

From: [Mavor, Kate](#)
To: [A303 Stonehenge](#)
Cc: [Tasker, Nichola](#)
Subject: English Heritage: Application by Highways England for an Order granting Development Consent for the A303 Amesbury to Berwick Down
Date: 24 September 2020 11:02:16
Attachments: [image594733.PNG](#)
[CEO-Highways England DCO-200924-O.pdf](#)

Dear Ms Kopala,
Please find attached a letter from English Heritage regarding PINS reference No TRO10025.

If you have any questions, please don't hesitate to contact me.

Yours sincerely,

Kate

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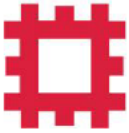
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By EMAIL ONLY: A303Stonehenge@planninginspectorate.gov.uk

28 September 2020

Application by Highways England for an Order granting Development Consent for the A303 Amesbury to Berwick Down

PINS reference No TROI0025

Dear Ms Kopala,

Please find below English Heritage's response to information requested in your letter of 20th August as outlined below.

'The Secretary of State would be grateful if the Applicant, Historic England, Wiltshire Council and other recipients could provide any final comments they have on those representations (referenced in your letter above).'

Introduction

English Heritage understands that the Secretary of State would like final comments on representations received in response to the Secretary of State's consultation letter of 16th July in reference to the Hidden Landscapes Project Report. We also note the invitation to comment on 'further information' as defined under the Infrastructure Planning (Environmental Impact Assessment) Regulation 2017.

English Heritage will particularly comment on the Highways England's Additional submission Heritage Impact Assessment (HIA) Addendum, addressing the 'new discovery' (as described in the Stonehenge Hidden Landscapes Project Report) and their overarching response addressing the same question from the Secretary of State in the letter dated 16 July 2020.

We will also comment on the various Errata documents submitted but particularly concerning the Public Rights of Way connected with the proposed Development, one of which runs across land managed by English Heritage.

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English Heritage's Final comments on the 'new discovery':

1. English Heritage has reviewed the submissions by Highways England and in particular the addendum to the HIA in response to the 'new discovery' in the landscape around Durrington Walls and Woodhenge.
2. From this review, we are confident that Highways England has considered the suggestion in our submission of 13th August (Conclusion 1), that the new discovery is assessed as any other heritage asset as per their overarching response document.
3. English Heritage agree with Highways England's assessment that the discovery will not be impacted by the proposed road scheme. We note the assurances in the updated HIA, that the existing documentation in the Detailed Archaeological Mitigation Strategy (DAMS) and the Outline Environmental Management Plan (OEMP) is sufficiently robust to address concerns about these types of features which are still being explored, and that they are covered by the Site Specific Written Schemes of Investigation (SSWSIs) (our previous Conclusions 2 & 4).
4. We accept the assurance by Highways England that the pit discovery's contribution to the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) will not be impacted on by the proposed road. While the new discovery is assessed as of High Value, because the features in question are sub-surface and well away from the red line boundary, the scheme will have a neutral effect.
5. We note that the other features reported on in the landscape which do not form part of the so-called pit circle will be left insitu by Highways England if within the DCO boundary.

Comments on the Errata

A303 Amesbury to Berwick Down
TR010025

Additional submission Location of Environmental Statement (ES) documents and ES documents that have been corrected, replaced, or added to since submission of the application.

1. English Heritage note the various errata which have been corrected by Highways England in the Environmental Statement including the decreased figures on vehicles between the A303 and the A36, the small improvement on air quality in general related to the scheme and similarly the review of dust management, all of which are of interest to us as managers of Stonehenge.
2. We also note the corrections to tree management in the landscape and various aspects of soil management in addition to the corrections on the amount of land needed for the proposed scheme both on a temporary and permanent basis.
3. We note the bibliographic corrections to align with WHS policies.

Public Rights of Way

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010025/TR010025-001458-A303%20Amesbury%20to%20Berwick%20Down%20Errata%20Report.pdf>



1. We note the corrections by Highways England to figure 13.3A showing the proposed restricted right of way across land that English Heritage manages at the Stonehenge Visitor centre.
2. The negotiations over this proposed restricted right of way are on-going with the applicant Highways England and remain under discussion as noted in our Statement of Common Ground with Highways England and also our comments on Applicants Consultation report on Changes to the DCO application [AS-066 & AS 067] (Deadline 8a).

Final conclusions and summary: Role of the English Heritage Trust at Stonehenge.

As was stated previously, the English Heritage Trust cares for the National Heritage Collection of 420 historic monuments, buildings and places – from world-famous prehistoric sites to grand mediaeval castles, from Roman forts to Cold War bunkers. All these historic sites are owned by the Crown or in the care of the Secretary of State for Digital, Culture, Media & Sport.

Through its collection, English Heritage brings the story of England to life for 10 million people each year, including over a million overseas and 300,000 educational visitors. The charity's purpose is to care for the national collection of historic places and inspire people to value, visit and enjoy it.

The prehistoric stone circle of Stonehenge is the best known site within English Heritage's care. Held in guardianship for the nation and as part of the wider World Heritage Site (WHS), it is a powerful witness to the once great communities of both the Neolithic and Bronze Ages.

English Heritage is very mindful that Stonehenge is part of a complex of outstanding prehistoric monuments of international importance. It forms the major focus of the UNESCO World Heritage Site along with Avebury Stone Circle and Associated sites (Simmonds & Thomas, 2015).

Stonehenge itself merits its own attribute of OUV as seen in first the statement of attributes.

1. *Stonehenge itself is a globally famous and iconic monument.* (Thomas & Simmonds, 2015).

For these reasons, we strive to provide visitor experiences and interpretation that is authentic and respects the integrity of the site. Stonehenge usually attracts over 1.5 million visitors each year, around 70% of whom come from overseas.

The experience of visiting Stonehenge and the surrounding prehistoric landscape has been substantially improved by the removal of the old visitor facilities adjacent to the Stones and the grassing over of the A344. With the opening of our new Visitor Centre, achieved in partnership with many other agencies, English Heritage is the gateway to the site and to a large part of the WHS with our partners the National Trust. However our ability to encourage visitors to explore further into the landscape is greatly hampered by the current A303.

English Heritage therefore still considers that the current proposed A303 road scheme has the potential to transform the Stonehenge part of the World Heritage Site landscape by removing the sight and sound of the current road.



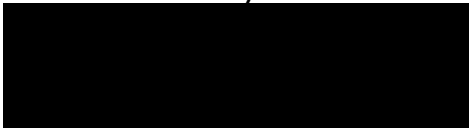
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As we have always stated, provided it is well designed and located sensitively, this scheme could greatly enhance the Outstanding Universal Value (OUV) of the World Heritage Site, simultaneously improving the setting of the Stones themselves, and people's experience of them, by the removal of the surface road.

Finally, as we have previously commented in our Statement of Common Ground (SOCR) EHT believe that *"...removing the scar of the A303 and the sight and sound of all that traffic would be an enormous achievement and complete the ambition of returning dignity to Stonehenge and its landscape as set out within the Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan."*

We wish to thank the Inspectorate and the Secretary of State for the opportunity to add these final comments.

Yours sincerely,



Kate Mavor