



**National  
Trust**

April 2018

Highways England  
A303 STONEHENGE STATUTORY CONSULTATION

*By email*

Dear Sir/Madam

**A303 STONEHENGE  
Road improvement from Amesbury to Berwick Down**

This letter and its enclosure are the National Trust's response to the statutory consultation undertaken by Highways England pursuant to s48 of the Planning Act 2008.

The National Trust is Europe's largest conservation charity with more than 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. Large areas of our landholding are already open for public access on a permissive basis but we believe the removal of the existing A303 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.

We recognise that the current road programme represents a clear opportunity 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 WHS. Indeed,

finding a solution to the harm caused by the existing A303 is a specific action within the WHS Management Plan which we, together with partner organisations, are committed to delivering. To this end, we have continued to work closely with Historic England and English Heritage Trust to help to ensure any scheme brought forward protects the WHS. We welcome the progress that has been made by Highways England to date, but as set out in further detail below, we consider that there is still work to do to ensure the road scheme adequately protects the WHS.

In respect of the proposed bored tunnel, we agree with the removal of a substantial section of the existing A303 from the Stonehenge WHS. The prehistoric landscape is currently split in two by the A303 with tens of thousands of vehicles passing through it every day. The heavy traffic and constant noise, smell and visual intrusion from the road compromises the enjoyment and understanding of the WHS, and severs both the visual relationships and access between monuments (including Stonehenge itself) in the northern and southern halves of the Stonehenge part of the WHS. We welcome the addition of a 200m grass-covered extension at the western end, which together with a bored tunnel of at least 2.9km and 90m canopy at the eastern end will remove the visual intrusion of the traffic from much of the Stonehenge landscape. This will improve the setting of numerous Neolithic and Bronze Age monuments within the WHS (all of which convey attributes of its OUV) and reunite the majority of the north and south sides of the WHS.

In addition, the removal of vehicles from the existing A303 alignment could provide significant benefits for public access. Without the physical barrier and associated safety concerns, visitors would have much greater opportunity to use existing rights of way and permissive 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. The removal of this section of the road would allow the creation of 'more habitat; in better condition and in bigger patches that are more closely connected', in line with the Government's ambitions for habitat restoration set out in the 25 Year Plan for the Environment and the Lawton Review.

We recognise that there are strongly held views regarding the Stonehenge landscape. We believe it is important to make the right decision. To help the National Trust respond meaningfully to the proposed scheme the National Trust, together with our partners, has carried out a number of assessments of the impact of the potential road schemes on the OUV of the WHS. The latest 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 responses to the consultation are based on this assessment but those responses, and any future assessments are subject to change as the scheme design progresses. Any final decision on the acceptability or otherwise of the scheme, or any individual element of it, can only be undertaken once the design is finalised.

Our assessment suggests that the proposed scheme has the potential to protect and enhance the WHS, but only if the following remaining mitigation issues are fully addressed:

- More needs to be done to mitigate the adverse impact of the road as it passes

between the Winterbourne Stoke and Diamond Barrow groups in the western part of the WHS. Should a green bridge be the chosen option to achieve this it will need to be of a substantially greater width than the bridge illustrated in the consultation documentation. It will also need to be located in an appropriate position to form an effective physical and visual link between these important monuments in the landscape. The current proposals are not acceptable in these respects.

- We are extremely concerned about and oppose plans within the proposed scheme to introduce a new route between byways 11 and 12. A new byway in the landscape would have an adverse impact on the OUV of the WHS and seriously undermine the benefits of the proposed A303 tunnel scheme.

Additionally we are concerned that all of those aspects of the design that have not yet been addressed in detail in the proposed scheme are undertaken in a manner that ensures the protection of the OUV of the WHS - for example the approach taken to the surfacing of the existing A303 alignment (including whether it should be returned in its entirety to chalk grassland) and the design of any fencing required within the WHS. It is essential that the final design is right in all aspects to ensure the protection of the OUV of the WHS.

The WHS'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".

As we stated in our response to the previous consultation, the international significance of Stonehenge and its prehistoric landscape will be an important material consideration when the Development Consent application 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)]

This emphasises the importance of a final scheme design that avoids, wherever possible, or minimises conflict with conservation interests. At present, we consider that while the proposed scheme is much improved from the route presented at the last consultation it still needs to go further to minimise such conflicts, and further work is required to address the remaining issues flagged by our OUV impact assessment work. As one of the world's most recognisable and truly iconic places, and given its international designated status, 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.

In the document called Response to Consultation Questions (enclosed) we have made further comments on 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.

We note that Highways England acknowledge that the proposed scheme is a once in a generation opportunity to reconnect the iconic stones with the surrounding ancient monuments to restore the natural setting and tranquility which has been lost for generations. Consequently we would urge Highways England to consider in detail the points that we have made in response to this consultation and to make the necessary changes and refinements that we are raising.

As custodians of this iconic landscape for all future generations we cannot support a scheme which does not achieve the aims of conserving, protecting and enhancing the WHS. It cannot be that we simply allow one unacceptable situation to be traded for another with which future generations will have to contend.

Yours faithfully



**Ingrid Samuel**

Historic Environment Director, National Trust

Encl: NT Response to Consultation Questions.

National Trust  
Heelis  
Kemble Drive, Swindon  
Wiltshire SN2 2NA  
Tel: +44 (0)1793 817400  
Fax: +44 (0)1793 817401  
[www.nationaltrust.org.uk](http://www.nationaltrust.org.uk)

President: HRH The Prince of Wales  
Chair: Tim Parker  
Director-General: Hilary McGrady  
  
Registered office:  
Heelis, Kemble Drive, Swindon  
Wiltshire SN2 2NA  
Registered charity number 205846

