



Summary of Points Issue Specific Hearings August 2019

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The Stonehenge and Avebury World Heritage Site Coordination Unit (WHSCU) welcomes the opportunity to submit a brief note on the matters raised as Issue Specific Hearings in August – Heritage etc. and Issue Specific Hearing 3 – Landscape/visual etc.

The role of the WHSCU is to draft, update and coordinate the implementation of the Stonehenge and Avebury World Heritage Site Management Plan working with national partner organisations, the local authority, landowners, farmers, local communities and other stakeholders. In addition, it monitors and reports on the condition of the WHS and revises and updates the Management Plan.

The WHS Management Plan is endorsed by DCMS and partner organisations who sit on the local WHS Committees and the WHS Partnership Panel but the contribution to the hearings was on behalf of the WHSCU. Partner organisations were present at the hearings and provided their own response.

A key role of the WHSCU is to offer impartial and independent advice on issues relating to the implementation of the Management Plan and its overarching aim, the protection of the WHS and its OUV. Alongside the statutory spatial planning system and designation of specific assets the development of WHS Management Plans represents a major element of the United Kingdom Government's approach to fulfilling its obligations under the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage to identify, protect, conserve, present and transmit WHSs to future generations (UNESCO 1972, Article 4). The ICOMOS Guidance on Historic Impact Assessment for Cultural World Heritage Sites (2011) suggests that proposals should be tested against policy frameworks and the Management Plan for the WHS. In its written representation, the WHSCU will highlight points based on a review of how the current proposed scheme aligns with the aims and policies set out in the WHS Management Plan and other elements of the relevant policy framework including Policy 59 of the Wiltshire Core Strategy.

Policy 1a of the Stonehenge and Avebury WHS Management Plan 2015 states the *Government departments, agencies and other statutory bodies responsible for making and implementing national policies and for undertaking activities that may impact on the WHS and its environs should recognise the importance of the WHS and its need for special treatment and a unified approach to sustain its OUV*. The WHSCU appreciates Highways England's commitment to this policy and their efforts alongside partner organisations to reflect this in their submission.

The scheme offers a remarkable opportunity to remove the harmful impacts of the A303 in line with the aims of the WHS Management Plan. The potential to create new and damaging impacts is however a real possibility. This needs to be avoided through an appropriately designed scheme based on comprehensive modelling and visualisations that would allow accurate, expert assessment and meaningful mitigation. In response to consultations during the development of the scheme the WHSCU underlined the need for a comprehensive and robust Heritage Impact Assessment (HIA) in line with ICOMOS guidance. We welcome the preparation of the detailed HIA undertaken to accompany the application however a number of points remain regarding both the alignment of the current scheme with the WHS Management Plan vision, aims and policies and the ability to fully



assess this. Below is a brief note on points raised in relation to these issues. The outline summary aims to avoid repetition of points made in previous representations. Points raised at the hearing were outstanding issues regarding the alignment of the scheme with WHS Management Plan aims and policies rather than any beneficial elements of the proposed scheme.

Summary of principal points

Harm to the OUV of the WHS

The comments in relation to this item on the agenda remain the same as those provided in response to the first hearing when the weight given to the protection of OUV was discussed. No changes in application or new evidence from the developer have appeared in the interim to alter this position. The issue relates to the weight given to international obligations to prioritise the protection of WHS's and how far damage to an area of a cultural landscape can be offset by enhancement to another.

A State Party who ratifies the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage is obliged to identify, protect, conserve, present and transmit its WHSs to future generations (UNESCO 1972, Article 4). In England, this duty should be carried out through the statutory spatial planning system, designation of specific assets and the development of WHS Management Plans. The National Planning Policy Framework (NPPF) recognises WHSs as heritage assets of the highest significance. It states that the WHSs 'are internationally recognised to be of Outstanding Universal Value... an irreplaceable resource and should be conserved in a manner appropriate to their significance.'. At paragraph 194 the NPPF states that: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: b) assets of the highest significance, notably scheduled monuments....and World Heritage Sites, should be wholly exceptional."

The Planning Practice Guidance (PPG) Further Guidance on World Heritage Sites prepared in 2014 to align with the NPPF states that '...the description of the Outstanding Universal Value will be part of the World Heritage Site's heritage significance and National Planning Policy Framework policies will apply to the Outstanding Universal Value as they do to any other heritage significance....' (para 31). At paragraph 29 it confirms that Statements of OUV are 'key reference documents for the protection and management of each Site and can only be amended by the World Heritage Committee.'

The Statement of OUV for Stonehenge, Avebury and Associated Sites was adopted by the World Heritage Committee in June 2013. The Statement of OUV now forms the focus of all protection and management decisions. Statements of OUV are key references for the effective protection and management of WHSs, the main objective of which should be to sustain their OUV. Any assessment of impact should take the Statement into account and not focus solely on the list of attributes. The attributes are designed to aid management decisions and do not obviate the need to consider the Statement of OUV as a whole. The WHS Management Plan at 2.3.8 underlines that "the attributes are not themselves individually of OUV but that together they express the OUV of the Site." In addition, at 2.3.10 it notes that the "the very high potential for future discoveries in the WHS means that any list of components could not be considered final. Further components will emerge as our understanding advances and deepens through research and the development of management tools



such as the WHS Setting Study and Landscape Strategy.” The HIA relies on assessments of some of the currently identified heritage assets contributing to OUV. This is therefore an assessment limited to current understanding.

Due to the limitations of assessing the impacts on the attributes of OUV through some of the currently identified assets that convey this, we should ensure that we consider a more consistent and robust assessment if we are to fulfil our international obligations.

We should consider the criteria for which the Stonehenge and Avebury WHS appears on the World Heritage List. These include Criterion ii: “The World Heritage property provides an outstanding illustration of the evolution of monument construction and of the continual use and shaping of the landscape over more than 2,000 years, from the early Neolithic to the Bronze Age, the monuments and landscape have an unwavering influence on architects, historians and archaeologists over time, and still retain a high potential for future research.” Both this and Criterion iii emphasise the holistic nature of the cultural landscape which makes the validity of balancing the impacts of development on different asset groups in different parts of the landscape more questionable.

Heritage Impact Assessment

The HIA finds on balance that the proposed scheme has a slight beneficial effect on the WHS. Although the document is commendable in its comprehensive approach and level of detail, its conclusions on the effect of the proposed scheme are open to question. It is unclear that the effect on the WHS as a single cultural landscape and in particular its integrity and authenticity can be arrived at by adding together the impacts on discrete known heritage assets and the relationship between them. A further challenge is assessing the scale of the impact of the existing surface A303 against the topographical change engendered by the deep, largely uncovered cutting.

There are other aspects of the HIA that are open to question. The assessment of impact on OUV in relation to Attribute 1 is problematic as it relates to intangible aspects namely the global fame and iconic status of the monument. The current status of Stonehenge as one of the most famous prehistoric monuments in the world makes it difficult to conclude that the existing A303 has had a large adverse impact on this intangible attribute. The scheme is unlikely to benefit this fame or iconic status although it would bring substantial benefits to its setting and relational attributes; attributes 3, 4 and 5. It is questionable whether to the very large beneficial impact can be justified. The assessment of impacts on attribute 2, the physical remains, also calculates benefits beyond those which relate to the physical remains in its conclusion that the current road has large adverse effects. In short the slight beneficial impact on the OUV of the WHS could very well be an overstatement of the overall impact of the scheme. This could affect the assessment of its value for money.

ICOMOS Guidance could have been adhered to more closely in the preparation of the HIA. Outcomes have appeared too late to effectively influence design and a limited approach to stakeholder involvement has constrained the effectiveness of the process. The WHS governance structure had little opportunity to influence assessment or design. Ideally an HIA should be produced very early in the scheme design with a wide range of stakeholder involvement as advised in the ICOMOS guidance. It should be an iterative process aimed at producing a scheme that best protects the WHS and its OUV.



World Heritage Committee adopted decision and report

Decisions of the World Heritage Committee should be taken very seriously by state parties who have ratified the World Heritage Convention. The role of the World Heritage Committee as set out in UNESCO's *Operational Guidelines for the Implementation of the World Heritage Convention* (paras 19 -26) should be noted. In particular it is important to acknowledge that the main functions of the Committee include to:

- a) identify, on the basis of Tentative Lists and nominations submitted by States Parties, cultural and natural properties of Outstanding Universal Value which are to be protected under the Convention and to inscribe those properties on the World Heritage List;
- b) examine the state of conservation of properties inscribed on the World Heritage List through processes of Reactive Monitoring (see Chapter IV) and Periodic Reporting
- c) decide which properties inscribed on the World Heritage List are to be inscribed on, or removed from the List of World Heritage in Danger;
- d) decide whether a property should be deleted from the World Heritage List

The position of the World Heritage Committee needs to be considered very seriously in the assessment of the appropriacy of the scheme.

Visualisations

The WHSCU has been asking for digital modelling that better reflects the impact on people's ability to experience the WHS cultural landscape throughout the process of development of the scheme. This has still not been supplied. We continue to request visualisations that reflect the experience of moving through the landscape and across the green bridge so it is possible to adequately assess impact on the WHS and advise on mitigation. It remains regrettable that the most advanced modelling is photomontage from fixed points. For one of the most preeminent sites in the world it remains difficult to understand why no interactive immersive environment has been produced to robustly assess the impacts of the proposed scheme on people moving through the landscape.

If permission is given to go ahead with the scheme this should be provided as an essential tool in identifying the most appropriate mitigation through comprehensive and innovative design. A number of the existing photomontages do demonstrate that extremely innovative and comprehensive mitigation will be required. This is particularly true for the western portal and cutting. A clear example of this is Appendix 6.9 Figure 11 Viewpoint CH10. This visualisation from a key barrow group towards the portal indicates that some form of cover would be appropriate. Views from the green bridge will again require extensive mitigation to reduce harm.

The discussion of fences and the possible additional requirements for safety in this iconic landscape were concerning. Intensive high fencing on the green bridges and above the line of the cutting would have a harmful effect on the landscape character. It was of some concern to note the number of fences alongside PROW in the landscape in the photomontages provided. This which will reduce the benefits of the open landscape sited as a valuable outcome of the scheme. These measures and their design will require very careful thought and sensitive design.



OEMP

The WHSCU welcomes the invitation in the week of the hearing to be involved in agreeing the Design Principles. This should continue as the principles evolve. It is important that input is sought from a wider range of stakeholders than those represented on HMAG. We have a governance structure for the WHS that has been accepted by UNESCO and all endorsing bodies as representing key stakeholders. We have a committee for each half of the serial WHS and a WHS Partnership Panel which deals with strategic matters across the WHS. These stakeholders should be consulted. Highways England should not be only the deciding authority.

It is important that the Design Principles explicitly incorporate the Vision agreed in the World Heritage Site Management Plan. Key terms in the Vision include the need for a tranquil, rural and ecologically diverse landscape. The Vision is attached at Appendix A.

When tenders are assessed quality should be of paramount importance. Truly innovative and effective design approaches need to be sought. These should not be hampered by overly constrained budgets or mitigation of harm will be harder to achieve.

It is important to ensure that all measurements of noise and emissions reflect the experience of the visitor in the landscape particularly where the impacts will be most marked near portal entrances and the cutting. Standard locations required by environmental assessment such as nearest dwellings must not be relied on when assessing impacts on visitors' experience of the WHS landscape.

Setting

The brief for the WHS Setting Study has been prepared by a project board including Wiltshire Council, the North Wessex Downs AONB, Historic England, the NT and WHSCU. It now requires funding to employ a consultant to deliver the study. This should not however impede accurate assessment of impacts on the WHS from changes in its setting related to this scheme. Assessment should follow guidance set out in The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England 2017).

Archaeological mitigation

No matter how comprehensive and exemplary the methodology there will still be destruction of the archaeological record which will limit the potential for understanding the cultural landscape both now and in the future. It will have closed off an avenue for increasing our understanding. Mitigation should be assessed in relation to the following WHS Management Plan requirements:

Aim 7: Encourage and promote sustainable research to improve understanding of the archaeological, historic and environmental value of the WHS necessary for its appropriate management. Maximise the public benefit of this research.

Policy 7a – Encourage sustainable archaeological research of the highest quality in the WHS, informed by the WHS Research Framework

Management of Byways in the World Heritage Site



The Management Plan contains policies and actions related to the management of byways. These refer not only to protection of archaeology but to the creation of a tranquil environment in which visitors and residents are encouraged to explore and understand the wider WHS landscape. It is unclear how allowing continued motorised access to current BOATs will achieve this. To achieve the full benefit for the WHS of the below ground elements of the scheme and support the search for value for money, the byways within the WHS should be closed to all motorised traffic except where access is required. The following aim and policies are particularly relevant:

Aim 6: *Reduce significantly the negative impacts of roads and traffic on the WHS and its attributes of OUV and increase sustainable access to the WHS.*

Policy 6a – Identify and implement measures to reduce the negative impacts of roads, traffic and parking on the WHS and to improve road safety and the ease and confidence with which residents and visitors can explore the WHS

Policy 6b – Manage vehicular access to byways within the WHS to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot whilst maintaining access for emergency, operational and farm vehicles and landowners

Appendix A

The Vision from the World Heritage Site Management Plan 2015

The Stonehenge and Avebury World Heritage Site is universally important for its unique and dense concentration of outstanding prehistoric monuments and sites which together form a landscape without parallel. We will work together to care for and safeguard this special area and provide a tranquil, rural and ecologically diverse setting for it and its archaeology. This will allow present and future generations to explore and enjoy the monuments and their landscape setting more fully. We will also ensure that the special qualities of the World Heritage Site are presented, interpreted and enhanced where appropriate, so that visitors, the local community and the whole world can better understand and value the extraordinary achievements of the prehistoric people who left us this rich legacy. We will realise the cultural, scientific and educational potential of the World Heritage Site as well as its social and economic benefits for the community.