



Historic England

**SUMMARY OF WRITTEN REPRESENTATIONS**

**ON BEHALF OF THE**

**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND**

**(HISTORIC ENGLAND)**

**(“HBMCE”)**

**Application by**

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

**PINS Reference No: TR010025**

**HBMCE Reference No: 20019871**

**DEADLINE 2 SUBMISSION**

**03 MAY 2019**

## INTRODUCTION

- 1.1. This document is a Summary of the Written Representations made by Historic England for Deadline 2 of the Examination into the Application for a Development Consent Order (DCO) by Highways England, authorising development to upgrade the A303 between Amesbury to Berwick Down.
- 1.2. Historic England is more formally known as the Historic Buildings and Monuments Commission for England (HBMCE). We are the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment. There is also, in this case, the requirement in Article 4 of the 1972 'Convention Concerning the Protection of the World Cultural and Natural Heritage' to protect, conserve, present and transmit the values of the Stonehenge, Avebury and Associated Sites World Heritage Site (SAAS WHS).
- 1.3. As stated in our Section 56 Relevant Representations (January 2019), and restated in our Written Representations, we are supportive of the aspirations of the proposed Scheme. By putting much of the current surface road into a bored tunnel and allowing archaeological features currently separated by the intrusive A303 trunk road to be appreciated as part of a reunited landscape, the Scheme has the potential to deliver a beneficial outcome for the historic environment.
- 1.4. The Scheme does, however, raise a wide range of issues relating to the historic environment. This includes potential impacts on monuments scheduled under the provisions of the Ancient Monuments and Archaeological Areas Act 1979 (as amended) and structures listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 along the length of the route, including the section that passes through the Stonehenge

component of the WHS. The requirement for development consent under the Planning Act 2008 results in the disapplication of consents under those other statutory regimes.

1.5. Our objective, therefore, is to ensure that the historic environment, including the WHS element, is fully and properly taken into account in the determination of whether to grant development consent for the Scheme set out in the draft DCO. More specifically, Historic England is concerned to ensure 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 with appropriate DCO terms; and
- d. The Examining Authority is fully informed, and can be satisfied, that there is clear and convincing justification for any harm with great weight being given to the conservation of assets affected as a result of the development that would be authorised by the DCO.

1.6. 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 more significant the asset and the greater the harm to that significance, the greater the justification that will be needed for any loss (NPSNN 5.132).

### **SIGNIFICANCE OF THE SALISBURY PLAIN LANDSCAPE (INCLUDING THE SAAS WHS)**

1.7. The world heritage 'property' inscribed by UNESCO on the World Heritage List in 1986 as the 'Stonehenge, Avebury and Associated Sites World Heritage Site' (SAAS WHS) is located in the Salisbury Plain landscape. It 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 settlements, burial mounds, and large constructions of earth and stone, which are recognised by UNESCO as “landscapes without parallel” in a global context. Overall, around 2000 years of continuous use and monument building between c. 3700 and 1600 BC is demonstrated. The Statement of Outstanding Universal Value (2013) includes a summary of the significance of the SAAS WHS, described in terms of certain Attributes which express the Outstanding Universal Value (OUV).

1.8. Whilst the SAAS WHS inscription reflects an exceptional focus of activity during the Neolithic and Bronze Age, the significance of the wider landscape is not restricted to archaeological remains from this period. Significance is also derived from its continuity of use, organisation and land division by successive communities and cultures, reflecting the value of this natural landscape to prehistoric and later communities, both before and after the construction of Stonehenge. The importance of continuity and connectivity to the significance of the Stonehenge landscape are explored further in our Written Representations.

## **HISTORIC ENGLAND’S ASSESSMENT OF THE SCHEME**

1.9. Historic England supports the aspirations of the proposed road scheme and considers that the Scheme (as presently articulated in the first draft DCO) has potential to deliver a beneficial outcome for the historic environment, helping to sustain and enhance the OUV of the WHS. Much of this potential benefit derives from the diversion of part of the current surface road into a bored tunnel, allowing archaeological features currently separated by the A303 to be appreciated as part of a landscape reunited at ground level.

1.10. However, if this potential is to be realised in practice, it is essential that a number of matters are addressed, and satisfactorily so, including by incorporation of Protective Provisions and Requirements to ensure delivery of the stated aspirations and objectives. This includes the Department for

Transport's own objective that the Scheme should help conserve and enhance the internationally important SAAS WHS and make it easier to reach and explore.

1.11. Our Written Representations identify key matters which we consider need to be addressed by Highways England during the Examination. These matters largely restate those identified in our earlier Relevant Representations (January 2019), as well as matters arising from our further review of the application documentation (including the Environmental Statement and supporting Heritage Impact Assessment and Settings Assessment).

1.12. These outstanding matters are summarised in the paragraphs below, with more detail included in our full Written Representations.

**Gaps in, and sufficiency of, the information submitted as part of the DCO application:**

- (a) The results of evaluation work (both intrusive investigation and geophysical survey) should be amalgamated with a comprehensive assessment of previous archaeological work in the SAAS WHS. This will inform the development of the Detailed Archaeological Mitigation Strategy and, in turn, the Overarching and Site Specific Written Schemes of Investigation.
- (b) Additional drawings and visualisations are needed to show the Scheme (as set out in the first draft DCO) and its visual impacts (both positive and negative) on aspects of the historic environment. These must show the reasonable worst case with regards to vertical and lateral deviation limits proposed in the first draft DCO, and should include static and kinetic, as well as day and night time, visualisations.

- (c) Clarification of mapped detail is needed where works are proposed adjacent to or abutting scheduled monuments.

**Areas of the Scheme where further refinement or illustration of effect is required to avoid and/or minimise harm to OUV and significance:**

1.13. Whilst aspects of the Scheme have potential to deliver benefits to the historic environment, helping to provide a stronger physical connection and visual relationship between currently disjointed parts of the landscape and thereby making it easier to reach and explore, our Written Representations identify where further refinement or illustration of effect is needed.

- (a) Detail is needed in relation to key engineering elements of the Scheme, including the relocated Longbarrow Junction, the tunnel approaches in retained cuttings and tunnel portals. This additional information should address engineering design, levels in relation to existing topography, the approach to the selection of materials and surface treatments, landscape integration, and visibility of associated infrastructure such as lighting and signage.
- (b) Detail is needed in relation to Green Bridge 4, including design detail, landscaping proposals, the ensured confirmation of its width at 150m and of its positioning.
- (c) Detail is needed in relation to the tunnel canopies, including design detail, confirmation of their positioning, and landscaping proposals to understand how they will be integrated into the landscape.
- (d) A greater degree of precision is needed in relation to the actual positioning of the tunnel portals given the sensitivity of the landscape. Historic England considers the limits of lateral deviation westwards in the first draft DCO of 200m for the western portal to be unjustified at this point.

- (e) Detail is needed in relation to the management of light levels (both from infrastructure and vehicle headlights) because of effects of light on the night time historic environment, in particular, in relation to the tunnels and retained cuttings within the SAAS WHS.
- (f) Detail remains required in relation to the deposition at Parsonage Down East of the processed chalk arisings from the boring of the tunnels. This relates in particular to:
- the preservation of archaeological remains;
  - the impacts of temporary works compounds and haul routes; and
  - long-term impacts on the significance of designated heritage assets, where this part of the landscape forms part of their setting.
- (g) Detail remains required in relation to the treatment and detailing of Non-Motorised User routes and Public Rights of Way (PROWs). This is important to understand how the provision of wider public access across the WHS landscape can best be achieved, with careful consideration given to surfacing materials, as well as the extent and nature of access provided. This applies to both new PROWs and those stopped up as part of the Scheme.
- (h) The Applicant must also provide evidence, as well as sufficient analysis of that evidence, in relation to Blick Mead (an important Mesolithic site). This is to enable an informed assessment of potential impact of the Scheme on the archaeological remains during construction and operation.
- (i) 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 to identify the extent, type and method of investigation that will be most successful in revealing the significance of designated heritage assets and in mitigating any harm to that

significance.

- (j) A robust strategy for the environmental management of both temporary and permanent elements of the Scheme is needed. Historic England advises that this should include terms enabling appropriate consultation with us, and where necessary, approval of the detail of management plans by statutory bodies responsible for the historic environment.
  
- (k) Detail is needed (e.g. in relation to vertical limits of deviation for the tunnel), together with consideration of a parameters framework, to ensure that there is no restriction to potential future archaeological work above or below ground level but above the tunnel crown level identified in the first draft DCO. This would be contrary to Article 4 of the 1972 Convention and the policies of the SAAS WHS Management Plan.

### **Provisions in the draft DCO**

1.14. Historic England would expect the first draft DCO terms to secure the delivery of a detailed Scheme, or to include the terms of appropriate parameters to address details if they are not able to be provided by the Applicant at this time.

1.15. This is particularly important and relevant given the inscription terms of the SAAS WHS, and the resulting international obligations binding the State Party. We would expect the first draft DCO to secure the relevant provisions for the historic environment not only during detailed design of the Scheme, but during its construction, implementation and subsequent operation and use by vehicles and the public.

1.16. Where it is identified that there may be potential for elements of detail to be approved during the Detailed Design Stage, the first draft DCO must secure an appropriate approach and appropriately worded legal parameters



within which these issues can be dealt with in due course, together with sufficient information at this Examination 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 in the first draft DCO.

- 1.17. Historic England will also be discussing our role in consultation, engagement and discharge of requirements under the DCO as part of our Statement of Common Ground (SoCG) discussions with Highways England. We will update the Examining Authority on this matter through submission of iterative drafts of the SoCG.

## **CONCLUSIONS**

- 1.18. As outlined in our earlier Relevant Representations, Historic England supports the aspirations of the Scheme (as presently articulated in the first draft DCO), which has the potential to deliver a beneficial outcome for the historic environment – reuniting this internationally important prehistoric landscape, severed for decades by the A303 trunk road.
- 1.19. This potential beneficial outcome, however, does not negate the need for a robust examination of the Scheme as set out in the first draft DCO terms. It is therefore essential that the examination of the Application is undertaken with appropriate care, with relevant evidence before the Examining Authority, and that measures and Requirements are in place to ensure appropriate protection for potentially affected heritage assets.
- 1.20. Our Written Representations highlight the information and refinements that we advise remain necessary at this stage to determine the Application for the first draft DCO. We will continue to discuss these matters with the Applicant, both through our role as a statutory consultee and as a member of the Heritage Monitoring Advisory Group. We hope that through this continued and constructive engagement we will be able to resolve these outstanding matters during the course of the Examination.

- 1.21. In our separate role, as part of our membership of the Heritage Monitoring Advisory Group, we will also continue to discuss these matters with the Applicant in a positive and constructive way.
- 1.22. We will update the Examining Authority when further information has been provided.