

***The Planning Act 2008 - Chapter 2 Examination TR010025
A303 Amesbury to Berwick Down Improvements***

Written Submission by the Council for British Archaeology

May 2019

APPENDIX A

Appendix A: Material relied upon in the preparation of this submission

- A 1. This statement is rooted in the CBA's current position statement on Stonehenge, (**Appendix B**) formally adopted by its membership in 2016, which forms the core criteria against which the views and conclusions set out below are reached. The current statement is based on and amplifies previous iterations, adopted respectively in 1998 and 2008.
- A 2. For contextual information this Statement draws on the CBA's own record of the 'Stonehenge Saga' from 1960 to 2010 and its involvement in initiatives seeking to resolve the problem of the A303¹. Other contextual factual information that the submission relies upon is almost entirely based on documents prepared for and presented to the Examination by the proponents of the scheme, as referred to in the text.
- A 3. Our comments on the policy framework setting out heritage and other factors to be considered in determining the proposals are rooted in the text of the relevant key policy frameworks, in particular the *National Policy Statement for National Networks 2014* and the *Stonehenge and Avebury World Heritage Site Management Plan 2015*
- A 4. For factual information about the baseline environment including heritage in relation to the scheme proposed we have relied very substantially on the information presented in the Environmental Statement and its Appendices. In respect of archaeological fieldwork, an overview of preliminary results from work at the Western Portal was included in Highways England's presentation to CBA trustees but the full reports on archaeological fieldwork (Deadline 1) have only relatively recently been deposited, shortly before Easter holidays. This represents an enormous amount of technical material that we have not yet fully, and in many cases not even partially evaluated, let alone assessed in conjunction with the setting issues to understand better the overall effects on heritage assets and the OUV of the World Heritage Site. **As a result much of this has NOT been fully assessed for this initial Statement.**
- A 5. With respect to the factual information underpinning our comments on possible alternatives, we have used the reports of earlier stages in the scheme and the account in the ES but these are far from satisfactory, providing only the vaguest and generalised information. Significant extra material has been submitted on this

¹ <http://new.archaeologyuk.org/stonehenge>

some of which can only now be assessed in relation to the additional archaeological material and how that combines with setting issues relative to OUV. **As a result much of this has NOT been fully assessed for this initial Statement.**

- A 6. Our comments on and analysis of the impacts and benefits of the scheme in relation to heritage assets and the historic environment (including archaeology) follow best practice standards as established by the Chartered Institute for Archaeology (CIfA) and guidance published by Historic England (HE). International context refers to relevant UNESCO and Council of Europe heritage and landscape Conventions to which the UK is party and guidance published by the International Council on Monuments and Sites (ICOMOS) as referred to in the text. These standards have been applied within the context of our own expert professional judgement (**Appendix H**). As noted above, much of the material requiring such scrutiny has only recently been submitted. **As a result much of the assessment needed to inform our comments has NOT been completed for this initial Statement.**
- A 7. The information underpinning the CBA's references to relevant procedures and national context of road infrastructure is derived from Government or Highways England documents, some of which have only recently been submitted. The tabulation presenting the national context of highways tunnels has been compiled principally from the online catalogue of the Road Tunnel Association (<http://www.rtoa.org.uk/Directory.html>) with some additional information from sources referred to above. This also includes reviews of other past road tunnel schemes, both on the ground and through use of Google Earth satellite imagery. **Because some of our comments relate to documents about alternatives considered, only recently submitted (Deadline 1) the conclusions presented in this initial Statement may need to be modified.**
- A 8. The documents underpinning our assessment of compliance with key environmental procedures for major infrastructure projects include relevant secondary legislation, key court judgments, the Design Manual for Roads and Bridges, other Highways England procedural guidance and reports covering the various stages of development of the scheme, as referred to in the text.