



Historic England

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A303 Amesbury to Berwick Down team  
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Date: 20 April 2018

Our Ref: PL00326762

**BY EMAIL ONLY**

Dear Sirs,

**RE: A303 Stonehenge - Amesbury to Berwick Down, response to public consultation on proposed route**

Role of Historic England

We are the government's expert advisor on England's heritage and we have a statutory role in the planning system. Central to our role is the advice we give to local planning authorities, government departments, developers and owners on development proposals affecting the historic environment.

'Constructive Conservation' expresses the role we play in promoting a positive and collaborative approach to conservation that focuses on actively managing change. The aim is to accommodate the changes necessary to ensure the continued use and enjoyment of heritage assets while recognising and reinforcing their historic significance. Our advice seeks to minimise the loss of significance to these assets. We also look for opportunities to enhance the historic environment.

Part of our role involves advising the Department for Digital, Culture, Media and Sport (DDCMS) on matters relating to World Heritage, as DDCMS act as the State Party responsible for fulfilling the government's responsibilities as a signatory to the 1972 World Heritage Convention. In this capacity we have taken part in the 2015 and 2017 advisory missions where the UNESCO World Heritage Centre and their advisory body ICOMOS International (not to be confused with ICOMOS-UK) were invited by DDCMS to visit the Stonehenge WHS and consider the evolving scheme proposals. In formulating this response we have taken into account the reports of both advisory missions and the decision of the 2017 World Heritage Committee which was informed by the 2015 and 2017 mission reports. A third advisory mission took place in March 2018 and although the mission report will not be issued within the statutory



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consultation deadline, we have also taken into account discussions held with the mission team in writing our advice.

### SUMMARY

Historic England sees the proposed scheme as great improvement on the route options taken to non-statutory public consultation by Highways England in January 2017. The evolution of the scheme from that time has been significant in terms of improving the impact of the proposals upon the Stonehenge World Heritage Site (the WHS). The route has been revised to bring the proposed alignment close to that of the existing, surface A303, thus resolving the serious adverse impacts the previous route options would have caused within the south-west quadrant of the WHS, including upon the winter solstice sunset alignment as viewed from Stonehenge itself. The location of the tunnel portals, with appropriate landscape mitigation by means of covered extensions, utilises the topography of the WHS to minimise the impact of these elements upon its Outstanding Universal Value (OUV). The positioning of the new surface approach road to the west of the western portal within a deep, steep sided cutting will remove from sight the visual intrusion of traffic passing through the western part of the WHS from a number of viewpoints relevant to OUV whilst minimising the footprint of the scheme within it. The removal of the current Longbarrow Roundabout, the creation of a new A303/A360 junction some 600m west of the current western boundary, and the diversion west of the A360 road where it formerly approached Longbarrow Roundabout from the north and south, will have a significant, positive impact upon the setting of the Winterbourne Stoke and Diamond monument groups, especially when combined with the removal of the current roundabout and old A303/A360 roads and their transition to traditional green ways.

Welcome commitments from Highways England to avoid intrusive lighting within the WHS and the new junctions, and to avoid intrusive signage within and adjacent to the WHS, will bring further benefits to bear in conserving a dark skies environment important for the appreciation of significant astronomical alignments as viewed from those monuments designed for this purpose. We are keen to learn more on how intrusive lighting will be avoided at the proposed new A303/A360 junction.

The overall effect of these improvements when combined with the removal of over 3km of the current surface A303 and the reunification of the landscape it presently severs, effectively preventing safe access to the WHS to its south, will substantially improve the ability of the public to appreciate the extraordinary archaeology of the whole Stonehenge WHS, rather than only the part to the north of the A303 as is the case at present. There are potentially substantial public benefits arising from the scheme, which if secured could transform the



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public's understanding of the WHS, allow its improved interpretation and the transmission of its significance in manner fit for Britain's pre-eminent archaeological WHS.

However, whilst recognising the progress made by Highways England in improving the scheme it is our view that further work is needed in two key areas to create a road improvement that can be demonstrated to protect the OUV of the WHS. The scheme proposals include a 'green bridge' over the proposed deep cutting of the new A303 on the site of the current Longbarrow Roundabout, to provide connectivity between the north and south parts of the WHS at this location. An independent outline assessment of potential impacts on OUV, jointly commissioned by Historic England and National Trust to inform our positions on the proposals, suggests that the proposed green bridge will do little to mitigate the impacts of the scheme upon the WHS at this location. It identifies the need for a wider land-bridge at a position east of the proposed green-bridge to provide meaningful landscape connectivity between the Winterbourne Stoke and Diamond monument groups. The purpose of such a land-bridge would be to reinstate the appearance of a rural land-form between the two monument groups at their closest point, not only for visual mitigation, but also to provide landscape context and to facilitate the impression of walking through a green landscape when moving between the two groups (should future land access allow), rather than moving across a narrow strip of land above the new A303 cutting. Such a land-bridge would need to be wider than the proposed 45m wide green-bridge. Our commissioned study suggests it would need to be carefully located and a minimum of 150m wide to be provide effective mitigation of the impacts upon OUV the scheme would have within this part of the WHS.

Our latest outline OUV assessment, titled '*Stonehenge A303 improvement: Assessment of aspects of the Preferred Route as at 4th December 2017, March 2018*' assesses the proposed scheme as put forward by Highways England for statutory consultation. Our response to the statutory consultation is informed by this assessment but it, and any future assessments are subject to change as the scheme design progresses. Our definitive advice on the scheme, or any individual element of it, can only be undertaken once the design is finalised.

The second area where further work is required is the proposal to create a link for motorised vehicles between Byways Open To All Traffic (BOATs) 11 and 12. This proposal would have an adverse impact upon the OUV of the WHS by encouraging the proliferation of motorised vehicle traffic along the byways within the WHS, something not only harmful to OUV in its own right, but seemingly at odds with the major thrust of the scheme in removing the intrusive sight and sound of traffic from much of the Stonehenge WHS. Whilst we acknowledge and support the improvement of public access routes within the WHS we cannot support the creation of a new byway for motor vehicles and strongly advise that any such link should be a Restricted Byway only, for walkers, cyclist and horse riders/carriages.



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Historic England is closely involved in the strategy, direction, oversight and monitoring of the archaeological assessment and evaluation work necessary to inform the scheme proposals. This reflects our role as the Government's lead adviser on heritage and is undertaken as part of the Heritage Monitoring and Advisory Group (HMAG) we are part of together with Wiltshire Council Archaeology Service (WCAS), the National Trust and English Heritage. Historic England and WCAS have formal curatorial roles within the planning process whilst National Trust and English Heritage provide valuable expert advice as major conservation bodies responsible for managing significant aspects of the WHS. Going forward HMAG will be closely involved in advising upon requirements for archaeological mitigation within the WHS and the wider scheme area once the results of assessment and evaluation are available.

Beyond these headline issues, we are also in ongoing pre-application discussion with Highways England on a range of issues of detail, all of which require careful consideration and sensitive design to avoid adverse impacts upon the WHS or to maximise any benefits we may consider they have the potential to deliver.

### SIGNIFICANCE OF THE STONEHENGE WORLD HERITAGE SITE

The Stonehenge WHS forms one half of a larger world heritage property together with Avebury, and was inscribed on the World Heritage List in 1986 as the Stonehenge, Avebury and Associated Sites WHS.

The international significance of Stonehenge and its WHS landscape cannot be overemphasised. As a globally famous and iconic monument and enduring symbol of man's prehistoric past, it is an internationally recognised symbol of Britain. It is difficult to overstate its importance as one of the best-known and best-loved monuments in the world. The Stonehenge World Heritage Site is globally important not just for Stonehenge, but for its unique and dense concentration of outstanding prehistoric monuments and sites, which together form a landscape without parallel.

The significance of the WHS is well summarised in the Statement of Outstanding Universal Value (SOUV) adopted by the UNESCO World Heritage Committee in June 2013. The full SOUV can be found here: <http://www.stonehengeandaveburywhs.org/assets/Stonehenge-and-Avebury-WHS-SOUV.pdf> but the key attributes of that significance are worth reiterating:

*The Attributes of Outstanding Universal Value of the Stonehenge World Heritage Site*

1. Stonehenge itself as a globally famous and iconic monument.



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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 protection of OUV as expressed through these Attributes, together with the Authenticity and Integrity of the WHS are therefore key considerations in assessing proposals within the site or its setting.

### POTENTIAL IMPACT OF THE PROPOSED ROUTE (from east to west)

**East of Countess Roundabout** – the proposals for this section of the scheme would appear to have a limited impact upon designated heritage assets. The scheme elements in this location have in our view little or no impact upon the setting of the WHS or those designated assets clustered to the west of Countess Roundabout and the A345 Amesbury-Durrington road. The works proposed to byways in this area should have a positive impact upon Scheduled Monument No 1009566 *Two disc barrows and a bell barrow, 400m east of the Pennings, Earl's Farm Down* by diverting the course of a Byway Open To All Traffic (BOAT) away from the monument, which is at present suffering damage and erosion through its partial location within the byway. It is vital that measures are taken to protect the monument from further vehicle damage once the byway diversion has been created.

**Countess Roundabout/junction** – the proposals to improve Countess by means of a flyover for the A303 and grade-separated junction would not appear, from the information available in the consultation documents, to have any significant impact upon the OUV of the WHS,



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given the baseline condition of this part of the site. However, the infrastructure associated with the junction improvements, including signage, lighting, fencing, cameras etc will require sensitive consideration. Although it appears that all the proposed works will take place within the existing highway land-take, we note the potential for indirect (setting and visual) impacts upon the following designated heritage assets, which will require careful assessment to determine the level of impact and suitable mitigation measures.

- Amesbury Abbey – Grade I, Grade II\* and Grade II Listed Buildings, Grade II\* Registered Park & Garden
- Amesbury Conservation Area – we note that the northern edge of the conservation area abuts the highway land-take at Countess
- Countess Farm – group of Grade II Listed Buildings on north-west edge of the junction.

We would welcome the opportunity to discuss these potential impacts further with Highways England, to advise upon the proposed impact assessment methodology and ensure the best approach to protect these designated heritage assets. We would recommend that any such discussion includes the relevant Wiltshire Council Conservation Officer, who is normally the lead source of advice for Grade II Listed Buildings and Conservation Areas. Historic England will be able to advise on assessing the setting impacts upon the Grade I Listed Building and the Grade II\* Registered Park and Garden.

**From Countess to proposed Eastern Portal** – the consultation documents indicate that this section remains entirely within the existing highway land-take up to the point where the road would divert to the north to enter the eastern portal approach. It does not appear that this section will impact negatively upon the OUV of the WHS, due to the confined nature of the land-form where the route diverts from the existing highway boundary to approach the eastern portal. Any new signage will require very careful consideration at this location due to the proximity of both the Amesbury Abbey Registered Park & Garden and SM No 1012126 *Vespasian's Camp*, an Iron Age hillfort.

- **Blick Mead** – whilst of an earlier period than that for which the WHS is designated, this recently discovered Mesolithic site is considered to be of national importance for the significant collection of prehistoric worked flint and other finds emerging from the site. It lies immediately south of the existing highway land-take along this section of the route. We are aware that Highways England is engaged in discussions with the Blick Mead excavation leaders with a view to including data from the site within the scheme's hydrology assessment. It may be that the significance of the Blick Mead site is dependent in part on the maintenance of groundwater levels within the site and an



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appropriate assessment following the recently published Historic England guidance on preserving archaeological remains (<https://www.historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>) will be important in identifying any such sensitivities and designing effective mitigation.

From ongoing discussions with Highways England it appears that there will be no harmful effect upon the Blick Mead site from the proposed tunnel or its portals impacting upon chalk groundwater levels/flow, or from any potential underlying ground compaction from the proposed new Countess flyover embankments. Any groundwater sensitivity within the Blick Mead site may instead be due to fluctuations in surface water entering the site through the drainage ditches alongside the existing A303. It is therefore important that Highways England understand what role the existing drainage ditches play in maintaining waterlogged conditions at Blick Mead and to ensure that the scheme has no negative impact upon that flow if it can be demonstrated to be vital to preserving the significance of Mesolithic archaeological remains. The water environment within the Blick Mead site is complex and likely to lie beyond the conclusions of the landscape-scale groundwater modelling undertaken for the new tunnel and portals. It is our view that targeted assessment of the small-scale groundwater environment within the relatively restricted area of Blick Mead would be advantageous in both establishing baseline conditions and in helping to demonstrate the neutral impact of the scheme upon this nationally-important archaeological site.

We note that there will be no direct impact upon the Blick Mead site from the engineering/infrastructure of the proposed road improvement as shown in the consultation documents, as all works at this location will be within the existing highway boundary.

**Eastern tunnel portal** – the proposed location of the eastern portal improves upon that of the 2017 public consultation by moving the portal further to the east, thus providing greater separation between the portal and the Stonehenge Avenue (part of SM No 1010140 together with Stonehenge itself). The Avenue in this part of the WHS is the section that runs from the River Avon at West Amesbury and runs roughly north-west towards King Barrow Ridge. It is severed by the minor road from West Amesbury to Great Woodford, the old A303 alignment along Stonehenge Road from Amesbury and by the current, surface A303. The Avenue in this location is known to survive as buried archaeological remains as demonstrated by both



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geophysical survey and archaeological investigation (the latter not in connection with the present road proposals) and runs nearly perpendicular to the existing A303 dual carriageway, by which it is bisected. By placing the portal to the east of the Avenue and removing the existing A303 from the eastern portal westwards to Longbarrow junction, it brings forward the eventual prospect of making much of the course of the Avenue through the landscape legible or even accessible to future generations.

This would be a significant achievement for the conservation and enhancement of the WHS and a major improvement on the present surface road.

The proposed portal location is also favourable in terms of its archaeological impact. Historic England, as part of the Heritage Monitoring and Advisory Group (HMAG), is involved in the design and monitoring of the archaeological assessment and evaluation of the portal site and approach road (further comments on archaeological work undertaken to inform the scheme proposals are set out towards the foot of this letter). This work is being undertaken to a high standard and has sampled a high percentage of the portal site and approach. The results demonstrated a very low archaeological presence at this location within the WHS.

The combination of negligible archaeological impact, preservation of the Avenue and the low intervisibility between the latest, revised portal site and OUV-relevant sites & monuments leads us to the view that the eastern portal proposals are acceptable in-principle and should preserve OUV. In fact, the location now proposed for the portal site greatly reduces its intervisibility with OUV-relevant sites and monuments compared to the 2017 location, due to the steepening and narrowing of the minor dry valley within which it sits as the valley runs east. However, it is critical that the infrastructure is designed and located sensitively if this improvement is to be properly realised. The CGI visualisations produced for the public consultation indicate the potential for this aspect of the scheme's infrastructure to be delivered with little visual intrusion on the WHS, however we are concerned that the impact upon the setting of Vespasian's Camp scheduled monument is also assessed and any impacts identified properly mitigated.

**The bored tunnel** – the twin, fully-bored tunnel of 3km would deliver huge benefits for the WHS by facilitating the removal of much of the damaging and intrusive surface road that presently severs the Stonehenge WHS in two. It would entail the removal of the surface dual and single carriageway road from the eastern portal location on the east side of King Barrow Ridge across to Longbarrow junction on the west side of the WHS. This would enable the reunification of the WHS north and south of the current road.

At present, around two thirds of the WHS lie to the south of the A303, effectively isolated from the northern part which contains Stonehenge and the other major ceremonial monuments. The land to the south of the current A303 contains some of the most spectacular groups of



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funerary monuments within the WHS and a more diverse landscape than that which visitors are familiar with to the north of the road. At present none of this heritage is promoted for visitors because of the dangers inherent in crossing a busy trunk road. The bored tunnel presents an opportunity to hugely improve the visitor experience to the whole WHS landscape, opening up new views and new approaches to Stonehenge along public rights of way, in addition to opening up to public appreciation the rich heritage of the southern part of the Stonehenge landscape. The benefits that could be secured by the tunnel for the appreciation, understanding and interpretation of the whole of the Stonehenge WHS are potentially substantial and could significantly enhance the protection and transmission of its OUV.

In addition, the removal of the surface road via the bored tunnel will significantly improve the setting of some of the country's most important and best-preserved prehistoric monuments including Stonehenge itself, and restore tranquillity to this ancient landscape.

**Proposed byways connection** - The proposal to provide connectivity for motor vehicles between Byways Open To All Traffic (BOATs) 11 and 12 causes us serious concern. This proposal would have an adverse impact upon the OUV of the WHS by encouraging the proliferation of motorised vehicle traffic along the byways within it, something not only harmful to OUV in its own right, but seemingly at odds with the major thrust of the scheme in removing the intrusive sight and sound of traffic from much of the Stonehenge WHS. The connection of byways 11 and 12 in this way, whether on the line shown in the consultation documents, or along the line of the old surface A303 (as would become likely should National Trust object to the loss of inalienable land on the proposed alignment), would result in the existing negative impact on the WHS of motor vehicle traffic on the byways increasing along the proposed new connection. Whilst we acknowledge and support the improvement of public access routes within the WHS we cannot support the creation of a new byway for motor vehicles and strongly advise that any such link should be a Restricted Byway only, for walkers, cyclists and horse riders/carriages. This would provide the required connectivity between these rights of way without impacting negatively upon OUV. It would allow non-motorised users to travel through and explore the WHS along the new connection without impacting negatively upon the tranquillity and setting of the WHS and its monuments.

*Western section of proposed scheme within the WHS – the scheme section from the western tunnel portal to the relocated A303/A360 junction has the potential to impact adversely upon the WHS and its OUV unless very carefully and sensitively designed. To help inform our view on the scheme proposals, and to allow us to provide balanced, expert advice to Highways England on the evolution of the scheme, Historic England has jointly commissioned with the National Trust a series of preliminary, outline OUV impact assessments, as different scheme iterations have arisen.*



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*Our latest outline OUV assessment, titled 'Stonehenge A303 improvement: Assessment of aspects of the Preferred Route as at 4th December 2017, March 2018' focuses on the western section of the scheme within and adjacent to the WHS as put forward for statutory consultation by Highways England, where significant changes to the scheme are proposed compared to the 2017 public consultation. A copy of that document is included as an appendix to this letter and the views expressed in the following paragraphs are informed by its conclusions. While our response to the statutory consultation is informed by this assessment, it and any future assessments are subject to change as the scheme design progresses. Our definitive advice on the scheme, or any individual element of it, can only be provided once the design is finalised.*

**Western Portal** – the proposed western portal position is now aligned close to the south side of the existing A303 and has been extended from 2.9km to 3km in length in order to avoid impacting upon a scheduled round barrow No 1010832, which is an outlier of the major Normanton Down barrow cemetery that lies to its south-east. The proposed portal location is acceptable in OUV terms provided that it is mitigated by the proposed 200m long extension, to provide essential landscape mitigation. Thus mitigated, the western portal is in our view well located to make best use of the natural topography, with the point at which traffic would emerge from underground having a relatively low visual impact when viewed from most sites and monuments that convey OUV (where intervisibility exists). Our preferred treatment for the portal extension is for the option that best replicates the existing landform within its footprint.

**From the proposed Western Portal to the new A303/A360 junction location** – the appropriate design treatment and mitigation of this section will be central to protecting the OUV of the WHS. Our view is that the preferred treatment for this section is to set the road within the steep-sided 'abutment' cutting rather than a gently-sloped 'open' cutting. The steep-sided cutting has two essential functions – it minimises the land-take necessary for the new road, thus reducing the impact upon buried archaeological remains, and will effectively remove from view, from many sites and monuments that convey OUV, the intrusive sight of heavy traffic moving through the WHS. The proposed depth of the cutting means that the traffic removed from view will include heavy goods vehicles, which form a substantial part of the traffic upon the A303.

We understand that the steep-sided cutting will require retaining walls – the design of these features will require sensitive consideration. The proposal to provide rounded, grassed 'shoulders' to the cutting is a welcome one, which will provide some mitigation of the presence of the cutting within views north and south perpendicular to the line of the road. However, it is our view that further landscape mitigation will be required to minimise the impact upon OUV within this section.



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The scheme proposals include a 45m wide green bridge across the cut at what is now the location of Longbarrow Roundabout. Whilst this feature will provide connectivity between the WHS to north and south of the new road (as part of future proposals to improve access to the southern part of the Stonehenge WHS), it is our view that this feature will do little to provide the landscape mitigation required to offset the impact of the cutting upon two key groups of sites and monuments that convey OUV.

The Winterbourne Stoke barrow group lies to the north and east of the present Longbarrow Roundabout, focused on the Winterbourne Stoke 1 long barrow which currently sits close to the roundabout. The Diamond group of monuments lies to the south and east of Longbarrow Roundabout and includes three long barrows, several round barrows, a henge and a hengiform monument. These two monument groups convey OUV not only through the evidence they hold for Neolithic and Early Bronze Age funerary and ceremonial activities and culture, but also through their relationship to the surrounding landscape and to each other as monument groups. Our assessment indicates that notwithstanding the steep sided cutting and rounded grassed shoulders, where the Winterbourne Stoke and Diamond groups lie in close proximity to each other an additional form of landscape mitigation is required to effectively reduce the impacts upon OUV at this location to an acceptable minimum.

Our assessment indicates that the proposed green bridge provides connectivity but not effective landscape mitigation. To do this, the proposed green bridge would need to be much wider and be located to the east of the proposed old-A360 location. The purpose of the wider green bridge would be to provide the impression to a future visitor of moving through an unbroken grassland/rural landscape when travelling between the two monument groups, rather than moving across a narrow corridor that merely links the land parcels within which the two groups sit. The beneficial effect of this wider green bridge (perhaps more accurately termed a *land bridge*) would be twofold – firstly, to provide effective landscape mitigation of visual impacts when viewed between the two monument groups, and particularly when viewed between the two well-preserved long barrow mounds of SM No 1011841 *Long barrow north east of Winterbourne Stoke crossroads [now roundabout]* (north of the road) and SM No1010830 *Long barrow on Wilsford Down* (south of the road). This is necessary to mitigate the impact at this location upon SOUV Attribute 5 - *The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other*. Secondly, it would provide landscape context mitigation important to the setting of the two monument groups as described in Attribute 3 - *The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape*.

With the caveat that our joint OUV assessment with NT is preliminary and outline, based upon the information available in the consultation documents and CGI visualisations as currently available, rather than the full suite of data that will need to be provided by Highways England for the forthcoming Environmental Statement, the indication is that an



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appropriately-located land bridge would need to be a minimum of 150m in length to effectively mitigate the identified impacts upon OUV.

**Proposed new A303/A360 junction** –this aspect of the proposed scheme has the potential to impact positively upon the OUV of the WHS and the setting of the Winterbourne Stoke and Diamond monument groups, provided the design detail of the new junction is sensitive to its location within the setting of the WHS. The proposal to move the A303/A360 junction some 600m west of the present Longbarrow Roundabout; the realignment of the A360 to the north and south of Longbarrow Roundabout some distance to the west; and the subsequent removal of Longbarrow Roundabout, the old surface A303 and the lengths of old A360 presently approaching it, will have a significant, beneficial impact in this part of the WHS. The digital visualisations give an indication of the change to setting that these measures will bring, however a site visit to the Winterbourne Stoke barrow group, particularly its southern end, makes clear the scale of improvement that the junction relocation will make possible by removing the very intrusive infrastructure, clutter and sight of traffic that dominates the setting of these monuments at present.

These positive improvements at Longbarrow Roundabout are made possible by the new road in cutting to the south of the line of the existing A303, which we discuss above in the preceding section of this letter with recommendations for its appropriate mitigation.

The design of the new junction as shown on the consultation documents has the diverted A360 crossing over the A303 in cutting. The ‘dumb-bell’ roundabouts to north and south of the A303, and their approach roads, will be in cutting and the ‘green bridge’ over the A303 will be landscaped to minimise its appearance as hard infrastructure. These measures will provide some mitigation of the sight and sound of moving traffic and will reduce the visual impact of the junction itself.

The commitment to avoid intrusive lighting on the new junction is a welcome one, and is necessary to maximise the benefits of removing the current, intrusively lit Longbarrow Roundabout. We are keen to be engaged in the evolving discussion about lighting at the new junction, whether it can be avoided completely, or if not, how it can be achieved without causing an intrusive impact upon the WHS or its setting. If the latter, we would wish to be involved in any impact assessment/modelling of proposed lighting solutions to ensure a positive outcome for the WHS.

Finally, we note the indicative proposed tree/scrub planting proposed around parts of the proposed green bridge and approaches and would recommend that landscape planting is avoided at this location, in accord with the draft WHS Woodland Strategy currently being produced by the National Trust. The document is very near completion and any finalisation will not affect the recommendation to avoid screen planting within or adjacent to the WHS,



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intended to mitigate the visual impact of any development which would otherwise be unacceptable. In this instance we recommend that careful design and use of subtle landscaping techniques would be preferable to screen planting.

**Winterbourne Stoke Bypass (section west of proposed new A303/A360 junction)** – beyond the new road junction the proposed alignment runs to the north of Winterbourne Stoke, crossing the River Till on embankment and viaduct. This section will largely be out of sight of much of the WHS and is unlikely in our view to have an adverse impact on its setting. However, the new road, its embankment and viaduct will all be visible from the suite of scheduled monuments to the north of the new road, between Winterbourne Stoke and Shrewton. These include SM 1015020 *Winterbourne Stoke East round barrow cemetery and earthwork enclosure on Fore Down*, SM 1015019 *Winterbourne Stoke West round barrow cemetery and Conigre enclosure*, and SM 1015222 *Romano-British settlement on Winterbourne Stoke Down*. As with all scheduled monuments (and other designated heritage assets) likely to be within visual range of the scheme, a thorough assessment of the potential setting impact upon these assets must be carried out so that effects can be determined and potential mitigation measures agreed.

**Archaeological assessment, evaluation and mitigation** – Historic England is part of the Heritage Monitoring and Advisory Group (HMAG) set up to ensure a high quality, thorough approach to archaeological assessment, evaluation and ultimately, mitigation. Within HMAG the formal curatorial advice roles of Historic England and Wiltshire Council Archaeology Service are supplemented by prehistory specialists from the two heritage conservation bodies with significant responsibilities within the WHS – National Trust and English Heritage. HMAG is advised and augmented by the independent Scientific Committee of prominent archaeologists, all of whom are subject matter experts in areas relevant to the significance of the WHS. HMAG and the Scientific Committee advises on archaeological matters arising from the scheme proposals within the WHS, whereas outside of the WHS boundaries curatorial responsibilities lie with Historic England for designated heritage assets such as Scheduled Monuments and WCAS for undesignated assets.

The weight and calibre of advice provided by HMAG, augmented by the Scientific Committee, for the scheme proposals within the WHS has ensured that archaeological assessment and evaluation strategies are of a high standard appropriate for its significance. The same high standards have translated across into the scheme areas beyond the WHS boundaries where responsibility lies with Historic England and WCAS rather than HMAG.

The production of a robust Archaeological Evaluation Strategy and Overarching Written Scheme of Investigation has enabled equally robust Site-Specific Written Schemes of Investigation to be developed. Archaeological investigations are now underway or planned for land likely to be affected by the scheme. A substantial programme of evaluation is



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required to allow us to understand the direct impacts of the proposed scheme. This includes the evaluation not only the tunnel portal sites and new surface road, but all areas within the red line boundary where potential heritage impacts may occur through works associated with the scheme, including land that may be affected by temporary infrastructure necessary to undertake construction and land earmarked for landscape mitigation, such as the proposed extension to the Parsonage Down National Nature Reserve.

The results of the ongoing archaeological evaluation programme will need to be carefully considered by HMAG/Historic England and WCAS to identify detailed scheme impacts on buried archaeology and to allow us to advise on suitable mitigation measures, which may take the form of design solutions and/or archaeological excavation. Where archaeological excavation is required, it is important that the project commits to a full and timely programme of post-excavation analysis, archive preparation and appropriate publication, including integration of the results of assessment and evaluation. Adequate funding must be made available for the full publication of the results of archaeological work in a format suitable for the international significance of the WHS, and appropriate to the rich archaeological landscape beyond the WHS boundaries. As part of these commitments, the scheme should also ensure that adequate resources are available and secured for the long-term museum storage of the archive arising from archaeological work.

**Matters subject to ongoing discussion** – the public consultation documents represent a point in time of the development of scheme proposals and at this stage necessarily do not contain finalised proposals on all matters of detail. Discussions are ongoing with Highways England on a number of different areas of detail, and given the rapidly evolving situation with these aspects of proposals I do not intend to offer extensive comment upon them in this consultation response. However, it is important that as with the major scheme infrastructure a heritage-centred approach is maintained to ensure that these scheme elements are designed with the significance, setting and character of the WHS, and designated heritage assets within and adjacent to it, foremost in considerations.

These elements include, but are not restricted to: tunnel portal and abutment designs; tunnel control facilities; detailed design of green bridges; the treatment of the old A303 and A360 roadbeds and associated infrastructure, including embankments supporting the current road within the WHS; fencing; lighting; access for non-motorised users; drainage; signage; temporary works (compounds, haul roads, processing plants, etc). We will wish to continue our present close engagement in the design development of these details to ensure they are fit for the WHS and its environs.



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### RELEVANT POLICY FRAMEWORK

**International** - In 1984 the UK ratified the World Heritage Convention 1972, article 4 of which requires State Parties to do “*all they can, to the utmost of their abilities*” to protect and transmit the OUV of their WHSs. Details on the scope and nature of relevant protection efforts are set out in the Operational Guidelines for the Implementation of the World Heritage Convention (World Heritage Committee 2005).

In addition, ICOMOS International, heritage advisers to the UNESCO World Heritage Centre, has produced supplementary guidance on Heritage Impact Assessments (HIA) for development within WHSs (ICOMOS 2011), to gauge the effect of proposals on OUV. It recommends an iterative series of HIAs, undertaken as a project moves from initial scoping through design and application. Highways England has produced a robust HIA Scoping Report which should inform a full and thorough Heritage Impact Assessment in line with the ICOMOS 2011 guidance. We would be pleased to provide further advice on this matter as the full HIA is drafted

As noted above, the special qualities of the WHS were formally set out in the Statement of Outstanding Universal Value (SOUV) adopted by the WH Committee in June 2013. The SOUV describes the Attributes of OUV that are central to the significance of the WHS. Importantly, these not only refer to Stonehenge and its relationship to the other major monuments, but also to the relationship between individual groups of monuments themselves and the value of night skies & relevant astronomical alignments. The value of the whole WHS as a “landscape without parallel” is also recognised as an Attribute.

**National** - As a nationally-significant infrastructure project (NSIP) the A303 Stonehenge Improvement will seek consent via the Development Consent Order (DCO) process under the Planning Act 2008. Schemes seeking DCO must demonstrate that they comply with relevant international treaties to which the UK is a signatory. The 1972 World Heritage Convention is one such treaty.

The DCO process follows the policy and guidance in the National Planning Policy Framework, and, for infrastructure, the National Policy Statement for National Networks (NPSNN), supplemented by the online Planning Practice Guidance (Gov.uk website). Both sources contain clear guidance on how to approach historic environment issues within the context of development. NPPF identifies World Heritage Sites as one of the most important forms of designated heritage asset, whilst the supplementary PPG contains further guidance on how to treat WHSs, including a link to the ICOMOS 2011 HIA guidance.

Aside from assessing the impact of the scheme upon the WHS as a single heritage asset, the impact of the proposals upon the setting of individual heritage assets (whether designated or



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not) must also be assessed to allow informed advice to be provided on impacts and mitigation options. Detailed comments on this aspect of assessment have been provided in response to the scheme's development of the recent Environmental Impact Assessment and Heritage Impact Assessment Scoping Reports and are not repeated here.

**Local** - the scheme should comply with the 2015 Stonehenge and Avebury WHS Management Plan, which contains a series of policies agreed by all WHS partners (including Highways England) for the protection & enhancement of the WHS. The Plan includes policies on the impact of roads and transport and broadly states that solutions to intrusive traffic issues, including the A303, should protect the OUV of the WHS. The Plan carries weight in the local planning process and although the current Plan has not been formally adopted as SPD it can be expected to be a document of interest in consideration of the DCO.

From our prior engagement in the scheme we are aware that Highways England and their consultants are working to all of the policy requirements set out here, in order to develop a scheme fit for the WHS – we encourage them to continue work closely with us and other heritage partners to ensure the emerging scheme accords with this strong raft of policy protection.

### HISTORIC ENGLAND POSITION

We believe that this scheme presents the best opportunity in a generation to resolve the long-running traffic problems that blight the WHS, and that the current proposals contain many positive aspects which deserve recognition. The present scheme is a huge improvement on that taken to public consultation in January 2017 and in our view has the potential to protect the OUV of the WHS whilst delivering substantial public benefits through the removal of the intrusive current surface A303 and the reunification of the two halves of the Stonehenge WHS that would result from this. However to achieve this it is in our view important to resolve the two outstanding issues of the scheme within the WHS which are needed to provide satisfactory mitigation of OUV impacts – the question of additional landscape mitigation east of Longbarrow Roundabout (the land bridge) and the issue of the proposed byway link for motorised vehicles to the south of Stonehenge. Important matters of detail must also be satisfactorily resolved as the scheme moves towards DCO submission, and the programme of archaeological assessment and evaluation must be completed across the red line boundary to allow informed advice to be provided on the scheme's direct impacts on buried archaeology.



Historic England

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Yours sincerely,

P.A-MC

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Enclosure: Appendix 1, Historic England and National Trust, *Stonehenge A303 improvement: Assessment of aspects of the Preferred Route as at 4th December 2017*, March 2018

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