



**National
Trust**

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Your ref: TR010025

Our ref: ID no. 20020498

13 August 2020

National Infrastructure Planning
Temple Quay House
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Dear Sir/Madam

Application by Highways England for an Order Granting Development Consent for the A303 Amesbury to Berwick Down (Stonehenge) scheme

**RESPONSE TO SECRETARY OF STATE CONSULTATION OF 16 JULY 2020;
REQUEST FOR COMMENTS AND FURTHER INFORMATION**

Please find hereunder the National Trust's response in respect of [the letter](#) dated 16 July 2020, and addressed to us from the 'Head of Transport Infrastructure Planning Unit' requesting: "The Secretary of State would be grateful if all recipients of this letter could provide any comments they have on the matters raised in the Hidden Landscapes Project report and representations relating to the archaeological find at the World Heritage Site".

Summary

In response to the Secretary of State's request we have considered both the character and the significance of the Hidden Landscapes Project (HLP) find in relation to the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS) and its Outstanding Universal Value (OUV). The discovery of the features which were the subject of the HLP report has the potential to make an important contribution to our understanding of the Stonehenge Landscape. However, in our view the evidence to support their identification as Neolithic or Early Bronze Age in date, and thus conveying the OUV of the WHS, is lacking at present.

In response to the Secretary of State's questions concerning the implications of the find for the impact of the Development (A303 Amesbury to Berwick Down (Stonehenge) Scheme) and any harm it may cause to the WHS, we have taken a precautionary approach and considered the impacts if it were eventually demonstrated that the find did indeed convey the OUV of the WHS. Even in this case, in our view the find does not result in the

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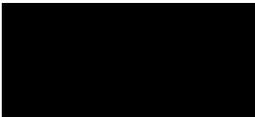
Development having any additional adverse impacts on the OUV, Integrity or Authenticity of the WHS.

We have also considered the Secretary of State's request regarding the implications for the Applicant's Environmental Statement (ES), including the Heritage Impact Assessment (HIA), and the proposed Detailed Archaeological Mitigation Strategy (DAMS). And in our view there are no substantive implications for the Applicant's ES, the HIA or the DAMS.

Enclosed includes the National Trust's:

- Response to Secretary of State Consultation of 16 July 2020; Request for comments and further information

Yours faithfully



Nick Simms
Senior Project Manager



**National
Trust**

**Response to
Secretary of State Consultation of 16 July 2020;
Request for comments and further information**

TR010025

Amesbury to Berwick Down (Stonehenge)



August 2020

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1. Introduction

- 1.1.1 Any assessment of the impacts of development proposals on a World Heritage property should be undertaken in accordance with the ICOMOS Guidance (ICOMOS 2011). Highways England have undertaken such an assessment which was published as part of their Environmental Statement submitted as part of their Development Consent Order application. It is not our intention here to repeat that exercise; but in response to the Secretary of State's request to the National Trust, to provide comment on the matters raised in the Hidden Landscape Project article (Gaffney *et al* 2020), and representations relating to the find within the World Heritage property – specifically:
- a) implications of the archaeological find for the Development and any harm it may cause to the World Heritage;
 - b) implications for the Applicant's Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy.

2. Significance: the definition of Outstanding Universal Value for the Stonehenge, Avebury and Associated Sites World Heritage Site

- 2.1.1 To establish the implications of the find for the Development (the A303 Amesbury to Berwick Down (Stonehenge) scheme (TR010025 – A303 Stonehenge)) (or “the Scheme”) and any harm it may cause to the WHS it is necessary first to establish the significance of that find.
- 2.1.2 Internationally, the UNESCO World Heritage Committee, through successive editions of the Operational Guidelines to the World Heritage Convention, has increasingly emphasised the need for effective management to protect the Outstanding Universal Value (OUV) of each World Heritage property. Heritage Impact Assessment (HIA) is now requested for developments affecting World Heritage properties. And the World Heritage Committee has endorsed the guidance for this developed by ICOMOS International (ICOMOS 2011).
- 2.1.3 Nationally, the National Policy Statement for National Networks (DfT 2014) and associated Policy Guidance reflect this. They also contain guidance on the need specifically to protect the OUV of World Heritage properties, which are regarded as heritage designations of the highest significance.

- 2.1.4 A Statement of Significance, developed with the steering groups for Avebury and Stonehenge, was submitted by the UK government and agreed by the UNESCO World Heritage Committee in 2008. It was subsumed into an overall Statement of Outstanding Universal Value (now including assessments of integrity and authenticity) agreed by the Committee in 2013. The 2009 Stonehenge World Heritage Site Management Plan defined seven attributes of OUV, based on the Statement of Significance, along with assessments of integrity and authenticity. These remain the key stone of the current Stonehenge, Avebury & Associated Sites WHS Management Plan (Simmonds & Thomas 2015).
- 2.1.5 The Statement of OUV and the Management Plan make it clear that all Neolithic and Early Bronze Age funerary and ceremonial monuments and associated sites, together with their relationships with each other and with the landscape are attributes of OUV and need to be treated as such.
- 2.1.6 For Stonehenge and Avebury, its seven attributes of OUV have been set out in the World Heritage property management plans (Young, Chadburn, Bedu, 2009; Simmonds, Thompson 2015). These are:
1. Stonehenge itself as a globally famous and iconic monument.
 2. The physical remains of the Neolithic and Bronze Age funerary and ceremonial monuments and associated sites.
 3. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape.
 4. The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.
 5. The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other.
 6. The disposition, physical remains and settings of the key Neolithic and Bronze Age funerary, ceremonial and other monuments and sites of the period, which together form a landscape without parallel.
 7. The influence of the remains of Neolithic and Bronze Age funerary and ceremonial monuments and their landscape settings on architects, artists, historians, archaeologists and others.
- 2.1.7 Central to understanding the significance of the HLP's most recent find is whether the anomalies they have identified are archaeological sites and monuments that convey attributes of the OUV of the World Heritage Site. In

line with the Statement of OUV this has been taken to mean all Neolithic and Bronze Age funerary and ceremonial monuments and associated sites dating to the period 3700 to 1600 BC (i.e. Neolithic or Early Bronze Age in date).

3. The character and significance of the Hidden Landscape Project's discovery

3.1.1 Key to determining the significance of the discoveries of the Hidden Landscape Project (HLP) referenced in the submissions of the Consortium of Archaeologists (2020) and the Stonehenge Alliance (2020) are the following issues:

- a) Are the features identified by the HLP humanly made or are they natural in origin?
- b) If they are natural is there evidence for deliberate deposition of cultural material within them?
- c) Of what date are the features, and any material deliberately deposited within them?
- d) Do these features form part of a single coherent monumental structure or might they have been understood as such during the Neolithic and Early Bronze Age?

4. Character

4.1.1 The work of the Hidden Landscapes Project (HLP) in the Stonehenge Landscape over the past decade has provided many important new insights into the landscape. Their fieldwork has focussed on non-invasive techniques and has produced findings which have helped inform our understanding of both the range and extent of monumental activity in the WHS. Whether humanly created, wholly natural, or humanly modified the identification of the features referred to by the HLP undoubtedly substantially adds to our understanding of the Stonehenge landscape.

4.1.2 But like all techniques those employed in the HLP's fieldwork have both strengths and their limitations. And the level of certainty accorded to the interpretation offered by the HLP team in relation to their most recent findings must necessarily be informed by an understanding of these.

4.1.3 The HLP's initial survey which brought a number of these features to light was conducted using a Fluxgate gradiometer and Ground Penetrating

Radar, and revealed ten geophysical anomalies. They subsequently carried out further investigations of three of these features (for a summary see *below 4.1.6 c*) and through archival research identified ten additional features whose similarities in character they have highlighted.

- 4.1.4 The contention of the HLP in the paper setting out these most recent findings is that, *'The degree of similarity across the 20 features identified suggests that they could have formed part of a circuit of large pits around Durrington Walls,'* (Gaffney *et al* 2020).
- 4.1.5 These features are subsequently referred to as pits, a description that implies they are humanly made, or humanly modified. It is this contention, together with the assertion that they are of Neolithic date, that needs to be examined in order to establish the significance of the findings, and thus the implications for the impacts of the proposed Development on the World Heritage property.
- 4.1.6 Of the twenty anomalies identified by the HLP:
- a) Four (**ii, iii, iv, v**) are known only from aerial mapping / LiDAR survey and have never been subject to any geophysical survey, excavation or coring.
 - b) Six were discovered by Wessex Archaeology (**10D-15D**) and, following partial excavation, were all identified as natural in origin. Gaffney *et al* (2020, 10) acknowledge in their article that the interpretation of these features as natural is supported by the ubiquity of such features on the chalk and their location in a slight valley trending west-east towards the Avon.
 - c) Ten (**1A-9A & i**) were identified by geophysical survey undertaken as part of the Hidden Landscape Project. Of these:
 - I. Anomaly **i** is acknowledged by the authors as potentially being a geophysical response produced as a result of metallic debris filling a surface depression within the area of a known historic military light railway, and its similarity in character to the other anomalies therefore remains in doubt (Gaffney *et al* 2020, 4).
 - II. Only three (**5A, 7A & 8A**) have been subject to further investigation (further geophysical survey and coring).
 - III. None were subject to excavation – whole or partial.

IV. It is noted by the authors (Gaffney *et al* 2020, 16) that **5A** was situated in an area mapped by the British Geological Survey as, 'head.' It is well known that sinkholes on the chalk can occur in areas of, 'head,' deposits. Inspection of the BGS dataset shows that similarly features **2A**, **3A**, **4A** and **5A** all fall entirely within the area mapped as containing, 'head' deposits and **6A** is situated on the fringes of this area. Thus raising the possibility that these features too (whether or not subsequently modified) may be natural in origin.

- d) Gaffney *et al* (2020, 27), '*tentatively dated*,' all of the features to the Late Neolithic on the basis of a single radio carbon date derived from animal bone obtained during coring and found in association with a single struck flint flake in one of the 20 features (**8A**) (Gaffney *et al* 2020, 26). On this basis they assert that the Middle Bronze Age radio-carbon date obtained from a different feature (**5A**) must be situated within a recut (as it is later in date than their hypothesised date for feature **8A**). In both cases (**5A & 8A**) the material found within them can provide only a *terminus post quem* for the fill / deposit within which they were found *i.e.* the fill or deposit in which each was found can be no earlier than the date of the material itself. And in neither case is there evidence to demonstrate that the dated material derives from deliberately structured or placed deposits.
- e) With regard to the, '*alignment of smaller posts / pits running parallel to features 6A to 9A*' these remain undated (Gaffney *et al* 2020). And their chronological relationship with the putative circle of features remains to be established. A secure radio-carbon date was obtained by Wessex Archaeology for two intersecting lines of post holes situated in the vicinity of features **14D** and **15D**, and separately seventeen postholes (one of which was associated with Late Neolithic and Early Bronze Age pottery) were found to the south of features **11D** to **13D**. But there is no evidence that demonstrates an association between the postholes and the larger features.

4.1.7 **In summary** the evidence to support Gaffney *et al*'s (2020) attribution of the twenty features as humanly made, or modified pits is at present lacking. In all of the cases where the features have been subject to excavation the excavators (Wessex Archaeology), informed by the advice of experienced geo-archaeologists, determined that these were natural.

4.1.8 It must be acknowledged that some of these features, both those subject to HLP fieldwork and those where fieldwork was undertaken by Wessex

Archaeology, have been demonstrated to contain cultural material of multiple dates. The majority of the material found within the features has proven to be of Middle Bronze Age, Roman and Medieval date and thus not related to the OUV of the World Heritage property. And some - albeit limited in quantity - is of Neolithic (or possible Neolithic) date.

- 4.1.9 There is no evidence at present that any of this culturally derived material was deliberately placed within the features. And in the case of the northern group of features investigated by Wessex Archaeology the evidence led their excavators to interpret this cultural material as having been washed into the upper levels of the features, from the surrounding surface deposits with, in just one instance, the top of the hollow (all that would have been visible of the feature at the time of deposition) having been used as an area for disposal of flint knapping waste.
- 4.1.10 While no evidence exists at present to support the assertion that any of the twenty features identified by the HLP are humanly made or modified, if they were visible during the Neolithic or Early Bronze they may still have been ascribed significance by prehistoric communities. A number of researchers have highlighted the existence of a continuum during the Neolithic and Early Bronze Age from entirely natural features; natural features that were ascribed significance and actively incorporated into the practice of prehistoric communities; natural features that were physically modified; to those that were wholly humanly created. However in those features highlighted by the HLP where excavation has been undertaken evidence suggests the majority would have been visible only as shallow hollows during the Neolithic and Bronze Age.
- 4.1.11 It remains possible that some of the features, even if natural in origin, may have been ascribed individual significance. But their identification as a single, coherent, deliberately constructed or humanly modified, Neolithic (or Early Bronze Age) monument is in doubt. The evidence to support the hypothesis that the cultural material found within them was deliberately placed there as a result of structured deposition is also lacking at present.

5. Implications of the archaeological find for the Development and any harm it may cause to the World Heritage Site

- 5.1.1 The Development will have no direct physical impact on any of the features identified in the Hidden Landscapes Project's recent article (Gaffney *et al* 2020). The nearest of these features lies some 220m to the north of the red line boundary of the Scheme, and c. 450 metres to the north of the construction footprint of the Scheme.

- 5.1.2 Therefore even if the features identified by the HLP were eventually demonstrated to be of Neolithic or Early Bronze Age date, or to have been humanly modified during that period, the discovery does not result in any increase in the direct physical impacts of the Scheme on any of the monuments that convey the attributes of OUV of the WHS. (Attribute 2)
- 5.1.3 The evidence presented in relation to the HLP discoveries in relation to astronomical alignments is equivocal. The stronger evidence relates to the northern group of features where the most consistent views are to the north-east. Gaffney *et al* (2020, 35) suggest this group of features may have inherited this orientation towards the summer solstice sunrise as part of an attempt to incorporate the Early Neolithic site of Larkhill causewayed enclosure into the group's construction. This interpretation is reliant on these features being humanly made contra the interpretation of their excavators. However even if that were to be evidenced the orientation is away from the direction of the Development. And the find would not result in any increase in the adverse impacts of the Scheme design on Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy (Attribute 4).
- 5.1.4 Following the application of viewshed analyses to the features Gaffney *et al* (2020, 28-33) conclude that the strength of relationships with other monuments lies not in its visual relationship but in the positioning of the features at a broadly similar distance from Durrington Walls henge. Though they do also point out that the location of the features in the northern group may have been chosen in reference to Larkhill Causewayed enclosure. However, if the features are natural in origin the reverse may be true i.e. the enclosure may spatially reference the features. In either instance the find would not result in any increase in adverse impacts of the Development on Attributes 3, 5 or 6.
- 5.1.5 The discovery would not result in any increase in impacts of the Development on Attribute 7, nor on the Integrity or Authenticity of the WHS.

6. Implications for the Applicant's Environmental Statement, including the Heritage Impact Assessment, and the proposed Detailed Archaeological Mitigation Strategy

- 6.1.1 As referenced above Highways England have undertaken a Heritage Impact Assessment in line with the ICOMOS guidance (ICOMOS 2011) which was published as part of their Environmental Statement submitted as part of their Development Consent Order application (Highways England. 2019b). In light of our comments above in regard to the implications of the find for the Development and any impacts it may have on the WHS, in our view there is

no substantive change to the impacts of the Development on the World Heritage property.

- 6.1.2 Considerable archaeological research and fieldwork has been undertaken to improve understanding of the archaeology of the World Heritage property in order to inform the design process for the road Scheme and evaluate its impacts. Geophysical survey has been conducted across the area of the Development (techniques employed included magnetometry, Ground Penetrating Radar and resistance survey), as has surface artefact collection (including fieldwalking, test pitting with accompanying sieving, and sieving of topsoil samples from trial trenching), in addition to extensive trial trenching. Within the WHS Highways England have also sought the advice of the Heritage Monitoring and Advisory Group (HMAG) and the Stonehenge A303 Scientific Committee (an independent panel of experts) in relation to the archaeological evaluation, the drafting of the Detailed Archaeological Mitigation Strategy (DAMS) (Highways England 2019a) and the scoping of the HIA. Should the Development be consented both bodies would continue to provide advice on the cultural heritage aspects of the Scheme throughout its life (Highways England 2019a, 6).
- 6.1.3 In their submission the Consortium of Archaeologists and Blick Mead Team (2020, 3) state that, *'the potential significance of the pits, and similar features on and close to the road line, went unrecognised.'* However the existence of such features more broadly within the Stonehenge landscape is well established, and has been since at least the excavation of the Wilsford Shaft (Wilsford G33a; Heritage List Entry No. 1010833) between 1960 and 1962 (Ashbee *et al* 1989). Both the DAMS (Highways England 2019a) and Highways England's HIA (Highways England 2019b) acknowledge the existence, and take account of the significance, of the Wilsford Shaft, which undoubtedly was humanly created (or at the very least humanly -modified) and within which Neolithic cultural material (the remains of a wooden container) was found. It is within this context and understanding that the archaeological evaluation and HIA of the Development were undertaken.
- 6.1.4 Within the WHS two additional features, both initially identified by means of geophysical survey and subsequently partially excavated by Wessex Archaeology on behalf of Highways England as part of the archaeological evaluation for the Development, displayed similar characteristics to the twenty features highlighted by the HLP. One feature (**51224**) on the eastern side of the WHS was situated outside of the red line boundary of the Scheme, and one (**24105**) was located within the footprint of the Scheme west of the proposed location of the western portal. (**24105**) was also cored to a depth of 1.6 metres. Both (**51224**) and (**24105**) were partially excavated, and both were securely identified (with the advice of experienced geo-

archaeological specialists) as being natural in origin (Highways England 2019c & 2019d).

- 6.1.5 The DAMS (Highways England 2019a) sets out a framework to guide the development of more detailed Site Specific Written Schemes of Investigation (SSWSIs) for individual areas during the archaeological mitigation phase of the Development. This enables methodologies and techniques to be deployed to appropriately address research questions according to the potential of specific locations. The objectives designed to be delivered by the DAMS (Highways England 2019a) include the following:
- 6.1.6 *'c) Promote high quality research using innovative methodologies and reflexive approaches to explore a transect through the landscape and test existing landscape models, develop new research questions and feed back into the SAARF and SWARF.'* (Highways England 2019a, 7)
- 6.1.7 This reflexive approach, coupled with the promotion of high quality research has the ability to ensure the archaeological mitigation undertaken as part of the Development responds appropriately to any new information, and discoveries in order to appropriately hone both the creation of SSWSIs, and to allow for further modification in light of additional information that comes to light during the course of fieldwork.

7. Conclusions

- 7.1.1 In responding to the Secretary of State's request to the National Trust in his letter of 16 July 2020, we have given careful consideration to the matters raised in the Hidden Landscape Project report (Gaffney *et al* 2020), and representations relating to the find at the World Heritage property. (Consortium of Archaeologists and the Blick Mead Project Team 2020; Stonehenge Alliance 2020). We consider the HLP's find is an important discovery with the potential to add to our understanding of the Stonehenge landscape. However at the present time we consider evidence that the find conveys the OUV of the WHS is lacking.
- 7.1.2 Nevertheless in responding to the Secretary of State's request to comment on implications of the find for the Development and any harm it may cause to the World Heritage property we have taken a precautionary approach, and considered the impacts if it were eventually demonstrated that the find did indeed convey the OUV of the WHS. In our view the impacts of the Development on the World Heritage property remain unchanged by the recent find.
- 7.1.3 In response to the Secretary of State's request we have also considered the implications for the Applicant's Environmental Statement (ES), including the

Heritage Impact Assessment (HIA), and the proposed Detailed Archaeological Mitigation Strategy (DAMS). In our view there are no substantive implications for the Applicant's ES, the HIA or the DAMS.

- 7.1.4 Our view remains that if well-designed, and delivered with the utmost care for the surrounding archaeology and chalk grassland landscape the A303 Amesbury to Berwick Down road scheme has the potential to have a positive impact on the Outstanding Universal Value of the World Heritage Site (National Trust 2019a 3.1.3; 2019b).

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