[Table 5-4 Results of assessment against Client Scheme Requirements]

5.2.117 Against the Cultural Heritage CSR it can be seen that Corridors B, C and E scored poorly, with these corridors passing directly through the WHS at surface level. Corridor A scored slightly better as it does not pass through the WHS but is in close proximity to it which will cause harm to the setting of the WHS. Corridors F (both) and G scored well against this CSR as they completely avoid direct land take within the WHS.

5.2.118 In respect to the Environment and Community CSR, Corridors A, B and C scored poorly because they include land within a Nationally and Internationally (European) designated nature conservation site, and impact on communities to the north of the WHS. Corridor E scores poorly because it includes land within a Nationally and Internationally (European) designated nature conservation site, is close to a RSPB reserve and impacts on communities within the Woodford Valley. Corridor G scored poorly because it would impact on a significant number of communities along the corridor. It crosses a number of Nationally and Internationally (European) designated nature conservation sites and with its increased length, it is also likely to cause substantial areas of habitat loss. When these points are taken together it is concluded that Corridor G may not allow a net addition to biodiversity. Corridors F (north), F (south) score slightly better as they avoid the RSPB reserve but would impact on settlements within the Woodford Valley. Corridor D avoids impact on the RSPB reserve and settlements within the Woodford Valley and therefore scores better than the other corridors.

5.2.119 Corridors C and D performed well against the Economic Growth CSR, principally because route options within these corridors would deliver the shortest overall length of route of all the options being considered. The shortest route lengths would deliver the greatest journey time savings, and consequently the greater journey time benefits. The longer the route, the less journey time benefits would be delivered, therefore Corridors A, F (south) and G all scored poorly against this CSR.

5.2.120 In terms of the Transport CSR, Corridors C and D were assessed to provide the greatest benefits of all the corridors considered, closely followed by Corridors B and E as these provided the most direct link. Corridors A and F (north) would contain longer routes and therefore score lower. Corridor G scored poorly against this CSR because it would mean road users suffering considerable diversion relative to more direct routes.

Assessment against environmental criteria (having regard to EAST and NPSNN)

5.2.121 The details of the assessment against NPSNN are shown in Appendix B5. Table 5-5 below provides a summary of the assessment of the corridors using the 5-point scoring system described in the above methodology section.

Table 5-5 Results of assessment against NPSNN environmental criteria

Environmental Criteria	Corridor A	Corridor B	Corridor C	Corridor D	Corridor E	Corridor F (north)	Corridor F (south)	Corridor G
Historic Environment	1	1	1	2	1	4	4	2
Biodiversity	1	1	1	1	1	1	1	1
Landscape (incl streetscape and urban environment)	2	2	2	2	1	2	1	1
Air Quality	2	2	3	3	2	1	2	1
Noise	2	3	3	4	2	3	3	3
Water Quality and Resources	2	3	3	2	3	2	1	1
People and Communities	2	3	2	4	2	2	2	1
Geology, Soils and Materials	2	2	2	2	2	2	2	2

Historic environment

5.2.122 Whilst significantly reducing severance within the WHS, Corridor A would have the potential to harm the setting and key assets of the WHS, including Durrington Walls, and substantial harm to the Outstanding Universal Value (OUV) of the WHS is considered probable. Corridor A would also run through Bulford possibly requiring the demolition and certainly substantially harming the setting of listed buildings, and affecting a Conservation Area.

5.2.123 For Corridors B, C and E,surfaceroutes within the WHS would result in severance, fundamentally altering its character and fabric and resulting in substantial harm to the OUV, which is unlikely to be outweighed by the removal of traffic from the existing A303. In addition these options are likely to require the removal of scheduled assets and would seriously degrade the setting of other scheduled assets.

5.2.124 Tunnel based routes within Corridor D would still include portals and a section of above ground dual carriageway within the WHS, but would bring substantial benefits for the WHS arising from the closure of the A303 to the south of Stonehenge, reducing severance within the WHS and the impact of traffic in the WHS. Overall, it is considered that the potential exists for the benefits to outweigh the harm.

5.2.125 Outside the WHS, all surface routes, including Corridors F (north) and (south) and Corridor G have the potential to adversely impact on the historic environment, including the setting of listed buildings and scheduled assets, registered park and gardens and Conservation Areas.

5.2.126 Adverse impacts were weighed against the benefits of the scheme on the WHS. In this respect Corridors D, F (north), F (south), and G are the better performing with F (north) and F (south) being the best when assessed against the Historic Environment criteria.

Biodiversity

5.2.127 Corridors A, B, C, D and E have the potential to impact the Salisbury Plain SPA/SAC, including Parsonage Down SSSI/NNR, and at new crossings over the River Avon SAC, encompassing the River Avon and River Till. The corridors also cross or are located in close proximity to a number of nationally designated sites and the Normanton Down RSPB Reserve.

5.2.128 Corridors F (north) and (south), and Corridor G would also have the potential to adversely affect the River Avon SAC. Furthermore, given the length of these corridors, they would be expected to result in larger areas of habitat loss and potential severance. Further south there is also the potential for Corridor G to have an adverse impact on Porton Down SPA and Chilmark Quarries Bat SAC.

5.2.129 All corridors scored equally poorly when assessed against the Biodiversity criteria.

Landscape

5.2.130 At grade routes within Corridors A, B, C, and D have the potential to impact on the high quality landscape of the non-statutory, locally designated SLA and a number of visual receptors in local communities e.g. Amesbury, Larkhill, Durrington, Shrewton and Winterbourne Stoke.

5.2.131 Corridor E, Corridor F (north), Corridor F (south) and Corridor G have the potential to impact to a greater or lesser extent on the nationally designated landscape of Cranborne Chase and West Wiltshire Downs AONB and a potentially high number of visual receptors within the more rural communities to the south of the WHS, including Steeple Langford, Stapleford, Wylye, Andover and Salisbury, and villages along the Vale of Wardour.

5.2.132 All corridors scored poorly when assessed against the Landscape criteria, with Corridors E, F (south), and G performing the worst due to the high quality landscape of the AONB and a high number of sensitive visual receptors including residential properties and PRoW.

Air Quality

5.2.133 Corridors A and B are located within 200m of up to four nationally designated ecological sites and have the potential to have an adverse impact on residential receptors at Larkhill, Durrington and Bulford.

5.2.134 In contrast Corridors C and D are unlikely to adversely affect residential receptors and have the smallest increase in emissions based on the traffic modelling undertaken for this Design Fix A stage.

5.2.135 In the south, Corridors E and F (north) and (south) are located within 200m of up to five nationally designated sites and would affect residential receptors within Amesbury, Steeple Langford, Berwick St James, Winterbourne Stoke, Normanton, Stapleford, Lower Woodford, Little Durnford. The closure of the A303 within the WHS and longer routes would result in higher emissions for Corridors F (north) and (south), with the highest emissions predicted for Corridor G. Corridor G would also pass within 200m of up to 10 nationally designated ecological sites and would have potential for adverse effects on residential receptors in communities that include Andover, Grateley, Salisbury, Barford St Martin, and Dinton.

5.2.136 Apart from Corridors C and D, the majority of corridors scored poorly when assessed against the air quality criteria, with Corridors F (north) and G performing the worst due to the greatest increase in emissions.

Noise

5.2.137 Traffic noise for Corridors A, B, C, and E is likely to increase noise levels in the northern and southern parts of the WHS and for communities and sensitive receptors including Larkhill, south of Durrington, Shrewton, west of Bulford, Berwick St James, Stapleford, and West Amesbury, whilst there would be a reduction in Winterbourne Stoke, and noise Important Areas along the A303. There would also be a reduction as the result of tunnel based options in Corridor D.

5.2.138 Traffic noise as the result of Corridor F (north) and (south), and Corridor G would reduce within the WHS as well as within communities in Amesbury and Winterbourne Stoke. However these corridors would introduce new road traffic impacts at a high number of communities and sensitive receptors in more than thirteen communities along the corridor.

5.2.139 Corridor D, which includes tunnel sections within the WHS, scored best when assessed against the noise criteria, with corridors A and E performing the worst due to communities experiencing increases in noise levels.

Water environment

5.2.140 Routes within Corridors A, B, F (north) and F (south) include two new river crossings with the potential to adversely affect the water quality, flood risk and biodiversity of the River Till and Avon and the internationally (European) designated habitats and species within the River Avon SAC. Routes C, D and E include a new crossing of the River Till with the potential for adverse effects on water quality, flood risk and biodiversity, and an existing river/floodplain crossing of the River Avon that could potentially be redesigned to provide new ecological and other benefits.

5.2.141 Corridor G includes new crossings of extensive floodplain associated with the River Nadder and River Avon downstream of Salisbury, including the historically, culturally and ecologically important Britford Water Meadows

5.2.142 Small parts of Corridors A, B and the majority of Corridor F (north) cross Source Protection Zone (SPZ) 2, whilst Corridors F (south) and G cross SPZ 1 (The most sensitive area within an SPZ). Corridors C, D and E do not cross the SPZ.

5.2.143 For Corridor D, the tunnel construction would pose the most significant risk to groundwater and, depending on method, could potentially disrupt groundwater flows and the dispersal to the River Avon. However this may be managed by careful planning and design.

5.2.144 Potential adverse impacts associated with the new river crossings and European sites mean that all corridors have a mostly low fit with water environment criteria. However Corridor F (south) and Corridor G score poorly when assessed against the water environment criteria due to the potential for adverse impacts on SPZ 1, the Britford Water Meadow and the River Avon and Nadder floodplains.

People and communities

5.2.145 Corridor A would significantly increase severance within the community of Larkhill. Corridors F (north), F (south) and G would increase severance of access to Amesbury or to Salisbury from several villages located in between these two centres.

5.2.146 Corridors B, C and E would not reduce severance within the WHS nor between Amesbury and residential areas to the north including Larkhill, Durrington and Bulford and Salisbury to the south. Corridors A, D, F (north), F (south) and G would minimise severance and maximise opportunities for connectivity within the WHS.

5.2.147 Corridor D scores best in the assessment against the severance criteria for people and communities, with Corridor G performing the worst due to communities experiencing significant levels of severance.

Geology and soils, and materials

5.2.148 All corridors include sources of potential contamination with varying levels of associated risk. Corridors A and B include potentially contaminant land uses such as MoD Larkhill that includes heavy weapon artillery ranges, Down Barn historical landfill site and non-delineated military waste disposal areas. For Corridors F (north) and F (south) the MoD Boscombe Down airfield and military base spans the majority of the corridor in the east, presenting a potentially significant constraint in respect of land contamination.

5.2.149 All corridors would generate at least a moderate amount of arisings with the tunnel based options in Corridor D and the length of Corridor G considered to generate a significantly higher volume.

5.2.150 All corridors scored poorly when assessed against the Geology and Soils and Materials criteria.

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Assessment utilising EAST

5.2.151 The details of the assessment against EAST are shown in Appendix B6. Table 5-6 shows the summary of the assessment of the corridors using the 5-point scoring system.

Table 5-6 Details of the assessment against EAST Cases

EAST Case	Corridor A	Corridor B	Corridor C	Corridor D	Corridor E	Corridor F (north)	Corridor F (south)	Corridor G
Strategic Case	2	1	1	4	1	3	3	1
Economic	3	3	4	4	3	3	2	1

Case								
Managerial Case	2	2	2	4	2	2	2	1
Financial Case	2	2	2	2	2	2	2	1
Commercial Case	3	3	3	3	3	3	3	3

Strategic case

5.2.152 Corridor D was the best performing as it delivered Government and local objectives and addressed well the transport issues. Corridors B, C and E failed to deliver environmental objectives and Corridor G delivered neither transport nor environmental objectives.

Economic case

5.2.153 Economic growth: Corridors C and D performed the best on journey time savings and reliability due to their short lengths. Corridors F (south) and G were the worst performing due to the lengths of routes leading to an increased potential for delay and incidents.

5.2.154 Carbon emissions: Emissions from vehicles were the largest component of this assessment. Corridors C and D were the shortest and therefore were the best performers. Corridors F (south) and G, being the longest, performed the worst.

5.2.155 Socio-distributional impacts and the regions: Weighed over a number of criteria all corridors performed similarly.

5.2.156 Local environment: On balance Corridor D performed the best. The other corridors performed well against some criteria but poorly against others. Overall the other corridors performed worse than Corridor D.

5.2.157 Wellbeing: Weighed over a number of criteria all corridors performed similarly

5.2.158 Expected value for money category based on the indicative Benefit Cost Ratios (BCR): Corridors B, C and F (north) performed the best. Corridor D offered lower value for money, primarily due to the high cost of a tunnel. Corridor G performed the worst due to high cost and limited user benefits with the increased length of the route.

Managerial case

5.2.159 Corridor D performed best as a tunnel scheme had been tested in public previously and there was strong and detailed evidence to support it. Corridor G performed worst as it followed a completely new route which was considered to be more difficult to get through DCO and had no evidence to support it.

Financial case

5.2.160 The financial case considered Capital and Revenue costs and overall cost risk. Corridor G performed worst due to its length which would lead to higher costs.

Commercial case

5.2.161 The commercial case considered funding sources and potential income generated with all corridors scored equally at this stage.

Summary of overall assessment

5.2.162 The results of the three different assessment methodologies (CSRs, EAST and environmental criteria having regard to NPSNN) were drawn together to facilitate a balanced review of the corridors and the recommendation of corridors to be taken forward for further development and appraisal. A summary of the key findings for each corridor is provided in Table 5-7 below.

Table 5-7 Overall Corridor assessment summary

Overall Corridor assessment summary
Corridor A Corridor A would provide a route to the north of the WHS. This would reduce severance within the WHS, and could also result in some benefit to the WHS. However, the harm it would cause to the setting of the WHS and key assets within it (e.g. Durrington Walls) mean substantial harm to the OUV of the WHS is probable and, on balance potential harm to the OUV of the WHS would outweigh the benefits associated with the removal of the A303. The corridor may also adversely affect Nationally and Internationally (European) designated nature conservation sites including through the direct loss, in two locations, of parts of Salisbury Plain SPA/SAC. It is likely that this would require significant compensation measures and conflicts with the objective of achieving a net addition in biodiversity. The corridor has the potential to adversely affect communities and land within the settlements at Larkhill, Durrington and Bulford. The corridor would reduce transport costs, improve regional connectivity, support the visitor economy and provide journey time savings compared to the existing situation. Corridor A runs along the northern boundary of the WHS. It is difficult to avoid the receptors or to expand the corridor without resulting in further direct impacts or worsening impacts on receptors such as the Salisbury Plain Special Protection Area (SPA) / Special Area of Conservation (SAC) and communities at Larkhill, Durrington and Bulford. On balance, the overall assessment of the corridor is unlikely to change and it would continue to perform poorly against a number of environmental criteria. Corridor A delivered a relatively poor fit against the CSRs, and overall performed poorly against the environmental criteria. The performance against the EAST criteria was also poor. Given the overall poor environmental performance and the poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.

Corridor B Corridor B would provide a surface dual carriageway route to the north of the existing A303, but would sever the WHS, fundamentally altering its character and fabric and causing substantial harm to the OUV of the WHS. The corridor would adversely affect nationally and internationally (European) designated nature conservation sites which could conflict with the objective of achieving a net addition in biodiversity, but it would reduce road traffic noise and severance in Winterbourne Stoke.
The corridor would reduce transport costs and improve regional connectivity, although the adverse environmental impacts on the WHS may cause negative economic impacts on the visitor economy. The corridor would provide journey time savings compared to the existing situation. Corridor B performed poorly against the CSRs, specifically in relation to Cultural Heritage and Environment and Community and overall performed relatively poorly against the environmental criteria. The performance against the EAST criteria was average. Due to the substantial impact on the WHS, and the consequential poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.
Corridor C Corridor C would provide a surface dual carriageway route close to the existing A303 corridor. This would cause substantial harm to the OUV of the WHS and the corridor offers limited opportunity to reduce severance within the WHS and there would be limited or no benefit in terms of noise. The corridor would not contribute to the enhancement of the historic landscape within the WHS and has the potential to adversely affect nationally and internationally (European) designated nature conservation sites which could conflict with the objective of achieving a net addition in biodiversity. It would reduce road traffic noise and severance in Winterbourne Stoke. The corridor would reduce transport costs and improve regional connectivity, although the adverse environmental impacts on the WHS may cause negative economic impacts on the visitor economy. The corridor would provide journey time savings compared to the existing situation. Corridor C delivered a very poor fit against the CSRs of Cultural Heritage and Environment and Community, but scored well against Economic Growth and Transport. Overall, Corridor C performed poorly against the environmental criteria. The performance against the EAST criteria was average. Due to substantial impacts on the WHS it was recommended that this corridor was not taken forward for further consideration.
Corridor D By providing a tunnel within the WHS, Corridor D reduces severance and benefits the character of the WHS and the setting of key assets such as Stonehenge. The above ground elements may cause adverse effects on the character of the WHS but it is considered that substantial harm can be avoided with appropriate design and mitigation. The corridor has the potential to contribute to the enhancement of the historic landscape within the WHS. It would reduce road traffic noise

and severance in Winterbourne Stoke.

The corridor would reduce transport costs, improve regional connectivity, support the visitor economy and provide journey time savings compared to the existing situation. Corridor D had a good fit against the CSRs, particularly Economic Growth and Transport, with the best overall fit of all the corridors. Similarly, the corridor scored the best of all corridors against environmental criteria and EAST.

This corridor offers reduced severance and potential to enhance the WHS and is the best performing corridor of all that were assessed. It was therefore recommended that Corridor D was taken forward for further consideration.

Corridor E

Corridor E would provide a surface level dual carriageway through the WHS to the south of the existing A303. This corridor presents limited potential to reduce severance within the WHS, causing substantial harm to the OUV. The corridor would not contribute to the enhancement of the historic landscape within the WHS. It would reduce road traffic noise and severance in Winterbourne Stoke although this should be weighed against the potential to increase noise in other settlements within the corridor such as at Berwick St James, Stapleford and West Amesbury.

The corridor would reduce transport costs and improve regional connectivity, although the adverse environmental impacts on the WHS would cause negative economic impacts on the visitor economy. The corridor would provide some journey time savings compared to the existing situation.
Corridor E performed poorly against the CSRs, specifically in relation to Cultural Heritage and Environment and Community and overall performed poorly against the environmental criteria, specifically Historic Environment, Biodiversity and Landscape. The performance against the EAST criteria was average.

Due to the impact on the WHS, and the consequential poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.

Corridor F (north)

Corridor F (north) would provide a surface option that would completely avoid the WHS to the south and it would reduce severance and benefit the character of the WHS and the setting of key assets, bringing substantial benefits. Any route that lies entirely within Corridor F (north) would run through the Boscombe Down airfield. The acceptability of this would be informed by engagement with the MoD during the design development stage.

The corridor has the potential to contribute to the enhancement of the historic landscape within the WHS although it may adversely affect some nationally and internationally (European) designated nature conservation sites, and the length of the corridor would lead to increased habitat loss compared to other corridor options. It would reduce road traffic noise and severance in Winterbourne Stoke although this should be weighed against potential adverse noise, severance and visual effects in other settlements within the corridor.

Economic benefits would be reduced because the length of the route would be longer than the existing road, meaning vehicles have to travel greater distances. However, the corridor would

provide journey time savings compared to the existing situation, improve regional connectivity and support the visitor economy.
Corridor F (north) performed relatively well the CSRs, specifically in relation to Cultural Heritage. The overall performance against the environmental criteria was average, but showed detriment in respect of air quality. The performance against the EAST criteria was average. This corridor has a good fit with the CSR for Cultural Heritage and offers reduced severance and potential enhancement within the WHS by avoiding direct impact upon it. It was recommended that Corridor F (north) was taken forward for further consideration.

Corridor F (south)

Corridor F (south) would provide a surface option that would completely avoid the WHS to the south and it would reduce severance and benefit the character of the WHS and the setting of key assets bringing substantial benefits. The corridor has the potential to contribute to the enhancement of the historic landscape within the WHS although it may adversely affect some nationally and internationally (European) designated nature conservation sites. The length of the corridor would lead to increased habitat loss compared to other corridor options, thus offering limited opportunity to increase biodiversity. The corridor would also result in adverse landscape impacts where it passes through the Cranbourne Chase AONB, and would likely affect a high number of sensitive visual receptors. The majority of the corridor is located within the inner part (Zone 1) of a source protection zone for groundwater. It would reduce road traffic noise and severance in Winterbourne Stoke although this should be weighed against the potential adverse noise, severance and visual effects in other settlements within the corridor.

The corridor would marginally reduce transport costs, improve regional connectivity and support the visitor economy. Hence, economic benefits are likely to be relatively slight. Corridor F (south) performed relatively well against the CSRs, specifically in relation to Cultural

Heritage, but the additional length of the route impacted upon the Transport and Economic criteria. The overall performance against the environmental criteria was poor, with detrimental impacts to Biodiversity, Landscape and Water. The performance against the EAST criteria was average.
This option has a good fit with the CSR for Cultural Heritage, and would offer reduced severance within the WHS by avoiding direct impact upon it. It has the potential to enhance the WHS but it performs less well in a number of environmental areas most noticeably landscape and provides reduced economic and transport benefits compared to Corridor F (north). On this basis it was recommended that Corridor F (south) was not taken forward for further consideration.

Corridor G

Corridor G would provide a surface option that would effectively provide a Salisbury southern bypass. This corridor would reduce severance and benefit the character of the WHS and the setting of key assets such as Stonehenge bringing substantial benefits to the WHS. The corridor would contribute to the enhancement of the historic landscape within the WHS. However, it would adversely affect numerous nationally and internationally (European) designated nature conservation sites and areas of ancient woodland. The length of the corridor would lead to substantially increased habitat loss and severance, thus offering limited opportunity to increase biodiversity. The corridor passes to the south of Salisbury and a significant section of the

corridor is located within the Cranbourne Chase and West Wiltshire Downs AONB. It would reduce road traffic noise and severance in Winterbourne Stoke although this should be weighed against the potential adverse noise, severance and visual effects in other settlements within the corridor. The corridor would not reduce transport costs as the benefits from the increase in traffic speed and creation of grade-separated junction are outweighed by the longer route. Hence there would be no improvements in regional connectivity and support for the visitor economy. Hence, there would be no associated economic benefits. Whilst this option would offer reduced severance and potential to enhance the WHS it is likely to lead to substantial habitat loss. Journey times would increase giving lower economic benefits compared with the more direct routes. Corridor G performed poorly against the CSRs, specifically in relation to Cultural Heritage and Environment and Community. The overall performance against the environmental criteria was very poor. The performance against the EAST criteria was also the worst performing corridor. Given the significant increase in journey length for through traffic and the associated disbenefits associated with the longer route, and the consequential poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.

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Assessment scoring

9.2.8 Route options were scored against each CSR and policy objective using the following three point Red-Amber-Green (RAG) scale:

3	Strong alignment. Route option makes a substantial positive contribution towards meeting relevant objectives.
2	Moderate alignment. Route option makes some contribution towards meeting relevant objectives.
1	Weak alignment. Route option makes little or no contribution towards meeting relevant objectives.

9.2.9 The CSR assessment undertaken at Design Fix A used a five point scoring scale, as required by Early Assessment and Sifting Tool (EAST). A three point scale was considered appropriate for the strategic fit assessments conducted at Design Fix C, and for this assessment of the three route options against CSRs and local and national policies, drawing on the WebTAG findings.

9.3 Assessment

Client Scheme Requirements assessment

9.3.1 Table 9-1 provides a summary of this assessment for each of the route options. Table 9-1 Client Scheme Requirements summary table

Document	Client Scheme Requirements	D061	D062	F010
Client Scheme Requirements	Transport: to create a high quality route that resolves current and predicted traffic problems and contributes towards the creation of an Expressway between London and the South West	3	3	2
	Economic growth: in combination with other schemes on the route, to enable growth in jobs and housing by providing a free flowing and reliable connection between the East and the South West peninsula	3	3	2
	Cultural heritage: to contribute to the conservation and enhancement of the WHS by improving access both within and to the site	2	2	3
	Environment and community: to contribute to the enhancement of the historic landscape within the WHS, to improve biodiversity along the route, and to provide a positive legacy to communities adjoining the road	3	3	2

9.3.2 In general, Route Options D061 and D062 align more closely with the CSRs than Route Option F010. However, Route Option F010 aligns most strongly with the cultural heritage CSR as it would remove the road from the WHS in its entirety. This would be a substantial benefit for the WHS and the setting of Stonehenge and other Scheduled Monuments. Route Options D061 and D062 would also remove the road from a key part of the WHS, and all three route options would allow the reconnection of the Avenue, a scheduled monument of high importance that is currently severed by the existing road. All three options would also improve access to the site by improving local traffic conditions. These are very notable benefits.

9.3.3 However, route Options D061 and D062 would introduce major new infrastructure into the WHS, adversely affecting important assets and key attributes of the site's OUV. On balance, D061 would result in a Slight/Moderate beneficial effect for the WHS, and D062 in a Moderate beneficial effect. Strategic fit with the cultural heritage CSR is therefore considered moderate for both route options.

9.3.4 In other respects, Route Option F010 performs less strongly than Route Options D061 and D062. While Route Option F010 would provide benefits in terms of increased capacity and improved reliability, the longer length of the route restricts potential journey time savings in comparison to Route Options D061 and D062, thereby limiting potential benefits and strategic alignment in terms of improved connectivity and economic growth.

9.3.5 Route Option F010 also has the potential for larger adverse impacts on the environment and community than Route Options D061 and D062. For example, the length and alignment of Route Option F010 could encourage traffic on to local roads to the north of the existing A303, resulting in further adverse severance effects. The route option could also introduce adverse severance effects to communities along the proposed route to the south of the existing A303, such as Berwick St James and Upper Woodford. The length of the route has the potential to result in significant loss of priority habitats and associated biodiversity.

9.3.6 All options would reduce the impact of traffic on Winterbourne Stoke, and have the potential for other beneficial environment and community effects such as a net benefit in terms of reducing noise and a net improvement in local air quality, although there is an increase in NOx emissions across the scheme area. However, route option F010 performs considerably less well in terms of impacts on local communities than route options D061 and D062, and also has

the potential for a larger adverse effect on biodiversity. This reduces its strategic fit with the environment and community CSR, relative to route options D061 and D062.

National policy assessment

9.3.7 Table 9-2 provides a summary of national policy alignment for each of the three route options. Route Options D061 and D062 generally align more closely with national policy objectives than F010. Route Option F010, which involves the construction of a longer surface route, offers smaller journey time savings than for D061 and D062 and, as such, contributes less directly to policy objectives relating to connectivity and economic growth.

Table 9-2 National policy summary table

Document	Relevant objectives	D061	D062 F010
National Policy Statement for National Networks (NPSNN)	Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs	3	32
	Networks which support and improve journey quality, reliability and safety	3	32
	Networks which support the delivery of environmental goals and the move to a low carbon economy	1	11
	Networks which join up our communities and link effectively to each other	3	31
Road Investment Strategy: for the 2015/16 – 2019/2020 Road Period (RIS1)	Making the network safer	3	32
	Improving user satisfaction	3	32
	Supporting the smooth flow of traffic	3	32
	Encouraging economic growth by working to minimise delay	3	32
	Delivering better environmental outcomes	2	22
	Helping cyclists, pedestrians and other vulnerable users	3	32

9.3.8 All route options would improve journey quality, reliability and safety for through traffic. However, F010 is expected to encourage more traffic to use local roads adjacent to communities to the north of the existing A303, resulting in adverse severance effects. This route option also has the potential to introduce new adverse severance effects for communities to the south of the existing A303, and therefore performs less well against objectives relating to local traffic issues and communities.

9.3.9 In terms of environmental objectives, all three route options are expected to result in a net overall increase in greenhouse gas water environment. However, F010, due to its greater length, has the potential to result in significant loss of priority habitats and associated biodiversity. Benefits of route options D061 and D062 would include a shorter scheme in terms of its length, landscape reconnection and habitat restoration, leading to a reduction in road fatalities and increase in wildlife movement relative to route option F010.

9.3.10 All three options would result in a net beneficial effect on noise. However F010 has the potential for a larger beneficial noise effect than D061 or D062 due to the reduced noise impact

of the existing A303 on Amesbury. All three options have the potential to result in a net improvement in local air quality due to a reduction to exposure of concentrations of particulate matter, although there is an increase in NOx emissions across the scheme area.

Network (ARN) were reviewed; due to the limitations of the regional changes in the current local model, the local ARN was used. It is recognised that not all changes in carbon emissions are captured with this approach; this may skew the results of the emissions comparison, particularly during the early years of operation of the Scheme. This limitation will be appropriately addressed once the new regional model becomes available.

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Cultural Heritage Impacts – The Value of Removing the Road from the World Heritage Site

11.4.26 Current appraisal guidance (WebTAG) does not monetise or seek to quantitatively value impacts on historic environment. It instead relies on qualitative scores. In some respects, the value of cultural heritage assets is intangible and will remain unquantifiable. However, techniques exist which seek to monetise the value that people place on cultural heritage assets.

Willingness to Pay Research

11.4.27 As noted, a Contingent Valuation study has been undertaken to provide a more balanced quantitative assessment of value for money. The aim of this study is to understand the value that visitors to the World Heritage Site, A303 users, and UK residents put on the removal of the A303 from its current location within the Stonehenge World Heritage Site (WHS), in relation to noise reduction, increased tranquillity, visual amenity and reduced landscape severance in the Stonehenge WHS.

11.4.28 The research elicits a value for the benefits of the scheme as perceived by visitors to the World Heritage Site and UK residents. Respondents to the survey were provided with information on the current route and a description of the impact of the existing A303 on the World Heritage Site. They were also been provided with information on the expected impacts of the scheme. On the basis of this information, respondents were asked to consider what (hypothetically) they would be willing to pay in an increase in annual taxation to realise the benefits of the scheme.

11.4.29 Care has been taken to ensure that responses are focussed on the impact of removing the road from the landscape, rather than factors such as transport benefits and considerations of affordability.

11.4.30 The survey responses have been used to generate estimates of the aggregate willingness to pay of the UK population as a whole or, put another way, the overall value that society attributes to these benefits.

Quantitative versus Qualitative Analysis

11.4.31 The quantitative research is intended to complement but not replace the qualitative appraisal of environmental impacts (including the historic environment assessment) undertaken

in accordance with WebTAG guidance. There are a number of important differences between the willingness to pay research and the WebTAG historic environment.

11.4.32 The quantitative assessment places a value on the impact of the scheme as perceived by visitors to the World Heritage Site, users of the A303 and the UK population. Although respondents are provided with high level information about the World Heritage Site and its features, in the vast majority of cases, their valuation will not be based on expert opinion as is the case with the qualitative assessment.

11.4.33 Linked to this, it is likely that responses to the survey will be highly influenced by impacts on Stonehenge itself as the most recognisable monument in the World Heritage Site. In contrast, the historic environment assessment takes a broader approach, recognising the uniqueness of Stonehenge and its international importance, but also weighing up impacts on the many different monuments affected, either positively or negatively, by the scheme. The historic environment assessment has to consider all aspects of the World Heritage Site landscape and the relationships between the monuments within it, not just the changes to the landscape around Stonehenge itself.

11.4.34 It should also be noted that the willingness to pay survey is focussed primarily on impacts on Stonehenge within the World Heritage Site, whilst the WebTAG qualitative assessment takes into account any impacts on the historic environment outside the World Heritage Site. There are a substantial number of important monuments, listed buildings and other assets around the WHS that may be adversely or beneficially affected by the scheme and these need to be taken into account when weighing the overall level of benefit and harm to the historic environment. The historic environment WebTAG assessment also addresses assets within the boundary of the World Heritage Site which are not directly connected with the Outstanding Universal Value of the World Heritage Site and, importantly, it has to assess impacts on individual monuments in their own right regardless of the World Heritage Site designation.

11.4.35 Finally, it should also recognised that, in practice, the willingness to pay values cover a range of impacts not necessarily limited to historic environment. The values generated by the surveys are likely to capture impacts on noise, air quality landscape and amenity, as well as impacts on historic monuments. In this regard, the willingness to pay research is closely related to a number of environmental topics covered in the qualitative WebTAG assessment.

11.4.36 In overview, the willingness to pay research provides an assessment of the public value attributed to removing the road from the World Heritage Site. It provides a partial assessment of the benefits of the scheme which complements qualitative assessment based on expert opinion. Nonetheless, understanding the value that people place on the benefits of the scheme, the research helps us to better understand the trade-offs between cost and impact.

Applying the Results of the Assessment

11.4.37 At this stage, the research has been undertaken only on the basis of the tunnelled option (nominall, Route Option D061). However, the research is primarily concerned with the impact of removing the road from part or all of the World Heritage Site. Therefore, the research can also be used to infer the likely benefits of the surface route in this respect.

11.4.38 In respect of cultural heritage impacts, all options would deliver transformative benefits for parts of the World Heritage Site by improving the setting of scheduled monuments,

including Stonehenge itself, and by removing the physical barrier that currently divides the Site into two parts. Therefore, the results of the assessment may underestimate the benefits of Route Option F010. However, it is likely that the value attributed to the scheme respondents is focussed on the impact of the scheme on Stonehenge (the most recognisable feature of the World Heritage Site), rather than impacts on monuments located to the east or west of Stonehenge that would be affected by the construction of tunnel portals or new sections of highway.

11.4.39 Whilst these differences are highly material to the qualitative assessment of heritage impacts, in respect of the quantifiable impacts of the benefits of removing the road from the World Heritage Site, the tunnelled and surface options are similar.

Results

11.4.40 As noted, the Contingent Valuation study involved undertaking face to face surveys at the Visitor Centre as well as on-line surveys with a stratified sample of UK residents. The research considered three separate populations:

- Stonehenge Visitors.
- A303 Road Users.
- General population.

11.4.41 Each survey was tested through survey pilots and appropriate refinements were made. In general the pilots demonstrated that the surveys were appropriate and clearly understood by respondents.

11.4.42 Respondents were asked whether they would be willing to pay to remove the road from the World Heritage Site. The majority of respondents reported that they would be willing to pay some amount to remove the road. The proportion of people willing to pay was highest for visitors and road users (both 67.4%). It was 59.2% for the general population.

11.4.43 Respondents who were not willing to pay to remove the road were further asked if they would require compensation in the event that the scheme went ahead. This was an important part of the research given that it ensured that those who perceived the scheme has having negative impacts (for example, because it would result in Stonehenge no longer being visible to road users when travelling on the A303) were also able to place a value on these impacts.

11.4.44 The percentage shares of people requiring compensation were very low for all populations, and was lowest for Stonehenge visitors (0.5%). Across the three groups between 30% and 38% of people neither required any compensation, nor were not willing to pay.

Table 11-1 Respondents ‘Willing to Pay’ for the Proposed Scheme

	Visitors	Road users	General population
Willing to pay to move the road	67.4%	67.4%	59.2%
Requiring compensation for the removal of the road	0.5%	2.1%	2.3%
Neither willing to pay nor requiring compensation	32.2%	30.5%	38.4%
Total	100%	100%	100%

11.4.45 Those willing to pay something for the proposed improvement were asked how much willing to pay an increase in annual taxes over a three-year period to support the scheme, whilst those requiring compensation were asked what they would be willing to accept in compensation should the scheme go ahead.

11.4.46 The average willingness to pay/accept values derived from the survey were then aggregated to the relevant population levels within each of the three groups. Willingness to accept is subtracted from willingness to pay in order to provide a net overall benefit. In accordance with good practice, a range of validity tests have been undertaken which demonstrate that the variation in values across different sub- groups of respondents are logical and internally consistent.

11.4.47 In summary, the aggregate net benefit for visitors to Stonehenge is £24m, for road users it is £51m, and for the general population it is £1.1 billion. Combining these together results in an estimated aggregate net present value of £1.3 billion (2016 prices and values) for the removal of the section of the A303 for a tunnel. For comparability with the overall cost benefit analysis this result has been converted to 2010 prices and values to give a value of £1.0bn.

Table 11-2 Aggregate Willingness to Pay/Accept

Group	WTP/WTA variable	%	Relevant Population	Mean (£ Net Present Value)	Aggregation to national level
Visitors	Annual tax	67%	363,776	£68	£24m
	Compensation (one off)	0.5%	2,517	£188	
Road Users	Annual tax	67%	854,212	£22	£51m
	Compensation (one off)	2%	27,204	£81	
General Population	Annual tax	59%	31,653,894	£14	£1,251m
	Compensation (one off)	2%	1,229,012	£58	
Total net present value (2016 prices and values)					£1,326m
Total net present value (2010 prices and values)					£992m

11.4.48 Upper and lower bound results have also been derived based on a 95% confidence interval for the Willingness to Pay / Accept values based on the respective sample sizes. The results show a range of £1.2bn to £1.5bn. The interpretation of this analysis is that we are 95% confident that the willingness to pay (net of willingness to accept) is between £1.2bn and £1.5bn.

Table 11-3 Upper and Lower Bound Estimates

11.4.49 It is acknowledged, however, that given the nature of this research there are uncertainties beyond those relating to confidence intervals. Notwithstanding that any assessment of this nature is subject to a significant margin for error, the assessment demonstrates that the

benefits of removing the road from the World Heritage Site – as perceived by Stonehenge visitors and the general public – are substantial.

Valuing Impacts on the Landscape beyond Stonehenge

Approach

11.4.50 As noted, for all options, the benefits of removing the road from the World Heritage Site need to be balanced against the negative impacts of the construction of a new or widened surface highway in an otherwise rural environment. As for heritage impacts, quantifying such effects is highly challenging. Where landscape impacts are highly material (i.e. scored as moderate or large), DfT has identified that an illustrative monetisation of landscape impacts can help inform the overall value for money assessment of a scheme.

	Lower Bound (of 95% Confidence Interval)	Central Estimate (Mean)	Upper Bound (of 95% Confidence Interval)
Total net present value (2016 prices and values) (£)	1,190	1,326	1,463
Total net present value (2010 prices and values) (£)	889	992	1,093

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Table 11-15 Programmatic Appraisal

£M 2010 Prices and Values	Option D061	Option D062	Option F010
Initial BCR	0.7	0.7	0.4
Adjusted BCR	0.9	0.9	0.7
BCR Including Monetised Heritage and Landscape Impacts	1.5 – 1.7	1.6 – 1.8	1.5 – 1.8
Complementary Approach to Wider Economic Benefits	1.9 – 2.1	2.0 – 2.2	

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Table 18-6 Summary of environmental assessment outcomes

Parameter	Option D061	Option D062	Option F010
Noise (NPV of change in Noise)*	£180,000	£225,000	£3,660,000
Air quality: Total value of change in	-£310,000	-£320,000	-£490,000

air quality*			
Greenhouse Gases (NPV of change in Greenhouse gases)*	-£50,106,484	-£50,615,971	-£53,875,360
Landscape	Moderate Adverse	Moderate Adverse	Very Large Adverse
Townscape	Neutral	Neutral	Neutral
Historic Environment (overall)	Neutral	Neutral	Large Beneficial
Historic Environment (WHS)**	Slight / Moderate Beneficial	Moderate Beneficial	Large Beneficial
Biodiversity	Large Adverse	Large Adverse	Very Large Adverse
Water environment	Large Adverse	Large Adverse	Moderate Adverse

* a positive value represents a benefit whilst a negative value a disbenefit

** Scores are as per WebTAG guidance (TAG Unit A3), these differ from DMRB derived impact and effect scores.

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Overall Summary

22.1.1 The identification of the existing problems and constraints for the scheme and the options development, sifting and appraisal process, to ultimately determine the route options to be taken forward for public consultation, was split into three stages: Design Fix A; Design Fix B; and Design Fix C.

22.1.2 In Design Fix A, some 60 historical routes that have been proposed by Government, stakeholders and the public in the past, were reviewed and grouped into eight corridors which contained routes with similar characteristics. The corridors were assessed against the Client Scheme Requirements (CSRs), WebTAG and EAST criteria, and the National Policy Statement for National Networks (NPSNN)) environmental aspects. The outcome of this initial corridor appraisal was that Corridor D (part tunnel part surface route options within the WHS to the south of the existing A303) and Corridor F (wholly surface route options to the south of the WHS) were the best performing corridors and should be taken forward for further consideration and development of route options.

22.1.3 A number of route options were then developed in Design Fix B, within the two best performing corridors, and sifted against the key engineering and environmental constraints to confirm 7 route options in Corridor D and 3 route options in Corridor F to be taken through initial route options appraisal. The methodology used to appraise the options (Design Fix C) followed that used for the Initial corridors appraisal, and was based on the guidance in the WebTAG Option Assessment Framework. The outcome of this initial options appraisal was that three of the best performing Corridor D and F route options were taken forward for further more detailed WebTAG appraisal to determine the route options for consultation.

22.1.4 The three better performing route options D061, D062 and F010, were taken through a WebTAG appraisal with the outcomes of the assessments reported in Appraisal Summary Tables (refer to Appendix H).

22.1.5 The further appraisal confirmed that Route Options D061 and D062 would deliver a better fit against the Client Scheme Requirements (CSRs) and the relevant local and national planning, transport and economic policy objectives, than Route Option F010, thus providing better alignment with the scheme objectives.

22.1.6 Route Options D061 and D062 would provide a shorter, more direct route for through traffic along the A303 relative to Route Option F010, reducing the extent of rat-running through local villages and delivering a journey time saving of approximately 4 minutes compared to the existing case. A journey along Route Option F010 would involve travelling an additional 3.7km relative to Route Options D061 and D062 and consequently, the journey time saving (in relation to the existing situation) is reduced and is less at approximately 2.75 minutes. A consequence of the longer Route Option F010 alignment and the proposed junction locations is an increase in rat-running through local villages.

22.1.7 The economic appraisal undertaken provided an assessment of the overall value for money of the investment on the basis of costs and benefits that can be monetised. If assessed on the basis of traditional metrics of transport user benefits, Route Options D061 and D062 performed better than Route Option F010, although costs outweigh benefits for all options. However, if the value of removing the A303 from the vicinity of Stonehenge is included in the assessment, a positive economic case can be made for each of the options. In overall terms, when viewed from this broader perspective, the options performed similarly. At this stage in the assessment, the scheme was assessed as offering ‘medium’ value for money.

22.1.8 Route Options D061 and D062 performed marginally better than Route Option F010 in terms of limiting the separation of residents from services and facilities within their community. This is due to reduced severance at a number of locations along the route and on the affected road network. In particular, Route Options D061 and D062 remove traffic from Winterbourne Stoke, reduce traffic for other nearby settlements such as Shrewton, Durrington and Larkhill, and also include new pedestrian facilities at Countess Roundabout. With the criteria of physical activity, Route Options D061 and D062 also performed better due to a lower degree of Public Rights of Way (PRoW) severance relative to Route Option F010. All options were comparable in terms of journey quality due to reductions in traveller stress.

22.1.9 The distributional impacts assessment identified no significant differentiators between the impact of Route Options D061 and D062, with these outperforming Route Option F010 overall due to fewer adverse impacts.

22.1.10 WebTAG environmental appraisals were undertaken on each of the three route options. For all options it is predicted that properties affected in the study area would experience low levels of change in noise, with a small number of properties assessed as experiencing noise nuisance. All options would provide noise benefits, with the level of noise reduction around Winterbourne Stoke better for Route Option D062 and Route Option F010 having further noise benefits for properties in Amesbury.

22.1.11 In terms of greenhouse gases all options would result in an increase in user carbon, with F010 resulting in the greatest increase due to vehicle flows and the much longer distance travelled. For air quality, the increase in vehicle flows and the much longer distance travelled for F010 would also result in the highest NOx emissions. For all options air quality receptors within 200m would experience a reduction in exposure to PM10 emissions, leading to improved local air quality. This improvement is offset for all options by the overall increase in exposure to NOx leading to an overall reduction in air quality.

22.1.12 In terms of landscape both D061 and D062 would have a Moderate Adverse effect with scope for further mitigation during design development. For F010 the magnitude of change and the sensitivity of the high quality rural landscape along the approximate 21.5 km length and the visual impacts of the highly intrusive crossing of the Upper Avon Valley would result in a Very Large Adverse effect on the landscape with limited scope for mitigation.

22.1.13 For the historic environment, both Route Options D061 and D062 would result in an overall Neutral score compared with a Large Beneficial effect for F010. In terms of the WHS, F010 would also result in a Large Beneficial effect, whilst D061 would result in a Slight/Moderate Beneficial effect and D062 a slightly greater Moderate Beneficial effect. These differences are due to the routing of D062 west of the western portal where it avoids important archaeological remains and uses local topography to better fit into the landscape of the WHS.

22.1.14 For Route Options D061 and D062 biodiversity and the water environment have both been assigned the same level of Large Adverse effect, with potential effects on water environment predicted to substantially reduce post construction. For biodiversity, mitigation through design development is predicted to result in a reduction in the scale of impact. Route Option F010 crosses 2.4km a Special Protection Zone 2 (SPZ) which is reflected in the Moderate Adverse assessment for water environment. For biodiversity F010 is nearly twice the length of D061 and D062 and at surface level would result in a Very Large Adverse effect. This is due to the direct adverse impacts to internationally (European) and nationally designated ecological sites.

22.1.15 All options were assessed to have a positive impact upon on road safety as the existing A303 is an accident blackspot, and all new route options will increase capacity and be designed

to high safety standards. All proposed route options would significantly reduce the risk of hazards to road users. Additionally, the horizontal and vertical alignments and associated forward visibility would improve significantly relative the existing conditions.

22.1.16 As a result of having shorter travel distances, Route Options D061 and D062 were assessed to have the potential to deliver greater in-service accident benefits over Route Option F010. In relation to Construction, Design and Management (CDM) safety assessment, Route Options D061 and D062 would involve significant tunnel construction, a highly specialised and technically complex activity. This would be considered a significant construction risk activity, but was assessed as manageable by a competent contractor. Route Option F010 would involve the construction of an additional significant viaduct over the River Avon, which would require significant amount of working at height, another significant but manageable construction risk.

22.1.17 In terms of performance against the assessment criteria of operation, technology and maintenance, all options performed to a similar level with Route Options D061 and D062 requiring enhanced operation and maintenance features specific to the tunnel.

22.1.18 In regards to the scheme programme, Route Options D061 and D062 could be delivered to meet the Road Investment Strategy (RIS) programme dates and achieve a start on site by March 2020. Route Option F010 would require additional survey information leading to a 12 month delay relative to Route Options D061 and D062, and thus would achieve a later start on site date of approximately March 2021.

22.1.19 In conclusion, based on the more detailed WebTAG assessment and appraisal of the sifted best performing route options for Corridors D and F, and the fit with the scheme objectives, the following route options are proposed to be taken forward to Stage 2 for public consultation and further appraisal, with no significant characteristics differentiating the two options:

- Route Option D061: Approximately 2.9km length tunnel with route running north of Winterbourne Stoke, eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse to minimise visual impact to and from Stonehenge.
- Route Option D062: Approximately 2.9km length tunnel with route running south of Winterbourne Stoke, eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse to minimise visual impact to and from Stonehenge.

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363