



A303 Amesbury to Berwick Down public consultation

APRIL 2018

Response to consultation questions

Note: This response should be read in conjunction with the letter attached to this consultation response.

This document details our response to the questions raised in the consultation documents provided by Highways England on the proposed scheme as currently designed. We note that while we have now been presented with more information about the design, a substantial amount of detailed design work still needs to be undertaken. We also await the publication of the full Environmental Impact Assessment and associated Heritage Impact Assessment to enable us to properly assess the potential impacts of the proposed scheme and the effectiveness of the measures proposed to mitigate those impacts. All of the comments we provide in this document (and the associated letter) are therefore given in the expectation of the delivery of a considered, high quality solution to the final design and construction of this proposed scheme, appropriate to the protection of this internationally important site.

The potential impacts and benefits of the proposed scheme must be tested in accordance with UNESCO/ICOMOS guidance to assess whether it will protect, conserve and enhance the Outstanding Universal Value (OUV) of the World Heritage Site (WHS). To that end, notwithstanding the need for Highways England as the scheme promoters to complete such an assessment as part of their full Heritage Impact Assessment, we, together with Historic England, have carried out our own assessments using this guidance to inform our position. Based on the findings of our latest assessment, we consider that while Highways England have made many improvements to the road design in an attempt to protect the WHS, further mitigation measures are required in order to ensure that the road, particularly in the western part of the WHS, does not cause unacceptable harm to its OUV.

Specifically, in light of our assessment of the impact of the proposed scheme on the OUV of the WHS, we would strongly advise that further measures are required to appropriately mitigate the impact of the road as it passes between the Winterbourne Stoke and Diamond Barrow groups in particular (see our response to Q3 for more detail) and that the proposed linking of byways 11 and 12 is not taken forward.

1. Western section: Please provide us with any comments you may have on our proposals for the viaduct crossing of the River Till valley.

The majority of our feedback on this consultation is focused on the impact of the road scheme within the boundaries of the WHS. However, as a conservation organisation and significant landowner nationally we do have the following comments on this section of the proposal:

- We are pleased to see the twin deck approach to allow more light to reach the River Till SSSI
- The drainage infiltration areas as proposed are large and there is not clarity on how these areas will be managed and how the potential impact on the water quality of the River Till SSSI, part of the River Avon SAC and the aquifers will be managed
- The option with the screen on the parapet is preferable to reduce the noise impact on the properties close to this section of the road
- Highways England will need to ensure the newly built up areas on which the viaduct will sit do not adversely impact on the functionality of the flood plain in this area and extend the flood risk zone beyond the current flood plain

2. Western section: Please provide us with any comments you may have on our proposals for the A303/A360 Longbarrow junction.

We are pleased to see the beneficial effect on the OUV of the WHS of moving the Longbarrow roundabout further west and away from the WHS, as it is currently directly adjacent to (and adversely affects the settings of) the Winterbourne Stoke Barrow Group and the Diamond Group, which lie to the north-east and south-east of the existing roundabout. We welcome the proposal to place the new dual carriageway in a cutting which would pass under the A360, limiting the adverse visual impact of the dual carriageway on the setting of the WHS at the scheme's western end. We also welcome the proposal to situate the new A360 junction and its approach roads in partial cutting which will help to reduce the impact of this junction on the Winterbourne Stoke and Diamond groups of monuments.

While we support the approach of no 'lighting columns' on the new roundabout we would like to see further detail of any alternative lighting approach that might be pursued in order to assess the impact this might have on the WHS. Furthermore, we would expect the same standards of archaeological evaluation and mitigation to be undertaken by Highways England outside the WHS as within it to ensure the protection of the internationally important archaeology outside of the WHS. In particular we are pleased to see due regard has been given to avoiding impacts on monuments that relate to the OUV of the WHS that lie outside of its current boundaries.

We are encouraged to see the new non-motorised route from Winterbourne Stoke that links to the WHS, however, we are concerned that the current proposed approach at the junction – where pedestrians, cyclists and horse riders will have to cross two of the approach roads to the roundabout – could be dangerous (particularly for horse riders).

We expect that appropriate access arrangements will be provided to land in our ownership, but are concerned about the approach to the use, management and surfacing of the old A303 within the WHS – more details on our concerns can be found in our response to question 7.

3. Western section: Do you have any other comments about our proposals for the western section of the scheme (Winterbourne Stoke bypass to Longbarrow junction)?

Our comments on this area of the road scheme can be summarised as follows:

- Highways England must do their utmost to maintain the viability of the farming businesses affected in this section
- We welcome the creation of new chalk grassland (and the ecological gains this could result in) but would like to understand the mechanisms by which this will be achieved, maintained and monitored
- Without prejudice to the bullet point above, the large area of new ground reshaping east of Parsonage Down could potentially impact on archaeology outside of the WHS and we would encourage Highways England to work closely with Wiltshire Council and Historic England to ensure this concern is appropriately addressed
- We have not yet seen adequate detail on the use of areas marked up as ‘contractor site compounds’ (e.g. for tunnel spoil processing and storage). We need to understand this in detail to assess both the permanent and temporary impacts on the WHS. Similarly we have not yet been provided with detail on the potential noise impacts of the same area during construction
- We have not yet seen evidence of how the long term impact of the construction compounds on ground and water quality and wildlife will be managed and mitigated
- We would encourage Highways England to meet the recommendations of the Landscape Institute in the design of all land bridges for this scheme to provide an ecosystem level of connection that will provide benefits for both wildlife and access. The land bridge should be of sufficient width, seeded with native provenance wildflower and grass seed and planted with native shrubs and trees (outside of the WHS).

4. Central section: Please provide us with any comments you may have on our proposals for the green bridge (No.4) at or near the western boundary of the World Heritage Site.

We consider that it is a positive addition to the scheme design to have increased physical connectivity in this part of the WHS. However, we consider that more work needs to be done with regards to the design of the road as it leaves the western portal to include mitigation measures which would best protect the OUV of the WHS and designated heritage assets. Based on the information that is currently available, our joint assessment work with Historic England indicates that due to the proximity of the new road to both the Winterbourne Stoke and Diamond barrow groups, and because it severs the visual link between them, the impact of the proposed scheme on these two monument groups, both of which convey attributes of OUV, is not acceptable without further mitigation.

Specifically, we do not believe that the land bridge options as illustrated in the consultation documents adequately mitigate the impact of the road as it passes between the Winterbourne Stoke and Diamond barrow groups. The first proposed location for this bridge on the line of the old A360 would provide no mitigation to the adverse visual impacts of the road on these two groups. While the second proposed location (as illustrated in Figure 5.18) is in an improved location, this bridge is currently of insufficient width to provide acceptable mitigation. Our assessment has suggested that a land bridge with a width of at least 150 metres would be required, but the exact length and design would need to be modelled and assessed to ensure it provided acceptable mitigation.

If a longer land bridge requires internal lighting beneath its length, we would expect Highways England to honour their commitment to no external lighting of the road within the WHS. We expect any land bridge to be designed in such a way so as to minimise its visual impact on the landscape while helping to improve habitat connectivity and access to the newly created restricted byway (if appropriate). For the avoidance of doubt we believe that the newly proposed byway that runs from north to south along the western edge of the WHS must be a restricted byway not open to motorised use. We look forward to separate discussions with Highways England about how agricultural and landowner access will be maintained and managed across the affected part of the WHS.

5. Central section: Please provide us with any comments you may have on our proposals for the cutting on the western approach to the tunnel.

We welcome the proposal to place the road in a cutting on the western approach to the tunnel. Based on our current understanding we believe the proposed route of the cutting for the new road should have minimal impact on buried archaeology. It avoids the known sites and monuments that embody the special qualities of the WHS and lies in an area where (based on current survey work) we expect there to be few archaeological features.

Our previous assessment work has shown that were the new dual carriageway to be on the surface, it would have a highly damaging impact on the WHS. Our preferred design of a cutting, with vertical sides and rounded, grassed shoulders will minimise its physical presence and visual impact on the relationships between and settings of key monument groups within the WHS. The highly intrusive noise and visual impact of the traffic on the current A303 is damaging to the WHS and a sensitively designed cutting could reduce those impacts. However, while this approach does much to mitigate the impact of this section of the road on many of the monument groups, in order to protect the OUV of the WHS more work is required to mitigate the impact of the road as it runs between the Winterbourne Stoke and Diamond barrow groups (see Question 4).

The proposed vertical sides will reduce the visual impact of the traffic and the road itself from outwith the cut. The sloped version would be more visible and increase the visibility of both the road and traffic from the key monument groups that convey attributes of OUV of the WHS. It would also require a fifty percent greater land take than the vertically sided solution with grassed top, and so would have a much greater physical impact on the WHS with the increased possibility of impacting on unknown archaeology.

6. Central section: Please provide us with any comments you may have on our proposals for the western entrance to the tunnel.

We consider that the proposed alignment of the road and the associated portal position presents the best opportunity to ensure the protection of the WHS – but only if appropriate mitigation is incorporated in the design. While the consultation document proposes a bored tunnel ‘of at least 2.9km’ our assessment has been carried out based on a 3km bored tunnel. Despite the extra 100m of bored tunnel length, our assessment work has shown that even with a bored tunnel length of 3km, the proximity of the tunnel portal to the Normanton Down barrow group would have a damaging impact on the OUV of the WHS without additional mitigation.

Highways England has proposed installing a further 200 metres of cover beyond the western tunnel portal. This could be either a 200m cut-and-cover tunnel extension or an extension of a similar length with a vented canopy at the end of the extension. A 200m extension has the potential to mitigate the impact of the road on the views between the Winterbourne Stoke, Diamond and Normanton Down barrow groups and as such our assessment work tells us that this 200m extension beyond the entrance to the bored tunnel is essential in order to protect the OUV of the WHS.

The canopy proposal could provide benefits of moving more of the tunnel buildings within the canopy as well as allowing for reduced vertical height at the tunnel entrance. However, we are concerned by the visual impact of the current proposed design of the ventilation openings. Even if an acceptable design could be achieved we would need to understand the practical and visual impacts of any fencing and additional safety measures that might be required around such openings as well as the impacts of any light emitted from those openings.

7. Central section: Do you have any other comments about our proposals for the central section of the scheme within the World Heritage Site?

Eastern entrance to the tunnel

We agree with the location of the tunnel's eastern portal to the east of the Stonehenge Avenue, allowing the reinstatement of the course of this ancient processional route where it is currently severed by the existing A303. Reuniting the Stonehenge Avenue at this point would be beneficial to the OUV of the WHS, as would the reduced impact of the proposed road on monuments that convey the OUV of the WHS on and to the east of King Barrow Ridge. However, it is critical that the new infrastructure is designed and located sensitively with regards to impacts on the OUV of the WHS if this improvement is to be properly realised.

We are pleased to see that the proposed design for the eastern portal seeks to minimise its impact on the landscape and that many of the buildings and much of the infrastructure associated with the entrance of a bored tunnel would be effectively hidden. We are also pleased to see that the proposed canopy extension to this end of the tunnel effectively moves the tunnel entrance further down slope away from the Stonehenge Avenue. However, we still await the detail of the assessments on aural and light pollution to ensure that any adverse impacts do not undermine our current assessment of the potential heritage benefits.

We understand from Highways England's consultation documents that lighting will be avoided in the western part of the WHS but we would seek assurances that the case will be the same in the road without the tunnel in the eastern part of the WHS. We recommend that Highways England continue to engage closely with the National Trust and other relevant bodies on these and other issues of detailed design to ensure the portal entrances/exits have the minimum possible impact on the WHS.

Rights of way

There are a number of public rights of way in the WHS. We are concerned that a number of these, on National Trust land, have been incorrectly identified including the suggestion that there is a byway on the Stonehenge Avenue (which is on land open to the public through a permissive open access agreement but where there is no such right of way). A map is attached at the end of this document identifying where rights of way have been incorrectly recorded. For the avoidance of doubt, those routes identified on the map included are not formal rights of way of any kind.

We are also concerned about the poorly defined use of the word 'byway' throughout the consultation documents. There are a number of different rights of way across the landscape (BOATs, bridleways etc.) and these all appear to have been labelled with one catch all term of 'byway'. This is incorrect, will lead to confusion, and has also created some ambiguity about the potential future use of the existing A303. For the

avoidance of doubt we believe that should there be a byway on the existing A303 alignment, it must be a restricted byway and not open to motorised use.

Two of the public rights of way through the WHS are byways 11 and 12. These are Byways Open to All Traffic (BOAT). Byway 12 is currently bisected by the A303. Byway 11 terminates at the A303.

Use of the BOATs by motorised vehicles has led to damage to archaeological sites (including Scheduled Monuments) which abut, and in some cases are crossed by them, and can disturb the atmosphere and relative tranquility of parts of the WHS. The presence of vehicles here also adversely impacts on visual relationships between monument groups, in particular between Stonehenge and the Normanton Down Barrow group. Since the publication of the first Stonehenge World Heritage Site Management Plan in 2000, it has been a policy to reduce or remove vehicular access from the two byways.

The consultation documents propose to link byways 11 and 12 along a new route to the south of the existing A303 alignment. The byways are not currently linked other than by virtue of the A303. We do not consider that there is a need or a justification to provide a new link between byways 11 and 12.

Furthermore, the assessment work that we have carried out with Historic England shows that a link with BOAT status (either as proposed in the consultation document, on the line of the old A303 or anywhere else within the WHS) would have a detrimental and unacceptable adverse impact on the OUV of the WHS. Given the proposed scheme seeks to address the damage caused by motorised traffic in this part of the WHS, it is inappropriate to reintroduce that damage by creating a new route for motorised vehicles within the very part of the WHS from which motorised vehicles would otherwise be a lesser intrusion.

We strongly oppose any proposed link between byways 11 and 12 for motorised vehicles.

Future use of the existing A303

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. However, as it is proposed to retain the A303 as a restricted byway we understand that consideration is being given to the possible (re) introduction of an appropriate surface cover that meets the needs of the landscape (and protects the OUV of the WHS) while being a suitable grade for non-motorised users. Should the existing alignment of the A303 become a restricted byway, we will want to ensure any approach taken to surfacing is not damaging to the WHS. In addition to this, we await further details from Highways England in order to assess the impact of the following;

- proposed approach to fencing along the line of the existing A303 (both in terms of precise location and fencing design and plans for future maintenance);

- proposed ownership of and approach to maintenance of the existing A303 in the future;
- proposed approach to ensuring, monitoring and enforcing proper use of the old A303 in the future.

While the relocation of the A303 into a tunnel will enhance the use of the public rights of way for non-motorised users, as they will no longer have to cross the extremely busy A303, we look forward to separate discussions with Highways England about how agricultural and landowner access will be maintained and managed across the affected part of the WHS and how they will ensure suitable access to Stonehenge Cottages.

Blick Mead and Vespasian's Camp

We urge Highways England to continue to conduct detailed assessment and evaluation in order to fully understand and in particular to avoid any potential direct or indirect impacts on the Mesolithic site at Blick Mead and also on the Scheduled Monument of Vespasian's Camp Iron Age Hillfort. We would expect to see Highways England follow Historic England's guidance to ensure that this is achieved.

Embankments

The current A303 sits on embankments in two areas as it crosses the WHS. The first (moving east to west) is at Stonehenge Bottom and the second sits between the western portal entrance and the western boundary of the WHS.

The embankment at Stonehenge Bottom in particular is currently causing harm to the OUV of the WHS as it disrupts the visual relationship between monuments (specifically the Stonehenge Avenue and the Cursus) and the natural topography – an attribute of OUV of the WHS. Removal of this section of the road into a tunnel presents an opportunity to remove this embankment, and would have a beneficial impact on the OUV of the WHS. In order to ensure we are not left with a continuing harm to the WHS we strongly advise that this embankment is removed as part of the proposed scheme.

8. Eastern section: Please provide us with any comments you may have on our proposals for the A303 flyover at Countess roundabout.

Our comments on this section of the proposed scheme can be summarised as follows:

- We are concerned about the impact on the Grade 2 listed Countess Farmhouse and buildings owned by the National Trust. These buildings sit immediately adjacent to the proposed flyover and they (and those that live in and use them) will undoubtedly suffer from the detrimental impact of this significant new infrastructure. In order to assess the nature of this impact, we require further detail on the following;

- evidence that the construction works will not cause physical damage to the Grade 2 listed buildings themselves
- evidence that traffic lights are necessary on the roundabout and do not cause increased delays and pollution from unnecessary vehicle idling
- Separately, we are concerned about the impact on the National Trust tenants who live in that same building and would like to further understand the approach to mitigation to maintain privacy and mitigate increased noise impact – is there, for example, an opportunity to add screening to the parapet as is proposed on the Till Valley viaduct or extend the fencing along the boundary of Countess Farm?
- Our preference is for the landscaped option as proposed in Figure 5.49 in the consultation document, not least because of the possible risk of improper use that could be an outcome of the ‘open’ option
- We would like to see a similar approach to lighting as we have seen on the proposed Long Barrow junction where Highways England seek to remove lighting columns (and where necessary come up with alternative approaches to road user and pedestrian safety)
- We expect that the construction of this junction infrastructure will cause significant disruption to both the local community and the normal use of the A303 and would like to see further detail on how this will be addressed
- Noise monitoring should be carried out at the rear of Countess Farm as the closest residential property to the proposed flyover as well as the front – we await the results of this monitoring to make an assessment of potential impact
- The potential harm to Countess Farm as a designated heritage asset, and any mitigation that would reduce that harm, needs to be clearly set out in order to inform the decision-making process

9. Eastern section: Do you have any other comments about our proposals for the eastern section of the scheme (Countess junction to just beyond the Solstice Park junction)?

Our comments on this area of the road scheme can be summarised as follows:

- Highways England must ensure their final design avoids pollution, road salt run off and direct/indirect impacts on the ecology of the River Avon SSSI & SAC.
- We would like to further understand the proposed use of the compound adjacent to the Countess roundabout (and the WHS boundary) to understand any potential impacts on the River Avon SAC

10. Do you have any comments on the preliminary environmental information provided for the scheme?

Our comments on the PEIR can be summarised as follows:

- Highways England should put in place appropriate measures to ensure continuity of above ground habitat connectivity following the loss of the underpass situated in the Bowtie Field which is currently an important feature for bat passage.
- Air quality - we would expect to see exemplary mitigation during construction to minimise temporary impacts.
- Cultural heritage - our comments in this area have been extensively covered elsewhere in terms of potential impacts on cultural heritage. Further to this, we note the particular points included below:
 - 6.6.2 (Pg 70) – as highlighted, changes in visitor footfall numbers during construction and operation is a potential indirect impact, and we would expect to see full information on the proposed mitigation for these indirect impacts in due course.
 - 6.6.3 (Pg 70) – although we agree that the tunnel section of the scheme would reconnect and improve the settings of monuments within the WHS that convey attributes of OUV, we would highlight that there are potential adverse impacts on attributes of OUV from the design of the road outwith the tunnel within the WHS.
 - 6.8.11 (Pg 74) – we agree with the statement that there is the potential for positive and negative impacts to some heritage assets (and attributes of OUV, as discussed elsewhere) and have included details elsewhere of our understanding of the necessary mitigation at the western tunnel approach cutting, the western portal and the canopy.
 - 6.8.12 (Pg 75) (and 6.8.17, Pg 76) – we acknowledge the statement that there are expected impacts on the setting of listed buildings at Countess Farm, in National Trust ownership, and would expect to see detailed assessment of the impacts and avoidance/mitigation proposals in due course.
 - 6.8.19 (Pg 76) - we would highlight that as presently proposed i.e. with a new BOAT joining byways 11 and 12 and without additional mitigation of adverse impacts in the area of the cutting between the Diamond Group and Winterbourne Stoke barrows, our current assessment work suggests there would be adverse impacts on monuments that convey attributes of OUV.
 - 6.9.2 (Pg 77) – we would expect to see detailed assessments of the two possible corridors for the eastern power connection in due course.
- Landscape and Visual Effects – we await more information in order to assess the landscape and visual impact beyond our outline assessment of impact on the OUV of the WHS. Along with other areas, we expect to see detailed information on landscape mitigation in due course. Further to this:

- 7.2.3 (Pg 79) – we welcome the opportunity for continued engagement with Highways England to discuss the ongoing scope of the LVIA and associated landscape mitigation.
- 7.5.24 (Pg 82) – we would note that National Trust land (that which is publicly accessible) within the WHS is permissive open access, not open access.
- Biodiversity – we would, as with other areas, expect exemplary mitigation for any potential impacts on biodiversity. We welcome the potential beneficial effects of improved ecological connectivity. In addition:
 - 8.6.32 (Pg 115) and 8.6.55 (Pg 119) and 8.8.7 (Pg 143) – we would expect a full assessment of any potential effects on breeding Stone Curlew with reference to any indirect impacts from construction and increased visitor footfall closer to breeding areas.
- Noise and Vibration – we welcome the benefits that the scheme presents for reduction of noise levels within the WHS, and would expect appropriate mitigation for all other areas where increased noise levels are anticipated.
- Road Drainage and the Water Environment – we would expect the scheme to be constructed and operated so as not to have an adverse impact on the water environment, particularly the River Till and River Avon SACs, the floodplain environment, and any effects on aquifers. We have not yet seen evidence of the treatment protocols identified as mitigation in the road drainage infiltration areas to control pollution from road run-off. We would also like to see evidence that the embankments required for the viaduct over the River Till SAC would not adversely affect the floodwater environment (11.6.3f, Pg 190).
- People and Communities – we admire the scheme’s aims of improving connectivity and provision for NMU access throughout the WHS, but draw attention to our concerns discussed elsewhere with regards to existing BOATs byway 11 and byway 12 within the WHS, and the proposed new link between them (as identified in the consultation documents) and the use, management and surfacing of the old A303. We also welcome the benefits that the proposed scheme will bring in terms of reduced severance to the local communities surrounding the WHS. In addition:
 - 13.8.3 (Pg 222) – we note that three of the affected farm businesses are also National Trust tenants, and we encourage Highways England to ensure communication with these landowners is ongoing.
- Cumulative, In-combination and Project-wide Effects – we expect to see the full evaluation in due course.

11. Do you have any other comments you would like to make about the scheme?

More generally, measures to avoid, reduce or mitigate the impacts of noise and light pollution need to be incorporated into the proposed scheme, including the type of road surfacing and ensuring there is no lighting within the WHS. This is a key issue both from the point of view of the visual impact on the OUV of the WHS and also for European protected species of bats which are known to hunt over the Stonehenge landscape and to be adversely affected by lighting.

We would expect the new location of the western portal and associated approach road should minimise the impact on the Stone Curlews known to be on the RSPB reserve of Normanton Down, but ongoing consideration should be given to this issue as the proposed scheme design is finalised.

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 and the natural environment. Farmland 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 throughout the development and construction of the proposed scheme to facilitate land management. In addition, the viability of field sizes, stock management requirements, maintenance of secure boundaries and the need for access to water for grazing stock must not be overlooked.

We are concerned that the construction phase poses a significant risk to the WHS. To this end, we require further detail (e.g. on the plans for construction compounds, temporary surfacing etc.) as well as a commitment from Highways England that their contractors at all levels will be controlled and monitored to ensure protection of the WHS during construction as well as to ensure delivery of a world class solution for this internationally significant place.

We are encouraged that Highways England are seeking to explore the legacy opportunities for the proposed scheme and are committed to working with them and our partners to ensure the maximum possible legacy benefits for the WHS and the local community are realised.

