



Susan Anderson
Head of Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

18 May 2020

Dear Ms Anderson

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure)
Rules 2010**

**Application by Highways England (“the Applicant”) for an Order granting
Development Consent for the construction of a new two-lane dual carriage way
for the A303 between Amesbury and Berwick Down in Wiltshire.**

Thank you for your letter of 04 May requesting further information or comments on behalf of the Secretary of State for Transport from the Applicant, Historic England and Natural England. We note that Highways England was requested to provide an updated Outline Environmental Management Plan (OEMP) and updated Detailed Archaeological Mitigation Strategy (DAMS) to address various points set out in the letter in relation to those documents. We note also that the Secretary of State would welcome the comments of Historic England on the proposed amendments to the OEMP and DAMS and our assessment of the extent to which the amendments might help to minimise the harm to the Stones and surrounding environment of the World Heritage Site (WHS).

Historic England is 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.

Our response is structured to follow the numbered points raised in your letter.





Document 6.3 (7) Environmental Statement Appendix 2.2 – Outline Environmental Management Plan (OEMP) [Examination Library document AS-1292]

Historic England indicated in our concluding submissions to the Examination that whilst there remained minor elements of inconsistency in the document, the issues we had raised in relation to the OEMP throughout our previous representations had broadly been addressed by Highways England.

1. OEMP, Paragraph 1.1.12 – HEMP

Secretary of State’s request: It is understood from MW-G11 that the consolidated version of the Handover Environmental Management Plan (“HEMP”) also contains the Landscape Environmental Management Plan (“LEMP”). This should be clarified in paragraph 1.1.12 at page 5 of the OEMP.

Historic England Comments:

The Secretary of State’s proposed change would appear to address an example of a minor element of inconsistency. It is our understanding that the consolidated version of the Handover Environmental Management Plan (HEMP) also contains the associated Landscape and Ecology Management Plan (LEMP) attached to the preceding CEMP. The proposed change to clarify this would provide for consistency between the Introduction and REAC Table 3.2b within the OEMP. Both sections of the OEMP would therefore ensure that the LEMP is appended to the Construction Environmental Management Plan (CEMP) (MW-LAN1) and that subsequently the HEMP would be based on the CEMP/s and LEMP (MW-G11).

2. OEMP, PW-LAN1 - ES Chapter 7, Section 7.8 Retained Vegetation

Secretary of State’s request: The Secretary of State understands that the fencing of retained trees and other vegetation may be subject to Site Specific Written Schemes of Investigation (“SSWSIs”) and Method Statements (“MSs”) if thought necessary by Wiltshire Council to protect archaeological remains following the





consultation indicated. This should be clarified in PW-LAN1 in Table 3.2a: REAC tables for the preliminary works at pages 32-33 of the OEMP.

Historic England Comments:

The Secretary of State's proposed change would appear to provide clarity and consistency to confirm in PW-LAN1 that the installation of protective fencing for retained vegetation should follow the same procedures as protective fencing for heritage assets, with the same requirements for Method Statements (MSs) and Site Specific Written Schemes of Investigation (SSWSIs).

3. OEMP, PW-GEO3 - Soils Management Strategy (SMS)

Secretary of State's request: The Secretary of State considers that for consistency, the wording of the first paragraph should follow that of MW-GEO3. The phrase, *'...and be consistent with the DAMS and any Heritage Management Plan, Archaeological Method Statement or SSWSI'* should therefore be added before the final sentence of the first paragraph of PW-GEO3 in Table 3.2a: REAC tables for the preliminary works at page 40 of the OEMP.

Historic England Comments:

The Secretary of State's proposed change would appear to provide clarification that the requirements for the Preliminary Works SMS (PW-GEO3) are exactly the same as those for the Main Works SMS (MW-GEO3), and that the strategy is consistent with the DAMS and any Heritage Management Plan, Archaeological Method Statement or SSWSI.

4. OEMP, MW-G5 – Preparation of a CEMP

Secretary of State's request: For consistency, the Secretary of State considers the reporting criteria for MW-G5 in Table 3.2a: REAC tables for the preliminary works at page 45 of the OEMP should reflect those of PW-G1 (CEMP Preparation) re: approval of Heritage Management Plans ("HMPs"), SSWSIs and MSs at page 27 of the OEMP.





Historic England Comments:

The Secretary of State's proposed change would appear to provide clarification that the Reporting Criteria set out in REAC Tables 3.2a and 3.2b for approval of HMPs, MSs and SSWSIs are the same for both Preliminary Works stage documentation (PW-G1) and Main Works documentation (MW-G5) and consistent between MW-G5 and MW-G7.

5. OEMP, MW-G11 – Handover Environmental Management Plan

Secretary of State's request: Under reporting criteria, Wiltshire Council's approval responsibilities in MW-G11 at page 47 of Table 3.2b REAC tables for the main works should include archaeological matters, to accord with approval responsibilities elsewhere in the OEMP.

Historic England Comments:

In the event the Secretary of State considers that this proposed change is required it would appear to provide a consistent approach to the approval of provisions for the management of identified heritage assets within each phase and consolidated HEMP regardless of whether they are located within land to be retained by the Authority or Wiltshire Council. The HEMPS make provision for any restriction or constraint on maintenance regimes and the exercise of other DCO powers necessary to ensure (i) the continued retention or preservation in situ of the assets that were previously identified in Heritage Management Plans and Archaeological Method Statements and (ii) continued application of provisions of the DAMS required for the protection of heritage assets post-construction. We are aware therefore that these matters will have been consulted on and approved under the relevant sections of the CEMPs that precede the HEMPs.

6. OEMP, MW-CH8 – Ground Movement Monitoring Strategy

Secretary of State's request: The Secretary of State considers in MW-CH8 at page 59 of Table 3.2b REAC tables for the main works the trigger levels established





should be subject to the approval of Wiltshire Council, consistent with the Council's approval of the HMP (MW-CH1) in Table 3.2b REAC tables for the main works at page 57 of the OEMP.

Historic England Comments:

The DCO (Requirement 4(4) and (11)) and OEMP (MW-CH8) currently ascribe responsibility for approval of the Ground Movement Monitoring Strategy to the Secretary of State, following consultation with Wiltshire Council, Historic England and the members of HMAG and acceptance by The Authority. The Ground Movement Monitoring Strategy is appended to the Main Works CEMP, which is itself approved by the Secretary of State (MW-G5).

The Secretary of State's proposed change is that within that process of overall approval of the Ground Movement Monitoring Strategy, the series of trigger levels (i.e. the maximum settlement that could occur without having an adverse effect on archaeological features), be approved by Wiltshire Council. Regardless of whether approval of the trigger levels is undertaken by the Secretary of State or Wiltshire Council, Historic England considers that we would be well placed to assist in identifying them bearing in mind the location of these assets within a World Heritage Site. Identifying the trigger levels requires an understanding of the impact of settlement on archaeological structures, remains and deposits, a matter relevant to our role and responsibilities. In all other heritage matters where Wiltshire Council provides approval under the OEMP, Historic England acts as a consultee. In addition the OEMP identifies our role in the identification of screening criteria and actions to control or mitigate impacts in relation to the protection of sensitive cultural assets (MW-NOI3; MW-NOI5) under the Noise and Vibration Management Plan. Historic England in general would recommend that a consistent approach is taken to the approval of matters relating to the protection of heritage assets.

7. OEMP, D-LAN4 – Stakeholder Engagement

Secretary of State's request: The Secretary of State considers consultation with Wiltshire Council on the general appearance and finishes of Countess Flyover should





also take place, for consistency and be added to D-LAN4 in 3.2b REAC tables for the main works at page 65 of the OEMP.

Historic England Comments:

The Secretary of State's proposed change would appear to provide clarification in D-LAN4 that Wiltshire Council would be consulted on the general appearance and finishes of Countess Flyover as set out under section 4.5 (Design Consultation) of the OEMP relating to the Stakeholder Design Consultation Group (SDCG).

Detailed Archaeological Mitigation Strategy ("DAMS") [Examination Library document REP9-0174]

Historic England indicated in our concluding submissions to the Examination that whilst there remained minor elements of inconsistency in the document, the issues we had raised in relation to the DAMS throughout our previous representations had broadly been addressed by Highways England.

8. DAMS, para 5.2.8 – Ground movement monitoring stations

Secretary of State's request: Ground Movement Monitoring Strategy ("GMMS") is noted as being subject to consultation with Wiltshire Council, Historic England and HMAG. It should also be subject to the approval of Wiltshire Council, consistent with the Council's approval of the HMP (MW-CH1).

Historic England Comments:

The Secretary of State's proposed change refers to the Ground Movement monitoring stations within the DAMS. These stations and the monitoring requirements are to be confirmed through the production and consultation process of a Ground Movement Monitoring Strategy (GMMS) as set out under OEMP item MW-CH8.

The Secretary of State has already raised a point with regard to the identification of trigger levels for ground movement in relation to this Strategy and we have noted in





our response above the need for consistency. Regardless of whether approval is undertaken by the Secretary of State or Wiltshire Council, Historic England considers that we would be well placed to assist in identifying them, bearing in mind the location of these assets within a World Heritage Site. Identification of the trigger levels requires an understanding of the impact of settlement on archaeological structures, remains and deposits, a matter relevant to our role and responsibilities. Similarly, in all other heritage matters where Wiltshire Council provides approval, Historic England acts as a consultee. We would therefore reiterate the same point as made above here.

9. DAMS, paragraph 6.3.16 – Ploughzone Sampling and

10. DAMS, paragraph 6.3.51 – Tree Hollows

Secretary of State's request: The Secretary of State considers that the following wording should be appended to the DAMS in paragraphs 6.3.16 and 6.3.51:

'Within the WHS ["World Heritage Site"], the Scientific Committee will be consulted, independently of HMAG, before decisions are made on baseline sample size [in relation to ploughzone sampling] /representative sample size [in relation to tree hollows], or on decisions arising from application of the reflexive approach. Each instance of advice given by members of the Scientific Committee will be published as an addendum to the appropriate SSWSI, explaining the reasons why the outcome might differ from the advice given.'

Historic England Comments:

As noted above, Historic England's role in the historic environment includes provision of advice relating to world heritage sites and we advise DCMS, which acts on behalf of Government, as a State Party to the 1972 Convention on how best it can meet its responsibilities with the requirements of the Convention.

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.

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 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.

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 WHS. The purpose of the Scientific Committee therefore 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 WHS landscape. It is tasked in particular to ensure excellence in the design and provision of archaeological assessment, evaluation, mitigation and fieldwork.

The role and engagement of the Scientific Committee is explicitly mentioned in the DAMS and Historic England agrees with the Secretary of State that the Committee's involvement in the decision making process for the development of SSWSIs will be important. Through this involvement they will contribute to significant discussions and decision making regarding the site specific research questions which are critical to establishment of appropriate sample sizes. The DAMS supports a reflexive and iterative approach to the archaeological mitigation strategy focused on the potential of deposits and features to answer carefully considered research questions and enhance our understanding of the Stonehenge landscape of all periods, but particularly in relation to the OUV of the WHS. The SSWSIs will set out parameters





for decision making to support the on-site staff and specialists in making decisions about how to implement an iterative strategy based on a reflexive understanding of the emerging results of on-going work. This approach is designed to avoid the need for continued review and revision of individual SSWSIs whilst work is progressing on site. It is essential for the delivery of the proposed reflexive and iterative strategy, the resulting quality of the archaeological mitigation conducted, and the progress of the archaeological mitigation programme, that the SSWSI provides clear guidance for decision making for site based staff. The DAMS sets out a process for monitoring and approval of this reflexive decision making (Section 6.1.24), and also makes clear that the Scientific Committee will be afforded regular opportunities to contribute their specialist expertise while the fieldwork progresses (Section 8.1.17).

In the period following the conclusion of the Examination discussion has continued through the process of consultation with HMAG set out in the OEMP to identify ways in which the Scientific Committee can best contribute their specialist expertise to the post-Examination stages of the scheme. Discussion has focused on how a series of technical workshops could be convened at which the Scientific Committee's attendance would be vital. These would structure and facilitate detailed technical discussion regarding topics such as sampling of ploughsoil and tree hollows and also importantly the development of site specific research questions from the framework included in the Archaeological Research Agenda in the DAMS (Section 4). These workshops would inform the production of the SSWSIs and facilitate the Scientific Committee's direct engagement in ensuring excellence in the design and provision of archaeological assessment, evaluation, mitigation and fieldwork. HMAG are currently discussing with Highways England specific provisions for such workshops in the SSWSIs on a series of agreed themes and outcomes. The Reporting Criteria for SSWSIs (PW-CH3; MW-CH9) require that they are produced in consultation with Wiltshire Council and Historic England and, for sites within or affecting the WHS, HMAG, and thereafter approved by Wiltshire Council (in consultation with Historic England) prior to the part of the main/preliminary works to which each SSWSI relates. We are aware that Highways England has written to the Scientific





Committee to indicate this approach to convening technical workshops and requested their contribution.

The SSWSIs will consider an appropriate baseline or representative sample size (termed 'minimum' and 'representative' in the DAMS e.g. 6.3.39, 6.3.51) for each site based on the scheme and site specific research questions outlined in the Archaeological Research Agenda (ARA) and developed within the SSWSI in consultation with the appointed contractor's specialists, and through wider consultation including with the Scientific Committee as outlined above. These questions will be developed considering previous work in the area and the results of statistical modelling of the overall artefact population. The emphasis will be on developing an approach to sampling which has the potential to allow these specific research questions to be addressed. Therefore development of the research questions through wider consultation will be critical to identification of the appropriate sample size. Through identification of a proportionate sample size, the archaeological contractor will be able to deal with the nuance of applying the research framework within an iterative and reflexive methodology (see DAMS 6.1.24) to an appropriate volume of material to enable them to answer the specific research questions for each site.

We understand from the Secretary of State's proposal that the Scientific Committee is to be consulted on decisions regarding the identification of baseline or representative sampling sizes (termed 'minimum' and 'representative' in the DAMS e.g. 6.3.39, 6.3.51) and decision making regarding the application of the reflexive (and iterative) approach to the archaeological mitigation. The operation of the iterative and reflexive approach is set out in Section 6.1.24 of the DAMS. This outlines the overarching principles within which the integration of the Scientific Committee, with specific references in Sections 6.3.16 and 6.3.51, would need to operate. This reflects the approach that we have advocated with Highways England and that informed our comments on the development of the SSWSIs to include for Technical Workshops attended by the Scientific Committee.





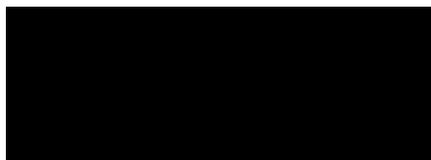
As commented elsewhere there is need for clarity and consistency in the language throughout the OEMP and DAMS to ensure the smooth operation of the procedures for consultation set out in those documents.

Concluding Comments:

Historic England has considered the proposed changes to the OEMP and DAMS and provided our advice to the Secretary of State above. We have indicated where the proposed changes have potential to provide clarification to address minor inconsistencies between sections of the documents. Our advice has addressed the need to avoid any risk of confusion which might impede the successful operation of the processes, procedures and consultation mechanisms set out in the OEMP and DAMS designed to minimise the harm to the Stones and surrounding environment of the World Heritage Site (WHS).

Should the Secretary of State have any additional queries, either in relation to our comments above or the responses from other Interested Parties to the Secretary of State's letter, we would be pleased to continue to offer further assistance.

Yours sincerely,



Dr Helen Woodhouse
Team Leader – Development Advice
Historic England South West office

