



Historic England

**HBMCE Comments on Outline Environmental Management Plan
submitted at Deadline 3
(OEMP)**

Deadline 4 Submission

21st June 2019

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

1. INTRODUCTION

1.1. 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). Our role is set out in more detail in our Written Representations (Section 2).

2. THE OUTLINE ENVIRONMENTAL MANAGEMENT PLAN (OEMP)

2.1. The purpose of the Outline Environmental Management Plan (OEMP) is to set out the proposed measures through which the environmental effects of the Scheme will be managed, whether through design mitigation, during construction or during operation. Consequently it must present a range of mechanisms through which that mitigation will be secured at each stage in the Scheme. It is important that the OEMP demonstrates the application of a consistent approach across the Scheme including setting out how those elements of mitigation which are embedded in the design will contribute to the achievement of that approach.

2.2. Given the continued discussions which are being held with Highways England regarding the approach to development of the detailed design HBCME have sought to provide the Examining Authority with an indication of our overarching approach to the OEMP document at this stage.

3. RELATIONSHIP BETWEEN OEMP AND DAMS

3.1. The d2DCO provides that the Scheme must be carried out in accordance with the Detailed Archaeological Mitigation Strategy (DAMS) and OEMP and as such these are both fundamental documents to the Scheme. There is need for a clear relationship between the management and mitigation

measures they provide for and secure under the DCO. In order to ensure that the measures in both are properly secured we will continue to provide more detailed comments on drafting to Highways England to assist them in updating the OEMP (as well as the DAMS) under a consistent and overarching approach.

3.2. At present, and this is similarly reflected in our comments on the d2DCO (see in particular commentary on draft Article 2 and the definition of “commence”), there remains a need to provide additional clarity regarding the scope of activity covered during the Preliminary Works stage. The definitions of the scope of works covered must be consistent across the various documents submitted. At present it does not appear that there is such consistency although this may result from differing deadlines for submission of the dDCO and OEMP which might be resolved following submission of the next iterations of these documents.

3.3. We remain cautious in relation to the categorisation of work and the extent to which the OEMP will secure the appropriate level of environmental management and mitigation that is necessary. Where it is indicated that categories of work would commence in advance of the certification of the OEMP we remain in discussion with Highways England regarding how, in such circumstances, the implementation of an equivalent level of management and mitigation would be similarly secured.

3.4. In particular we are looking to ensure that the OEMP would provide for appropriate coverage for both temporary and permanent works throughout the whole programme, both within and outside the WHS.

3.5. We consider that it would also be helpful for the process for amendment and change to the OEMP, if this is being proposed post certification by the Secretary of State, to be clarified further.

4. RECORD OF ENVIRONMENTAL ACTIONS AND COMMITMENTS (REAC) TABLES

4.1. The separation of the work into topics is helpful but its presentation can also undermine the achievement of a holistic approach. We have recommended to Highways England that the presentation of the REAC Tables be reviewed to consider how these might be made more accessible and how the relationships between different elements could be better highlighted. For example, the inclusion of a table of contents as a minimum would provide assistance in orientating to the relevant commitments in the tables.

4.2. A particular complexity associated with the Scheme due to the nature of the WHS inscription is the extent to which cultural heritage can be affected by multiple aspects of the works executed at each stage of preliminary works, main construction and operation, including all the temporary works necessary to facilitate each stage. Hence it is important that the OEMP coordinates the management of risk to designated heritage assets and archaeological remains by identifying which phases of work must be conducted in compliance with the DAMS through the REAC tables.

4.3. The OEMP therefore presents one opportunity and a means to ensure that the potential for unintended consequences for the historic environment across the entire Scheme is avoided through detailed reference to where, for example, works must be conducted in accordance with the DAMS and SSWSIs.

4.4. Consequently it is important that these relationships are cross referenced throughout the REAC tables and their easy and clear identification is facilitated by the structure of this section of the OEMP.

5. DEVELOPMENT OF DETAILED DESIGN

5.1. A significant inclusion in the latest iteration of the OEMP is at section 4 in relation to the development of the detailed design for the Scheme.

5.2. HBMCE consider that it is important to ensure that there is a consistent and holistic approach to development of the detailed design across the entire

Scheme. At present section 4 of the OEMP focuses on the design within the WHS exclusively. In our opinion there is need for this to be expanded across the full extent of the Order limits so that an equally sensitive approach is adopted to elements of the Scheme located within the setting of the WHS or within the setting of other scheduled monuments outside the WHS not considered to contribute to the OUV of the WHS, as within the WHS itself. The OEMP should seek to achieve consistency in design where this is needed to ensure, for example, comparability in terms of quality of material or typology, while still allowing sufficient flexibility to identify appropriate responses to the significance and sensitivity of individual areas of the Scheme. In so doing it will allow for the identification of areas within the landscape where its character transitions, and where the Scheme will therefore need to similarly transition through its detailed design to reflect the same change in character and be more successfully integrated into that landscape.

6. DESIGN VISION FOR THE SCHEME

6.1. Given the international importance of the landscape, described as being without parallel, there is a need for an overall vision for the Scheme. This has also been identified by the Examining Authority. The character of the WHS, both in terms of its historic and natural environment, should form the starting point for this design vision.

6.2. HBMCE has been discussing with Highways England how to develop such a vision which should outline a set of unifying principles on which basis the current illustrative and detailed designs can both evolve. It should set a bar for the quality of both design and delivery that should be expected across all aspects of the Scheme, commensurate with the international importance of the WHS landscape and directly responding to the elements within that landscape that convey its OUV.

6.3. In the current draft we have found that the separation of the design commitments which have been included in the REAC tables in Section 3 from

the design principles set out in Section 4 does not facilitate the narration of the coherent and consistent overarching approach that is needed.

7. HERITAGE LED DESIGN

7.1. One of the 4 stated objectives of the Scheme defined by the Secretary of State/Department for Transport is that of Cultural Heritage. HBMCE have advised Highways England to consider how the drafting of the OEMP can further actively engage with this core objective, seeking to embrace the opportunity for design-led mitigation of environmental effects. As currently drafted the OEMP prioritises the ability to deliver the Scheme in decision making. Whilst recognising that deliverability is important, we would also advise that the core cultural heritage objective offers a real opportunity to achieve a Scheme of the very highest quality by fully engaging with the potential for heritage-led design to contribute to the detailed design process. The continued input of key heritage consultees and advisers to assist in delivering this core objective at the heart of the Scheme, so embedded due to the international importance of the WHS landscape, offers the opportunity to achieve a final Scheme with cultural heritage firmly rooted in all levels of decision making.

8. ARCHAEOLOGICAL MITIGATION

8.1. The appending of the OAMS to the OEMP presents confusion since this document has been superseded by the DAMS. We consider therefore that all references in the OEMP should be to this more detailed document which now more accurately reflects the strategy for archaeological mitigation that is to be employed across the Scheme.

9. CONSULTATION, APPROVAL AND SIGN OFF

9.1. In our Written Representations, submitted at Deadline 2, HBMCE indicated that we did not consider it appropriate for Highways England to act as the sole authority in relation to approval of matters pertaining to the historic environment under the Scheme (Section 7.6.124).

- 9.2. We remain in discussion with Highways England regarding this issue to clarify how HBMCE will engage with the development of the documentation produced under the Scheme (ranging from, for example, the CEMPs, to the OLEMP, HMP, CHAMP, DAMS, HEMP, HMP, OLEMP, OWSI, SSWSI, and Method statement for preservation in situ of archaeological deposits).
- 9.3. We are aware that a new provision has been included on the basis of these discussions to date in the dDCO. HBMCE will continue to discuss the matter of the process of consultation and approval with Highways England in our role as a statutory consultee as well as in conjunction with other members of HMAG.
- 9.4. HBMCE's role in approval of documents would be to ensure that the historic environment in general, as well as the OUV of the WHS and the scheduled monuments within and surrounding it, are appropriately safeguarded under the Scheme and all impacts proportionately mitigated.
- 9.5. We would expect to be able to provide the Examining Authority with updates regarding the progression of these continued discussions both in our Statement of Common Ground and in comments on subsequent versions of the OEMP and related documents such as the DAMS submitted during the Examination.
- 10.** HBMCE will look to update the Examining Authority on the progress of discussions regarding all the matters identified above both through further written submissions and through our evolving Statement of Common Ground with Highways England.