A303 Stonehenge Improvement

Public Inquiries

CLOSING STATEMENT

ON BEHALF OF

WILTSHIRE ARCHAEOLOGICAL & NATURAL HISTORY SOCIETY

AND

THE PREHISTORIC SOCIETY

26th April 2004
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WILTSHIRE ARCHAEOLOGICAL & NATURAL HISTORY SOCIETY
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Sir, hitherto in these Inquiries, our two Societies have appeared in coalition with
the Council for British Archaeology. Each of these three bodies has particular
strengths and we have tried to draw on these in a co-ordinated way so as to help
you in reaching a decision. In what follows, however, I speak for just the
Wiltshire Archaeological & Natural History Society and the Prehistoric Society.

Throughout the last eleven weeks we have followed carefully the various
arguments. I would like to make it clear now that both Societies maintain their
opposition to the Scheme. We do this on three grounds –

1. We do not accept that damage on the scale proposed should be
   inflicted on any part of the World Heritage Site. In our view, “net
   benefit” calculations are not an acceptable approach in this case.
2. Even if the concept of net benefit were acceptable, we do not believe
   there would be sufficient net benefit to justify implementing the
   scheme: the overall effect on the heritage resource would not
   be “highly positive”, as claimed.
3. Finally, we do not believe the Government’s obligations under the
   World Heritage Convention can be delivered only by this scheme,
   as the Highways Agency has claimed. They could, however, be
   delivered by a less-damaging scheme.

We oppose the Published Scheme, but it is not that we want to see nothing done.
On the contrary, we want to see more done. We want to see the World Heritage
Site improved by the removal or concealment of more of the trunk road than is
currently proposed. To this end, we would be prepared to wait for a few more
years if this would give time for discussion and funding leading to an acceptable
scheme.

With other archaeologists, we recognise that the Stonehenge landscape embodies
a physical expression of the ideas and beliefs of the community which
culminated in the unique architectural achievement popularly known as “The
Stones.” The landscape is the best evidence we have as regards the cosmology
of those people. Here if anywhere, we believe, long term arrangements for
conservation, public access, research, education and enjoyment should take
priority over short term arrangements for passing traffic.
Dr Chippindale, speaking for the Prehistoric Society, has shown that over the last hundred years ground-level “solutions” to perceived problems have had a 30-year life span at most. Some have had much less. We should be ready to learn from history.

The Published Scheme has been described by Mr Jones for the Highways Agency (C.Jones, in cross-examination on 12 March 2004) as a development of a compromise scheme originally proposed by English Heritage in 1997 and adopted by Government in 1988 as a part of a “Master Plan” for the area round the Stonehenge monument itself. Subsequently, work began on a formal Management Plan for the full World Heritage Site. This is now accepted as having superseded the earlier Master Plan. We have pointed out that the Master Plan was never formally reviewed in the context of the more conservation-orientated Management Plan despite repeated requests that it should be so reviewed. As a result, major differences of approach were not resolved between English Heritage and a group of independent conservation bodies which included ourselves, the Council for British Archaeology and ICOMOS-UK as to how the A303 should be treated within the World Heritage Site. Those differences remain today.

If the A303 and A344 roadways were not already in place, few people would now seriously suggest their construction within the World Heritage Site. The fact that they are there is not in itself a sufficient argument for upgrading the trunk road in deep cuttings close to major groups of internationally important monuments. Rather, the aim should be to move towards what we would have liked the position to have been and now wish it to be.

The published scheme is put forward as an Exceptional Environmental Scheme. However, the Highways Agency and its consultants seem to have taken a consistently-minimalist approach to the assessment of impact. It is clear from cross-examination of their witnesses that they did not begin by consulting those prehistorians who could have explained the latest thinking about the likely inter-monument connections within the World Heritage Site. This was a major mistake and as a result the Scheme does not take into account the visual and perceptual linkages which we now believe to have existed in the past. Moreover, we can predict that new research within the World Heritage Site, planned for the next ten years, will probably transform our knowledge in the same way that discoveries of enormous timber structures and more settings of sarsen stones have done at Avebury in recent years.

There is a similar over-confidence to be seen in the extent to which the Agency believes buried archaeological remains can be detected by the particular investigative methods employed by their consultants. The Environmental
Impact Statement should have benefited from a much wider consultative process than it did. As a result the Agency’s consultants have not utilised the widest available range of technological aids for landscape assessment. Nor have the aids used been employed to a standard of detail appropriate for a World Heritage Site rather than general commercial application.

The mitigation action proposed by the Agency’s archaeological consultants in the event of the Scheme being implemented is similarly over-confident to the point of irresponsibility. As admitted by Mr Batchelor and Mr Lawson in cross-examination on 25.02.04 and 16.03.04), as it stands the mitigation strategy would not reveal physically insubstantial but crucially important features like the post-holes of a rare Neolithic house found at White Horse Stone during the course of work on the Channel Tunnel Rail Link.

Cutting corners - in this case threading your way between tightly-packed archaeological sites - is not the way to deal with levels of uncertainty as great as have been demonstrated here. The Agency’s minimalist approach is not consonant with an “Exceptional Environmental Scheme” for the Stonehenge World Heritage Site.

The overall importance of the World Heritage Site has been accepted by all parties to these Inquiries. What we have tried to show is that the World Heritage Site is not, and was not, just a group of separate monuments and their individual settings. This prehistoric landscape was both integrated and highly-structured. Widely-separated and not-intervisible monuments were interconnected - some physically, as by the Avenue and the Great Cursus, some possibly perceptually. These connections could also have included an awareness of the specific content and cultural associations of individual burial mounds, as has been demonstrated by Dr Shell.

What has emerged is a concept of “aggregate setting”, now increasingly recognised by those involved with research into prehistoric landscapes. The evidence of Professor Whittle, Dr Parker-Pearson and Dr Shell has shed a new and different light on this particular landscape, demonstrating that many of the most prominent landforms were utilised over very long periods. Some of those uses left still-visible remains, some did not. Examples would be King Barrow Ridge and the ridge now occupied by the Longbarrow Crossroads barrow cemetery. Here “the sites” are the ridges themselves with their full archaeological content, both upstanding and buried. It is the ridges whose setting should be protected, not just the individual barrows standing on them.

Buried monuments as important to the understanding of this landscape as, for example, parts of the Avenue and Greater Cursus should be regarded as useful
public assets for potential future appreciation. Their settings should therefore be protected, even if this does not fit easily with current planning practice. As noted by Dr Parker-Pearson, in the past English Heritage has supported the idea that the settings of non-visible monuments, where their siting appears to have been carefully chosen in relation to the historic landscape, are a material consideration in planning cases (the reference here is letter addressed to you, Sir, dated 20th April 2004).

The Highways Agency has determined the length of its proposed tunnel solely by reference to what can be seen from Stonehenge itself (the MILS). This is an idiosyncratic, obsolete and unacceptable measure. It finds no place in the Management Plan. Nor (as Dr Chippindale has shown) does it take any account of the progressive movement away from the practice of considering Stonehenge in isolation which characterised conservation approaches in the 19th and early 20th century. Moreover, it makes no attempt to take account of what the builders and users of Stonehenge may have considered to have been linked to Stonehenge.

An example of this, highlighted during the Inquiry, is the Avenue. Whatever its precise function in prehistoric times, it expressed on the ground a link that existed in the minds of its builders between the Stone Circle and the River Avon. Much of the Avenue could not be seen from Stonehenge, even when first built. Conversely, those walking towards Stonehenge along the eastern part of the Avenue would not have been able to see their destination. Nevertheless, the link was clearly important. Since the Avenue was (and still is) clearly integrated with Stonehenge, and has been scheduled by English Heritage as a single entity, we believe the “setting of Stonehenge” should logically include the setting of the Avenue along its entire length.

This idea would seem to be accepted by the Highways Agency – at least in part. In justifying the removal of part of the A344, the Agency has defined Stonehenge as including the attached Avenue, claiming that this important part of the overall complex was undesirably severed by the road. We agree. However, the Agency is not consistent in this approach. Elsewhere their Scheme fails to recognise the desirability of providing the infrastructure to re-connect the eastern parts of the Avenue where severed by the A303 in the 1960s. Indeed, the Agency has gone out of its way to pour scorn on this idea.

So, close at hand, the Avenue is taken to be part of Stonehenge. Further away, the same Avenue is not part of Stonehenge. The specious argument is used that a difference in survival justifies this difference in definition. We find this wholly unconvincing.
For some visitors, particularly educational groups, walking the full length of “the old sacred/ceremonial track” of the Stonehenge Avenue is likely to become a highly-valued opportunity as soon as access to the relevant land can be secured. This can be seen from the number of visitors who currently walk the West Kennet Avenue at Avebury. For them, this is not just a walk in the country past a number of standing stones: they say it is important for them to be able to re-tread a path laid down in connection with the Avebury Henge more than 4,000 years ago. The Published Scheme makes no allowance for this to be done along the original approach to Stonehenge at some future date.

Limiting tunnel construction to the central part of the World Heritage Site would benefit visitors to the Stones at the expense of visitors to other parts of the area, thereby running counter to, and frustrating, declared Management Plan objectives which are aimed at the conservation and enhancement of the whole of the World Heritage Site and at encouraging visitors to explore the wider landscape beyond the Stones. Improving access to these areas, and helping visitors to understand what is there, is a major part of the Management Plan’s overall vision for the World Heritage Site and is supported by the Government’s Special Countryside Stewardship Scheme. While wandering-at-will may be limited to the central part of the World Heritage Site at present, and access beyond this limited for the time being to existing rights-of-way, the intention should be to facilitate the future extension of access within the wider World Heritage Site whenever and wherever possible.

Contrary to this goal, the new long cutting to the west of the proposed West Portal exacerbates and makes permanent the division of the landscape in this part of the World Heritage Site. It would frustrate access to and from land on the south side of the A303 should this become accessible to the public in the future, forcing visitors to make a 2 km diversion. This cutting would also have a damaging direct visual and aural impact on the setting of the prehistoric cemetery at Longbarrow Crossroads. It would cut through land assessed previously assessed by Mr Batchelor of English Heritage as being of high archaeological value (D. Batchelor in “Science and Stonehenge,” CD/WANS/1).

These are absolute issues, not to be set at nought in view of other benefits elsewhere. The failure of the Highways Agency to provide visualisations of the effect of their scheme on this cemetery, compared with their provision of visualisations of the eastern tunnel portal, suggests that they did not wish to draw attention to it.
The Highways Agency’s assessment that the tunneled part of the Scheme would have “a major beneficial effect” on a broken milestone beside the A303, whereas a deep cutting would have only a “moderate adverse effect” on the cemetery at Longbarrow Crossroads clearly demonstrates the foolishness of using a scoring system which treats all Scheduled and Listed structures as of equal value. These two assessments, set against each other, run against all common sense.

Together with the Council for British Archaeology, our two Societies have drawn attention to the western part of the World Heritage Site, which we feel has been seriously under-valued by the Agency and its advisors. Although out of sight of the Stonehenge monument, this area contains a remarkable concentration of Neolithic long barrows. Notwithstanding the attempt at rebuttal made by Mr Lawson, we maintain that nowhere else in England is there a comparable concentration of long barrows. Equally, there is nowhere else in England with a similar association of long barrows with large round barrow cemeteries. This part of the World Heritage Site must have been recognised as an ancestral area by the community that built and used the later stone circle and should be recognised as such by us today. For the Highways Agency and its advisors to say that fast-moving traffic in deep and wide cuttings will merely “disturb the pattern” of this landscape is ludicrous.

We believe that much more currently-unrecorded material would be found, especially in the immediate vicinity of known cemeteries. This material should be considered as part of the social context of those cemeteries and should not be regarded as expendable after excavation in advance of road-works.

In particular, the areas to the east and west, beyond “what can be seen from Stonehenge”, are likely to emerge as having been more important in prehistoric times than the disposition of upstanding monuments might suggest. The importance of the River Avon in linking the stone circle to other places via the Avenue, and the significance of outlying burials such as that of the “Amesbury Archer,” are only now beginning to be realised.

What is the present hurry? The World Heritage Site Management Plan, the County Structure Plan and the District Local Plan all make it clear that large scale development adversely affecting the World Heritage Site should be avoided. The Published Scheme, with its short tunnel and long cuttings, would be the one exception to that good and consistent attitude and policy. The major landowner, the National Trust, does not support the scheme. Neither does ICOMOS, which advises the UNESCO World Heritage Committee on these matters. The Highways Agency itself has made it clear that Scheme would not be in the current roads programme on traffic grounds alone: it is there solely as a result of the 1997 initiative by English Heritage.
We note that English Heritage, in advising the Department of Culture, Media & Sport, has changed its position several times in the last decade. In turn, each favoured scheme was pronounced to be the only one possible. All others were claimed to be unacceptable or unachievable. In turn, each scheme has been abandoned.

The present scheme, as the Highways Agency has admitted, is just “a development” of one originally advanced by English Heritage (C. Jones, under cross-examination, 12.03.04). We note that English Heritage feels able to support a road scheme that involves new lengths of four-lane highway in deep cuttings within the World Heritage Site, but feels it appropriate to site its own proposed development - a new Visitor Centre - outside the World Heritage Site.

This dual standard is worrying. The evidence given to this Inquiry, and answers given in cross-examination, show that in advising the Department of Culture, Media & Sport and supporting the present Scheme, English Heritage failed to demonstrate a clear distinction between its curatorial and managerial roles. We believe that English Heritage curators should not have limited themselves to endorsing “the only scheme on offer” (particularly since this was merely a development of their own 1997 scheme) but should have given advice on the relative heritage benefits of all options, regardless of cost and quite independently of the perfectly proper interests of the parallel wing of English Heritage which manages Stonehenge. The sole reason for English Heritage’s promotion of its original 1997 scheme and for its endorsement now of the Published Scheme would appear to be the desire to obtain a better deal for paying visitors to Stonehenge by improving the outward views from that monument. As a result, we have no confidence that English Heritage was able to offer genuinely impartial advice on conservation issues either to DCMS or to these Inquiries.

English Heritage claims that it supports the Published Scheme only because “it is the only one on offer.” What is on offer now is what can be built within cost limits decided in advance and rooted in English Heritage’s own compromise scheme of 1997. Five years ago, Sir Jocelyn Stevens told the Wiltshire Society that Government funding for his 2 km cut-and-cover scheme (now declared by English Heritage itself to be unsuitable) was “available on a take it or leave it basis.” He therefore refused to contemplate any other scheme which might be offered, even if the necessary additional funding could be found.

We recognise the difficulty of assessing the financial value of cultural heritage benefits. However, we remain concerned that the Highways Agency has made no attempt to do this. Without a way of assessing heritage benefits, how can
English Heritage, or the Department for Culture, Media & Sport, claim that the costs of other schemes with admitted greater cultural heritage benefits cannot be justified? Indeed, how can the Department agree to fund a proportion of the overall costs of a scheme that makes no attempt to assess the heritage cost-benefits as well as the transport cost-benefits?

We are surprised by the cross-departmental funding for the Published Scheme. In 1998 a conventional (ie. surface-level) upgrading of the A303 to dual-carriageway was declared by the Government to be unthinkable and under cross-examination the Highways Agency has now admitted that it is still unthinkable (C.Jones, 12 March 2004). That the tunnel element of the present Scheme constitutes mitigation of an otherwise unacceptable scheme was also tacitly admitted by Highways Agency (C.Jones again, 12 March 2004). The fact that other benefits would flow from that mitigation does not alter the position. In our view, off-loading the costs of mitigating an otherwise unacceptable road scheme onto another Government department sets a dangerous precedent.

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Sir, we have been struck by the patience and humour with which you and your colleague have conducted this Inquiry and we thank you for that.

You asked us, as you have asked every objector, to give you a clear indication of what we would prefer to see instead of the scheme put forward by the Highways Agency. We will do this.

We have followed with great attention the presentation of alternative schemes which have been laid before this Inquiry. Our base line has been our desire to see improvements to the World Heritage Site and our belief that any new road scheme should have as its basis the protection and rehabilitation of the World Heritage Site as a whole.

We therefore feel obliged to rule out any scheme which involves new or extended roads at surface-level in view of the inescapable intrusion and physical damage such schemes would cause.

In considering the various off-line schemes, we have noted Wiltshire County Council’s concerns regard in the ability of surrounding roads to absorb extra traffic if the A303 and A344 were to be closed in favour of an off-line alternative route. We therefore rule out any scheme which would leave the A303 and A344 in place, except as an interim measure pending agreement on a scheme to remove and/or bury those roads.
For these reasons we believe, at the present time and in our present state of knowledge, that the only safe and acceptable course is for any upgrading of the A303 from its present condition to be put underground within the World Heritage Site.

We note that the Longer Tunnels Scheme Assessment Report (CD/CBA/5) states that the longer the tunnel, the greater the conservation are the conservation benefits within the World Heritage Site. We agree, and for this reason we must reject the 2.9 km bored tunnel scheme advocated by the National Trust. We fully support the Trust’s arguments for the extension of the eastern part of the tunnel to beyond the line of the Avenue. However, we note that the limits of their suggested alternative lie close to the limits of their own estate. We ourselves can consider the landscape of the World Heritage Site more widely and we remain deeply concerned that the Trust’s suggestions take no real account of the damaging impact of the Published Scheme on an important cultural landscape in the western part of the World Heritage Site. It is ironic that half a century ago this area was singled out for special mention by Dr Grahame Clark (later Professor Sir Grahame Clark) in the National Trust’s own publication celebrating its 50th Anniversary.

Of the alternative routes which have been presented during these Inquiries, we favour Alternative Route No. 5. This is the logical outcome of the evidence we have presented during this Inquiry. It is also in line with our Societies’ consistent support in the past for a 4.5 km on-line tunnel. If a road improvement is needed now, it should be this scheme. This is not to say that an even better solution could not be devised at some point in the future. But this is the most acceptable solution for which sufficient information exists at the present time.

Throughout the development of the Published Scheme, in common with others, our Societies have attended conferences, public consultations and workshops, and have put forward ideas which we believed to have been helpful. It gives us no pleasure to object to a scheme which, in the event, was developed in parallel with that process rather than from it.

Sir, these Inquiries are charged with considering a proposed “improvement” to the World Heritage Site, involving both the A303 and Stonehenge. We believe that the scheme presented to you by the Highways Agency would fail to make that improvement if the term is taken as applying to the World Heritage Site rather than just the A303. We are appalled particularly at the proposal that the largest visible element in this internationally-recognised 6000 year old religious complex should be an early 21st century monument to passing traffic.

Accordingly, we confirm our objection to the Published Scheme.