



Historic England

WRITTEN REPRESENTATIONS
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION
FOR ENGLAND
(“HBMCE”)

Application by
Highways England for an Order granting Development
Consent for the A303 Amesbury to Berwick Down

PINS Reference No: TR010025

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1. INTRODUCTION

- 1.1. The following statement has been prepared by the Historic Buildings and Monuments Commission for England (HBMCE) for the Examination of the application by Highways England (HE) for a Development Consent Order (DCO) required under sections 14(1)(h) and 22(1)(a), (c) and (4) and 31 of the Planning Act 2008 (“PA 2008”) for linear development comprising a highway of about 13km in length (comprising an area of completed highway and temporarily used land greater than 12.5 ha¹) from Amesbury to Berwick Down (the ‘Scheme’).
- 1.2. Appendices to these Written Representations are referred to throughout and submitted in the form of a separate document.

The Scheme

- 1.3. The Scheme is set out in Document APP-020 draft [1] Development Consent Order (October 2018), and summarised in Document APP-295, Design and Access Statement, pages 7-8, and Figure 6-1: Overview of the Scheme. Figure HA1 shows the area of the Application in relation to the Stonehenge and Avebury and Associated Sites World Heritage Site.
- 1.4. The Scheme envisages the construction of 4 essential components:
- (a) A northern bypass of Winterbourne Stoke with a viaduct over the River Till valley;
 - (b) A new junction between the A303 and A360 to the west of and outside the Stonehenge World Heritage Site, replacing the existing Longbarrow roundabout;
 - (c) A twin-bore tunnel approximately 2 miles (3.3km) long, past Stonehenge; and

¹ Section 22(9) defines the “area of development” to be (a) in relation to construction of a highway, which means the land on which the highway is to be constructed and any adjoining land expected to be used in connection with its construction.

(d) A new junction between the A303 and A345 at the existing Countess roundabout.

1.5. Review of the first draft DCO (October 2018) (d1DCO) submitted with the Application shows that, in essence, the d1DCO terms described the Scheme as comprising a linear volume of space that is envisaged to contain a highway structure of which part would be tunnelised. The Scheme for which authorisation is sought comprises the “authorised development” in Articles 4(1) and 7, and Schedules 1 and 12 to the d1DCO; Schedule 12 describes certain plans only to be certified. Schedule 1 to the d1DCO describes authorised development (and associated development) comprising Work Nos. 1-9 and Ancillary Works, as shown on Works Plans. The Works Plans show areas outlined in red in which it is envisaged that a highway would be constructed along a Linear Work Centre Line. Article 7 refers to the Engineering Drawings. There is no other evidence to ensure content of the Scheme within the volume in which works would be authorised². Article 51(1)(a) would also permit the transfer of the benefit of the d1DCO to a third party to construct the proposed highway and structures.

1.6. Schedule 12 to the d1DCO describes a number of plans. The plans include Engineering Section Drawings that include details of a scheme that is expressly stated to be *“illustrative only and will be subject to detail design”*. The Schedule does not include the “Structures Drawings” in Document APP-017 or the General Arrangement Drawings in Document APP-012. Further, the Structures Drawings and the General Arrangement Drawings are also expressed to be for *“illustrative purposes only”*. HBCME reasonably considers that the Engineering Plans do not ensure a particular scheme will be executed, and the Structures Drawings and the General Arrangement Drawings do not describe the detail of what will actually be constructed if the

² Section 8 of the HIA envisages descriptions of measures that will be incorporated into the d1DCO in due course and HBMCE welcomes this commitment.

d1DCO is granted as presently drafted.

- 1.7.** Highways England have applied for a Scheme that has “flexibility”³ and on the terms described in the d1DCO. The Planning Act 2008 permits a DCO to be granted in such outline form and not in detail as discussed in Advice Note 9: Using the *Rochdale Envelope* (see Appendix 1 hereto). The National Planning Statement National Networks (“NPSNN”) also recognises this approach in particular in relation to highways’ infrastructure in paragraphs 4.18-4.19, including in the context of Part 5 of that guidance which concerns the historic environment. As presently drafted, HBMCE notes that the d1DCO includes no legal parameters within which the actual details of the Scheme can be reasonably expected to evolve, and provides for a notional spatial linear envelope without guaranteed descriptions of the detailed nature of the Scheme. In the context of the d1DCO Scheme proposal to traverse the Stonehenge, Avebury and Associated Sites WHS (SAAS WHS), HBMCE is concerned at the present lack of details, and about the lack of relevant legal parameters within which decisions about the actual design of the executed scheme can be properly considered at this stage so that a view can be properly reached as to what subsequent decision makers may conclude⁴. However, HBMCE anticipates that appropriate parameters can be formulated during the Examination by which to ensure that the effects of the d1DCO Scheme can be properly assessed by it, the Examining Authority and the Secretary of State, and thereby that the support of HBMCE for the concept of the Scheme can be crystallised during the Examination by the submission of binding details and parameters to regulate future decision making processes.
- 1.8.** The d1DCO would also result in planning permission being permitted pursuant to Articles 6(1) and (2) and 53, and to sections 263(1) and 264(1), (2) and (3)(a) of the Town and Country Planning Act 1990 (TCPA 1990) (operational land) because the d1DCO would result in the land within the Application area

³ See d1DCO, Articles 4(1), 7 and the two tables therein, and Schedule 1.

⁴ See *Smith v Secretary of State* [2003] 2 P&CR 11 at paragraph 33; *ex parte Tew* [1993] 3 PLR 74, and *ex parte Milne* [2001] JPL 470.

being treated as operational land for the purposes of the TCPA 1990. Thereby, pursuant to sections 59 and 60 of the TCPA 1990 and Article 3(1) and Class B of Part 9 in Schedule 2, to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), the d1DCO would permit “connected or incidental works” to be executed in the Application area in addition to the proposed authorised works that appear unregulated by the d1DCO terms. There are also no plans within the d1DCO identifying the nature of such connected or incidental works that might be executed by Highways England or a third party benefiting from the d1DCO nor any parameters to regulate their detailed content. HBCME is concerned at the absence of relevant legal parameters within which decisions about the use of permitted development rights within the SAAS WHS can be properly considered. As set out above, HBMCE anticipates that, subject to appropriately formulated terms in the d1DCO, its support for the concept of the Scheme can be appropriately regulated in its detailed execution.

The Application Area

- 1.9.** The said Scheme spatial volume described by the d1DCO is proposed to be situated within an Application area shown on the Location Plan (Document APP-004) and outlined in red on the Heritage Impact Assessment (HIA) (ES 6.3 Appendix 6.1- APP-195) Figure 1. HIA Figure 1 shows that the Scheme would be sited so as to traverse the property that comprises the SAAS WHS and extend east and west from the boundary of that property.
- 1.10.** The SAAS WHS is described in summary in **Appendix 2** hereto. The SAAS WHS is inscribed under Articles 1, 3, 6(1) and 11(1), (3) of the Convention Concerning The Protection of The World Heritage and National Heritage 1972 (1972 Convention)⁵. Stonehenge is also a Monument scheduled pursuant to section 1(1), (11) and 61(1), (7) and (8) of the Ancient Monuments and Archaeological Areas Act 1979 (AMAA 1979)⁶. It is one of 175 scheduled

⁵ See Appendix 5 hereto.

⁶ <https://www.legislation.gov.uk/ukpga/1979/46>

monuments within the SAAS WHS (see **Appendices 3 and 4** hereto).

- 1.11.** The Scheme authorised volume would enable the provision of a tunnel below the existing ground level of the SAAS WHS bearing a highway that would be entered by vehicles from portals at its western and eastern ends at artificial new ground levels. The portals would be situated below the existing ground level of the SAAS WHS. The Scheme envisages the replacement of a section of the existing ground level A303 as it traverses the SAAS WHS with a c. 3.3km tunnel.

The Statutory Scheme

- 1.12.** The Application seeks “consent” under the Planning Act 2008. See Document 7.1 Case for the Scheme and NPS Accordance, paragraphs 8.3.1-8.3.2 (APP-294). The effect of a grant of development consent under section 114 of the PA 2008 would be to exclude, under section 33(1)(a) (planning permission under the TCPA 1990; (f) consent under section 2(3) or (3) of the AMAA 1979; (g) consent under section 35 of the AMAA 1979; and (i) consent under sections 8(1), (2) or (3) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (PLBCAA 1990). Article 4(2) of the d1DCO seeks to make any enactment applying to the Application area or adjacent to that area, to have effect “subject to” the d1DCO.

Matters of Concern

- 1.13.** Whilst HBMCE remains supportive of the concept of the Application Scheme, (i.e. its aspirations), the Scheme raises a wide range of matters of concern regarding impacts on the historic environment that fall to be appropriately addressed by Highways England during the Examination. We have identified areas of concern in these Written Representations and anticipate that they can be satisfactorily addressed during the iterative process of the Examination. A number of designated heritage assets will be affected including monuments scheduled under the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* (as amended), structures listed under the *Planning (Listed Buildings and Conservation Areas) Act 1990*

and, importantly, the Stonehenge, Avebury and Associated Sites World Heritage Site (the SAAS WHS).

- 1.14.** Four key objectives have been identified by the Department for Transport (DfT) for the Scheme⁷. In relation to cultural heritage the DfT's objective specifically requires the Scheme to help conserve and enhance the World Heritage Site and to make it easier to reach and explore. This reflects the requirement under Article 4 of the 1972 Convention to protect, conserve, present and transmit to future generations the values of cultural and natural heritage, and hence of World Heritage Sites.
- 1.15.** The Scheme would introduce a new piece of contemporary infrastructure that would traverse the Stonehenge element of the SAAS WHS. The SAAS WHS property is internationally important⁸ for its complexes of outstanding prehistoric monuments and their relationships with the landscape of the inscribed property, with the Stonehenge element itself acknowledged to be the most architecturally sophisticated prehistoric stone circle in the world and with Avebury to be the largest. Together with interrelated monuments and their associated landscapes, the SAAS WHS helps us to understand Neolithic and Bronze Age ceremonial and mortuary practices. It demonstrates around 2000 years of continuous use and monument building between c. 3700 and 1600 BC.
- 1.16.** HBMCE supports the concept (i.e. the aspirations) of a road scheme and considers that the Scheme (as presently articulated in the d1DCO) has potential to actually deliver a beneficial outcome for the historic environment helping to sustain and enhance the Outstanding Universal Value (OUV) of the WHS.

⁷ See page 1, and Table 1-0 of Document 7.1 The Case for the Scheme and NPS Accordanc (APP-294).

⁸ See the detailed terms of the inscription that record its justification for its status on page 5 of the HIA.

- 1.17.** However, if this potential is to be realised in practice it is essential that a number of matters are satisfactorily addressed, such as by inclusion of the terms of appropriately worded Protective Provisions, Requirements, and measures, as part of the d1DCO. This is so that the relevant and important elements of the currently illustrative scheme that has been assessed by the Environmental Impact Assessment and HIA can be appropriately ensured to be executed in line with those assessments, and, thereby, ensure delivery of the stated aspirations and objectives. These matters, and our advice in relation to how they might be addressed by Highways England, form the basis of HBMCE's Written Representations on the Scheme.
- 1.18.** Our objective overall is to ensure that the historic environment and, in particular, the WHS element is properly taken into account in the determination of this DCO. This is due to the potential for significant effects and adverse impacts arising from the Scheme on the significance of the historic environment and the OUV of the SAAS WHS. To this end we have engaged with, and continue to engage with, Highways England and other stakeholders to facilitate and encourage the detailed evolution of the development of a scheme which would, subject to the matters we have raised in these Written Representations, deliver actual benefits to the historic environment and also satisfy the specific cultural heritage objective set by the DfT, while avoiding and minimising adverse impacts to the SAAS WHS. This applies particularly to the area of the Stonehenge component of the 2 areas of the SAAS WHS and the many other designated heritage assets within, adjacent to and beyond the Order limits.
- 1.19.** At this time, however and regrettably, HBMCE is not able to give either detailed advice or to set out our final position on a range of matters because of gaps in the submitted information. We anticipate that Highways England will provide further information in due course and that we will remain in a dialogue with them about the terms of Protective Provisions, Requirements and measures for inclusion in the d1DCO. HBMCE will provide its advice to the Examining Authority and to the Secretary of State when further information

has been provided by the Applicant together with appropriate draft parameters within which decision taking can be articulated at subsequent stages.

2. THE ROLE OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

The Historic Buildings and Monuments Commission for England

2.1. The Historic Buildings and Monuments Commission for England is generally known as “Historic England”⁹. HBMCE was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983 and that Act establishes the particular obligations on us. The general duties of HBMCE under Section 33 are as follows:

“...so far as is practicable:

- (a) to secure the preservation of ancient monuments and historic buildings situated in England;
- (b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- (c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.

2.2. HBMCE’s sponsoring department is the Department for Digital, Culture, Media and Sport (DCMS), although its remit in conservation matters intersects with the policy responsibilities of a number of other government departments, particularly the Ministry of Housing, Communities and Local Government, with its responsibilities for land-use planning matters¹⁰.

2.3. HBMCE administers the consent system for Scheduled Monument Consent giving advice to DCMS on each application, and also advises DCMS who acts on behalf of Government as State Party to the 1972 Convention on meeting and complying with the requirements of the Convention.

⁹ To avoid potential confusion in relation to “HE” (Highways England and Historic England), we have used “HBMCE” in our formal submissions to the examination.

¹⁰ HBMCE also has a role in relation to maritime archaeology under the *National Heritage Act 2002*.

HBMCE as Advisor to Government on DCOs

- 2.4.** HBMCE is a statutory consultee on all Nationally Significant Infrastructure Projects¹¹.
- 2.5.** In light of this role as a statutory consultee, HBMCE encourages pre-application discussions and early engagement on DCO projects to ensure informed consideration of heritage assets and to ensure that the potential for impacts on the historic environment are taken into account. In undertaking pre-application discussions for nationally significant infrastructure schemes, the key matters for HBMCE are ensuring that:
- (a) the significance of any heritage asset that may be affected is fully understood;
 - (b) the potential impact on that significance as a result of the proposed development is fully understood and assessed;
 - (c) any proposals to avoid, or mitigate that impact have been considered and can be secured; and
 - (d) the decision maker is fully informed and can be satisfied that there is clear and convincing justification for any harm with great weight given to the conservation of the assets affected [NPSNN 5.131].

Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of the proposed development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss [NPSNN 5.132].

HBMCE as Advisor to the State Party

- 2.6.** HBMCE advises DCMS, which acts on behalf of Government, as a State Party to the 1972 Convention on meeting and complying with the

¹¹ HBMCE is also statutory consultee providing advice to local planning authorities on certain categories of applications for planning permission and listed building consent. Similarly HBMCE advises the Secretary of State on those applications, subsequent appeals and on other matters generally affecting the historic environment.

requirements of the Convention. See **Appendix 5** hereto.

- 2.7.** The 1972 Convention was adopted by the General Conference of UNESCO on 16 November 1972. The United Nations Educational, Scientific and Cultural Organisation (UNESCO) was established with the objective of building peace in the minds of men and women in November 1945. The organisation is based in Paris. The UK ratified the Convention in 1984 and is currently one of 193 states parties that have chosen to do so¹².
- 2.8.** Amongst other things Article 4 of the 1972 Convention places a duty on states parties *“of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage”* of Outstanding Universal Value. Whilst these duties are primarily the responsibility of individual states parties, Article 6 of the Convention makes it clear that, *“whilst fully respecting the sovereignty of the states on whose territory the cultural and natural heritage ... is situated ... the states parties to this convention recognise that such heritage constitutes a world heritage for whose protection it is the duty of the international community as a whole to cooperate”*.
- 2.9.** It is also worthy of note that Article 5 of the Convention requires each state party to *“adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes”*.
- 2.10.** In response to these international obligations the UK State Party (a role currently played on behalf of HM Government by the DCMS), has successfully nominated 31 properties across the United Kingdom of Great Britain and Northern Ireland and British Overseas Territories for inclusion on the List of World Heritage. Protection and conservation duties are

¹² Consequently, the 1972 Convention binds the UK Government, including the Secretary of State for Transport and the Secretary of State for Communities and Local Government.

discharged through the application of UK heritage legislation and planning policies to World Heritage properties, which also allow community engagement and participation in line with Article 5. There is no specific legal domestic heritage designation for World Heritage Sites in the UK. Therefore, recourse falls to be had to the 1972 Convention and, in its application, to guidance promulgated under it.

- 2.11.** Aware of its responsibilities in relation to Article 6 of the 1972 Convention, the UK State Party invited three successive advisory missions from the UNESCO World Heritage Centre (the Secretariat to the World Heritage Committee) and the International Council of Monuments and Sites (ICOMOS - the cultural heritage adviser to the World Heritage Committee) following the government announcement in March 2015 that it intended to proceed with improvements to the A303 between Berwick Down and Amesbury. See **Appendix 11** hereto.
- 2.12.** Article 14 of the Convention sets out the remit of the Centre and ICOMOS. A distinction need to be drawn between ICOMOS, the advisory body to the World Heritage Committee, and ICOMOS UK, which is its UK National Committee. While ICOMOS may seek the views of its national committees, the advice it provides to the World Heritage Committee is independent of such national committees and vice versa.
- 2.13.** In addition to the advisory missions and the reports resulting from them, the UK State Party also submitted state of conservation reports to the World Heritage Centre in 2017, 2018 and 2019. The advisory mission and state of conservation reports were considered by the World Heritage Committee in 2017 and 2018 and are scheduled for further consideration at this year's World Heritage Committee session in early July. The details of these reports and decisions, together with the ICOMOS assessments of the State of Conservation, can be found in **Appendices 12-20** hereto.
- 2.14.** In order to understand the particular status of state of conservation reports, mission reports and Committee decisions it is useful to set out some of the

main elements of the structure and governance of the World Heritage Convention. The Convention sits within the Cultural Directorate of UNESCO. The General Assembly of States Parties to the Convention meets once every two years during which elections to the World Heritage Committee are held. The Committee consists of representatives of 21 States Parties to the Convention. Approximately 50% of the Committee is elected for a term of four years at each session of the General Assembly. The electoral procedures ensure an equitable balance of representation from the five regions of the world as defined by UNESCO.

2.15. The Committee is the principal policy and decision making body for the Convention. The Secretariat for the Committee is provided by the UNESCO World Heritage Centre and specialist advice is provided by the International Centre for the Study of the Preservation and Restoration of Cultural Property (ICCROM), the International Council of Monuments and Sites (ICOMOS) and the International Union for the Conservation of Nature (IUCN), collectively referred to as the advisory bodies.

2.16. Where the Committee so wishes it can ask a State Party to prepare a state of conservation report in a standard format set out in Annex 13 of the Operational Guidelines for the Implementation of the World Heritage Convention. The relevant advisory body then makes its own assessment of the state of conservation of the property, taking into account the information provided by the State Party. The State Party and advisory body state of conservation reports are then made available to the World Heritage Committee together with a draft decision which the Committee adopts, with or without modification according to circumstances, at its annual session. Mission reports are also made available to the Committee and draft decisions take account of the recommendations made in these reports. State of conservation and mission reports form the advice given to the Committee; it is the Committee that decides on whether to follow this advice and if so to what extent, in making a decision.

- 2.17.** Committee decisions are then formally communicated to the relevant States Parties and it is for individual States Parties to respond to the Committee decisions as they see fit. If there are serious concerns about the state of conservation of the property the Committee can decide to place it on the List of World Heritage in Danger and ultimately can delete a property from the World Heritage List if it considers that site no longer has Outstanding Universal Value (see section 5.7 below). Of the 1092 properties currently on the World Heritage List, 54 are on the List of World Heritage in Danger. Since the Convention came into being, two sites have been deleted from the World Heritage List.
- 2.18.** The World Heritage Committee does not exercise any legal or planning powers in the territory of any State Party to the Convention. Rather, the 1972 Convention establishes obligations on the States Parties. It is then for States Parties to discharge these obligations and to apply their own heritage protection and planning policies to ensure that they discharge and meet their obligations to the 1972 Convention, taking account also of the recommendations and requests made by the Committee in those cases where the Committee has considered the state of conservation.
- 2.19.** It should be made clear that the advisory missions to Stonehenge that took place in 2015, 2017 and 2018 were at the voluntary invitation of the UK State Party with the intention of obtaining advice on how best to address the long standing harm to the OUV of Stonehenge caused by the existing A303. The need to improve the situation in relation to the roads at Stonehenge has been recognised by the Committee since the site was first inscribed on the List of World Heritage in 1986, and in 2007 the Committee expressed its regret about the delays to the implementation of the A303 Stonehenge improvements scheme – at that time based on a 2.1km tunnel. Advisory missions are distinct from cases where the Committee is sufficiently concerned about the State of Conservation of a property that it asks the State Party to invite a reactive monitoring mission. There have been no requests from the Committee to invite a reactive monitoring mission to Stonehenge. (See **Appendix 11** hereto).

2.20. As part of HBMCE's role as statutory adviser to DCMS on all aspects of the historic environment of England, we provide advice to DCMS in its capacity as the UK State Party to the World Heritage Convention on how best it can meet its responsibilities to the articles of the Convention. DCMS's role as State Party extends to the whole of the United Kingdom of Great Britain and Northern Ireland and to British Overseas Territories; HBMCE's role as statutory adviser is similarly extensive, although in practice we of course liaise closely with colleagues in the relevant heritage agencies of the devolved administrations and overseas territories. HBMCE not only provides advice to DCMS on the implementation of the cultural heritage component of the Convention, but also acts as a link between individual WHSs and the State Party and, where appropriate, engages directly with the UNESCO World Heritage Centre and ICOMOS in Paris and with ICCROM in Rome. A representative of HBMCE forms part of the UK delegation to the annual World Heritage Committee sessions where they support the delegation's role as a State Party Observer. The UK is not currently a member of the World Heritage Committee and attends the sessions as a State Party Observer.

HBMCE's membership of the Heritage Monitoring and Advisory Group (HMAG) and the Scientific Committee

2.21. The report on the first joint Advisory Mission by the World Heritage Centre and ICOMOS to the Stonehenge, Avebury and Associated Sites in October 2015 included as a priority recommendation the establishment of a heritage-centred steering mechanism called the Heritage Monitoring and Advisory Group (HMAG) to ensure appropriate quality control at all stages of decision making, project design and implementation. It was advised that this should include a Scientific Committee, a board of experts for monitoring and quality control at each phase to be defined.

2.22. Membership of the HMAG comprises representatives from:

- The English Heritage Trust;
- HBMCE;
- The National Trust; and

- Wiltshire Council (specifically the Archaeology Service).

HMAG does not itself represent HBMCE nor vice versa. The advice of HBMCE cannot bind HMAG and vice versa.

2.23. HMAG provides advice on the requirements with regard to the historic environment impacts of the project's design, assessment, implementation and mitigation where it relates to the SAAS WHS, ensuring the protection of its OUV.

2.24. While recognising, and without prejudice to, the particular statutory and advisory roles and responsibilities of the individual organisations throughout the life of the project HMAG advises on and formulates requirements for, guides and monitors the development and delivery of the Scheme in order to ensure the consistent protection of the OUV, integrity and authenticity of the WHS in particular, and the historic environment in general.

2.25. Where supplementary advice and expertise are required HMAG will request advice from members of the Scientific Committee.

2.26. The Scientific Committee was set up in 2017 at the request of Highways England to inform and advise HMAG and Highways England in the pursuit of their function on the A303 Stonehenge Amesbury to Berwick Down project where it relates to the WHS and its OUV, and to provide advice in relation to historic environment impacts as the project proceeds through its design, assessment, mitigation and construction stages.

2.27. In addition to the members of HMAG, the Scientific Committee comprises individuals who have a required specialist skillset or are experts in a specific aspect of the landscape of the SAAS WHS.

The Scientific Committee does not represent HBMCE nor vice versa.

2.28. The purpose of the Scientific Committee is to respond to requests from HMAG and Highways England to draw on their individual expertise and provide advice on particular issues relating to the historic environment impacts of the project's environmental assessment, design and construction in relation to the SAAS WHS landscape. It is tasked in particular to ensure excellence in the design and provision of archaeological assessment, evaluation, mitigation and fieldwork.

“English Heritage”

2.29. As noted above, HBMCE was established with effect from 1 April 1984, and was informally known as English Heritage from then until 1 April 2015. On 1 April 2015 the identity of HMBCE remained the same and there was no change in its statutory remit, but its informal name was changed to Historic England. The name of “English Heritage” was instead given to a new charity, officially called the English Heritage Trust, who under a licence given by HBMCE are charged to care for and actively manage the National Heritage Collection - an estate of more than 400 historic sites and monuments across England, which includes Stonehenge.

3. SCOPE OF WRITTEN REPRESENTATIONS

- 3.1.** In this section we set out the scope of our Written Representations and address in further detail the matters raised in our Section 56 Relevant Representations (January 2019). These two documents should be read together.
- 3.2.** As stated in our Section 56 Relevant Representations, HBMCE's interest in the Scheme is focused upon ensuring sufficient information is submitted to enable the Examining Authority to assess the significance of the heritage assets affected and to understand the impact on that significance. This is an essential first stage in their assessment of whether the potential to deliver a beneficial outcome for the historic environment and to sustain and enhance the OUV of the WHS can be realised in practice if the d1DCO were to be granted and then executed.
- 3.3.** HBMCE is confident that an appropriate degree of flexibility can be provided whilst at the same time appropriate parameters are included in the terms of the d1DCO by which to appropriately tie the assessed illustrative Scheme to the scheme described in the d1DCO in the circumstances of new infrastructure traversing the SAAS WHS.
- 3.4.** There are a number of matters which must be assessed satisfactorily in the DCO Application Scheme. These comprise:
- The effect of the Scheme on the attributes of OUV of the SAAS WHS (both within and beyond its boundary);
 - The effect of the Scheme on the Authenticity and Integrity of the SAAS WHS; and
 - The effect of the Scheme on the significance of those designated heritage assets which, due to their date, are not considered to contribute to the OUV of the SAAS WHS.

3.5. In addition these Written Representations consider:

- The significance of the prehistoric and historic landscape of the Salisbury Plain including the SAAS WHS; and
- Areas of continuing unresolved concern as outlined in our Relevant Representations.

3.6. HBMCE's advice reflects the National Policy Statement for National Networks (NPSNN), including and in particular Part 5, paragraphs 5.120 – 5.142. Our advice is also provided in line with the: National Planning Policy Framework (NPPF), and with relevant and important published guidance, including the Planning Practice Guidance (PPG) and Good Practice Advice Notes produced by HBMCE (on behalf of the Historic Environment Forum, in particular GPA3 "The Setting of Heritage Assets" (HBMCE 2017)).

3.7. Our advice recognises that the Planning Act 2008 excludes the need for separate consent to be obtained under section 2(3) or 3 of the Ancient Monuments and Archaeological Areas Act 1979 or under Sections 8 and 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.8. Our advice also takes account of the State Party's obligations as a signatory to the 1972 Convention which place additional requirements on the Secretary of State to ensure that in granting development consent, its international obligations would not be breached (Planning Act, 2008; Section 104(4); NPSNN 1.2).

3.9. The focus of HBMCE's advice in these Written Representations is primarily on the SAAS WHS, and those Scheduled Monuments affected by the Scheme, regardless of whether they convey the attributes of OUV or lie within or outside the WHS boundary. In accordance with our remit we will also make additional observations on other elements of the historic environment but recognise that other interested parties and statutory consultees (e.g. Wiltshire Council) may be making more detailed comments in this regard.

3.10. In providing our assessment of the key issues associated with the DCO application HBMCE has referred to all the relevant areas of the Environmental Statement in addition to Cultural Heritage Chapter 6 including Landscape and Visual, Noise and Vibration, Drainage and Water, and Material and Waste. This is given the pre-eminence of the historic environment in the landscape, which means that many of the included topic areas have potential not only to affect the reading of the cultural heritage chapter but also its conclusions.

4. BACKGROUND TO WORLD HERITAGE SITE MANAGEMENT

4.1. Since the early 1980s, even before its inscription as a World Heritage Site in 1986 by UNESCO, there has been concern about, and actions to improve, the setting of Stonehenge. HBMCE (previously as English Heritage) has been involved throughout this time in managing the site on behalf of the nation (a role now undertaken on our behalf by the English Heritage Trust). We have supported the production of Management Plans for the SAAS WHS, seeking to promote the WHS and greater understanding of it. The Management Plans set the overarching strategy for achieving the correct balance between conservation, access, the interests of the local community and the sustainable use of the Site. The primary aim of the Management Plans is to protect the SAAS WHS to sustain its OUV as agreed by UNESCO, provide access and interpretation for local people and visitors, and allow its continued sustainable economic use. The Aims, Policies and Actions set out how partners will work together to achieve this aim¹³.

4.2. In our role as the Government's statutory adviser on the historic environment HBMCE has been involved in various projects including proposals to upgrade the A303, development of a new Visitors Centre, and securing reversion from arable to grassland in the core of the SAAS WHS. A principal aim of each of these proposals has been to improve the setting for the Stonehenge element of the SAAS WHS itself in line with the Aims, Policies and Actions of the current World Heritage Site Management Plan (2015)¹⁴.

4.3. The first Management Plan for the Stonehenge element of the SAAS WHS was produced in 2000 and updated in 2009. The 2009-2015 Management Plan was prepared by HBMCE¹⁵ on behalf of the Stonehenge World Heritage

¹³ Simmonds & Thomas, 2015, Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan, 10.

¹⁴ ¹⁴ The Management Plan (2015) derives from paragraphs 108-109 of the Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (January 2011). See also paragraphs 1.1.2 and 1.2.1-1.2.2 of that Management Plan (2015) and its purpose in paragraph 1.3.1-1.3.2.

¹⁵ At that stage, known as "English Heritage".

Site Committee. It sought to prioritise the removal or screening of the A344 and keep the A303 improvements under review. During this plan period the priority to *'enhance the visitor experience by 2012 by providing improved interim facilities'* was achieved in December 2013 alongside significant enhancement of the setting of Stonehenge and the integrity of the SAAS WHS achieved through the closure of the A344. In addition a new Visitor's Centre was also constructed.

- 4.4.** In 2013 it was decided to produce the first joint Management Plan for the Stonehenge and Avebury World Heritage Site largely due to the recommendation by UNESCO that such serial WHSs¹⁶ should have a coordinated approach to management (2013). The WHS Coordination Unit, set up in 2014, was instrumental in preparation of the joint Plan.
- 4.5.** The updated Management Plan for the period 2015- 2021 again identified the reduction of the dominance and negative impact of roads and traffic, ensuring that any improvements to the A303 support this. Another priority identified is the enhancement of the visitor experience in the wider landscape. The Scheme for the A303 and subject of this DCO application has potential to support these priorities, and will need to demonstrate how it will help to achieve them.
- 4.6.** Regular review of WHS Management Plans is recommended as best practice and a review of the current Plan is scheduled for 2021.
- 4.7.** Having achieved some improvements to the setting of the Stonehenge element with the new location and establishment of the Visitor's Centre since the adoption of the first Management Plan, attention is now fully on the existing A303 as the remaining major infrastructure priority. The A303 continues to have a detrimental impact on the integrity of the SAAS WHS,

¹⁶ That is, a WHS that is comprised of elements that are physically separated from one another but otherwise related in some way.

effectively cutting the southern part into two and also has a detrimental visual and aural impact. Whilst its presence did not prevent the SAAS WHS inscription, its *removal* remains an important opportunity for enhancement.

4.8. Throughout HBMCE's engagement with the SAAS WHS, in line with our statutory and advisory remits, our overall objective has been to improve the surroundings of the prehistoric monuments located at Stonehenge, to provide a tranquil and informative experience for visitors to the Stones and surrounding area, and to minimise intrusive infrastructure within their settings.

4.9. HBMCE's ENGAGEMENT WITH THE SCHEME

4.9.1. HBMCE has been engaged with the current proposals to improve the A303 through the SAAS WHS since early 2014 after the Department for Transport (DfT) announced a feasibility study to look at potential solutions in the UK Government's Autumn Statement in 2013.

4.9.2. HBMCE's engagement with the feasibility study primarily took place through a DfT Technical Working Group, together with other heritage partners comprising the National Trust, the English Heritage Trust and Wiltshire Council. Our constructive engagement in this process was instrumental in securing the Government's December 2014 announcement that it would invest in a bored tunnel of "at least" 2.9km to improve the A303 through the WHS¹⁷.

4.9.3. In the two years following, HBMCE continued to provide advice and guidance through scoping and initial assessment of route options. A key aspect of this engagement was our recommendation that the advice of the UNESCO World Heritage Centre (WHC) and their heritage advisors, ICOMOS, be sought at the earliest opportunity. This was to ensure that

¹⁷ <https://www.gov.uk/government/publications/autumn-statement-documents>.

the project had the benefit of their on-going advice throughout the development of the scheme and identification of routes.

4.10. HBMCE'S PRE-DCO APPLICATION ADVICE

4.10.1. In March 2017 (see **Appendix 6**) HBMCE responded to the first phase of public consultation setting out our assessment of the impacts of the options put forward for consideration. At this time Route Options D061 and D062 were being consulted on (See ES 6.1 Assessment of Alternatives (APP-041)).

4.10.2. In our advice we highlighted a number of concerns as follows, which remain important and relevant to the current iteration of the Scheme:

- The designated heritage assets with potential to be affected by the Scheme that require careful assessment, including those that do not contribute to the OUV of the SAAS WHS;
- The potential for impacts arising from the detail of infrastructure design, such as signage, lighting, fencing, and cameras;
- The need to thoroughly assess impacts on groundwater levels and hydrogeology in relation to the preservation of the archaeological remains at the Mesolithic site at Blick Mead;
- The potential for significant heritage benefits through increased legibility of the Avenue by positioning the eastern tunnel portal east of the Avenue;
- The benefits for the SAAS WHS of removing the damaging and intrusive surface road that currently severs the Stonehenge WHS in two through construction of a tunnel;
- Concerns regarding the location of the western portal in relation to monuments within the landscape that contribute to OUV and the need for the location at which traffic emerges into the landscape to demonstrate that it protects the OUV of the SAAS WHS;

- The need for the Scheme to demonstrate it can be delivered without harming the design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy, an attribute of the OUV; and
- The need for archaeological assessment and evaluation of Winterbourne Stoke bypass options.

4.10.3. In November 2017 (see **Appendix 7**) HBMCE provided a scoping response under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

4.10.4. Our advice highlighted the following concerns, which again remain important and relevant to the current iteration of the Scheme:

- The need for an assessment of the settings of heritage assets to be undertaken in accordance with HBMCE's Good Practice Note (No 3) on the Setting of Heritage Assets (2017);
- The need for the OUV Heritage Impact Assessment compliant with the 2011 ICOMOS guidance to be fully integrated into the Environmental Statement Cultural Heritage chapter;
- The need for the planning policy context to include relevant international policy and guidance governing WHSs in addition to national and local planning context;
- The need for the Environmental Statement to acknowledge the potential for non-designated heritage assets to be relevant to the OUV of the SAAS WHS and of national importance in their own right;
- The need for the Environmental Statement (Landscape and Visual) to include an assessment of the potential impact of the Scheme on dark skies in relation to Attribute 4 of the 2013 Statement of Outstanding Universal Value and the setting of individual scheduled monuments;
- The need for the Environmental Statement to differentiate and reflect the Very High importance acknowledged in national planning policy attributable to WHSs, and the relevant degree of importance attached to Scheduled Monuments, and to Grade I and II* Listed Buildings;

- The need for commentary on the Overarching Written Scheme of Investigation (OWSI) which will inform Site Specific Written Schemes of Investigation (SSWSIs) together with the Archaeological Evaluation Strategy;
- The need to establish the potential for visual impact beyond 5km and justify the proposed parameters for assessment; and
- The need to clarify whether bunds or other earthworks will be constructed within the SAAS WHS since they will impact on OUV.

4.10.5. In April 2018 (see **Appendix 8**) HBMCE responded to a further round of public consultation on revision to the route bringing it closer to the existing A303 and avoiding adverse impacts on the winter solstice sunset alignment as viewed from Stonehenge. We outlined the positive changes to the indicative Scheme recognising the potential for substantial public benefits to arise from the Scheme which if secured could transform the public's understanding of the SAAS WHS, allow its improved interpretation and the transmission of its significance. Despite this we noted the need for further work in two areas:

- Adjustment of the location and width of the proposed green bridge in the WHS to provide meaningful landscape connectivity between the Winterbourne Stoke and Diamond monument groups. The adjusted width and location proposed was drawn from the recommendations of an OUV assessment commissioned by HBMCE to inform our advice. That assessment was appended to our response as it is hereto.
- Amendments to the proposals involving the creation of a link for motorised vehicles between two byways open to all traffic (BOAT 11 and BOAT 12), due to this disconnect between this objective and the overall intention behind the Scheme to remove the intrusive sight and sound of traffic from much of the SAAS WHS.
- Further to this we outlined our initial assessment of the potential impact of the proposed route identifying areas where careful assessment and discussion regarding mitigation measures was

considered beneficial. The proposals at this stage represent a point in time of the development of the Scheme proposals and did not contain finalised proposals on all matters of detail.

4.10.6. In a supplementary response to a further amended Scheme in August 2018 (see **Appendix 9**) we commented on two key changes recognising the potential to deliver substantial benefits but that details needed to be agreed to ensure the protection of OUV:

- Removal of the previously proposed link for motorised vehicles between BOAT 11 and BOAT12 in line with our previous advice; and
- Adjustment of the location of the green bridge within the SAAS WHS, again in line with our previous advice.

In addition we commented on:

- Revised junction proposals at Rolleston crossroads; and
- Clarifications to the Public Rights of Way proposals.

4.11. STATEMENT OF COMMON GROUND (SoCG)

4.11.1. HBMCE recognises that it is good practice to agree common ground with Highways England so as to assist the Examining Authority and the Secretary of State.

4.11.2. HBMCE will continue to engage with Highways England on the concerns covered in our Written Representation in our role as a statutory consultee, and as part of the Heritage Monitoring and Advisory Group (HMAG) (and by extension the Scientific Committee), seeking to agree matters on a topic-based approach as the Examination progresses. We will also continue to progress discussions regarding the content of a Statement of Common Ground (SoCG) which is in the process of being compiled by Highways England on behalf of both parties to assist the Examining Authority in understanding the extent of agreement and disagreement on facts and of opinions between the parties.

4.11.3. HBMCE will provide updates on its position as the Examination Period proceeds and in light of any further information that it may receive from the Applicant during the Examination Period.

5. THE SIGNIFICANCE OF THE SALISBURY PLAIN LANDSCAPE AS THE SETTING OF THE DESIGNATED HERITAGE ASSETS AFFECTED BY THE SCHEME (INCLUDING THE SAAS WHS)

5.1. INTRODUCTION

5.1.1. The following section provides an overview of the significance and international importance of the Salisbury Plain, the SAAS WHS and its surrounding landscape. It is the purpose of the Environmental Statement (ES) produced by Highways England to provide a comprehensive review in this regard. HBMCE's contribution is to provide at this stage an overarching assessment of how certain elements of character, significance and sense of place that we consider are essential in understanding the importance of the landscape, relate to one another across the extent of the Scheme.

5.1.2. The elements of character and significance on which we have focused are:

- the changing nature of land use and its influence on the character of the landscape;
- the implications of the relationship between the human and natural environment and their interaction; and
- the history of continuity in human interaction with this landscape including the range, breadth and density of remains of that interaction that preserve the story of that relationship.

5.1.3. This focus accords with the approach taken in the NPSNN which indicates that the historic environment includes all aspects of the environment resulting from the *interaction* between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged [NPSNN 5.121].

- 5.1.4.** The unique significance of the SAAS WHS, as well as its international importance, means that it retains strong connections with communities both here and abroad. For this reason its 'sense of place' is also an important consideration in understanding this landscape.
- 5.1.5.** Again this reflects the acknowledgement in the NPSNN that 'heritage assets' (whether in the form of buildings, monuments, sites, places, areas or landscapes), hold value to this and future generations because of their historic, archaeological, architectural or artistic interest [NPSNN 5.122].
- 5.1.6.** Significance is defined in the NPSNN as the *sum* of the heritage interests that a heritage asset holds, and it is acknowledged that significance derives not only from a heritage asset's physical presence, but also from its setting [NPSNN 5.122], the surroundings in which it is experienced, which may change as the asset and its surroundings evolve and which may make a positive, negative or neutral contribution to its significance, may affect the ability to appreciate that significance [NPSNN fn. 96].
- 5.1.7.** These principles of understanding in relation to setting inform an assessment of the effect of the existing A303 and focus attention on how the significance of the SAAS WHS landscape can best be appreciated, in line with international obligations to protect, conserve, present and transmit to future generations the values of cultural heritage through the SAAS WHS.
- 5.1.8.** The significance of the SAAS WHS is summarised in the Statement of Outstanding Universal Value (SOUV) adopted by the UNESCO World Heritage Committee in June 2013 (discussed in ES 6.3 Appendix 6.1; APP-195) and the text of this document is drawn upon throughout the following section.

5.1.9. In addition we have adhered to the philosophy of understanding significance and heritage value as set out in HBMCE's Conservation Principles (HBMCE 2008). Reference to corresponding 'interests' is intended to provide correspondence to the relevant sections of the NPSNN.

5.2. SAAS WHS LAND FORM AND USE

5.2.1. Formed during the Cretaceous Period the Salisbury Plain in which the SAAS WHS property lies is an extensive and open, gently rolling chalk downland characterised by calcareous grassland, the largest such remaining area in north west Europe.

5.2.2. The Plain is thought to have been gradually cleared of woodland for increased farming and grazing from the Neolithic period onwards, with major clearances in the Iron Age and Roman periods. The pattern of trees and woodland that exists today largely represents the planting of copses and shelterbelts associated with the 18th and 19th century estates with earlier and more substantial areas of woodland confined mainly to valleys and steep slopes.

5.2.3. Erosion by rivers has left the area with a pattern of river valleys, all of which rise within the Plain with the exception of the Avon. The Avon itself is a key landscape feature in the eastern half of the Plain which relates in different ways to the changing historic landscape. In addition, a series of winterbournes, such as the Till, flow over the Chalk after prolonged rainfall.

5.2.4. Outside the Salisbury Plain Training Estate, which covers about half the Plain, the main land use today is arable farming with intensification of agricultural cultivation in the latter part of the 20th century threatening the survival of archaeological remains and the loss of pasture. However, increased reversion in the early 21st century, particularly within the World Heritage Site, has contributed to sensitive enhancement of its character

and appearance as well as that of its setting.

5.2.5. As the largest military training area in the United Kingdom, a further dominant land use characteristic of Salisbury Plain is associated with its military tracks, impact areas, airfields and structures, remains of practice trenches from both World Wars, and military camps around its edge (including Larkhill). The intensive military use has become synonymous with the Plain since the late 19th century and, through restricting arable cultivation, has made a significant contribution to the preservation of its archaeological remains. Largely as a result of the establishment of the Training Estate, the Plain is also sparsely populated.

5.3. HISTORIC CHARACTER AND CONTINUITY OF USE

5.3.1. The character of the Salisbury Plain has been heavily influenced by the result of the action and interaction of natural and human factors¹⁸. It forms the natural setting for a rich prehistoric landscape which is one of the best preserved archaeological landscapes in western Europe.

5.3.2. The diversity of evidence for human activity illustrates the changing relationships of communities with the natural landscape across the periods of its use. That use of the landscape spanning across the periods of human intervention influences its character today, with its layers of varied history imposed on and to a great extent respecting, or at least recognising, the distribution of earlier phases of activity.

5.3.3. Whilst the SAAS WHS inscription (**Appendix 2** hereto) reflects a particular focus of activity during the Neolithic and Bronze Age due to the

¹⁸ "Landscape" means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors (European Landscape Convention Article 1) Council of Europe, 2000: <https://www.coe.int/en/web/conventions/full-list/-/conventions/rms/0900001680080621>

preponderance of preservation of features of these periods, the overall evidential value of the wider landscape is not restricted to this timescale.

5.3.4. A key element of the evidential value of the Plain is derived from its continuity of use, organisation and land division by successive communities and cultures, reflecting the persistence of an appreciation of the value of this natural landscape to prehistoric and later communities both before and after the construction of Stonehenge.

Palaeolithic (1,000 000 to 10,000 BC) ¹⁹

5.3.5. Evidence from the Palaeolithic is scarce in the SAAS WHS and surrounding landscape, usually characterised by isolated findspots of hand tools. The river valleys, particularly at points of confluence, may yield more substantial evidence if their deposits sequences were to be investigated, but as yet the SAAS WHS landscape holds unrealised potential for understanding the extent of activity during this early period.

5.3.6. At Longbarrow Junction, Primary loess deposits were identified during the evaluation²⁰. These deposits can be associated with Palaeolithic archaeology and palaeoenvironmental datasets.

Mesolithic (10,000 to 4,000 BC)

5.3.7. The earliest structures known in the immediate area surrounding the Stonehenge monument are a small number of pits identified in the 1960s during construction of the visitors' car park. Three of these appear to have supported large wooden posts and have been dated to the Mesolithic period, between 8500 and 7000 BC. Whilst their relationship with the later structures is not yet understood, in the context of other finds and the nearby site of Blick Mead they demonstrate more widespread

¹⁹ All time periods are defined in relation to HBMCE's Periods List published by the Forum on Information Standards in Heritage (FISH): <http://www.heritage-standards.org.uk/chronology/>.

²⁰ Stage 4 – Ploughzone Artefact Collection and Trial Trench Evaluation

activity across this landscape during this period.

5.3.8. The majority of recorded evidence of Mesolithic activity, from within the SAAS WHS and its surroundings, has to date been derived from the areas in the east, possibly reflecting a connection between activity in this period and the River Avon. Several sites with potential for Mesolithic remains have been identified below later alluvial and colluvial sequences. One such site is Blick Mead.

Blick Mead

5.3.9. Blick Mead is a Mesolithic site²¹ located adjacent to the southern edge of the Order limits west of Amesbury, within Amesbury Park and close to the scheduled monument known as Vespasian's Camp. Preserved within it is a large lithic assemblage and organic preservation, including a nationally significant assemblage of aurochs bone including evidence for butchery. Such a site has the potential to preserve significant evidence of Mesolithic occupation and activity. Initial assessments suggest that there is evidence for Mesolithic and later Neolithic activity within the site, which is in itself significant, and a greater understanding of this significance will be developed through full analysis of the artefact assemblage²². As excavation is on-going, clarification of the site taphonomy throughout this process will develop our understanding of the full significance of the site, artefacts and ecofacts within their stratigraphic setting and wider landscape setting.²³

5.3.10. There is some limited evidence for activity that might provide a background for understanding whether there was demographic continuity between communities of the Mesolithic with later periods or not. The presence of earlier sites, potentially also with the level of woodland

²¹ Simmonds and Thomas, 2015, 53

²² D.Jacques, T. Phillips, and T. Lyons, 2018. Blick Mead. Exploring the 'First Place' in the Stonehenge Landscape, Studies in the British Mesolithic, Volume 1; Peter Lang, Oxford.

²³ Jacques et al, 2018.

clearance already undertaken across this landscape, may provide an indication of an influence on its selection as the site for later, further, monumentalisation, such as at Stonehenge itself.

Neolithic (4,000 to 2,200 BC) and Bronze Age (2,600 to 700 BC)

5.3.11. The association of the emergence of monumental structures, both megalithic (e.g. Stonehenge with its stone settings) and non-megalithic (e.g. Silbury Hill, a Neolithic monumental mound in the Avebury element of the SAAS WHS), with the spread of Neolithic practices is recognised across northern Europe even if the reasons for that are not properly understood. The term monumental refers to the scale of building activity and the size of the structures created in relation to the scale of all other broadly contemporaneous human activity. This evolution coincides with the development of social organisation and cultural complexity, in particular associated with burial activity.

5.3.12. Long barrows (rectangular or trapezoidal earthen mounds of Neolithic date, usually accompanied by flanking or encircling ditches and normally associated with human remains²⁴) are amongst the earliest representations of this social development. There are seven scheduled and at least 2 non-scheduled examples are located within the SAAS WHS²⁵, A further major focus of early activity was at the causewayed enclosure known as Robin Hood's Ball (SM 10120; NHLE 1009593)²⁶. Located to the north of the SAAS WHS boundary at the head of the dry valley of the former Avon tributary now known as Stonehenge Bottom, it also occupies an elevated and prominent position. The Greater Cursus (SM 10324; NHLE 1009132) remains variously interpreted but recent theories have linked it to recognition of astronomical alignments or a

²⁴ All definitions are supplied from HBMCE's Monument Type Thesaurus published by the Forum on Information Standards in Heritage (FISH): http://www.heritage-standards.org.uk/wp-content/uploads/2019/03/Mon_alpha.pdf (hereafter FISH 2019).

²⁵ All scheduled monument descriptions and locations from within the SAAS WHS can be found at **Appendix 4** hereto.

²⁶ All designated and non-designated heritage assets referred to in the text (both within and outside the SAAS WHS) listed at **Appendix 22** hereto.

desire to demarcate or create a barrier between zones of the landscape. The positioning, orientation and function of all these monuments in relation to land form and features demonstrates the close inter-relationship between the human and natural landscape and an increasing ability to impose upon it. Whilst a spatial reference to the landscape has not been interpreted for the positioning of all monuments in the SAAS WHS (e.g. the lesser cursus (SM 10353; NHLE 1010901)), in many cases they become a focus in the landscape in and of themselves, drawing activity to these locations. For many subsequent centuries in the Bronze Age this landscape was returned to as a focus, as the dense distribution of barrows and barrow cemeteries demonstrates, sometimes clustering around or respecting the positioning of earlier monuments.

5.3.13. The SAAS 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. The first Early Neolithic long barrows were constructed many centuries before work commenced on Stonehenge.

Late Neolithic (2,900 to 2,200 BC) & Early (2,600 to 1,600 BC) to Late Bronze Age (1,600 to 700 BC)

5.3.14. The Stonehenge element of the SAAS WHS is located in the southern half of the Plain and forms one half of the larger world heritage ‘property’ inscribed by UNESCO on the World Heritage List in 1986 as the “Stonehenge, Avebury and Associated Sites WHS”²⁷ (see **Appendix 2** hereto).

5.3.15. The Stonehenge element of the serial SAAS WHS comprises an area of chalkland within which complexes of Neolithic and Bronze Age ceremonial and funerary monuments and associated sites were built. This exceptional survival of prehistoric monuments and sites includes

²⁷ <https://whc.unesco.org/en/list/373>

settlements, burial mounds called barrows (artificial mounds of earth, turf and/or stone, normally constructed to contain or conceal burials and sometimes forming cemeteries as clusters of closely spaced barrows and related monuments²⁸), and large constructions of earth and stone. Overall around 2000 years of continuous use and monument building between c. 3700 and 1600 BC is demonstrated. Indeed the Stonehenge monument itself represents around twelve hundred years of activity, change and development at the hands of successive generations of communities.

5.3.16. The SAAS WHS is acknowledged to be internationally important for its complexes of these outstanding prehistoric monuments. Each complex contains a focal stone circle and henge and many other major monuments. At Stonehenge these include the Avenue (part of SM 10390; NHLE 1010140), the Cursuses (SM 10324; NHLE 1009132 and SM 10351; NHLE 1010901), Durrington Walls, Woodhenge (SM 10365; NHLE 1009133, and the densest concentration of burial mounds in Britain. The henge at Stonehenge is only one of several scheduled henges in the Plain constructed during this period, including those at Woodhenge and Durrington Walls (SM 10365; NHLE 1009133), that south of Stonehenge Cottages (SM 10323; NHLE 1012376), that south of Longbarrow Cross roads east of the A360 (SM 10482; NHLE 1021349), and the hengi-form monument in Fargo Plantation (SM 10363; NHLE 1012402). Other non-scheduled henges have been identified by researchers of the SAAS WHS landscape.

5.3.17. The unparalleled density of distribution of burial activity within the current boundaries of the Stonehenge element of the SAAS WHS acknowledged to be of national importance comprises a total of 175 separate scheduled monuments (**Appendices 3 and 4** hereto). These were assessed in 2015 in the Management Plan as representing

²⁸ FISH 2019.

something in the region of 415 individual prehistoric items or features from a total of over 700 recorded within the Stonehenge element of the SAAS WHS²⁹.

5.3.18. These complexes would have been of major significance to those who created them, as is apparent by the huge investment of time and effort they represent. They provide an insight into the mortuary and ceremonial practices of the period, and are evidence of prehistoric technology, architecture and astronomy. Together with interrelated monuments and their associated landscapes, they provide an exceptional insight into the funerary and ceremonial practices in Britain in the Neolithic and Bronze Age. A profound understanding of the changing mortuary culture of the periods is provided by the use of Stonehenge as a cremation cemetery, and by the hundreds of other burial sites illustrating evolving funerary rites. Today they form landscapes without parallel and represent a unique embodiment of our collective heritage.

5.3.19. The Stonehenge monument (SM 10390; NHLE 1010140) is pre-eminent in the surrounding natural landscape. As a key element in the wider countryside the Stonehenge monument itself forms a clear focus within, and relates to, the SAAS WHS *landscape*. Since Neolithic movement relied on knowledge of the landscape and so its form and points of reference within it, the significance and importance that Stonehenge would have commanded is clear. Together with the Avebury element of the SAAS WHS, it is one of only a small number of areas in southern England which appear to have acted as *foci* for ceremonial and ritual activity during the Neolithic and Bronze Age periods.

Iron Age (800 BC to 43 AD) to Romano-British Period (43 – 410AD)

5.3.20. The relationship between the Iron Age hill forts at Yarnbury Castle (WI 116; NHLE 1005689) and Vespasian's Camp (SM 10360;

²⁹ Simmonds & Thomas, 2015, 18.

NHLE 1012126) and the surrounding landscape is demonstrated by their selection of prominent topographical locations. Yarnbury Castle, the large multivallate hillfort, sits on the summit of a prominent hill overlooking two dry valleys and the distant River Wylde to the west of the SAAS WHS whilst Vespasian's Camp is situated on a prominent spur immediately west of the River Avon at Amesbury within the SAAS WHS. These sites evidence the changing nature of the use of the landscape and the range of activities within it. Yarnbury Castle represents a centre of permanent occupation and both sites are defended places, but with many other purposes in Iron Age society. Excavations have demonstrated that activity and occupation continued here into the Romano-British period with adaptive re-use, again evidencing continuity of use even as its nature changed.

5.3.21. Romano-British settlement in this landscape for the most part is spatially related to Iron Age settlement, as at Durrington Walls and Parsonage Down and focused on the lower lying river valleys. In general these two periods can be considered together and is evidenced across the Plain through enclosures, linear features, pits and settlement and field systems. The well preserved scheduled remains of the Parsonage Down Camp earthwork enclosure and associated field system (SM 10231; NHLE 1009646) illustrate this likely continuity of pastoral activity between the Iron Age and Romano-British landscape. Similarly the presence of Iron Age and Romano-British settlements in and around Durrington Walls (SM 10365; NHLE 1009133) provides evidence for its continued use beyond the period of its primarily ceremonial function.

5.3.22. In some areas Iron Age and Romano-British activity overlies and sits within older funerary and ceremonial landscapes. In this respect the location of a scheduled barrow lying in-between Yarnbury Camp and Parsonage Down is notable (WI 395; NHLE 1005614).

5.3.23. The Romano-British settlement on Winterbourne Stoke Down located north-west of Longbarrow Junction on the south facing slopes of

the down is a scheduled monument (SM 28943; NHLE 1015222). Romano-British villages surviving as earthworks are rare nationally, making the survival of substantial earthwork remains of house platforms and lynchets (banks formed at the end of fields by soil which, loosened by the plough, gradually moves down slope through a combination of gravity and erosion)³⁰ here particularly important.

Early Medieval (410 to 1066) and Medieval (1066 to 1540)

5.3.24. Early to Middle Saxon settlement with sunken feature buildings has been recorded at Countess East at the east end of the Scheme. The association of intrusive Saxon burials with earlier burial mounds is not an unusual occurrence in this period. Examples of this practice have been identified outside the SAAS WHS in the Winterbourne Stoke barrow cemetery (SM 28921; NHLE 1015019) as well as at the cluster of features known as the Lake Barrow group (SM 10300; NHLE 1010863).

5.3.25. Amesbury Abbey was a key feature in the medieval landscape. Founded in the 10th century as a Benedictine monastery for women, it was dissolved in the 12th century and incorporated into the subsequent priory. At the Dissolution, the latter held its own site, mills, meadows, pasture, agricultural land, parkland, and various properties in the town of Amesbury.

5.3.26. Saxon settlements such as that at Winterbourne Stoke, its Grade II* listed medieval Church of St Peter (NHLE 1130975) standing at its core, form the main settlements in the medieval landscape of Stonehenge. The rural settlement pattern that persists today lay around the edge of what is now the Stonehenge element of the SAAS WHS, focused on the river valleys. Evidence of the agricultural production that supported these settlements in the surrounding landscape ties them together.

³⁰ FISH 2019.

Post Medieval (1540 to 1901)

- 5.3.27.** In the 16th century, the Crown granted the estate of the Amesbury priory manor to private hands and this saw the manor replaced with a new house. The surrounding landscape was ornamentalised with gatehouses and a tower, and the precincts of the former priory, which were enclosed by the River Avon and a wall, was laid out as a park. The principal building in this landscape has seen significant change and rebuilding and now stands as the 19th century house called Amesbury Abbey.
- 5.3.28.** Countess Farm, beside the road leading south to Amesbury on the west bank of the Avon, is likely to be on the site of Countess Court, added to the manor at Amesbury in the 16th century. Now divorced from Amesbury by the diversion of the A303 which was constructed in the 1960s rerouting it immediately to the north of the town, it nonetheless illustrates this former spatial and historic relationship as does the parkland character to the north of the road.
- 5.3.29.** The parkland character associated with the lands of Amesbury Abbey's estate remains visible in the Stonehenge landscape. Vespasian's Camp was recognised as a prominent feature in its landscape design and incorporated by being laid out with formal rides and avenues. A new approach to the Abbey was created in the first quarter of the 18th century including the planting of a formal ride, later called Lord's Walk. The park was extended west of the River Avon after 1735 and also enlarged to the north and west in the later 18th century. This included the planting of the so-called Nile Clumps (referencing the ships involved in the Battle of the Nile) beyond the area registered as a Grade II* park and garden, overlaying the prehistoric landscape east of Stonehenge.
- 5.3.30.** The introduction of turnpikes (toll roads) maintained with the proceeds of levying tolls in the 18th and 19th centuries was responsible for

bringing many more visitors to Stonehenge. Former turnpike roads with their associated milestones are still in use in the landscape today as modern roads and byways.

20th Century

5.3.31. The owners of Amesbury Abbey also have a historic ownership connection with the monument and land at Stonehenge as it had formed part of that estate since its medieval origins and had been in the ownership of the Antrobus family since the early 19th century. When the heir to the estate was killed during World War I the estate was divided up and Stonehenge was sold in 1915 to Sir Cecil Chubb who gifted it to the nation in 1918.

5.3.32. The A303 Amesbury Bypass was constructed in 1968 including the roundabout and dual carriageway beside Amesbury Abbey and Park now known as Countess Roundabout which severed its connection with Countess Farm to the north.

5.4. UNDERSTANDING THE EVIDENCE PRESERVED IN THE LANDSCAPE

5.4.1. As a result of its association with the monuments within it the Salisbury Plain holds exceptionally rich potential to yield evidence of past human activity in the form of archaeological and architectural interest both above and below ground, bearing a unique testimony to a cultural tradition which has disappeared. Consequently it has a long tradition of both archaeological and historical research (ES 6.3 Appendix 6.1, Annexes 4 and 6 (APP-199 and 201) and Appendix 6.10 (APP-291)).

5.4.2. Archaeological research continues to reveal new evidential information and develop understanding about the evolution of activity on the Plain, the associations between monuments in the surrounding landscape, and the role in particular of Stonehenge in the evolution of Neolithic and Bronze Age Britain. Stonehenge is one of the most studied but

persistently enigmatic monuments in the world, and this enigmatic quality contributes to the sense of mystery that it commands.

5.4.3. The careful siting of monuments in relation to the landscape helps us to further understand the Neolithic and Bronze Age³¹. The spatial relationships between monuments linked historically, physically and functionally demonstrate a structured and planned, designed approach to the landscape of aesthetic value and architectural interest. The Stonehenge monument itself is acknowledged to be the most architecturally sophisticated prehistoric stone circle in the world.

5.4.4. The design, position and interrelationship of the monuments and sites are evidence in themselves of a wealthy and highly organised prehistoric society able to impose its concepts on the environment. An outstanding example is the alignment of the Stonehenge Avenue (probably a processional route) and Stonehenge stone circle on the axis of the midsummer sunrise and midwinter sunset, indicating their ceremonial and astronomical character. This continues to provoke debate on the role of the monument and the nature of the ceremonies with which it was associated.

5.4.5. Theories regarding the symbolic value of the Stonehenge circle and its associated monuments and landscape abound. Principal amongst these is the interpretation of its astronomical significance with the principal axis (marked by the Avenue and the horseshoe of Trilithons) aligned with sunrise on the Summer Solstice and sunset on the Winter Solstice.

³¹ Quote from Roberts et al 2018: "The landscape setting of long barrows has long been acknowledged to be of importance [...] localised topography [is] key to the alignment of long barrows, rather than cosmological alignments. Work at WS71 [one of the Diamond Group long barrows investigated for the proposed scheme and by Historic England] and more widely by Exon et al. (2000) suggests that inter-monumental views were also important, and the cluster of long barrows around the head of the dry valley between Wilsford and Normanton Downs may suggest an early significance to this area".

5.4.6. The Stonehenge Plain as perceived and utilised by historic human communities was a kinetic landscape. The structured use and planned approach to the location of the monuments within it, most notably Stonehenge via the Avenue, demonstrates the importance of moving through the landscape as part of its experience. The physical link between The Avenue and the River Avon also indicates how part of this journey would have been made and contributes to the sense of approach that this would have generated.

5.4.7. It remains true today that the experience of Stonehenge for many people is also kinetic as they drive along the existing A303.

5.5. THE SENSE OF PLACE

5.5.1. The aesthetic draw of the monumentalised, symbolic and mysterious landscape has resulted in an unwavering influence on architects, artists, historians and archaeologists alike. Since the 12th century when Stonehenge was considered one of the wonders of the world by the chroniclers Henry de Huntington and Geoffrey de Monmouth, the Stonehenge and Avebury Sites have excited curiosity and been the subject of study and speculation (ES 6.3 Appendix 6.1 Annexes 6- 8 (APP-201-203)).

5.5.2. With a strong sense of remoteness and openness together with an expansive sky the Salisbury Plain is for the most part a tranquil landscape, notwithstanding the intrusion of the modern A303 (which this scheme seeks to address), military training areas and other infrastructure. A recent positive development was the restoration of the landscape setting to Stonehenge through the stopping up of the A344 next to the Stonehenge monument itself, and the restriction of traffic from that point to Airman's Corner to the west. This has helped enhance the sensory experience and value of the landscape, restoring something of the peace and tranquillity of its historic character.

- 5.5.3.** This tranquillity is integral to its sensitivity today as a commemorative and ritually significant landscape, not only for those historic communities who buried their dead within it but also contributing to its communal value for those in today's communities who derive a spiritual or religious connection from the site and what it represents.
- 5.5.4.** Monuments from these periods demonstrate considerable evidence for communal activity starting with the process of their construction and continuing to their main function for communal burial practice, as well as the gathering of people and communities at these sites thereafter to participate in shared commemoration.
- 5.5.5.** As a major tourist destination the Plain also holds today a new communal value for the millions of visitors each year who gain access through the land managed by the English Heritage Trust and the National Trust to the unique experience of the only surviving lintelled stone circle in the world. This is not a modern phenomenon; Stonehenge has been a major destination since the late 17th century for antiquarians, historians, authors and artists.
- 5.5.6.** However it is also a place of residence and local community for the settlements in and around the Plain and the farmsteads within which its monuments are located.
- 5.5.7.** Stonehenge and the Salisbury Plain together have a *strong* sense of place and history, contributing to its communal value overall. As an iconic monument both nationally and internationally, the henge is instantly recognisable, a globally famous and iconic monument and enduring symbol of man's prehistoric past. The Stonehenge monument and its WHS landscape is an internationally recognised symbol of Britain and its international significance cannot be overemphasised as one of the best-known and best-loved monuments in the world.

5.6. SALISBURY PLAIN AND THE SETTINGS OF DESIGNATED HERITAGE ASSETS

5.6.1. Moving wider than the SAAS WHS, Salisbury Plain, as the setting of the monuments, buildings, and landscapes within the SAAS WHS encapsulates their complex and evolving relationships with their surrounding natural and human landscape. This incorporates both those elements of the historic environment which would be considered to be broadly contemporaneous (in line with the Attributes of the SAAS WHS), and those which illustrate the development of settlement history and human activity across broader timescales.

5.6.2. The western and northern boundaries of the Stonehenge element of the SAAS WHS are formed by modern infrastructure features. In the east it largely follows the River Avon and extant field and parish boundaries in the south. As a result the definition of the boundary does not always respond directly to the extent of the Neolithic and Bronze Age activity and distribution of monuments that the WHS celebrates or the natural landscape with which it was connected.

5.6.3. Consequently, some monuments and landscape features that contribute positively to the significance of the World Heritage Site and its OUV lie outside its boundary. These include the causewayed enclosure of Robin Hood's Ball and the long barrows in this general area north and west of the WHS³². These early Neolithic monuments were named in the UK Government's nomination documentation in 1985 and are part of the development of the Stonehenge area into a locality of exceptional significance in the later Neolithic and Bronze Ages. Understanding the establishment of the tradition in the use of the landscape in this way helps us understand the later development of the area. For this reason in order to understand the significance contributed by the setting of

³² Stonehenge World Heritage Site Management Plan Consultation Draft, 2008 Section 3.3.18

Stonehenge it is important to draw on the information from across the Plain, not just within the defined boundaries of the WHS.

5.7. OUTSTANDING UNIVERSAL VALUE AND ATTRIBUTES

5.7.1. The effect of the Scheme on the outstanding universal values of the SAAS WHS lies at the heart of the assessment of the Application. The SAAS WHS inscription includes a plan that delineates the boundary of the SAAS WHS property and explains the Outstanding Universal Value (OUV) of the SAAS WHS. The concept of OUV is a foundation of the World Heritage Convention and provides the basis for the “identification, protection, conservation, presentation and transmission to future generations” of World Heritage Sites as set out in Article 4 of the 1972 Convention. Understanding OUV, therefore, is central to the consideration of any proposed developments that have the potential to impact on it. Features outside of the property boundary can also support the OUV of the SAAS WHS (see 5.6.3 above).

5.7.2. The term ‘Outstanding Universal Value’ is used in the text of the World Heritage Convention in defining various types of cultural and natural heritage set out in Articles 1 and 2. There is little further elaboration in the Convention text and added clarity is provided in the *Operational Guidelines for the Implementation of the World Heritage Convention (WHC.17/01)*. The concept of OUV has evolved and been incorporated in the *Guidelines*, which have been regularly revised since 1977; the current version was published in 2017³³.

5.7.3. OUV is comprised of three “pillars”:

- Meeting the criteria (WHC.17/01 para, 77);
- Authenticity and Integrity (WHC.17/01 para. 79-95); and

³³ Download from <http://whc.unesco.org/en/guidelines/>

- Protection and Management (WHC.17/01 para. 96-119).

5.7.4. While meeting the criteria and authenticity and integrity together comprise what the National Planning Policy Framework in England refers to as significance, the inclusion of protection and management within the concept of OUV provides a different rationale for inscribing WHSs than the use of significance as the basis for listing and scheduling in England. Whereas listing and scheduling provide the legal *means* of protection and management, the World Heritage Committee regards protection and management as an integral part of OUV itself. A property that has an inadequate management and protection regime does not have OUV and cannot be a WHS. The Committee and advisory bodies also take the view that if the protection and management pillar is failing, the property concerned will have lost its OUV, even if it still meets the criteria and retains authenticity and integrity.

5.7.5. In 2007 it was agreed that every WHS should have a Statement of Outstanding Universal Value (SOUV) setting out clearly in summary form how individual properties satisfy the requirements of the three pillars. For properties already inscribed on the List of World Heritage at the time, every State Party to the Convention was invited to prepare and submit retrospective SsOUV for endorsement by the World Heritage Committee.

5.7.6. The retrospective SOUV for the SAAS WHS was submitted by DCMS to the World Heritage Centre and adopted by the Committee in 2013³⁴.

5.7.7. The SOUV illustrates how the property meets:

- criterion (i) represent a masterpiece of human creative genius;
- criterion (ii) exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in

³⁴ <http://whc.unesco.org/en/list/373>

architecture or technology, monumental arts, town-planning or landscape design; and

- criterion (iii) bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.

It also sets out the conditions of authenticity and integrity and the provisions for protection and management. In the latter it is of note in the present context of the Scheme proposing new highway infrastructure that the SOUV says:

“the A303 continues to have a negative impact on the setting of Stonehenge, the integrity of the property and visitor access to some parts of the wider landscape”.

5.7.8. Since the establishment of SOUVs the thinking on the part of the Advisory Bodies to the World Heritage Committee (ICOMOS for cultural heritage, IUCN for natural heritage and ICCROM for specialist conservation) has developed further to promote the concept of attributes of OUV. Attributes are aspects of a property which are associated with or express OUV. They relate to the authenticity of a WHS and satisfy this requirement if they “truthfully and credibly” (WHC.17/01, para. 82) convey the OUV of the property. Attributes can be tangible or intangible and embrace such factors as:

- form and design;
- materials and substance;
- use and function;
- traditions, techniques and management systems;
- location and setting;
- language, and other forms of intangible heritage;
- spirit and feeling; and
- other internal and external factors.

More detail concerning attributes lies in the Preparing World Heritage Site Nominations Resource Manual³⁵ .

5.7.9. The attributes set out below were first set out in the Stonehenge Management Plan 2009 but now apply across the SAAS WHS. They are derived from the Statement of Significance agreed by the World Heritage Committee in 2008 and therefore ultimately from the original nomination documentation and the ICOMOS evaluation dating to 1985. The same attributes were agreed in the 2015 WHS Management Plan as:

1. Stonehenge itself as a globally famous and iconic monument;
2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites;
3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape;
4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy;
5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other;
6. The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel; and
7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.

5.7.10. While some of these attributes are intangible (1 and 7), the SOUV and the other 5 attributes clearly set out the physical expression on the ground of the defined values. The Convention is property based and WHSs will not be inscribed on the World Heritage List unless OUV is clearly expressed physically on the ground. The values of a property can

³⁵ Second edition 2011 - <http://whc.unesco.org/en/resourcemanuals/> pages 59-67

therefore be affected by changes in land management.

6. ASSESSMENT OF THE SCHEME

6.1. HBMCE's approach to the assessment of the Scheme is set out in the Scope of our Written Representations above (Section 3).

6.2. The Scheme is set out in the current terms of the d1DCO text. The Applicant has submitted an Environmental Statement (ES) as part of the Environmental Impact Assessment (EIA) process that seeks to assess the d1DCO Scheme. The ES is supported by a Heritage Impact Assessment (HIA) as is required by the 2011 ICOMOS Guidance on Heritage Impact Assessment for Cultural World Heritage Properties (6.3 Appendix 6.1 (APP-195) including Annexes 2-7 and Figures 1-19; see 6.9.2 below). The ES is also supported by a Cultural Heritage Settings Assessment (6.3 Appendix 6.9 (APP-218)), whose methodology follows HBMCE published guidance (GPA3 2017) and hence the NPSNN. However, as the overarching methodology is drawn from Design Manual for Roads and Bridges (DMRB), embedded inconsistencies in assessment outputs appear in the intersection between the HIA and Settings Assessment and their combination through the production of Chapter 6 of the ES.

6.3. HBMCE has assessed the ES and associated appendices in relation to the requirements of the NPSNN (NPSNN 4.15) to describe the likely significant effects of the proposed Scheme on the historic environment and the measures envisaged for avoiding or mitigating significant adverse effects. We have also assessed the HIA in relation to how it addresses the 2011 ICOMOS Guidance. Our comments on these assessments and their integration through compilation of Chapter 6 of the ES, including any areas where we disagree with the assessment submitted are detailed in our Written Representations below.

6.4. As outlined in Section 5 above (5.1.1), HBMCE will not present a detailed assessment of the Scheme on the full range of individual designated heritage assets.

6.5. Our advice at this time, therefore, focuses on discussing the key matters, previously raised in our Relevant Representations, that we consider require particular attention during the Examination and where additional detail is required to properly assess the impacts and effects of the Scheme in the d1DCO.

6.6. HBMCE has made an assessment of the types of effect on the historic environment arising from the Scheme in relation to significance (including from that contribution made by an asset's setting) and OUV as follows:

- The effect of the Scheme on the attributes of OUV of the WHS (both within and beyond its boundary) (Section 6.9);
- The effect of the Scheme on the Authenticity and Integrity of the WHS;
- The effect of the Scheme on the significance of those designated heritage assets which, due to their date, are not considered to contribute to the OUV of the WHS (Section 6.10).

6.7. We have taken account of our assessment of the significance of the Salisbury Plain landscape as outlined in Section 5. In summary we have articulated that significance in terms of the continuity and connectivity in the Salisbury Plain and more specifically the landscape around Stonehenge as illustrated through:

- Consideration of the changing nature of land use and its influence on the character of the landscape;
- The implications of the relationship between the human and natural environment and their interaction; and
- The history of continuity in human interaction with the landscape, including the range, breadth and density of archaeological remains that preserve the story of that interaction and relationship.

6.8. On this basis we have outlined the areas of continuing unresolved concern that relate to the issues outlined in our Relevant Representations (Section 5) and which in our opinion need to be addressed during the Examination.

6.9. ASSESSMENT OF THE EFFECT OF THE SCHEME ON THE ATTRIBUTES OF OUTSTANDING UNIVERSAL VALUE OF THE STONEHENGE WHS, AND ON DESIGNATED HERITAGE ASSETS NOT ASSOCIATED WITH THE OUTSTANDING UNIVERSAL VALUE OF THE WHS

6.9.1. The protection of OUV as expressed through its Attributes (Section 5.7), together with the Authenticity and Integrity of the WHS are key considerations in assessing the effect of proposals within the WHS or its setting.

6.9.2. When considering potential impacts on OUV the World Heritage Committee has requested States Parties to undertake Heritage Impact Assessments (HIA) in line with IUCN or ICOMOS guidance depending on whether the WHS is natural or cultural. The 2011 ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties is the current guidance that should be applied to cultural WHSs. The starting point of such assessments is to explore options which would avoid harm to OUV. If this is not possible then mitigation based on a full understanding of the impacts on attributes singly and collectively is needed. Where this does not remove harm entirely the guidance says at 2-1-5 that *“ultimately, however, it may be necessary to balance the public benefit of the proposed change against the harm to the place”*. Public benefit can include heritage as well as wider social and economic benefits. The EIA process also works on the basis of mitigating harm if it cannot be avoided.

6.9.3. The condition of the property at the time of inscription together with the SOUV provides the baseline against which the effects of change (positive and negative) can be assessed.

6.9.4. Attributes express OUV singly as well as collectively. The principle that harm to one part is harm to the whole is one of the reasons why it is

particularly important to minimise the adverse impacts of any new development on OUV so far as possible³⁶. Assessing change in relation to attributes individually and collectively assists in the detailed understanding of potential or actual impacts and should assist in making well informed management decisions.

- 6.9.5.** Having established that OUV can be harmed we must acknowledge that it can also be enhanced or better revealed. An example of recent positive development was the restoration of the landscape setting to Stonehenge following the stopping up of the A344 next to the Stonehenge monument itself, and the restriction of traffic from that point to Airman's Corner to the west.
- 6.9.6.** The Scheme has potential for a range of different impacts specific to the OUV as it is conveyed through the WHS Attributes. These may have either a positive, negative or neutral effect and can have effect beyond the boundary of the WHS.
- 6.9.7.** The HIA submitted by the Applicant is based on a scoping brief which was determined to be appropriate in terms of its scope and methodology in 2018 by the World Heritage Committee.
- 6.9.8.** It addresses the current condition of the property in relation to assessing the significance of effect and impact of the existing A303 on the WHS Attributes to provide a comparator for its assessment of the significance of effect and impact of the proposed Scheme.
- 6.9.9.** The significance of the historic landscape means that many of the same types of impact read across to all heritage designations and are not specific to the evidence for the Neolithic and Bronze Age – the basis for

³⁶ For example in 2014 the World Heritage Committee was concerned that the impact of a supermarket development in one part of one of ten separate geographical components of the Cornwall and West Devon Mining Landscapes WHS would diminish the OUV of the whole. The place concerned, Hayle, is the only part of the WHS where the attributes of OUV concerned with trading through ports and the manufacture of beam engines are expressed.

the SAAS WHS designation. Consequently, further assessment of designated heritage assets is also required where these do not contribute to expressing the OUV of the WHS.

6.9.10. The ES is therefore supported by a Settings Assessment (ES 6.3 Appendix 6.9) as required by the NPSNN (NPSNN Footnote 96; 5.127) and Steps 2 and 3 of the Good Practice Advice Note produced by HBMCE (GPA3: The Setting of Heritage Assets, 2nd Edition 2017).

6.9.11. GPA3 sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

6.9.12. It sets out a process of understanding setting, and how to articulate its contribution to the significance of heritage assets including but not limited to an appreciation of the contribution of views, with a staged approach to decision taking.

6.10. OVERALL ASSESSMENT OF EFFECT OF AND IMPACT OF THE SCHEME ON THE HISTORIC ENVIRONMENT

6.10.1. The discussion below illustrates the complexity of combining different methodological approaches in the assessment of designated heritage assets. The overarching methodology is drawn from Design Manual for Roads and Bridges (DMRB), and as a result embedded inconsistencies in assessment outputs appear in the intersection between the HIA and Settings Assessment which respectively follow the methodology of 2011 ICOMOS guidance and GPA3. The resulting difficulty for the ES assessment is to combine the results of these two separate assessments whilst ensuring consistency and comparability between their conclusions. HBMCE has highlighted the importance of continuity and connectivity in the landscape as a unifying thread of

significance. We have highlighted some examples of the extents of historic and spatial relationships reaching beyond the boundaries of assessment included within the ES and its supporting documentation (HIA, Settings Assessment) in our Written Representations below.

6.10.2. HBMCE has not, at this time, identified any designated heritage assets that have been scoped out of the assessment in the ES or related appendices which we consider are likely to experience a significant effect resulting from the Scheme. However, the additional information we have requested from Highways England will assist in either identifying other significant effects or confirming that the effects are not considered to be significant and so enabling HBCME to advise the Examining Authority and the Secretary of State on matters of relevance and importance. In particular we consider that this wider appreciation may be necessary to inform identification of the most appropriate mitigation.

6.10.3. The Settings Assessment indicates that its study area contains 115 designated assets including 3 conservation areas, 1 registered park and garden, 2 scheduled monuments classified as buildings (one also listed), 110 listed buildings (97 grade II, 10 grade II* and three grade I) and 14 non-designated historic buildings. These are located within a 2km study zone around the Order limits. This approach has potential to exclude assets from the Settings Assessment that will be affected by the Scheme. It also means that the assessment in the ES will be compiled from a HIA with a broader study area in relation to impacts on OUV than the Settings Assessment in relation to significance more broadly. Since there is correlation between the asset groups used in both assessments this means that the HIA will have been conducted with greater reference to the continuity and connectivity of the landscape than the Settings Assessment, and some assets with potential to be affected by the Scheme will be included in the wider remit of the HIA but not the Settings Assessment. This could potentially create a gap in relevant and important information if the overall synthesis of these individual assessments in Chapter 6 of the ES does not account for the differing

methodologies employed.

6.10.4. Assets at Rolleston, Winterbourne Stoke, West Amesbury, Amesbury Abbey and Amesbury Conservation Area, as well as some outlying areas, have been scoped out of the Setting Assessment (Appendix 6.9, 3.4.4-3.2.16).

6.10.5. HBMCE has commented on the potential effects of the Scheme on some designated heritage assets scoped out of the assessment in the ES where our own assessment indicates that these form part of a series of related assets; where the physical approach to the asset contributes to its significance and the route of that approach falls within the Scheme; or where other assets historically associated with that asset are affected by the Scheme. The ES recognises the potential contribution to significance of such relationships (Section 3.6.1). We therefore do not necessarily agree with the scoping out of all of these assets from the Settings Assessment. For this reason we have commented on the Grade I listed Amesbury Abbey as part of a complex of historically, spatially and functionally associated designated assets. An important part of the setting of this Grade I listed building is its designed and parkland landscape (the Grade II* Registered Park and Garden of Amesbury Abbey), part of which is directly affected by the Scheme. In addition Amesbury Abbey has a historic relationship with the site now known as Countess Farm (Grade II listed), also affected by the Scheme. As a result we consider it more appropriate to assess the impact of the Scheme on this interconnected complex of historic assets rather than just focusing on the Grade II* registered landscape element and the Grade II listed buildings at Countess Farm.

6.10.6. The submitted HIA and Settings Assessment both identify a series of asset groupings (ES Appendix 6.1 pages 10-12; Annex 2.1) and discrete assets (Table 2 page 17; Annexes 3.2 and 3.3) that are considered to convey the Attributes of OUV and assesses the

significance of effect of the existing A303 in comparison with the anticipated impacts and effects of the Scheme on the same groupings (ES Appendix 6.1 Table 1 page 13; Annex 3.1) and individual assets (ref).

6.10.7. Asset Groups are utilised as a means of rationalising the highly complex baseline that relates to the SAAS WHS and its immediate environs. Thirty nine archaeological Asset Groups are defined. Nine of these groups include Neolithic and Early Bronze Age assets that the assessment considers too distant from the WHS to contribute to OUV, but which will nonetheless contribute to its setting and therefore its significance. Fourteen discrete archaeological assets are also assessed individually.

6.10.8. The consideration of related assets as part of groups allows for the potential for differential levels and types of impact on individual components of individual asset groups extending over large areas to be assessed (Appendix 6.9, 2.4.3). In particular, HBMCE welcomes the consideration of associated archaeological remains (**Attribute 2**), inter-visibility (**Attribute 5**), acoustics (**Attribute 6**), and astronomical and astronomical sightlines (**Attribute 4**) (Appendix 6.9, 3.6.5 – 3.6.16) which aligns with the appreciation of the range of elements that can contribute to an asset's setting and hence its significance in our own Good Practice Advice Note 3 (GPA3 2017, for example Step 2 Checklist page 11).

6.10.9. Given the importance of the continuity and connectivity in the landscape, the asset group approach taken in the HIA and Settings Assessment is valuable in focusing assessment on groups of interconnected and related assets to identify where the highest level of impact and significance of effect will be seen across the Scheme in a meaningful way. However at the same it can restrict the assessment and exclude settings impacts between associated groups. For this reason, in addition to the Very Large beneficial effects on Stonehenge (as assessed in Annex 3.1) as a result of the Scheme, it will also experience negative effects as a result of impacts on associated asset groups (**Attribute 5**)

and associated non-designated archaeological remains (**Attribute 2**) contributing to the significance it derives from its setting (**Attribute 6**).

6.10.10. HBMCE considers that the assessment is defined very tightly in relation to the contribution to significance made by broadly contemporaneous archaeological remains, monuments or sites, to the significance of an individual asset and the identification of Asset Groups in the wider landscape. In reviewing, for example, the assessment of designated Asset Groups AG01 (Yarnbury Camp and Parsonage Down Camp) and non-designated AG02 (Scotland Lodge), whilst appreciating that relationship exists, the Settings Assessment does not explore this in detail. The assessment does not consider the impact of separating these two broadly contemporaneous asset groups by rerouting the A303 between them. Therefore, whilst the impact on AG02 as a site in isolation is assessed as slight beneficial due to the reversal of the severance of the northern and southern parts of the settlement by the existing A303, the slight negative impact of disassociation from other contemporaneous settlement sites is not included in the assessment. This serves to illustrate the complexity of setting assessments in such a sensitive historic landscape and creates a gap in relevant information.

6.10.11. We have noticed some potential confusion between the presentation of the assessments between Table 1 on page 13 of the HIA and the detailed breakdown in Annex 3.1 of the same document, and similarly between Table 2 and the detailed breakdown in Annexes 3.2 and 3.3 of the same document. We consider the representation of the assessment in the detailed Annexes a more reliable source of information.

6.10.12. The main elements of the Scheme identified in the ES, HIA & Settings Assessment as having a positive effect are associated with the removal of the existing A303, the opportunity for the design to reconnect elements of the landscape previously severed by existing infrastructure (in particular but not limited to The Avenue), the provision of further

physical and interpretive access to the WHS landscape, and the potential to contribute to our understanding through the archaeological component.

6.10.13. HBMCE agrees with the identification of these elements of the Scheme as having potential to represent positive benefits (regardless of whether affecting OUV or the significance of other designated heritage assets) when in the context of a clearly and convincingly justified Scheme (as outlined at 6.10.26 below).

6.10.14. The main elements of the Scheme identified in the ES, HIA & Settings Assessment as causing negative effects are the deep cuttings and portal ends of the tunnel, the dual carriageway and the loss of archaeological remains. The documentation acknowledges that these will affect physical and visual relationships and discusses the design elements (such as the portal canopies) intended to minimise those effects.

6.10.15. HBMCE agrees with the identification of these elements of the Scheme as having potential for negative effects overall (regardless of whether affecting OUV or the significance of other designated heritage assets).

6.10.16. In addition, we would potentially include the proposal for deposition of the chalk arising from the tunnel at Parsonage Down East, but at the current time consider there is insufficient information in the application to make a final assessment in this regard.

6.10.17. HBMCE agrees that the existing A303 has an adverse effect in respect of all 7 Attributes, in addition to the Integrity and Authenticity of OUV. HBMCE also agrees that the Attributes of OUV which have potential to be affected most positively in comparison with the current situation on completion of the Scheme (Table 3 page 21) are 1 (Stonehenge as a globally famous and iconic monument) and 4 (design in relation to the skies and astronomy). We agree that adverse effects

will be experienced in relation to Attributes 2 (physical remains) and 3 (siting in relation to the landscape) after completion of the Scheme. The potential for the design and location of Green Bridge 4 to redress the impact on the integrity of relationships between monuments (**Attribute 5**) is acknowledged. Regardless of the potential for an overall benefit from the Scheme, HBMCE consider it is important to ensure that any remaining adverse effects on these Attributes are kept to the minimum possible and then appropriately mitigated.

6.10.18. The assessment considers setting in relation to the association between monuments in the landscape and the broader context of the rich archaeological resource preserved within that same landscape (Appendix 6.9, 3.6.5 – 3.6.7) (**Attribute 2**). The assessment methodology acknowledges that setting is not restricted to upstanding monuments and that below ground setting effects may not necessarily be visible or tangible in the absence of survey results to demonstrate those effects. The loss of or damage to archaeological remains is assessed as a negative effect, nonetheless. HBMCE agrees with these underlying principles of assessment.

6.10.19. The astronomical significance of the monumentalised landscape is a key element of significance and a specific Attribute of OUV (4), which whilst not fully understood, has been a determining element in the development of the Scheme. It is essential that the Examination is presented with a clear understanding of how this Attribute conveys OUV³⁷ and a very clear description of how the Scheme design has evolved to take due account of this Attribute.

³⁷ For example Ruggles, C & Chadburn, A (2017) Stonehenge World Heritage Property, United Kingdom, In: Ruggles, C. (ed.), Heritage Sites of Astronomy and Archaeoastronomy in the context of the UNESCO World Heritage Convention: Thematic Study no. 2, ICOMOS/Ocarina Books, pp. 41–62

6.10.20. With this in mind HBMCE has noted Figure 19 of the HIA; this provides a useful spatial reference for this Attribute of OUV within the landscape. However, we consider that further clarification of *how* impacts on this Attribute of OUV have been avoided is required. Submission of further visual representations, through overlaying understanding of Attribute 4 on the proposals, is essential to inform the Examining Authority's consideration of the Scheme in this regard. We have discussed elsewhere in our Written Representations (7.5.30) issues with the level of accuracy in mapping of this Attribute, as well as the potential impacts of the current limits of deviation, which could result in the position of key elements of the Scheme being adjusted. This would have a bearing on the assessment of impact and effect in relation to Attribute 4.

6.10.21. We consider this is an area of the Scheme that requires further information to support the "illustrative" design, given the potential for a significant positive effect. It is in HBMCE's view important that the Examining Authority are able to be satisfied that the enhancement of this Attribute of OUV will be secured through the d1DCO where it is present.

6.10.22. The assessment methodology also acknowledges the importance of clear, uninterrupted visual relationships between monuments sometimes over considerable distances and makes reference to the existing assessments to date of this element of significance (**Attribute 5**). On this basis the removal of modern elements of development that sever the historically relevant landscape and relationships would be beneficial. The assessment states that the focus in the submitted assessment is on existing lines of visibility within the modern landscape, as these are most readily apparent and prominent. Whilst recognising the speculative nature of some previous research on this topic, the assessment does also acknowledge the need to make best use of the opportunity this presents to identify where the re-establishment of a visual link would represent a positive effect and establishing whether there is potential within the Scheme to deliver such a benefit.

6.10.23. The Settings Assessment concludes that while the Scheme can make a significant contribution to reducing ambient traffic noise, in isolation (due to other infrastructure and land use) it cannot restore a **wholly peaceful** situation (3.6.11 Settings Assessment) (**Attribute 6**). The acknowledged importance of *tranquillity* within the Stonehenge landscape is reflected on as a modern perception, considered beneficial in relation to its spiritual connections and on our ability to experience the monuments and the landscape with reduced modern intrusion or distraction rather than as a reflection of an interpretation of its former, prehistoric, experience. HBMCE agrees with this approach to the assessment focusing on modern noise disturbance as a factor affecting the modern experience of the monuments of the Stonehenge WHS within their setting.

6.10.24. Since the cumulative effects on assets, asset groups and attributes of OUV are all assessed as having greater positive than negative effects in all cases the final assessment within the HIA is reported as positive overall. HBMCE is concerned to ensure that this does not override the need for clear and convincing justification for the level of negative effects, making clear that these have been minimised and avoided in all cases before the balancing exercise against the positive effects is made. This will not reduce the weight of the positive effects in making that balancing exercise. However it does make it clear that a robust process is required regardless to ensure that all negative effects are reduced to the minimum required to deliver the Scheme and to achieve its objectives for enhancement.

6.10.25. The ES, HIA and Settings Assessment assess that there will be no impact on historic fabric of any of the scheduled monuments that convey OUV (Annex 3.2) and the only such impacts will be on non-designated archaeological sites, both known and as yet unknown.

6.10.26. HBMCE does not as yet consider sufficient information has been submitted to enable us to confirm whether we agree that there will be no direct physical impact on any scheduled monuments. We have outlined below (7.5.30) the additional clarification that is needed in this regard. On submission of this information HBMCE will be able to provide an update to the Examining Authority on our position.

6.10.27. The HIA outlines a series of proposed mitigation measures to address the negative impacts identified as part of the assessment. This includes protecting archaeological sites and monuments during construction, a programme of archaeological recording, and outreach and public access to the wider WHS landscape after completion.

6.10.28. HBMCE offers our more detailed comments on these mitigation measures in relation to the Outline Environmental Management Plan (OEMP), Detailed Archaeological Mitigation Strategy (DAMS) and Overarching Written Scheme of investigation (OWSI) (7.6.117).

6.10.29. Given our comments in sections 6.9 and 6.10 of our Written Representations regarding the information submitted HBMCE is not at this time able to provide the Examining Authority with a final position in relation to our assessment of the conclusions of the submitted ES and its supporting HIA and Settings Assessment. However, we would hope to address this during the course of the Examination following submission of additional information by Highways England in relation to details of the Scheme set out in Section 7, and to provide our position promptly in relation to:

- Whether there is further potential to reduce the adverse effects on these assets;
- Whether the negative effects of the Scheme on the Attributes that convey the OUV of the WHS have been minimised as far as possible;
- Whether any residual effects are considered to be both justified and acceptable in conjunction with any associated positive effects;

- Whether the delivery of positive, beneficial effects is secured by the DCO;
- Whether the summary HIA Table 3 reflects all the effects of the Scheme outlined in the detailed HIA assessments.

7. AREAS OF CONCERN FOR THE APPLICANT AND THE EXAMINATION TO ADDRESS

7.1. The areas of concern discussed in detail below restate the key matters that HBMCE highlighted in our Relevant Representations in January 2019. In addition this section covers issues that have arisen from our further review of the ES following its submission and in discussion with Highways England as part of our engagement with HMAG and Heritage Design Meetings. They are as follows:

(a) The gaps in and the sufficiency of the information submitted as part of the DCO application.

The information provided in the ES and its supporting documents must facilitate a clear understanding of the effect and impact of the Scheme. At present HBMCE consider a range of additional information is required which is critical to providing that level of understanding and informing the assessment of the Scheme by the Examining Authority (Section 7.5 below).

(b) Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance.

Key elements of the Scheme have the potential to adversely affect the significance of designated heritage assets, including the OUV of the WHS (Section 7.6 below). Consequently it is important to ensure that a comprehensive assessment can be made of these elements. On the basis of the information submitted it is already clear that refinements to the proposal are required to reduce the potential for harmful effects and impacts.

(c) The provisions in the DCO to secure the level of benefit in heritage terms, as well as the avoidance, minimisation, and proportionate mitigation of harm as considered appropriate by the Examining Authority.

The DCO must incorporate a set of provisions which will be robustly

capable of securing the enhancement and protection of the historic environment and ensuring that mechanisms to implement and deliver mitigation, benefits and legacy provisions as part of the aspirations of the Scheme are embedded. It must contain sufficient detail on each provision given the very high sensitivity of the Scheme. It is essential that its provisions include for adequate consultation with HBMCE as a statutory consultee in the discharge of its requirements (Section 7.7 below)

7.2. In outlining these issues we have indicated where we consider additional information is essential for HBMCE to be able to provide advice and for the Examining Authority to assess in detail whether the Scheme:

- a) Satisfies the Cultural Heritage aspiration set by the DfT confirming how enhancements to the historic environment will be secured;
- b) Provides sufficient evidence on which basis an informed decision on the Scheme can be taken;
- c) Avoids negative effects on OUV and heritage significance wherever possible and where this is not possible minimises those effects to an acceptable level supported by clear and convincing justification [NPSNN 5.129, 5.131); and
- d) Confirms how the Scheme will secure and deliver appropriate and proportionate mitigation to achieve no greater negative effect than that considered acceptable and clearly justified.

7.3. In identifying these issues, we have integrated our comments on the Environmental Statement (ES), its associated Appendices, and the draft Development Consent Order (d1DCO).

7.4. Where appropriate we have also made recommendations for how these issues might be addressed during the Examination to assist the Examining Authority.

7.5. GAPS AND SUFFICIENCY OF INFORMATION AND EVIDENCE BASE PRESENTED IN THE DCO APPLICATION

HBMCE has had due regard to the requirement in the NPSNN for any requests for environmental information not included in the original environmental statement to be proportionate and focused only on significant effects (NPSNN 4.15). Our advice focuses on the following:

- Final reports on Archaeological Evaluation conducted to date (Section 7.5.1)
- Final reports on Geophysical Surveys conducted to date (Section 7.5.4);
- Assessment of Previous Archaeological Investigations in ES (Section 7.5.7);
- Provision of more comprehensive visualisations of the Scheme (Section 7.5.14);
- Clarification of mapped detail in relation to adjacent or abutting scheduled monuments (Section 7.5.31).

Archaeological Evaluation – Investigation Reports

7.5.1. The DCO was submitted before the results of all the archaeological evaluation had been finalised. Consequently the assessments of the areas covered by these investigations in the ES will need to be reviewed on the basis of the final evaluation reports, the majority of which were submitted at Deadline 1.

7.5.2. HBMCE is reviewing these reports in our role as a statutory consultee, and as a member of HMAG, and is highlighting to Highways England specific issues or additional work that we consider need to be addressed or taken into account through development of the DAMS/OWSI. This will assist in identifying the most appropriate approaches to archaeological mitigation, whether that be through preserving archaeological remains from impacts during construction and operation or securing a proportionate level of archaeological work to ensure their significance is understood and recorded prior to their loss.

7.5.3. Once the final awaited evaluation report has been submitted from this phase of work HBMCE will provide its overarching assessment of the conclusions of that evaluation to help inform the development of the DAMS/OWSI and SSWSIs. We will also be able to provide a more detailed update to assist the Examining Authority regarding the identification of other mitigation measures which might need to be secured under the DCO to sustain the significance of archaeological remains which convey the OUV of the SAAS WHS.

Archaeological Evaluation – Geophysical Survey Reports

7.5.4. Following review of some of the interim suite of Geophysical Survey Reports produced for the Scheme, provided to HBMCE in our role as a statutory consultee and as a member of HMAG, it is evident that the methodologies employed to investigate the areas within the red line boundaries, including magnetometry for larger areas and GPR for smaller detailed area surveys, are effective and appropriate within predominant chalk geology.

7.5.5. Two of these reports have to date been provided to the Examination and HBMCE is aware that further survey is currently underway in the field. The programme of geophysical survey forms one of the baseline sets of information on which the approach to intrusive archaeological evaluation, investigation and mitigation has been designed.

7.5.6. Once the remaining geophysical survey reports have been submitted HBMCE will provide further representations as necessary. This will include any recommendations regarding areas for potential enhancement of the reporting evidence base which we consider will be of benefit to the Scheme overall and to specific areas within it to ensure that as clear a picture of the distribution of potentially archaeological anomalies is gathered from across the Scheme.

7.5.7. This will be important initially to assist in targeting subsequent stages of archaeological work, and critically the development of the DAMS.

Assessment of Previous Archaeological Investigations (ES Appendix 6.10, ES Appendix 6.1 Annex 4)

7.5.8. The review of previous archaeological and antiquarian investigations within the SAAS WHS and its environs is a crucial element of background work for the Scheme. It provides a baseline of understanding which is essential both for a holistic and nuanced interpretation of the evaluation results from the Scheme, and to inform the development of the DAMS and associated OWSI & SSWSIs. It offers the ability to draw down from a wide range of research, particularly in recent years, which has seen significant focus and attention paid to the Stonehenge landscape. This has included the application of technology at the forefront of its field in elucidating more about this perpetually elusive monument and its surroundings.

7.5.9. This section of the ES draws primarily upon a few key syntheses of research within the landscape rather than providing a fresh vision for research within the scope of the Scheme. As a result there is limited scope within this baseline document to transfer potential to the DAMS and SSWSIs for environmental research, with the research questions discussed restricted to a focus on landscape form, earthworks and artefacts.

7.5.10. We consider this represents a missed opportunity since the identification of proportionate and targeted approaches to the mitigation strategy for the Scheme must rely heavily on as nuanced an understanding of how the results of the evaluation stage of the Scheme contribute to the current baseline understanding of the landscape and its features as possible.

7.5.11. We would advise that additional reference to a number of other recent surveys, research projects and environmental research in

particular would be of assistance in formulating the approach to the DAMS, OWSI and SSWSIs. Summaries of key pieces of previous work which are a significant part of the overall narrative would create the baseline to support the development of research questions as the Scheme progresses, providing a framework and strong holistic evidence base for the development of the DAMS and the SSWSIs. We will be providing recommendations to Highways England to ensure that these are included as part of the development of the DAMS.

7.5.12. It is clear that this section of the ES was finalised in advance of work on the DAMS and other supporting documentation including the HIA³⁸ and therefore does not represent a complete assessment of all the research consulted by Highways England throughout their development of the Scheme. Given the importance of being able to assess that the extent of the baseline information consulted is appropriate and complete we would recommend that Highways England clarify the research they have consulted in relation to production of the ES and on the basis of an understanding of which the ES and DAMS have been developed. This would provide confirmation to the Examining Authority that a consistent and comprehensive baseline of information has been used throughout the development of the Scheme.

7.5.13. HBMCE would recommend that this issue could potentially be addressed at this stage in the Examination by submission of a summary of the key findings of relevant recent research with real and valuable potential to contribute to the refinement of the OWSI and SSWSIs, within the DAMS. Following submission of the draft DAMS HBMCE will be able to provide the Examining Authority with an update to our representations on this issue.

³⁸ We have noted that Appendix 6.10 and Appendix 6.1 Annex 4 appear to comprise different versions of the same document.

Visualisations of the Scheme

7.5.14. The Scheme visualisations are included at ES 6.3 Appendix 6.9 and Landscape and Visual Impact Assessment Figures 7.10 – 7.68). It is essential that the complement of visualisations submitted demonstrate to the Examining Authority the full range of visual impacts on the OUV and experience of the Stonehenge WHS and the designated and non-designated heritage assets in that same landscape. Specific comments relating to the need to visualise individual elements of the Scheme are also addressed in Section 7.6 below.

7.5.15. HBMCE is aware that the locations of 17 key viewpoints and a list of visualisations submitted were previously discussed during HMAG meetings (ES Appendix 6.9, 5.3.38 & 47) as a baseline for understanding OUV. Only 13 of these have been used in the production of the ES and it is unclear why the others were not included. These visualisations provide a starting point to consider how the visual impact of the Scheme can best be assessed. This initial assessment will also assist in identifying other locations from which photomontages (and wireframes, as necessary) will need to be produced to give a picture of the Scheme and either confirm its significant effects or where necessary confirm that effects will not be significant. The information requested is considered proportionate given the nature and level of significance of the SAAS WHS. Recommendations for additional visualisations are provided in more detail below.

7.5.16. The SAAS WHS inscription and the Attributes of OUV make the importance of the relationship between the archaeological monuments and the natural landscape explicitly clear (Attributes 3, 4, 5 and 6). The monumental character of the prehistoric landscape, the multitude of assets preserved within it, and the multiple views and viewpoints within which those monuments and that landscape will be experienced demands a comprehensive visual analysis on which to assess the

Scheme.

7.5.17. Consequently, it is essential that the Examining Authority has a clear understanding of the topographical changes proposed by the Scheme, and the visual impression and range of visual experiences it will alter in relation to visual receptors within the surrounding landscape, of which heritage assets form a key group.

7.5.18. In HBMCE's opinion the limited number of visualisations presented to date does not demonstrate a consistent approach to the illustration of information to confirm the effect described in the ES and supporting appendices on individual assets or asset groups. Visualisations are needed both to clarify the extent of the visual impact and visual intrusion of key elements of infrastructure, but are also required to demonstrate the effectiveness of design and mitigation in minimising those visual impacts. It is essential that the visual representations of the Scheme provide confirmation both of assessments of no or negligible change as well as major change regardless of whether this is positive or negative.

7.5.19. The Settings Assessment (ES Appendix 6.9, 2.5.1) indicates that the visualisations of the Scheme comprise wireframes, photomontages and 360 CGI visualisations. HBMCE have not been able to identify any wireframes in the visualisations submitted, nor has the full opportunity to view the 360 CGI visualisations been provided. Wireframes can be helpful in addition to, and overlaid on, photomontages to provide a visual reference as to where the Scheme outline sits in that view. This is particularly helpful when images are provided to illustrate no change due to existing screening, incremental change over time, or the appropriateness and effectiveness of screening implemented as part of the Scheme.

7.5.20. In general we are very concerned by the limited number of visualisations in comparison with representative views. This may reflect

the outline nature of the Scheme. The submitted generalised views of the landscape experience and character (Representative Viewpoints 1-36) complement, but cannot be substitutes for, views to, from or including individual, sensitive, heritage receptors or groups of assets where such views are needed to illustrate the effect and visual impact of the Scheme.

7.5.21. At present only 2 visualisations of the tunnel portals, identified by the submitted HIA as being a key area of harm to the OUV of the WHS, have been incorporated (Figures 8 and 20, 6.3 ES Appendix 6.9). Figure 8 (Viewpoint CH07) does not in our opinion present the reasonable worst case scenario with the location and extent of the western tunnel portal masked in the view. Whilst this offers some indication of the potential effect of the design initiatives to minimise the impact, there is a need for a more complete understanding of its visual impact. We refer to Advice Note 9 (Rochdale Envelope) and paragraphs 4.18-4.20 of the NPSNN requiring proper assessment of the project as it may be constructed.

7.5.22. HBMCE is also not convinced that the portals to the tunnel are best represented solely from 2 (or even a series of) static viewpoints. We recognise that some small visualisations are included in the Structures Drawings (ES 2.14 (APP-017)) and Design and Access Statement (ES 7.2 (APP-295)), for example, but do not consider these are sufficient to address the concern set out above.

7.5.23. No intermediary visualisations have been provided for any of the locations where the 15 year impact of the Scheme has been presented (ES 6.2 Figures 7.51-7.68). This is relevant and important to those designated heritage assets where the assessment of the residual level of impact is reliant on the establishment and maturity of screening mitigation at 15 years (e.g. at Countess Junction, Figure 24, ES Appendix 6.9). Consequently, in order to understand the effect of the Scheme in the intervening years it is necessary for intermediary visualisations to be provided. This will demonstrate how quickly the level

of visual intrusion from the Scheme will decrease relative to the increasing maturity of the screening.

7.5.24. No comparative day and night time views have been submitted to illustrate how the light levels at the ends of the tunnel and the use of traffic lights will be adjusted to limit the visual intrusion of this modern infrastructure in such a sensitive landscape. Such views are also relevant to the experience of the Solstice at Stonehenge and from within the surrounding landscape, with specific reference to Attribute 4 of the OUV of the WHS. We would expect special consideration to be given to the visual effects of the Scheme at these significant times of the year.

7.5.25. No visualisations of the Scheme during construction have been provided. Given the large extent of compounds associated with the nature of the construction, and the size and scale of temporary infrastructure associated with the construction phase, such as, for example the chalk slurry processing compound, HBMCE consider that the temporary visual effects have potential to be significant. Without this information it will not, in our opinion, be possible to assess the extent of the effects of the Scheme during this phase or the proposals for temporary mitigation of these effects.

7.5.26. The visualisations presented must provide an impression of the experience of moving through the landscape such as along routes that express the OUV of the WHS, those which form part of its setting and from which its significance can be experienced, and those which represent a common and communal experience regardless of whether they those views are considered critical to OUV. This is important due to the kinetic significance of this landscape as a result of its deliberate design around structured movement within it, as exemplified by the purpose of The Avenue in the approach to Stonehenge (5.4.6 above). A kinetic experience is also relevant to those assets for which a 'sense of approach' is important to their significance, such as for example to the Lodges at the exterior of Amesbury Abbey and in relation to its

connection with Lords Walk as part of its designed landscape, as well as its historic relationship with Countess Farm.

7.5.27. Viewpoints (similar to the aerial views included in the Structural Drawings) from which views would not normally be possible, as well as views from locations which offer panoramic views of the landscape may assist in providing the overall sense of how the Scheme will effect change at a landscape level that is currently not included in the DCO application. This is in our opinion required to address the need to assess the effect and impact of the Scheme on the SAAS WHS as a whole (as set out in ICOMOS 2011 HIA guidelines) and the recognition of the importance of the landscape within the Attributes of OUV.

7.5.28. Consequently we would expect significant additions to the visual information submitted as part of the application to address the current gaps in the evidence base. This should be provided to inform the Examination Hearing process, comprising a range of different visualisations both static and kinetic, and day and night time, illustrating in general terms:

- Views towards the tunnel at each end;
- Views in which the portals (or their locations) can be seen from or in conjunction with designated heritage assets or other distinct topographical locations within the WHS;
- Visualisations illustrating the impact over the course of the 15 year period of establishment of screening mitigation where this is assessed in the ES (or supporting documentation) as reducing the impact of the Scheme on individual heritage assets or groups of assets;
- Wireframes illustrating the effectiveness of mitigation proposals;
- Visualisations providing an illustration of how the light levels at the ends of the tunnel and the use of traffic lights will be adjusted to limit the visual intrusion of this modern infrastructure;
- Visualisations illustrating the effects during the construction phase of temporary compound, infrastructure and machinery;

- Visualisations illustrating the Scheme in relation to key sightlines with astronomical significance;
- Visualisations illustrating the Scheme in relation to the biannual solstice events; and
- Visualisations illustrating the effect of the Scheme in views from or towards designated heritage assets in close proximity to the Scheme where the ES identifies these assets are visually prominent in views from within the landscape.

Where additional visualisations are considered necessary to illustrate the effect of the Scheme in relation to individual assets or specific elements of infrastructure these have been identified in Section 7.6 following.

7.5.29. Allied to the representations of the Scheme included in the form of photomontages, HBMCE would also recommend consideration of the length of the submitted sections included in the DCO application. In areas where landscape reprofiling is proposed we consider long sections through the landscape, both before and after reprofiling, are necessary to understand the impact of this element of the proposals in relation to views out from the WHS and individual designated heritage assets within the settings of which the works are proposed.

Clarification of Specific Mapped Detail in Relation to Scheduled Monuments in Close Proximity to the Scheme

7.5.30. The extent of the Scheme for which authorisation is sought in d1DCO, needs to be shown (e.g. on work plans, environmental masterplans and other illustrations) in relation to the location of adjacent assets, whether designated or non-designated.

7.5.31. Where the asset is designated consideration must be given to the capture scale at which the statutory map of the scheduled area was

produced in comparison with the level of accuracy assumed by the use of digital spatial datasets³⁹.

7.5.32. Where such assets are in very close proximity to the Scheme, in order to confirm that they will not be physically impacted by the proposed works we would expect to see additional visual presentation of their position in relation to the Order limits. This could, for example, be achieved by overlaying the outline of the Scheme and the extent of the scheduled area against LiDAR or geophysical survey imagery to confirm the extent of monument remains in relation to the limits of the DCO. This would illustrate the extent of any works included within the DCO in relation to the actual recorded position of the archaeological remains included within the scheduling, regardless of how the boundary of the scheduled area is represented in relation to that feature.

7.5.33. HBMCE will make further detailed representations on this issue following any response made by Highways England. At present, however, this is a point of clarification that is required to confirm whether any archaeological remains designated on the basis of their national importance will be directly impacted by these areas of work forming part of the Scheme.

7.6. AREAS WHERE FURTHER REFINEMENT OF THE SCHEME OR ILLUSTRATION OF ITS EFFECT IS REQUIRED TO AVOID AND/OR MINIMISE HARM TO OUV AND SIGNIFICANCE

7.6.1. The justification for the detailing of the Scheme relies heavily on Highways England's ability to demonstrate how it will ensure avoidance of negative effects of the d1DCO Scheme on key Attributes of the OUV of the WHS and the significance of other designated heritage assets, and

³⁹ Capture scales for all scheduled monuments within the SAAS WHS are noted in **Appendix 4** hereto.

mitigation of any such negative impacts will be secured in its delivery under the DCO.

7.6.2. The positioning and design of some elements of the Scheme are critical to ensuring the delivery of the DfT's cultural heritage aspiration. As such it is essential that detailed information is presented on these elements to satisfy the Examining Authority that the Scheme can be delivered in practice, with appropriate safeguarding secured for the historic environment including for the SAAS WHS.

7.6.3. In assessing these design and engineering elements, it is important to identify those which are considered critical to the acceptability of the Scheme. Consequently, in relation to these elements a high level of detail will need to be submitted as part of the DCO application for consideration during the Examination. Critical elements may be identified on the basis of their potential impact or the sensitivity of their location within the Scheme.

7.6.4. Not all elements of the Scheme in all locations will be considered critical. Provided sufficient indication of the design approach and key parameters for decision-making are included under the DCO regarding non-critical elements, which will enable them to be established and secured, it is possible that some final decisions regarding their particular detailing can be considered at detailed design stage for approval under an appropriately drawn Requirement.

7.6.5. Where it is identified that there may be potential for some of these elements of detail to be approved during the detailed design stage, the d1DCO must secure the establishment of an appropriate approach and legal parameters within which these issues could be dealt with together with illustrations so that the Examining Authority can properly form a view now of what a subsequent decision maker may conclude about the detail of the Scheme.

7.6.6. Where even at this stage on the basis of the submitted information elements can be identified as critical, we have made this clear in our representations. HBMCE would expect to be able to provide further advice and updates to the Examining Authority on our position in relation to critical and non-critical elements following provision of additional information by Highways England to address the points raised below.

7.6.7. On the basis of the information submitted to date HBMCE's representations cover the following specific elements of the Scheme followed by consideration of issues relevant across the entire Scheme:

- (a) Assessment of each of the 5 sections of the Scheme (by section and chainage as set out in ES 6.1 Chapter 6, 6.6.57) identifying where further detailing or refinement of design is required (Sections 7.6.10 - 7.6.111). This includes reference, where appropriate to secondary infrastructure and engineering details including:
- Lighting – both street lighting and traffic lights;
 - Fencing and boundary treatments;
 - Drainage;
 - Security Cameras;
 - Tunnel infrastructure;
 - Earthworks and landscaping including bunds, gradients and tree and vegetation planting, approaches to existing routes and areas of infrastructure that are to be stopped up;
 - Pollution control; and
 - Treatment of Non-Motorised User (NMU) routes and Public Rights of Way (PROW).
- (b) The approach to archaeological mitigation across the Scheme (Section 7.6.117);

- (c) The approach to management of the Scheme as set out in the OEMP (Section 7.6.124) with particular reference to temporary works associated with construction;
- (d) Potential restriction of future archaeological research (Section 7.6.133).

7.6.8. As a common theme to the secondary infrastructure across all elements of the Scheme, signage is dealt with here. It is essential that a signage strategy is produced for the Scheme that deals sensitively with the need for an appropriate level of signage in association with the road. The DCO should secure provisions to ensure that the necessary signage is carefully designed and positioned and will not, including over time, form an additional visually intrusive element, contributing to modern infrastructure clutter. A series of overarching principles are included in the Design and Access Statement and HIA that need to be embedded with additional detail in the DCO.

7.6.9. At present the list of issues discussed is not exhaustive. On provision of further information by Highways England it may become apparent that other elements of the infrastructure and design also require refinement in order to avoid or minimise harm. HBMCE will provide an update to the Examining Authority on these aspects following submission of additional information from Highways England during the course of the Examination as set out in Sections 7.5 above and below.

7.6.10. Section 1: The Western Scheme Origin to Western Limit of Winterbourne Stoke Bypass (Chainage 0-1800)
From Yarnbury Castle along the current course of the A303 to just west of Parsonage Down

Yarnbury Castle (Yarnbury Camp) Scheduled Monument

7.6.11. The Iron Age multivallate hillfort of Yarnbury Camp's topographic location, its dominant position and broad long-distance views are acknowledged in the ES and supporting documentation (Appendix

6.9 Section 4 AG01). Figure 7.14 (Representative Viewpoint 1) in ES Chapter 7 illustrates the extent of the views obtained from the Camp. It is not clear from this image, however, whether the deposition of tunnel arisings beyond the high point on Parsonage Down will have an impact on these views out from the scheduled monument, which contribute to its significance.

7.6.12. The ES does not present an indication of the extent of the Scheme visible from locations within Yarnbury Castle or Parsonage Farm Camp with the most extensive views towards Parsonage Down. This would enable and assist in clarifying whether there will be any visibility from Yarnbury or Parsonage Camps of the landscape adjacent to Parsonage Down in Section 2 of the Scheme that will be subject to significant change resulting from the deposition of arisings from the tunnel construction, or whether the intervening topography will prevent views to the specific areas proposed for deposition.

7.6.13. Since the relationship between Parsonage Down and Yarnbury Camp has been identified in the ES, as has the significance of Yarnbury's topographic setting, HBMCE considers it relevant that the DCO application demonstrates and confirms the neutral effect assessed in the Settings Assessment (AG01) in visual terms. This is relevant to provide a rounded understanding of the impact of the deposition of chalk arisings within the settings of designated heritage assets (see 7.6.15 below), but the visual impacts from this location are not likely to be considered critical to the Scheme. It may however assist in clarifying any mitigation measures required, such as avoidance of any visually sensitive areas in addition to those avoided due to the presence of archaeological remains.

7.6.14. Section 2: Winterbourne Stoke Bypass, Longbarrow Junction, Western Portal (Chainage 1800-7400)

From the point where the proposed route deviates from the present route of the A303 on Parsonage Down to the western tunnel portal on Normanton Down just north of Normanton Gorse.

Deposition of tunnel arisings

7.6.15. The Scheme proposes to deposit the arisings from the tunnel boring within this section of the landscape outside the WHS. It is proposed to preserve selected archaeological landscapes outside the WHS beneath this spoil from the tunnel to create a chalk grassland habitat. The spoil will arise from the tunnel boring machine as slurry, which will then be treated and redeposited.

7.6.16. HBMCE has been considering the information available regarding this process in the ES and also in relation to other Schemes where a similar process has been used. Before HBCME is able to advise further, there are a number of questions in relation to this process that we consider need to be explored during the Examination process. These relate to the assessment of the potential impact on archaeological remains in line with our published guidance on *Preserving Archaeological Remains (HBMCE 2016)*, and the assessment of the impact on the topography and character of this landscape as part of the setting of the WHS and other designated heritage assets in the surrounding landscape. We consider the information requested below necessary to assess the impacts and effects of the proposal to regrade this section of the landscape. This is both relevant and important to the Scheme given the significance of the landform to its relationships with the remains of human activity within it. Any significant change to that land form therefore has potential for impacts in EIA terms and requires robust assessment. Necessary additional information includes:

- (a) Additional detail regarding the estimated compaction or density of the slurry once hardened;
- (b) Additional exploration of how accessible in practice preserved archaeological remains (including dispersed unenclosed settlement of possible Bronze Age date, linear boundary, extensive field systems, enclosures and possible trackways of possible Iron Age / Romano-British date) will be once 2m of chalk slurry is laid over the landscape;
- (c) Clarification as to how easy it will be in practice to remove the barrier membrane between the existing ground surfaces and fill material to excavate the material beneath. This is important as any preservation of Neolithic and Bronze Age remains in this area of the landscape will need to remain accessible to avoid harm to Attribute 2 of the WHS's OUV, and to comply with the policies of its Management Plan;
- (d) Assessment of whether there will be any impact resulting from the potential for chemical changes, and changes to pH, through alteration of the pH of the groundwater, in underlying sediments as a result of deposition of alkaline material;
- (e) Assessment of the potential effects of changes in groundwater hydrology and run-off. It is not currently clear how permeable the chalk slurry will be, nor how permeable the barrier layer will be and this information will be required to assess the potential impact;
- (f) Additional visualisations to accompany the longer sections through this part of the Scheme requested above (7.5.29). We have noted limited ability within the visualisations incorporated in the ES of the potential to assess the visual impact of this element of the Scheme from elsewhere within the landscape.

(g) Additional detail, including visual representations, of the temporary compound for processing of the chalk slurry, along with the temporary haul routes to the proposed deposition site. We have noted the proposed mitigation strategy in the OEMP (ES 6.3 Appendix 2.2 Table 3.2b) is to site the treatment and tunnel batching plant behind the existing retained hedgerow west of Longbarrow junction and to restrict buildings to a single storey in height where they can be screened by the hedgerow, an earth bund and 'other appropriate measures'. Given the proximity of this major compound, with a high level of activity, to the WHS we consider it is necessary for details of this activity to be clarified, along with the nature and detail of proposed mitigation. This will enable the effect and impact, as well as the efficacy, of the proposed mitigation to be assessed as part of the Examination of the Scheme. Determination of these details, in such a sensitive location, should not in our opinion be left to agreement following a decision on the Scheme.

Assessment of designated heritage assets in Winterbourne Stoke - Winterbourne Stoke Manor House (NHLE 1130971; Grade II*)

7.6.17. The Settings Assessment acknowledges that the setting of the Grade II* Manor House set in its lawned grounds to the west of the village and to the south of the A303 extends to the higher ground to the north of the A303 where the house, if not the grounds, can be clearly seen at all times of year. It notes that this area includes a stretch of the B3083. Despite this the ES includes only one viewpoint from within the Winterbourne Stoke Conservation Area looking north in the direction of the Scheme (Appendix 6.9 Figure 2). It does not provide a visualisation of the potential impact of the Scheme on any of the highly graded assets in Winterbourne Stoke despite acknowledging the visibility of the Manor House as a high status building within the landscape. It is not clear from the submitted information what impact the viaduct might have in views to, or from the Manor House as there is no inclusion of a visual representation of the extent and height of trees and buildings which the ES states will screen the viaduct in views from the house. Similarly it is

not clear whether any views will exist in which the viaduct and the Manor house can both be seen. HBMCE consider this additional information relevant and important against which to assess the positive benefits assessed (cross-ref) from the Scheme on the setting (and hence significance) of this Grade II* listed asset as a result of reduction in traffic and noise.

Viaduct over the River Till and Highway over B3083 from across the Wider Landscape

7.6.18. The visualisations included in support of the Landscape Visual Impact Assessment (LVIA) illustrate two views each of the viaduct (Figures 7.5.3 – 7.5.4) and highway (Figures 7.5.1 – 7.5.2) after 1 year and 15 years from the same location.

7.6.19. These visualisations, together with the structural drawings (ES 2.14 Sheets 2 and 3), do not provide an understanding of the extent of visibility of these elements of the Scheme and vehicles on them. Nor do they provide a guide to their impact and effect on the historic environment and any designated heritage assets whose significance may be affected by the intrusion of these structures within their settings.

7.6.20. The fact that these elements of the Scheme may be visible from or in conjunction with designated heritage assets does not automatically mean that this will be harmful or constitute a significant effect (ref GPA3). Nonetheless, since these both form new infrastructure interventions in the landscape it is important to be able to visualise how they will be integrated into their surroundings and over what extent of area they will be visible to inform assessment of the conclusions of the ES that they will not result in any significant effects in heritage terms.

Replacement for Longbarrow Junction

7.6.21. The replacement of Longbarrow Junction, relocated further to the west outside the WHS has significant potential to reduce the visual intrusion of modern infrastructure within the settings of the scheduled

monuments around Winterbourne Stoke Clump (as demonstrated by Viewpoint CH03 in ES 6.3 Appendix 6.9). This illustrates the changes in the view from the Winterbourne Stoke Crossroad Barrow group, supplemented by a complementary view from the south west (CH02) and wider views to the north at CH04. Unfortunately CH04 does not provide an existing baseline with the current A303 for comparison so it is more difficult to assess the level of benefit presented. CH04 also does not provide a comparable view to CH03, being further removed to the north without the same experience of proximity to the road or extent of view. Where visualisations are produced to demonstrate the lack of visibility of the Scheme from a particular viewpoint they would benefit from the addition of visual markers, particularly where infrastructure elements have moved in relation to their former position. This will assist in the assessment of how successfully the Scheme has addressed the need to limit intrusive visual impacts from within the WHS and within the settings of other designated heritage assets.

7.6.22. Given the size and complexity of the proposed new Longbarrow Junction arrangements, a clear understanding of a number of elements of engineering and design detail, together with secondary infrastructure, is necessary to ensure that the negative effects of the Scheme, including the cumulative effect, can be properly assessed during the Examination and that the Scheme has successfully minimised those negative effects, resulting from sinking the junction into the landscape, notwithstanding the fact that this is outside the WHS boundary.

7.6.23. The engineering design, level of the junction in relation to the existing topography, landscape integration and visibility of associated infrastructure at height is critical to the Scheme in the context of the setting of the SAAS WHS. Therefore, to complement the information included in the Structural Drawings (ES 2.14 Sheet 5), HBMCE would request additional visualisations of the junction - e.g. from key vantage points within the landscape, and on approach to it such as from the commencement of the cuttings on the A303 and A360 (as provided in

indicative form at Figure 6-9 of the Design and Access Statement ES 7.2). This information will enable HBMCE to provide our final position to assist the Examining Authority in relation to this element of the Scheme.

7.6.24. The lit junction at Longbarrow currently results in night-time light spill, which has a negative impact on dark skies (Attribute 4 of OUV). The proposals indicate that lighting here will be managed carefully to achieve a positive effect in comparison with the existing situation. Whilst it is possible that the detailing of lighting columns and timings of the transition from a lit to a non-lit junction may be an issue which can be comfortably addressed at Detailed Design Stage, sufficient indication of the parameters for decision making must be subject to Examination. Consequently we would expect to see additional information submitted on this aspect of the Scheme during the Examination in the form of a lighting strategy for the Scheme

7.6.25. We advise that further consideration of how the features connected with the scheduled monument of the Bronze Age enclosure and bowl barrow 100m west of Longbarrow Cross Roads on Winterbourne Stoke Down (SM 10484; NHLE 1011048) be addressed as part of the Scheme. The monument contributes to the OUV of the WHS despite being outside its boundary. Currently it is bisected by the existing A303 and hedgerows on either side. The proposed Scheme (as illustrated on Environmental Management Plan Figure 2.5E) retains the existing hedgerow as a boundary to the area identified for species rich chalkland and as such the remains of the enclosure and bowl barrow remain disconnected. Whilst the monument is no longer visible on the ground being located in an area previously disturbed by cultivation and more recently by improvement works on the A303, it is however visible on aerial photographs and in the results of geophysical survey. In addition this enclosure has been highlighted on the basis of evaluation results conducted as part of the Scheme for the significance of its artefactual assemblage recorded in association with the enclosure. Despite the inability to appreciate the monument above ground we would

nonetheless consider it beneficial to reconnect the two previously separated parts of the enclosure, such as by re-routing the hedgerow around the exterior of the enclosure. Whilst we do not consider this a critical amendment to the Scheme it would, nonetheless, contribute to its positive effects.

7.6.26. We welcome removal of the woodland immediately to the north west of the existing Longbarrow junction to open up views of the reconnected landscape. If, at a future date, an opportunity arises to reduce coverage of the north eastern section of woodland in the Winterbourne Stoke Clump (outside the Order limits and consequently the Scheme) the improvements made under the Scheme will contribute cumulatively to the enhancement of visibility, understanding and appreciation of the relationships between the group of scheduled barrows around the former junction, including the eighteen round barrows forming the greater part of the Winterbourne Stoke crossroads round barrow cemetery (SM 10306; NHLE 1012368) (Environmental Masterplan Figure 2.5E).

7.6.27. The proposed Public Right of Way (PROW) and Private Means of Access (PMA) must be routed around the scheduled monument of the Long barrow north east of Winterbourne Stoke crossroads (SM 10462; NHLE 1011841) (Environmental Masterplan Figure 2.5E) in such a way as to avoid any physical harm to its earthworks and archaeological remains. The location of the route must be secured under the DCO at a sufficient distance (to be specifically defined) from the monument to avoid any direct impacts, regardless of any limit of deviation. It will be necessary for Highways England to clarify the extent of works in relation to both the mapped boundary of the scheduled monument and the recorded position of the remains (such as from LiDAR) (see 7.5.30 above). HBMCE consider that it may be possible to agree details of surfacing materials, methods and fencing at a later stage for this PROW, provided there is provision in the DCO for a process of approval including from heritage statutory consultees in line with an agreed set of design

and construction principles.

7.6.28. Similar provisions to 7.6.27 above will be required in relation to works associated with the proposed PROW and PMA adjacent to the scheduled monument of a Middle Bronze Age linear boundary (SM 10489; NHLE 1010837) (Environmental Masterplan Figure 2.5E).

7.6.29. Since this linear boundary is only a part of a longer boundary feature that previously extended to the north-west, consideration will need to be given to how a sense of its former continuity might be achieved in the approach to landscaping. This is an issue of detail that is considered beneficial but not critical to the Scheme at this point.

7.6.30. The respective methodologies of the ES, HIA and Settings Assessment all consider there will be a large adverse negative impact from the relocation of the Longbarrow Junction as part of the Scheme on the asset group identified as AG13: The Diamond Group as a result of the proximity of the Scheme, and the impact of the dual carriageway, deep cutting and tunnel portal. This is a nucleated group of Neolithic and Bronze Age scheduled and non-scheduled barrows, and possible henge, bisected by the scheduled Middle Bronze Age linear boundary identified above. The HIA concludes that despite these negative effects the completed Scheme will still cause less harm than the existing A303 in relation to this group of monuments.

Archaeological Implications

HBMCE are aware that the archaeological evaluation results from the areas west of the existing Longbarrow Junction are starting to identify areas of archaeological significance that require additional investigation. In providing an overarching approach to archaeological mitigation the DAMS and OWSI will need to ensure that the full range of investigation and analytical techniques that might be most appropriately employed by the SSWSI for this area, given its significance, are made available. HBMCE will be able to provide additional updates to the Examining

Authority on our opinion concerning the proposed approach to archaeological mitigation in this area following submission by Highways England of the draft DAMS at Deadline 2.

7.6.31. Section 3: The Twin-Bore Tunnel Past Stonehenge
(Chainage 7400-10375)

The route of the proposed tunnel from just to the east of the current junction of the A303 and Stonehenge Road

7.6.32. The tunnel, deep cuttings and related mitigation measures have potential to significantly reduce visual intrusion and the noise of traffic within the SAAS WHS in the section of the Scheme closest to the Stonehenge scheduled monument itself, thereby enhancing its enjoyment and important views within the prehistoric landscape. The case for this element of the Scheme and its potential benefits are addressed throughout the ES (incl. ES 7.1 Case for the Scheme APP-294). This includes benefits enhancing the experience of the SAAS WHS and the safeguarding and enhancement of its OUV from the tunnel element of the Scheme. In order to secure this level of heritage benefit it will be essential for additional information regarding some key elements of the Scheme to be provided at this stage during the Examination for consideration.

Portal approach splays, tunnel approach, deep road cutting and walls surface treatment

7.6.33. The road cutting has been designed with vertical sides to limit land take within the WHS and with indicative proposals for chalk grassland slopes at the top of the retaining walls and security fencing set down to ensure it is not visible above the top of the cutting (ES 7.2 Design and Access Statement).

- 7.6.34.** Limited visualisations have been provided of the sections of the retained vertical cutting which comprises the portal and tunnel approach. Those submitted (ES 6.3 Appendix 6.9 CH07, CH10) do not give a clear indication of the visual impression of this element of the Scheme within the landscape and the illustrations included in the Structures Drawings (ES 2.14) are only indicative. It is essential that sufficient visualisations are provided both to assess whether the negative effects of creating this artificial cutting in the WHS landscape have been minimised as far as possible, and as a baseline for discussion regarding approaches to mitigation through design detailing.
- 7.6.35.** Since there may be potential for cumulative effects from the visual juxtaposition of the cuttings, Green Bridge 4 and the tunnel canopies and portals within the WHS landscape additional visualisations should be provided which enable the progression of the Scheme through the WHS landscape to be appreciated. It may be, for example, that these are best provided from an aerial viewpoint (similar to that presented at Figure 6-13 of the Design and Access Statement ES 7.2).
- 7.6.36.** An iterative design approach is required in relation to the detailed design elements, for example finishes and materials for the tunnel construction. The critical assessment at this stage is in relation to its landscape integration and the minimisation of negative effects as a result of the overarching engineering and structural design. It may be possible to refine the visual appearance at later stages provided a robust set of design parameters are established and secured by the DCO to inform decision making.
- 7.6.37.** HBMCE will be able to provide additional updates to the Examining Authority on our opinion concerning the proposed design of this element of the Scheme following submission by Highways England of additional information as outlined above and as iterative design discussions proceed during the Examination period.

Green Bridge 4

7.6.38. The formation of Green Bridge 4 aims to re-establish landscape connectivity between the scheduled monuments comprising the Winterbourne Stoke Crossroads Group (AG12), the Diamond Group (AG13) to the south and the more distant North Kite Enclosure and Lake Barrow Group (AG16), further to the south.

7.6.39. The width of Green Bridge 4 and its increase to 150m following earlier consultation represents a significant improvement in helping to mitigate the impact of the deep cutting, by providing greater physical and visual connectivity between currently disjointed parts of the landscape. Consequently, it is essential that construction of Green Bridge 4 at a width of no less than 150m is secured in the DCO. This, together with its precise location in relation to the scheduled monuments it is designed to reconnect, represents a critical element of the Scheme at this stage.

7.6.40. Limited visualisations beyond the Structural Drawings (ES 2.14 Sheet 6) have been provided in which it is possible to identify as yet how successfully the design of Green Bridge 4 will integrate this structure into the landscape. It is not possible, for example, to identify whether Viewpoint CH06 provides a visual context for the green bridge at distance and we have not been able to identify any close up visualisations elsewhere in the ES. We have outlined a possible approach at 7.6.36 above to help visualise how the structures along the line of the retained cutting through to the western portal will achieve this landscape integration.

7.6.41. It may be possible to refine the visual appearance and approach to landscaping at later stages provided a robust set of design and landscaping parameters are established and secured by the DCO to inform decision making.

7.6.42. HBMCE would expect to see further detail on how light levels under Green Bridge 4 will be managed in a lighting strategy for the

Scheme to supplement the indicative proposals set out in the Design and Access Statement and other documentation (e.g. the HIA). We have noted the indicative proposals for the use of downlights with lower light spill to reduce impacts on the surrounding landscape and dark skies (Attribute 4).

7.6.43. HBMCE will be able to provide additional updates to the Examining Authority on our opinion concerning the proposed design of this element of the Scheme following submission by Highways England of additional information as outlined above and as iterative design discussions proceed during the Examination period.

Canopy extensions

7.6.44. The canopy extensions have been designed to extend the visual impression of the reconnected landscape further than the end of the tunnel portals. As such, the proposed canopy extensions would reduce the visibility of the cutting in views from designated heritage assets and within the WHS. Consequently it is a critical element in reducing the visual impact of the Scheme by establishing a longer expanse of chalk grassland beyond the end of the tunnel where otherwise there would have been exposed cutting. The Scheme indicates that the canopies will be 'up to 200m long'. In HBMCE's view the length of the canopies must therefore be secured under the DCO.

7.6.45. The Environmental Masterplan and associated documentation states that the completed Scheme will "*replicate existing ground levels so far as practicable*" (Environmental Masterplan Figures 2.5 F & H) across the canopy extensions. Further clarification from Highways England is required to confirm the methods that will be used to secure as close a replication of the existing ground levels as possible and to set out what tolerance might be expected relative to the existing situation.

Western Portal

7.6.46. The location of the western portal is critical to ensuring that carefully planned avoidance of impacts on physical remains (Attribute 2) and astronomical lines (Attribute 4) can be delivered. Its position is also critical to ensuring its visual intrusion in the landscape is minimised as far as possible.

7.6.47. The western portal has been sited in an area identified to have limited distribution of archaeological remains that contribute to any of the Attributes of OUV. As such any deviation from this carefully planned element of the Scheme requires assessment in relation to how it might otherwise affect archaeological remains which had been carefully avoided. It is also not clear what the implications of adjustment of the location of the western portal might be on other structures along the realigned A303.

7.6.48. We are aware from our work nationally on other tunnel Schemes that it has been possible in other situations to reduce the limits of deviation in order to reduce negative effects on the historic environment. Consequently, before providing our final position on this critical element of the proposals, HBMCE consider it is necessary for Highways England to provide clarification that any adjustment of the tunnel portal location will only realise additional positive effects for the Scheme. For example, through increasing the length of the tunnel without requiring associated reduction of length or adjustment of position to the carefully planned structural elements further to the west along the cutting, principally Green Bridge 4 but also the tunnel canopies.

7.6.49. As such, HBMCE considers it critical that the implications of the limits of deviation for the western portal on associated parts of the Scheme are clarified by Highways England. This should include a clear assessment regarding how alteration by up to 200m will affect the assessment of visual effect, as well as the archaeological remains within that zone of deviation, particularly where any such remains contribute to

Attribute 2 of the OUV of the SAAS WHS.

7.6.50. Amongst other objectives, the tunnelisation of the A303 is intended to remove the existing disruptions to the mid-winter sunset solstitial alignment between Stonehenge and the Sun Barrow. This would be a significant benefit in heritage terms for the SAAS WHS. Given the significance and sensitivity of the astronomical lines of the solstices (Attribute 4 of OUV) (Section 6.10.19 above; HIA Annex 5), it is critical that the DCO ensures that the Scheme will not impact on the integrity of those sightlines looking either south east and south west from Stonehenge or Woodhenge as illustrated in Figure 19 of the HIA. Since the proposed reconnection of the landscape through diversion of the A303 into a tunnel is critical to the delivery of enhancements to Attribute 4 of OUV, it is essential that the DCO secures the location of the western and eastern portals, and that associated documentation clarifies how light levels will be managed at these points in the landscape to avoid any harm to this Attribute. The DCO must secure this significant heritage benefit as part of the Scheme regardless of the limits of deviation that are provided for.

Tunnel

7.6.51. The potential significant heritage benefit of a bored tunnel through this section of the landscape, compared with the existing surface road, is the reunification of a previously severed landscape of international importance. HBMCE therefore agrees with the identification of potential benefits as set out in the ES in relation to a bored tunnel in this location.

7.6.52. It is therefore essential that the DCO secures the level of heritage benefit to which the Scheme aspires through the detailing of landscaping and engineering design. This must include the incorporation and visual integration of the tunnel portals, canopies and associated deep cuttings with the existing landscape, and mitigation of their visual impact as far as possible.

7.6.53. Notwithstanding the potential benefits of a bored tunnel, it remains important that archaeological excavations are able to continue below ground level and above the tunnel structure. The ability for archaeological research to continue in accordance with Article 4 of the 1972 Convention and the Management Plan for the SAAS WHS must be secured in the d1DCO (see more detailed comments at 7.6.133 below).

7.6.54. The HIA identifies that the tunnel passes directly beneath the long barrow 250m north of Normanton Gorse (NHLE no. 1008953) (HIA 9.2.8) but that significant impacts as a result are not anticipated. HBMCE is unable at the current time to form a view on this assessment as additional information is required. We have noted the assertions in Chapter 10 (10.6.25) that ground movement analyses have been undertaken but have not been able to identify any detail in the DCO Application relating to what assessments were conducted in relation to this scheduled long barrow. We have not been able to identify sufficient detail on the proposed locations of the tunnel movement monitoring stations in either Chapter 9 or its associated Figure 9.1, or a description of the process of their installation to assess any archaeological implications these may have. We have requested that this matter is addressed as part of the iterative development of the DAMS. HBMCE therefore requests that Highways England submit additional information in relation to the assessment they have carried out specifically in relation to the potentially affected long barrow. We would then be able to provide further detail to our own representations on this issue to assist the Examining Authority as to the measures we would expect to see secured in the OEMP and related documentation, as well as in the DCO to ensure that archaeological remains are dealt with appropriately.

Archaeological Implications

7.6.55. HBMCE is aware that the archaeological evaluation results from the areas east of the existing Longbarrow Junction around the existing pig field are starting to identify areas of archaeological significance that

require additional investigation. In providing an overarching approach to mitigation in these areas the DAMS and OWSI will need to ensure that the full range of investigation and analytical techniques that might be most appropriately employed by the SSWSI for this area, given its significance, are made available.

7.6.56. HBMCE will be able to provide additional updates to the Examining Authority on our opinion concerning the proposed approach to archaeological mitigation in this area following submission by Highways England of the draft DAMS at Deadline 2.

Tunnel control buildings

7.6.57. HBMCE understands from the supporting text that tunnel control buildings will be recessed under the tunnel canopies to reduce their visual intrusion. The submitted sections and indicative views within the Structures Drawings (Sheets 8 and 11) indicate that these structures will be located under the canopy of the tunnel to ensure their visibility is limited. As such HBMCE does not have further detailed comments to make in relation to this aspect of the Scheme on the basis of the information currently submitted.

Lighting in tunnel and at portals

7.6.58. Various sections of the ES and supporting appendices provide a general indication of the approach to lighting at the tunnel portal ends where the potential for negative effects on the WHS (with reference to Attribute 4 dark skies) is at its highest. We have noted proposals for lighting to be hooded and directional to minimise light spill from the western portal mouth in the submitted HIA.

7.6.59. At present, however, we consider that insufficient information on this aspect of the Scheme has been included in the application to assess the effect of light pollution at the tunnel portals.

7.6.60. HBMCE would therefore expect to see additional information submitted on this aspect of the Scheme, in addition to the indicative proposals outlined in the Design and Access Statement (ES 7.2) in the form of a lighting strategy for the Scheme. Ultimately such a strategy would need to ensure that the DCO secures an appropriate approach to the provision of lighting at the portal ends of the tunnels that will safeguard the OUV of the WHS in relation to Attribute 4.

Distribution of tunnel arisings outside WHS

7.6.61. HBCME has provided detailed comments in relation to this element of the Scheme in section 7.6.15.

7.6.62. We remain of the opinion that additional information, both descriptive and visual, is required to assess the temporary effects of the Scheme associated with the chalk processing compounds and haul routes to facilitate the re-deposition of the processed material, and the visual and physical impacts of this element of the Scheme on completion.

Decommissioning of Existing A303

7.6.63. In decommissioning the existing A303 the Scheme presents a significant opportunity to enhance both the SAAS WHS and specifically the Avenue as part of the associated group of scheduled monuments at Stonehenge. It is essential therefore that the approach to surfacing and access along this decommissioned route supports the delivery of that benefit, and secures appropriate landscaping that will visually and physically reconnect the landscape either side of this route. This integration must be sustained and maintained, despite provision as a route for public access. Whilst it might be appropriate to determine some elements of detailing in relation to this proposal at the detailed design stage, sufficient information must be presented during the Examination to allow the likely success of any such proposals to be assessed.

7.6.64. The removal of selected areas of retained woodland and hedgerow within the Order limits across the line of the Avenue could offer additional potential to enhance the appreciation of this key archaeological feature within the SAAS WHS landscape, in line with the obligations under Article 4 of the 1972 Convention.

Other NMU routes & PROW (in particular AMES 11 and AMES 12)

7.6.65. HBMCE supports the aspiration and principle of enhanced public access to the WHS and its monuments as part of the Scheme. This aspiration is also in line with the SAAS WHS Management Plan, as well as Article 4 of the 1972 Convention to identify, protect, conserve and transmit cultural heritage to future generations. In addition, a key requirement set out in the UNESCO SOUV was the implementation of a landscape strategy to optimise access to and understanding of the WHS. Aim 4 of the Management Plan is to 'Optimise physical and intellectual access to the WHS for a range of visitors and realise its social and economic benefits while at the same time protecting the WHS and its attributes of OUV'.

7.6.66. As such, NMU routes and PROW are a critical element of the Scheme, offering an opportunity to assist in achieving the aims and duties set out above. However, the Scheme will need to balance provision of enhanced access to the landscape with delivery of that access in the most appropriate and sensitive form possible.

7.6.67. The design of the most appropriate and sensitive form of access will vary in relation to the specific route in question and the sensitivity of that route in relation to the OUV, Integrity and Authenticity of the SAAS WHS, as well as the significance of individual designated heritage assets within it. The provision of public access within the SAAS WHS therefore needs detailed assessment, with careful consideration of factors including (but not limited to) the level of access (whether unrestricted vehicular, pedestrian, private, public), the management requirements

associated with that access, and detailing such as surfacing materials.

7.6.68. The establishment of an appropriate approach to the surface treatment PROWs, particularly the existing A303, is a further area of detail that is critical to the Scheme. It is essential that the treatment of decommissioned surfaces and the introduction of new right of way surfaces contribute to the overall objective to achieve greater visual and physical connectivity within the landscape. It is important therefore that such routes must not be read as a visual or physical barrier and should provide a seamless transition in the landscape. The achievement of appropriate and sustainable management and maintenance on completion of the Scheme must not detract from how successful stopped up routes are in achieving this transition in the landscape in tandem with the provision of wider access. The experience of stopping up the A340 should be drawn upon as a useful learning, including the successes and challenges in managing that scheme subsequent to its completion.

7.6.69. In order to establish details to be secured in the DCO, HBMCE would expect to see detailed proposals for the type and level of access to be provided (to landowners and visitors) on each route, and an associated assessment of physical and visual effects, bearing in mind the objective of the Scheme to reduce visual intrusion from vehicles within views of and from the Stonehenge stone circle in particular.

7.6.70. Where access is to be restricted, the mechanisms for these restrictions must be secured under the DCO.

7.6.71. HBMCE will be able to provide additional updates to the Examining Authority on this element of the Scheme following submission by Highways England of additional information as outlined above, and as part of the iterative discussion of design principles that will continue during the Examination period.

7.6.72. Section 4: The Eastern Portal, Countess Junction, Eastern Scheme Origin (Chainage 10375-12572)

The route of the present A303 north of Amesbury, just east of the junction of the A303 and the A3028

Eastern Portal

7.6.73. The Eastern Portal is located to the east of the King Barrow Ridge and The Avenue, its location selected on the basis of natural topographic features and the need to avoid impacts on both heritage assets contributing to OUV and on the significance of others, including those outside the WHS. HBMCE considers that the same range of critical issues regarding the western portal discussed above are also relevant to the eastern portal (See 7.6.47 above). Consequently we will not restate them in detail here.

7.6.74. Only one visualisation of the eastern portal has been provided to date (ES 6.3 Appendix 6.9 CH19). As with the western portal (7.6.47) additional viewpoints are necessary to assess the visual impact of this element of the Scheme. For example, views from areas of higher ground within the scheduled monument of Vespasian's Camp, which also forms part of the Grade II* registered Amesbury Abbey Park and Garden.

7.6.75. As with the western portal, a visual demonstration that the Scheme has avoided potential impacts on Attribute 4 of OUV (astronomical sightlines) through positioning the eastern portal relative to King Barrow Ridge in views from Woodhenge is required (6.10.19 above).

7.6.76. Given the significance and sensitivity of the astronomical lines of the solstices (Attribute 4 of OUV) (Section 6.10.19 above; HIA Annex 5), it is critical that the DCO ensures that the Scheme will not impact on the integrity of those sightlines. Since the proposed reconnection of the landscape through diversion of the A303 into a tunnel is critical to the delivery of enhancements to Attribute 4 of OUV, it is essential that the

DCO secures the location of the western and eastern portals, and that associated documentation clarifies how light levels will be managed at these points in the landscape to avoid any harm to this Attribute. The DCO must secure this significant heritage benefit as part of the Scheme regardless of the limits of deviation that are provided for.

Mesolithic Site at Blick Mead

7.6.77. As outlined in section 5.3.9, Blick Mead is an important Mesolithic site, located adjacent to the southern edge of the Order limits, west of Amesbury. HBMCE has provided advice to Highways England regarding its development of a strategy under the Scheme to ensure that archaeological remains at Blick Mead would be preserved in line with published HBMCE guidance on *'Preserving of Archaeological Remains'* on water environment assessment techniques (HBMCE 2016).

7.6.78. This guidance is aimed at addressing two aspects of the decision-taking process:

- a) Understanding the state of preservation of archaeological material, as a contribution to the assessment of a site's significance; and
- b) Understanding the nature of potential impacts of a proposed development, to assist in the assessment of the degree of harm that might be caused to the site and its significance.

7.6.79. HBMCE is aware that the information obtained by the Blick Mead project team has identified that organic remains are preserved at the site; however, preservation conditions may be impacted due to natural seasonal variations in the water table and the natural underlying chalk geology (See 5.3.9 above). Similarly the Highways England reports identify Blick Mead as a receptor of Very High sensitivity/importance (Table 5.2), justifying this as:

"The archaeological site at Blick Mead has been noted for its preservation of Mesolithic remains due to saturated conditions. As it is a nationally significant archaeological site of high importance (it is a non-

designated Historic Environment Record) it is assessed as a very high value receptor under the water environment.”

7.6.80. Consequently a tiered assessment in accordance with HBMCE’s published guidance was required.

7.6.81. The DCO Application as submitted included a series of reports covering the main ground water risk assessments (GRA) or the Scheme (6.3 Environmental Statement Appendices; Appendix 11.4 Groundwater Risk Assessment), together with a tiered assessment (Annex 3) in line with HBMCE’s published guidance. HBMCE can confirm that the tiered assessment conforms to the advice we provided at pre-application stage and the process set out in our published guidance.

7.6.82. The GRA collated available information on geology, hydrogeology and groundwater chemistry from previous phases of ground investigation data, and the Wessex Basin conceptual study (EA, 2011), and compiled a hydrogeological conceptual model for the study area (APP-019). This was based on data from the area of the road alignment collected during previous investigations, generally between 2002 and 2006, and new data collected during the development of the ES in 2017-18.

7.6.83. Additional environmental information has subsequently been submitted (Deadline 1) which includes:

- a) a review of the previously submitted conceptual model taking account of additional boreholes and data gathered between 2018-19 subsequent to submission of the DCO application in order to inform development of the detailed design; and
- b) a technical report providing the summarised results of manual (dip meter or gauge board) and automatic (data logger) ground water recording at the Blick Mead site.

7.6.84. The conclusions of ES 6.3 Appendix 11.4, Annex 1 “Numerical Model Report” which discusses the groundwater model and the work to

assess the impact of the tunnel on water levels, state that overall the groundwater model predicts negligible changes to river flows and ground water levels at spring and abstractor locations and at Blick Mead during average summer low levels as well as drought low levels. Increases in ground water level at peak periods are sufficiently small to not increase the risk of ground water flooding from the baseline risk to communities in the area.

7.6.85. ES 6.3 Appendix 11.4 “Groundwater Risk Assessment” indicates that a conceptual model has been developed for the Blick Mead site. It indicates that the archaeological site is underlain by alluvial deposits comprising sand, peat and clay, underlain by a sand and gravel aquifer considered to be in hydraulic continuity with the Chalk aquifer at depth. This is presented in the tiered assessment following HBMCE guidance in Annex 3.

7.6.86. ES 6.3 Appendix 11.4 Annex 3 (4.1.3) concludes that Mesolithic deposits of interest are likely to remain wetted by the underlying Chalk and sands and gravel aquifer under normal conditions. Groundwater levels in the underlying aquifer are generally above 68m aOD, although could potentially drop below the upper level of the Mesolithic deposits layer towards 67.5m aOD for a number of months in a natural drought. Despite this, the draining of the Mesolithic deposits layer will not occur immediately following a drop in groundwater level owing to their lower permeability, relative to the underlying aquifer.

7.6.87. It also identifies (4.1.4) that the existing A303 road drainage may be contributing some overland flow to Blick Mead at times of heavy rainfall.

7.6.88. The overall conclusions of the final reporting and the models predict that there will be negligible impact from the Scheme on water levels at the Blick Mead site.

- 7.6.89.** As a relevant and important site in relation to the Scheme, it is essential that the Applicant conducts sufficient analysis to inform an assessment of potential impact on the archaeological remains at Blick Mead during construction and operation. In this regards HBMCE can confirm that the Tiered Assessment submitted as part of the DCO application was conducted in accordance with our published guidance.
- 7.6.90.** Secondly it is essential that sufficient information is submitted to the Examination in support of that assessment to enable a judgement to be made regarding the appropriateness and robustness of its conclusions. The inclusion of the results from the Blick Mead data collection (AS-015) to the evidence base supporting the DCO Application provided essential information to help assess the conclusions of the ES assessment.
- 7.6.91.** Whilst the period of data collection is not replicated between Blick Mead and the Scheme overall, the results of data collection within Blick Mead to date do appear to demonstrate the same patterns of seasonal change as the Scheme wide modelling. However, it would be beneficial for the Blick Mead Hydrogeological Assessment to be updated in light of the recently collected data which would make it easier to understand how that data sits within the broader picture across the Scheme.
- 7.6.92.** HBMCE is now awaiting sight of the Representations of the Environment Agency on the core documentation regarding the Ground Water Assessment against which the trends seen in the data collected from Blick Mead have been compared.
- 7.6.93.** Once we have had an opportunity to review those Representations, along with the Representations of the Blick Mead Archaeology Team (who are also registered as an Interested Party in the Examination) regarding the significance of the site, HBMCE would hope to provide the Examining Authority with additional Representations on

this matter.

Countess Junction

7.6.94. The proposals for Countess Junction follow the existing line of the A303, reusing part of the existing carriageway to minimise land take and direct impacts including to Countess Farm to the north. Between the eastern portal and the junction a raised flyover commences, north of the Amesbury Abbey Registered Park and Garden, which provides for separation of traffic for the A345 and the continuation of the A303 to the east making use of space provided for when the existing junction was originally constructed.

7.6.95. No visualisations have been provided from high level either adjacent to or from the raised highway. HBMCE consider this is necessary to assess the full extent of its visual impact and to understand how it will be integrated into the surroundings of Amesbury and the eastern edge of the WHS.

7.6.96. Further clarification is required regarding how decisions will be made in relation to the use of piling for construction of the raised highway given the implications for the historic environment. HBMCE will be able to provide further representations on this issue in line with our published guidance on *Piling and Archaeology* (HBMCE, 2019) following submission of additional clarification from Highways England on this aspect of the Scheme.

7.6.97. The lit junction at Countess Roundabout currently results in night-time light spill, contributing to negative impacts on dark skies (Attribute 4 of OUV). At present HBMCE does not consider sufficient information has been provided to illustrate how this harmful effect will be controlled and restricted in the design of the proposed raised highway, which has potential to increase this element of harm within the landscape. We would expect to see night time visualisations, in addition to the other visualisations requested above, to illustrate the effect of this

aspect of the Scheme.

7.6.98. The new road infrastructure at Countess Junction will have a harmful impact and effect on the significance of the Grade II* RPG at Amesbury, as well as the associated listed buildings at Countess Farm. Images produced at Viewpoint 30 (LVIA Figures 7.67 – 7.68) and CH22 (ES Appendix 6.9 Figure 23) illustrate the further visual separation and sense of intrusive enclosure that the raised highway will create in relation to the significance of the assets affected.

7.6.99. Despite these negative effects, the Scheme also offers the potential opportunity for modest enhancement in the same areas. HBMCE considers that there may be further opportunity within the Scheme to minimise and mitigate the impact and effect on the designated heritage assets around the Countess Junction and has outlined opportunities for further enhancement in this respect below.

Countess Farm

7.6.100. Countess Farm will be further severed from Amesbury, both visually and psychologically, by the raised highway construction over Countess Junction. The visualisations supplied (CH22 ES Appendix 6.9 Figure 23) illustrate how the raised highway will encroach on the experience of the edge of the Countess Farm site, eroding the sense of the landscape continuing beyond its boundary. Due to the proximity of the raised highway to Countess Farm, unless the height of the highway can be reduced, there does not appear to be opportunity to mitigate this visual and enclosing intrusion into its setting.

7.6.101. The Scheme proposes the removal of the existing pedestrian subway and replacement with at-grade pedestrian crossings. HBMCE considers that further details on this aspect of the Scheme are required to inform Examination of its impact and effects.

7.6.102. An upgraded pedestrian and cycle route between Countess Farm and Amesbury could partially mitigate some of the visual severance, but care will be needed with the placement of associated infrastructure such as traffic lights for the pedestrian crossings which could have a further suburbanising effect. The submitted plans indicate the roundabout beneath the new flyover will be planted up to screen the flyover, but consideration might also be given to a more open area beneath the flyover to try and increase the visual connectivity between areas to the North of the flyover and areas to the South.

Lord's Walk

7.6.103. Lord's Walk is currently severed from the former Abbey precincts by the Salisbury Road. However, as the junction of the road and Lord's Walk is also the entrance point for the town, there is in our opinion scope to delineate at least the southern line of the Lord's Walk in the carriageway and also act as a town threshold within the Order limits.

Diana's Lodge & Amesbury Abbey

7.6.104. Similarly, the setting of the Grade II* listed Diana's Lodge (NHLE 1131053), the gatehouse to the Grade I listed Amesbury Abbey (NHLE 1131079) is currently compromised by unmanaged roadside vegetation and intrusive signage. A modest but sympathetic programme of soft landscaping and alterations to signage within the Order limits could provide for significant enhancement to the significance contributed by the lodge's setting.

7.6.105. HBMCE considers that Figure 24 (CH23 ES Appendix 6.9) could be amplified with accompanying and overlaid wireframes showing the outline of the Scheme. This would enable better visualisation of where the Scheme sits and help to assess the impact and effect on the approach to Amesbury Abbey, including the approach to Diana's Lodge.

Eastern Origin of the Scheme

7.6.106. The DCO will need to secure the positioning and treatment of any changes to PROWs which currently lie in close proximity to or transect individual scheduled monuments, such as the conversion to a footpath of the byway running south from the A303 on the same line as Amesbury Road, which terminates at the scheduled monument of the Bell barrow 550m east of New Barn, Earl's Farm Down (SM 12197; NHLE 1009872). Associated works include the stopping up of the continuation of this byway adjacent to the scheduled monument of Two disc barrows and a bell barrow, 400m east of the Pennings, Earl's Farm Down (SM 12200; NHLE 1009566) and its re-routing to the north which will assist in improving its condition and offer potential positive enhancements for the monuments affected. Whilst careful detailing of these aspects will be required HBMCE does not consider that this represents a critical aspect of the Scheme and therefore these details could be addressed subsequent to a decision regarding the DCO application.

**7.6.107. Section 5: Rollestone Corner
Rollestone Crossroads**

7.6.108. The realignment of Rollestone Corner to alter the traffic flow priorities and accommodate long vehicles limits loss of farmland within the north west corner of the Stonehenge section of the SAAS WHS where the Scheme considers direct impacts on archaeological remains will be limited (ES DAS 6.3.25).

7.6.109. The delivery of this element of the Scheme with no new lighting, landscaping or planting must be secured under the DCO. The layout of the junction has been detailed to avoid direct physical impacts on archaeological remains that convey OUV. Consequently it is important that no amendments are incorporated to this element of the Scheme

which would result in impacts of this nature.

7.6.110. We are aware from our attendance at Heritage Design Meetings that proposals are developing for the detailing of PROWs around the Stonehenge Visitor Centre. Until these are submitted as part of the Examination HBMCE is unable to provide representations on the management of provision of access under the Scheme in this area of the SAAS WHS in terms of its physical (on archaeological remains) or visual impact (setting of scheduled monuments) in the area. Due to the proximity of a number of scheduled monuments, it will be important for the Scheme to ensure that it sustains a positive experience of the SAAS WHS gained at the visitors' centre, a main point of both physical and interpretive access to this landscape, through sensitive management of routes of access in this area.

7.6.111. As a general principle, HBMCE consider it important to ensure that the urbanised character of the visitors' centre car park is not allowed to bleed further into the surrounding landscape. Consequently it will be essential for the DCO to secure a sensitive approach to surface treatment for routes providing public access and the design of boundary treatments (as elsewhere across the SAAS WHS) in this area.

7.6.112. Similarly the DCO must secure avoidance of direct impacts on archaeological remains that convey OUV (Attribute 2) in this area.

**Approach to Archaeological Mitigation Across the Scheme
(OAMS/DAMS, OWSI & SSWIs)**

7.6.113. The DAMS/OWSI is a key document in the DCO application, providing an explanation of the approach to archaeological mitigation across the Scheme and an overarching WSI which will directly inform the content of the site specific WSI's (SSWSIs). A DAMS/OWSI, when correctly drafted, should ensure consistency, setting out an overall strategy and approach to archaeological mitigation for the entire Scheme,

and ensure sufficient detail is included with regards to the selection of methods and specific areas for focus.

7.6.114. The DAMS has developed from the OAMS (Outline Archaeological Mitigation Strategy) (ES 6.3 Appendix 2.2 Annex A.2), a brief document submitted as part of the DCO application which gives a high level overview of the types of recording method likely to be employed (Table 2.1), an initial proposal for areas to be preserved in situ (Table 2.2) and areas for detailed archaeological fieldwork (Table 2.3), and an outline of the method statements that would be included in the OWSI. Given the limited complexity and content of the OAMS document HBMCE proposes to restrict comments to the emerging DAMS. We consider that at this stage these comments will be of greater assistance to the Examining Authority.

7.6.115. Through our role as a statutory consultee and member of HMAG, HBMCE has provided advice on two initial drafts of the combined DAMS and OWSI since it was first shared with us in March 2019. We have welcomed the significant improvements already made to its content and approach on the basis of our advice. We understand that this document is due to be submitted to the Examination in line with Deadline 2. Once the DAMS has been formally submitted in line with Deadline 2 HBMCE will be able to provide more detailed representations on this critical element of the Scheme to assist the Examining Authority. The following paragraphs provide an indication of the focus of our advice to date.

7.6.116. HBMCE's advice has considered the need for an archaeological strategy for the Scheme that is proportionate to the importance of the SAAS WHS and the potential impact of the Scheme (NPSNN 5.140). The international importance of the World Heritage Site and the iconic status of Stonehenge itself (Attribute 1) set a high bar for such work.

7.6.117. The Scheme represents a unique opportunity to explore a linear transect through this landscape, facilitating a greater understanding of the relationships between key monuments and the spaces between them, affording the opportunity to explore the relationship between groups of monuments which are less well understood (e.g. pit clusters), to refine existing chronologies, and to bridge gaps in our existing understanding of the archaeological landscape. It will be crucial that the right information is captured at the right points in the process to inform an iterative process capable of evidencing and addressing the research questions which arise from such a landscape.

7.6.118. Whilst this development is primarily a road infrastructure proposal and does not constitute a detailed research proposal, given that it runs through an internationally recognised and highly significant historic environment, and given one of the aspirations set by the DfT specifically relates to “cultural heritage”, we would advise that the development of a specific research framework for the Scheme is appropriate. Such an approach would provide the best and most appropriate means possible to identify the extent, type and method of investigation that will be most successful, in this case, in revealing the significance of the WHS and other designated heritage assets, and in most appropriately mitigating any loss of significance.

7.6.119. HBMCE has advised Highways England that the approach to decision making about the appropriate type and level of archaeological investigation to be undertaken should be underpinned by an understanding and assessment of significance and/or OUV, as well as the level of impact.

7.6.120. We have also advised that we consider the approach to archaeological mitigation would benefit significantly from a landscape scale approach, again linked to key research themes and an understanding of significance/OUV. Many individual archaeological features, which in themselves may appear typical or indistinctive, could

be impacted by the Scheme. In the context of understanding the significance of the overall landscape, however, these features could provide crucial information that would justify additional archaeological investigation, over that which a more limited site based strategy might indicate was required.

7.6.121. We have indicated that overall the strategy presented within the DAMS should be in line with all relevant best practice and HBMCE guidance.

7.6.122. Whilst the DAMS has not yet been formally submitted as part of the Examination HBMCE is aware that the Applicant has been amending the current draft on the basis of our latest advice, as well as advice from the Scientific Committee.

Management of the Scheme (OEMP)

7.6.123. The Outline Environmental Management Plan (OEMP) (ES Appendix 2.2) sets out a code of construction practice and a series of mitigation measures to be implemented as part of the Scheme addressing design, construction and operation. These mitigation measures have been informed in part by the assessments presented in the ES. Consequently a process for iterative updating of management proposals on the basis of the latest evidence base for the Scheme needs to be established. The OEMP is incorporated into a series of Construction Environmental Management Plans (CEMP) which will be produced by the relevant contractor for the relevant phase of the Scheme. Towards the end of the construction phase the main works contractor will produce a final version of the CEMP as a Handover Environmental Management Plan (HEMP) to be implemented as part of the maintenance of the operational Scheme. Heritage Management Plans may also be required in relation to safeguarding the sensitivity of particular areas covered by the Scheme.

7.6.124. HBMCE is concerned that the proposal is for all management plans, detailed schemes (including WSIs) and method statements implemented in relation to the OEMP to be approved by Highways England (ES Appendix 2.2, 1.1.10 (a); Table 2.1; Tables 3.2a,b). Since one requirement of the CEMPs is the control of potential impacts upon the historic environment, HBMCE considers that there is need for approval of these elements of any CEMP/HEMP or other management plan included within the OEMP by the relevant heritage statutory consultee. HBMCE do not consider that it is appropriate for Highways England to act as the sole Authority in relation to approval of matters pertaining to the preservation of scheduled monuments given our statutory remit.

7.6.125. The OEMP (Table 2.1) does not indicate which role amongst the Project Team is responsible for liaising with the relevant heritage statutory consultees (HBMCE and Wiltshire Council Archaeological Service (WCAS)) who should ultimately be responsible as the archaeological curators for the Scheme for monitoring and overseeing compliance with heritage legislation, the consent and DCO documentation requirements relating to the historic environment.

7.6.126. HBMCE has commented elsewhere in these Written Representations (Section 2.22) in relation to the distinction between our statutory role and our collaboration with WCAS and non-statutory heritage bodies as part of HMAG. We would refer the Examining Authority to these comments which are also relevant here in relation to the proposed role of HMAG following the determination of the DCO application as set out in the Tables of the OEMP.

7.6.127. In addition to those elements of the Scheme outlined in Tables 3.2a and b, given the sensitivity of the landscape and the number of scheduled monuments that are located within and adjacent to the Order limits, HBMCE considers that our involvement (along with WCAS) in the monitoring of work under any category of works where there is potential

for this to impact upon the historic environment will be necessary. We would in addition note the wide potential for aspects of the environmental management plan for the Scheme to have potential for impact on the historic environment. Consequently we consider it will be necessary to embed provision in the OEMP for a process of consultation in relation to the historic environment. Where necessary, formal approval by an appropriate statutory body on any details which it is agreed can be determined following the granting of consent, regardless of whether they are classed by Highways England to relate to cultural heritage or not, may be needed. This process should include a mechanism for identifying those works which are likely to have an impact on the historic environment and for which consultation and potential approval will therefore be required.

7.6.128. The relevant management plans for the Scheme should establish a procedure for managing and securing under the DCO the avoidance of collateral damage to and preservation in situ of standing and below ground remains in accordance with HBMCE's *Preserving Archaeological Remains* guidance (HBMCE 2016). This must include all temporary works, whether protective measures around standing remains or the construction of temporary access routes, and must clarify the measures that will be implemented to ensure the full range of impacts, including compression of below ground remains, will be avoided.

7.6.129. The extent of temporary works associated with the Scheme and the nature of the compounds and haul routes necessary for its construction requires the management plans to include provisions for dealing with potential for contamination. The potential for land to be contaminated is also relevant to the existing situation at the pig farm to the south of the existing A303 within the WHS. The management plans should both secure mechanisms to ensure that there is no contamination, in particular of the internationally designated SAAS WHS landscape, as a result of the Scheme, and that any areas of current contamination are

dealt with appropriately.

7.6.130. The relevant management plans should also directly engage with the need to manage the effect of the Scheme on the less tangible Attributes of OUV of the WHS. This should include consideration of how the policies of the WHS Management Plan will be respected during the construction phase of the Scheme in particular. All management plans and method statements should take account of how the execution of the works incorporated can be approached to limit the likely significant temporary effects of the Scheme. It will be necessary to secure implementation of key policies to limit significant temporary effects during construction under the DCO.

7.6.131. The relevant management plans should also set out how any impacts assessed under the EIA in relation to the historic environment from the use of diversionary routes will be managed, and any provisions necessary to minimise or mitigate those impacts secured under the DCO.

Potential Restriction of Future Archaeological Research

7.6.132. As indicated previously in our Written Representations (7.6.53 above), it is essential for the Scheme to ensure that access to the area below ground level and above the tunnel is not restricted by structures or otherwise for archaeological investigation, since this would be contrary to the policies of the WHS Management Plan and the obligation under the World Heritage Convention (**Appendix 5** hereto) to transmit the Attributes that convey OUV. Any restriction of the ability to conduct archaeological research in this part of the SAAS WHS would be considered unacceptable.

- (a) The limits of vertical deviation for the tunnel are, therefore, relevant and important here and represent a critical element of the Scheme. HBMCE considers that it will be essential for Highways England to demonstrate, in relation to the understanding of the archaeological

resource outlined elsewhere within the ES with particular reference to the maximum depths at which archaeological remains have been encountered through production of a deposit model evidence base, that the reasonable worst case scenario in the Tunnel Section (2 ES 2.16) will not compromise the ability to continue to research this internationally important landscape through archaeological excavation.

- (b) HBMCE understands that Highways England is in the process of considering how to address the issue outlined above. Once they have submitted a proposal as part of the Examination we will be able to outline our position on this issue in more detail to the Examining Authority.
- (c) HBMCE has additionally outlined advice in relation to the proposals for deposition of the tunnel arisings in the landscape adjacent at Parsonage Down. We would refer the Examining Authority to this advice which outlined the same position and concerns to that expressed above (Section 7.6.15).

7.7. PROVISIONS IN DCO TO SECURE AVOIDANCE OF, MINIMISATION OF AND APPROPRIATE AND PROPORTIONATE MITIGATION OF HARM

7.7.1. HBMCE would expect the d1DCO terms to secure the delivery of a detailed Scheme that not only ensures that negative impacts are minimised, but where there are residual effects that mechanisms and safeguards for delivering appropriate mitigation are secured, all pursuant to aspirational heritage-led objectives being stated in the d1DCO. This is especially relevant given:

- the inscription of the SAAS WHS;
- the objectives of the Secretary of State;
- the international obligations of the State Party; and

- where the aspirations in the Application documentation for the Scheme identify the need to contribute to enhancing and further revealing the significance of the SSAS WHS.

Consequently, our comments are focused on those areas of the d1DCO where we consider further clarity is required to provide the Examining Authority with assurance that the detailed design phase will not alter the Scheme such that the assessments in the ES are no longer representative of the effects of the Scheme at any individual stage or overall.

7.7.2. Similarly, in relation to all mitigation measures we would expect to see these robustly set out in the DCO and their provision secured and where appropriate maintained to ensure the continued performance of those measures in relation to the aspirations of the Scheme. We do have some concerns that these are not yet included and secured in the d1DCO.

7.7.3. In particular, we have included comments in our Written Representations above on the relationship between, content of and approval procedure for the relevant management and mitigation documentation that is related to the d1DCO.

7.7.4. HBMCE's advice is intended to assist the Examining Authority in assessing what requirements in relation to cultural heritage are considered necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects (NPSNN 4.9).

7.7.5. Broadly, we would expect the d1DCO to secure the relevant provisions for the historic environment not only during detailed design of the Scheme, but during its construction, implementation and operation. We would highlight the following key and recurrent issues in particular.

7.7.6. In a landscape which is expressed in the SAAS WHS inscription to relate so closely with the structures also inscribed, and that draws much significance from the spatial relationships between individual monuments (Attribute 5) and its archaeological resource (Attribute 2), the precise positioning of each element of the Scheme is relevant, important and indeed critical to be able to properly assess impacts and effects. At present HBMCE considers that the extent of deviation and approximation allowed for under the DCO has not been justified, in the absence of further confirmation of how the flexibility incorporated to the determination of such details under the d1DCO affects the assessment of the effect of the Scheme and the delivery of its key cultural heritage aspiration.

7.7.7. In relation to all Articles within the d1DCO that provide the authority for either archaeological works or works with potential to affect archaeological remains to commence HBMCE would reiterate that an appropriate programme for archaeological work must be secured under the DCO and that approval for any scheme of works within the protected area of a scheduled monument must be secured through HBMCE involvement as a consultee in the sign off of documents to be approved with regards to the impact on the historic environment.

7.7.8. Where additional preliminary archaeological works are required in advance of the DCO decision and completion of the DAMS these should follow the same process of sign off to ensure that the approach remains consistent across the Scheme.

7.7.9. HBMCE would expect to see the DCO deliver an appropriate and sensitive approach to removal of human remains as part of the Scheme, recognising that in addition to the *“treatment, excavation, recording, assessment and analysis of human remains”* the deposition arrangements will also need to be considered carefully and clarified in detail.

- 7.7.10.** HBMCE would expect the d1DCO to set out clear standards for temporary works and the restoration of any land thereafter.
- 7.7.11.** HBMCE would expect the DCO to establish an appropriate procedure for approval of and certification of plans and documentation once they are considered fit for their purpose. Strategies should be incorporated within the Scheme including at the preparation of detailed design stage, to draw on the appropriate level of expertise in support of the relevant Secretary of State, the highways authority or the local authority. These strategies should recognise that HBMCE's primary role is as a statutory consultee and as DCMS's adviser in relation to the WHS status.
- 7.7.12.** HBMCE would expect the DCO to establish a robust procedure for sign off on the quality and compliance of all elements of the Scheme, in particular the archaeological mitigation strategy that draws on the expertise of the local authority and HBMCE as a statutory consultee.
- 7.7.13.** HBMCE will be further discussing the representation of our role in consultation, engagement, and discharge of requirements under the DCO as part of our SoCG discussions with Highways England. We hope to resolve this and provide an update to the Examining Authority through submission by Highways England of iterative drafts of our SoCG.
- 7.7.14.** HBMCE would expect the relationship between the DCO, the OEMP and CEMP, the OAMS and DAMS, OWSI and SSWSIs to be made explicit in implementing a strategy for the preservation of and mitigation of impact on archaeological remains across the Scheme.
- 7.7.15.** As set out in HBMCE's Relevant Representations, we noted that the DCO encompasses compulsory purchase provisions which will have a bearing on HBMCE landownership. We understand that this is to be picked up in the Written Representations submitted by the English Heritage Trust.

General Observations

7.7.16. There may be points raised by other parties in their written representations which will have a bearing on the historic environment. As such, HBMCE reserves its position to raise other matters. For example, byways (the Non-Motorised User routes) may have implications for the historic environment which are, as yet, unknown until these representations have been submitted. HBMCE would therefore respectfully submit that should further information or clarification be provided in these or other documents submitted we will review this and provide further detailed commentary as appropriate. We will review and update the Examining Authority on the matter as soon as we are able.

8. EXECUTIVE SUMMARY AND CONCLUSION

8.1. The areas of concern set out in HBMCE’s Written Representations have primarily restated and provided further detail on the key matters highlighted in our Section 56 Relevant Representations (January 2019). We recognise that details of a large highways infrastructure scheme may not be available at this stage of its design whilst at the same time recognising that the Application scheme (“the Scheme”) envisages a physical intervention within and close to a World Heritage Site that is regulated by an international convention and by the Planning Act 2008, with associated statutory guidance. The effect of the Planning Act 2008 is to disengage at this point domestic heritage statutory schemes whose overall purpose is to ensure the preservation of heritage assets affected by the proposal. It is important, therefore, that the consideration and examination of the Application is undertaken with appropriate care, and with relevant evidence before the Examining Authority, and that appropriate measures and Requirements are in place to ensure appropriate protection for this historic environment.

8.2. These concerns have highlighted gaps in the sufficiency of information submitted as part of the DCO application. In order to provide constructive, informed advice regarding how these concerns might be addressed during the Examination, we have identified what further information is needed and explained why this is necessary to facilitate a clear understanding of the effect and impact of the Scheme (including the reasonable worst case).

8.3. The justification for the detailing of the Scheme relies heavily on Highways England’s ability to demonstrate how it has avoided and/or minimised negative effects on key Attributes of the OUV of the WHS and the significance of other designated heritage assets, and how mitigation of any such impacts will be secured in the delivery of the Scheme under the DCO.

8.4. HBMCE would expect the DCO to secure the delivery of a detailed Scheme that not only ensures that negative effects are minimised, but, where there is a residual negative effect, that the terms of mechanisms and safeguards for

delivering the mitigation of those impacts on the significance of the heritage assets are secured, all pursuant to aspirational heritage-led objectives being stated in the DCO so that, within the Examination, decisions and approvals made under the DCO can be properly said to have the historic environment in mind.

8.5. This is especially relevant given the inscription of the SAAS WHS and the resulting international obligations of the State Party. Broadly, we would expect the DCO to secure the relevant provisions for the historic environment not only during detailed design of the Scheme, but during its construction, implementation and operation.

8.6. We would expect to see all mitigation measures robustly set out in the DCO, in the form of an appropriate combination of Requirements of a Schedule of Protective Provisions, and their provision secured (and where appropriate maintained) to ensure the continued performance of those measures in relation to the currently asserted aspirations of the Scheme.

8.7. Consequently, and to assist the Examining Authority and the Secretary of State, in making our own assessment of the DCO application, HBMCE has identified where design and engineering details (or parameters by which to regulate the same) at this stage are considered critical to the proper understanding and consideration of the acceptability of the effects of the Scheme on heritage assets. In all cases, we advise that these elements have potential to cause significant effects in heritage terms. Additional detail is, therefore, either required to confirm how positive effects will be secured, and how negative effects will be minimised, or to demonstrate how a negligible or neutral effect has been achieved through design or mitigation and secured at this stage.

8.8. Our concerns are summarised as follows:

- (a) Overall across the Scheme significant further information is required in the form of drawings and, in particular, visualisations. These

should show the Scheme and its visual impacts (both positive and negative and on a reasonable worst case with regard to deviation limits) in relation to the designated heritage assets that the Scheme will affect.

- (b) Details to confirm and secure the delivery of design and engineering elements which are essential to successfully integrating the following elements into the landscape:
- the new Longbarrow Junction (covered by d1DCO Schedule 1, Works Nos 1C (paragraph (c)(ii)-(viii)); 1D (paragraph (d)(v)); 3C (paragraph (c)(i)); 4 (paragraphs (c)-(f)); 6 (paragraph (a)));
 - tunnel approaches in retained cuttings (covered by d1DCO Schedule 1, Works Nos 1D (paragraph (d)(ii)); 1H (paragraphs (h)(ii))); and
 - tunnel portals (covered by d1DCO Schedule 1, Works Nos 1E (paragraph (e)(ii)); and 1G, paragraph (g)(iii)).
- (c) Further engineering detail designs, levels in relation to the existing topography, approach to, and selection of, materials and surface treatments, proposals for landscaping and the visibility of associated infrastructure such as lighting and signage are critical to the Scheme in the context of the SAAS WHS and its setting (covered by d1DCO Schedule 1, and by the Ancillary Works, including paragraphs (a), and (b)(vi), (viii) (xiii) and (xiv)).
- (d) The detail of the Scheme design, the ensured confirmation of its width at 150m, and of its position, together with the landscaping proposals for the Green Bridge 4 (covered by the d1DCO Schedule 1, Works No. 1D (paragraph (d)(i)); and 6 (paragraph (b))), are essential to secure the way in which it will be visually and physically integrated within the landscape, the extent of the landscape reconnection that the Scheme is able to effect, and the level (or degree) of that positive effect as a result of assessment of the spatial relationship between

surrounding individual and groups of assets.

- (e) The detail of design, confirmation of size and position, and landscaping proposals for the tunnel canopies (also covered by d1DCO Schedule 1, Works Nos 1E (paragraphs (e)(i)-(ii)), and 1G (paragraphs (g)(i) and (ii); F (paragraph (f)); and Ancillary Works, paragraphs (b)(vi), (viii) and (xiv)) are essential to secure the way in which they will be visually and physically integrated within the landscape.

- (f) The level of detail provided to confirm the actual position of the tunnel portal structures with a degree of precision that will secure stated aspirations and enhancements for the OUV, in particular in relation to Attribute 4 (astronomy and the skies), of the SAAS WHS. HBMCE considers it critical that the potential implications of the limits of lateral deviation in the d1DCO of 200m for the western portal are clarified at this time (covered by d1DCO, Schedule 1, Work No. 1E (paragraph (e)(ii)) and by Article 7(2)-(3) and (7) and the table relating to (7) in relation to Work No 1E in column (2), rows 1 and 2 (reference to “200 metres”)).

- (g) The level of detail provided to confirm the management of light levels (both from infrastructure and vehicle headlights) in relation to the tunnels and retained cuttings must be sufficient to demonstrate how it will achieve the stated aspiration to reduce the impact of light pollution on the WHS particularly in relation to Attribute 4 of the OUV of the WHS (covered by d1DCO, Schedule 1, Ancillary Works, paragraph (a)(iii) and (iv), and (b)(ii) and (xiv), and Articles 39 and 47(1)).

- (h) Sufficient information is required to understand the implications arising from the deposition at Parsonage Down East of the processed chalk arisings from the boring of the tunnelised section of the proposed Scheme (covered by d1DCO, Schedule 1, Work No. 1F, and Articles 7(3) and (4) and the related table), and Article 29) in relation to:

- the preservation of archaeological remains;
 - the impacts of temporary works compounds and haul routes; and
 - the long term impacts on the significance that designated heritage assets derive from this part of the landscape as part of their settings.
- (i) Sufficient information is required to enable express parameters for the treatment and detailing of NMU routes and PROWs to be assessed and confirmed during the Examination. The assessment should show how the provision of wider public access across the SAAS WHS landscape can best be achieved with careful consideration of factors such as the extent, and nature of access and surfacing materials. This applies to both new PROWs and those stopped up as part of the Scheme.
- (j) The Mesolithic Site at Blick Mead is a relevant and important site. It is essential that the Applicant provides evidence, and sufficient analysis of that evidence to enable an informed assessment of potential impact on the Scheme upon its archaeological remains during construction and operation of the Scheme.
- (k) The Scheme represents a unique opportunity to explore a linear transect through this landscape, for which the development of an informed, nuanced, structured and iterative strategy for the programme of archaeological mitigation is required, rooted in a heritage research-led framework. This should provide the best and most appropriate means possible to identify the extent, type and method of investigation that will be most successful, in revealing the OUV of the WHS and the significance of other designated heritage assets, and in most appropriately mitigating any loss of that significance. We consider it essential that the results of evaluation work (both intrusive investigation and geophysical survey) are amalgamated with a comprehensive assessment of previous archaeological work in the SAAS WHS to inform the development of

the Detailed Archaeological Mitigation Strategy (DAMS) to be employed across the Scheme in tandem with the Overarching and subsequent, subordinate, Site Specific WSIs (OWSI and SSWSIs). At all times the strategy must identify an approach that is proportionate to the importance of the archaeological remains affected and the impact upon them (NPSNN 5.140). The international importance of the World Heritage Site and the iconic status of Stonehenge itself (Attribute 1 of OUV) set a high bar for such work.

- (l) Sufficient information is required to set out a clear baseline for development of a robust strategy for environmental management of both the temporary and permanent elements of the Scheme. This must ensure the safeguarding of the sensitivity of specific areas in relation to OUV and heritage significance, and respect the policies of the WHS Management Plan throughout. It must also, in HBMCE's opinion, include for appropriate consultation and where necessary approval of statutory bodies responsible for the historic environment.

- (m) Sufficient information is required on aspects of the Scheme (e.g. tunnel plan and deviation limits) where there could be potential for its operation and maintenance to restrict future archaeological work above the tunnel crown level. This is to ensure that these details are assessed during the Examination to establish a practicable long term solution to ensure that there will be no restriction on future archaeological research in the SAAS WHS as a result of the Scheme. Any such restriction would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan and would therefore be considered unacceptable.

- (n) Other areas for potential enhancement in relation to individual designated heritage assets contributing to expressing the OUV of the WHS, or individual or groups of assets which do not contribute to expressing OUV have been identified in HBMCE's Written Representations. These other areas are not, however, considered to

be critical to the acceptability of the Scheme or the achievements of the cultural heritage aspiration set by the Department for Transport.

- 8.9.** Where it is identified that there may be potential for elements of detail to be approved at a later stage, the DCO must secure the establishment of an appropriate approach and legal parameters within which these issues could be dealt with, together with sufficient information at this stage to enable the Examining Authority to form a proper view of what a subsequent decision maker may conclude about the detail of the Scheme.
- 8.10.** HBMCE considers that the Scheme offers a once in a generation opportunity to address the harm currently being caused to the Attributes, Integrity and Authenticity of the internationally important SAAS WHS by the presence of the existing A303. However, the proposed amendment to the route of that highway does not negate the need for a robust examination of the Scheme to which end a sufficient and comprehensive base of evidence and its proper assessment is required. Critically, it is also essential that the Examination is able to form a clear understanding of the detail of what will be actually constructed if the draft DCO is granted, and to clarify how the terms of the DCO will secure delivery of the aspirational potential for enhancement in the construction of the Scheme in the event consent is granted.
- 8.11.** HBMCE therefore supports the aspirations of the Scheme but recognises that, if this potential is to be realised in practice, it is essential that a number of matters are addressed, and satisfactorily so, including by inclusion of Protective Provisions and Requirements to ensure delivery of the stated Scheme's aspirations and objectives.
- 8.12.** If necessary to explore and understand significant effects on the historic environment as part of the Examination process and as relevant information becomes available, we will provide further updates regarding our position on relevant points to the Examining Authority during the course of the Examination.

8.13. Ultimately HBMCE's Written Representations set out where, in relation to the specifics of the Scheme, we advise that clear and convincing justification for negative effects, and clarification of how all negative effects have been avoided and/or minimised as far as possible. must be provided. Our advice is intended to assist in ensuring that the delivery of all identified positive benefits can be robustly secured. A level of clear assessment is essential to inform not only the balancing exercise in the decision taking process, but also to identify for the UK Government what is necessary in order to achieve their aspirations for the Scheme whilst continuing to meet their obligations in relation to the international cultural importance of the SAAS WHS.

8.14. This concludes the Written Representations of HBMCE for Deadline 2.