



ENGLISH HERITAGE

**SUMMARY OF WRITTEN REPRESENTATIONS
(DEADLINE 2)
ON BEHALF OF ENGLISH HERITAGE TRUST (EHT) TO
THE EXAMINING AUTHORITY (ExA)**

**Re: Application by
Highways England (HE) for an Order granting Development
Consent for the A303 Amesbury to Berwick Down**

PINS Reference No: TR010025

INTRODUCTION

EHT considers that the current proposed A303 road scheme has the potential to further transform the Stonehenge part of the Stonehenge and Avebury World Heritage Site (WHS) and make significant improvements to the setting of the Stonehenge monument (which is one of the WHS's attributes of Outstanding Universal Value (OUV)) and people's experience of them, provided it is well designed and located sensitively.

EHT is mindful of the National Policy Statement for Networks December 2014 (NPS), given that the Secretary of State for Transport must determine the DCO application in accordance with the NPS unless one of the exceptions set out in S104 of the Planning Act 2008 apply.

ASSESSMENT OF THE SCHEME

Our Written Representations identify key matters which we consider need to be addressed by HE during the Examination. These matters largely restate those identified in our earlier Relevant Representations (January 2019), as well as matters arising from our further review of the application documentation. These include:

- a) Clarification on impacts on access to the EHT Visitor Centre and monument during construction and after including a signage strategy.
- b) More information about the presentation and appearance of the completed scheme including design principles and parameters to work within now and if they are not able to be provided by HE at this time, provision within the DCO securing EHT's involvement in the future.
- c) Greater consideration of construction impacts on EHT (including noise and vibration; visitor experience; and negative impacts on EHT charitable business) and how these will be mitigated and monitored during construction.
- d) Further clarity on environmental impacts on EHT including air and water quality
- e) EH is also an "affected person" under S59 of the Planning Act 2008 in that Highways England (HE) proposes to acquire EHT's and the Historic Buildings and Monuments Commission for England's land and land interests: 08-04; 08-12; 14-07; and 07-09. EHT is therefore responding to the DCO as a landowner, and representative of HBMCE's land interests. There is not a compelling case in the public interest for the compulsory acquisition of plot 14-07 (part of the land of the Stonehenge Visitor Centre site for the A360 PROW). This is subject to on-going discussions with HE, but HE has not provided an acceptable solution and should take the requisite steps

under the NSIP legislation to add land into the compulsory acquisition under the DCO to provide the route outside of the Visitor Centre site.

Public Rights of Way (PROW)

EHT remains opposed to any link between the byways (removed from the scheme in summer 2018). EHT asks the Examining Authority (ExA) to consider that restricting vehicular access on BOATs 11 and 12 would be a DCO provision relating to matters ancillary to the development or, alternatively, within the scope of the scheme itself and a justified provision for the Secretary of State to include in the DCO.

EHT also object to the proposal to create a restricted byway running alongside the A360 within the boundary of the Stonehenge Visitor Centre complex on the grounds of negative impacts on safety, security, operations, heritage and local road users. EHT commissioned a highways specialist to assess the potential impact of this proposal and their view is included in the appendices of the full EHT Written Representations. Alternatives have been put forward by EHT and discussions with HE are on-going – see paragraph (e) above.

PROVISIONS SOUGHT AS PART OF THE DCO

EHT seeks provisions to be made within the DCO, to ensure HE (and its contractors) work with and consult EHT in a meaningful way through the entire life of the project, particularly the tender design stage, to ensure the final design and delivery of the scheme is well designed and located sensitively.

CONCLUSIONS

As outlined in our earlier Relevant Representations, EHT is broadly supportive of the scheme which has the potential to transform the Stonehenge part of the WHS – it offers the opportunity to reunite this internationally important landscape currently severed by the A303 and make significant improvements to the setting of the Stonehenge monument.

Our Written Representation highlights the information and clarity we seek on some details of the scheme and outlines our objection to a public right of way which will negatively impact upon our land, charitable business and public interest.

We will continue to discuss the matters outlined in our Written Representation with Highways England.

In our separate role, as part of our membership of the Heritage Monitoring Advisory Group, we will also continue to discuss these matters with the Applicant in a positive and constructive way.