

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: TR010025 A303 Stonehenge DCO, English Heritage Trust (20020117) Deadline 4 Submission
Date: 21 June 2019 16:34:43
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[image15c526.PNG](#)
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Dear Sir / Madam,

Attached is English Heritage Trust's additional written representation for Deadline 4. I trust this email is satisfactory for submission, but please let us know if you require anything else.

We would be grateful if you could please acknowledge safe receipt.

Yours faithfully

Freeths LLP

Robert Bruce

Partner



FREETHS

Freeths LLP

1 Vine Street, Mayfair

London W1J 0AH

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ENGLISH HERITAGE

**ADDITIONAL WRITTEN REPRESENTATIONS (DEADLINE 4)
ON BEHALF OF ENGLISH HERITAGE TRUST (EHT) TO THE
EXAMINING AUTHORITY (ExA)**

Re: Application by

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

PINS Reference No: TR010025

Interested Party Reference No: 20020117

I Introduction

- I.1 The following statement has been prepared by EHT for the examination of HE application for a Development Consent Order (DCO) for the A303 from Amesbury to Berwick Down which currently runs very close to Stonehenge.
- I.2 This additional written representation covers the following points:
 - I.2.1 Feedback on Environmental Statement (ES) Appendix 2.2 Outline Environmental Management Plan (OEMP) Deadline 3 Update – 31 May 2019
 - I.2.2 Matters arising from Highways England response to EHT Written Rep submitted at Deadline 2
 - I.2.3 Matters arising from the Issue Specific Hearings including:
 - I.2.3.1 Old Stonehenge Road - extension of stopping up
 - I.2.3.2 Clarification on EHT car parking provision and charges
 - I.2.3.3 Clarification on EHT solstice parking arrangements
- I.3 Clarification of points raised in the tourism section of ES Chapter 6.1 Heritage Impact Assessment (HIA)

2 Feedback on ES Appendix 2.2 OEMP Deadline 3 Update – 31 May 2019

- 2.1 EHT welcomes the progress made in the latest version of the OEMP to provide a mechanism for engagement and consultation beyond the DCO process. We have given HE feedback in regards to our concerns related to the effectiveness of the consultation process. We have also flagged we are: seeking to be consulted in the development of the CEMP and a number of the plans, strategies and policies that are appended to this document; seeking recognition in the OEMP that there are ancient artefacts on display at the Stonehenge Visitor Centre which will need to be monitored carefully for impacts of vibration from nearby construction; and require more information about what the monitoring of the Stonehenge monument entails to assess the heritage and operational impacts of this. EHT is also working through HMAG to support the development of design principles and commitments.

3 Matters arising from Highways England response to EHT Written Rep

- 3.1 EHT notes the comments from Highways England to our Written Representations.
- 3.2 EHT will continue to discuss the matters outlined in our Written Representations with HE until we are satisfied with the level of information provided. As stated in Section 2 in our comments on the OEMP, EHT welcomes the commitment to be engaged and consulted beyond the DCO and would like to see this extended to the development of CEMP and other key documents.
- 3.3 At paragraph 28.5 HE has failed to demonstrate that there is a compelling case in the public interest for compulsory acquisition of part of the Visitor Centre site, including the loss of overspill car parking, in comparison to alternative options for the A360 PROW. HE has failed to carry out an assessment as to whether there is a compelling case in the public interest and the best alternative, rather the route and site selection process is based on a failure to properly carry out pre-application consultation and a reluctance to change the submitted draft DCO because EHT's "*alternative route is on land in third party ownership and outside Order limits*" and "*could only be delivered by agreement outside of the DCO, or alternatively within the Order but subject to the established procedures for changes to development consent orders during an examination*". EHT in its representation of 10 January 2019 had flagged this issue long ago that "*The fact that EH's suggested alternative route mentioned above is outside the land identified for compulsory acquisition does not constitute a compelling reason in the public interest to compulsorily acquire the land and interests in question, given the impacts*" and, therefore, the need to add land into the DCO compulsory acquisition carries no weight (or negligible weight if any) in the assessment of the best route, consequentially the best land for compulsory acquisition and whether there is a compelling case in the public interest for compulsory acquisition of the currently selected land across part of the Visitor Centre site.
- 3.4 The compulsory acquisition of part of EHT's Visitor Centre site is outside of the powers of the legislation in S122 of the Planning Act 2008 and cannot lawfully be authorised under the DCO because the Secretary of State cannot be satisfied on the evidence submitted that there is a compelling case in the public interest for that land to be compulsorily acquired. Section 122 states:
- (1) An order granting development consent may include provision authorising the compulsory acquisition of land only if the Secretary of State is satisfied that the conditions in subsections (2) and (3) are met.*
- ...
- (3) The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily.*

4 Matters arising from the Issue specific hearings

4.1 Old Stonehenge Road:

4.2 EHT noted the discussion during Issue Specific Hearing 6 regarding the stopping up of the Old Stonehenge Road and whether this should be extended further towards Amesbury. EHT remains neutral on this matter. Our main concern is ensuring access for our tenants at the Stonehenge Cottages.

4.3 Clarification on EHT car parking provision and charges:

4.4 EHT noted the discussion during the Issue Specific Hearing 5 regarding car parking provided at Stonehenge, some of which was inaccurate. Below is a summary for clarification.

4.5 English Heritage manages two parking areas within the Stonehenge Visitor Centre site - a coach park with over 50 spaces for pre-booked coaches and a car park with approximately 500 permanent spaces on hard-standing. In addition, as noted in the Momentum Transport Consultancy Report dated 1 May 2019 submitted as Appendix 2 of EHT's Deadline 2 Written Representation an area of grass located next to the permanent car park is occasionally used to provide additional parking on some peak days. The proposed A360 PROW would result in the loss of some overspill parking in this area. This essentially reduces vehicular access for visitors to Stonehenge. A public bus service from Salisbury (The Stonehenge Tour Bus) stops in a purpose-built layby in the coach park.

4.6 Car parking charges only apply during school holidays and weekends in June/July - this is approximately 30% of our opening hours. Outside of these high-days and holidays all visitors park for free.

4.7 When the car park charge is in operation, it costs £5 to park a vehicle. When a visitor is charged £5, it is refunded if an admission ticket or EHT membership is purchased upon arrival.

4.8 English Heritage members, Local Resident's Pass holders, National Trust members and visitors with a pre-booked ticket to Stonehenge are not charged on arrival and park for free. All coaches are pre-booked and are not charged for parking in the coach park.

4.9 In summary a minimum of 70% of our visitor's park for free during periods when charges are in operation (those who receive refunds after purchasing a ticket or membership are additional to this) and 100% for the majority of the time.

4.10 **Clarification on EHT solstice parking arrangements:**

4.11 Since 2000, EHT offers 'managed open access' (MOA) to Stonehenge free of charge four times a year at summer and winter solstice and spring and autumn equinox. The nature of solstice means there are different operational plans and parking arrangements depending on the size of the event and time of year. Access to Stonehenge is free but parking is not for some of these occasions.

4.12 **Summer Solstice:**

4.12.1 Summer Solstice car park operates from 7pm on 20th June to 12pm (midday) on 21st June. There is a parking charge of £15 per vehicle (including cars, motorhomes and non-commercial minibuses (up to 16 seats) for up to 17 hours of parking. Motorcycles are £5. This income is used to off-set in part the considerable cost of providing the car park and to help promote car sharing and public transport. For Summer Solstice however it is necessary for EHT to rent land to accommodate the large volume of cars that travel to the event, plus infrastructure and staffing to manage it. EHT uses its hard-standing car parks at the Visitor Centre for blue badge and crew parking. A free shuttle bus from the car park to the stones is provided for anyone with accessibility needs. Attendances have ranged from 10,000-30,000.

4.13 **Winter Solstice:**

4.13.1 Winter Solstice car park operates from 6am to approximately mid-morning on 22nd December. The car parking charge is £5. The Visitor Centre car park is used and a secondary off-site park-and-ride car park is set up specifically for the occasion. EHT rents land, buses and drivers to provide this service. Parking for Blue Badge holders is reserved at the Stonehenge Visitor Centre Car Park. Attendances are usually around 5,000-7,000.

4.14 **Spring & Autumn Equinox:**

4.14.1 In recent years, the Stonehenge Visitor Centre car park and shuttle bus has been used free of charge for those attending the spring and autumn equinox. Prior to that, EHT did not provide parking and attendees tended to park on byway 12. Attendances are usually less than 1,000.

5 **Clarification of points raised in ES Chapter 6.1 Heritage Impact Assessment (HIA)**

- 5.1 There are some inaccuracies or out of date information within the Heritage Impact Assessment tourism section regarding EHT. Below is a list of clarifications.
- 5.2 Section 6.12.43 of the HIA references English Heritage's Phase I Visitor Survey. English Heritage is not the owner of this survey and our name should not appear here. This was raised at an Issue Specific Hearing.
- 5.3 Section 6.12.18 talks about EHT's educational offer. EHT would like to confirm that all education groups (ranging from UK and international schools, scouts, brownies, home educators etc.) have *completely free* access to Stonehenge and all other EHT properties. Some groups choose to pay for an additional 'Discovery Visit' workshop (expert-led sessions) whilst they are on site.
- 5.4 Section 6.12.19, 6.12.48 and 6.12.51 misrepresents the current and future capacity of the EHT Stonehenge visitor experience. To clarify, EHT operates a car park management plan at peak times to ensure we can accommodate visitors. Our ticketing allocation system encourages pre-booking but is flexible enough to accommodate spontaneous visits for those who decide to visit on the day. The environmental sensitivity of the WHS as well as the capacity of the existing amenities are considerations in future visitor growth. However, it is incorrect to assert that Stonehenge is 'full' throughout peak season. Current and future on-site capacity is driven by a number of variables including: season, month, day of the week and time of the day.

6 Conclusions

- 6.1 As outlined in our earlier representations, EHT is broadly supportive of the scheme which has the potential to transform the Stonehenge part of the WHS – it offers the opportunity to reunite this internationally important landscape currently severed by the A303 and make significant improvements to the setting of the Stonehenge monument.
- 6.2 We will continue to discuss the matters outlined in our Written Representations with Highways England. In our separate role, as part of our membership of the Heritage Monitoring Advisory Group, we will also continue to discuss these matters with the Applicant in a positive and constructive way.