

From: [Woodhouse, Helen](#)
To: [A303 Stonehenge](#)
Cc: [Barrett, Rebecca](#); [Harries, Beth](#); [McParland, Hayley](#); [Wiseman, Andrew](#)
Subject: A303 Amesbury to Berwick Down (A303 Stonehenge) - Historic England's Response to Secretary of State Consultation 3
Date: 28 September 2020 20:23:35
Attachments: [A303 Stonehenge Historic England DfT Consultation Response 28Sep2020.pdf](#)

Dear Sir or Madam,

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

Please find attached Historic England's response to the consultation letter from the Department for Transport received on 20 August 2020.

Should you have any queries regarding our submission, please do not hesitate to contact me.

I should be grateful if you would confirm receipt of our document.

Yours faithfully,
Dr Helen Woodhouse FSA
Team Leader - Development Advice
Regions Group
Direct Dial: 0117 975 0676 | Mobile: 07554 437327
Historic England | South West Office
29 Queen Square | Bristol | BS1 4ND
Telephone: 0117 9751308
www.HistoricEngland.org.uk
<https://historicengland.org.uk/southwest>

Follow us on Twitter [@HE_SouthWest](#)



Historic England

We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops. Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.



Historic England

SUBMISSION
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HISTORIC ENGLAND)
(“HBMCE”)

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.

PINS Reference No: TR010025

HBMCE Reference No: 20019871

28 September 2020

SUMMARY OF FINAL POSITION

- The recently published Stonehenge Hidden Landscapes Project (SHLP) research findings primarily relate to a series of large features surrounding Durrington Walls outside the DCO boundary. These are interpreted by the authors of the publication as chronologically, spatially and functionally related.
- Historic England remains of the opinion that the surveys and evaluations conducted as part of the DCO process were adequate to ensure that any features of a similar nature to these within the DCO limits would have been detected.
- Nonetheless we consider that the archaeological mitigation programme under the Scheme will need to explore the nature of the relationship between natural features, their appreciation and use by human populations, and the surrounding landscape. Processes have been set out in the Detailed Archaeological Mitigation Strategy (DAMS) to achieve this.
- Having reviewed the submitted addenda from the Applicant (the Other Information), Historic England remains of the opinion that the Heritage Impact Assessment (HIA) and Environmental Statement (ES) are sufficiently rigorous and broadly consistent with our understanding of how the ICOMOS 2011 Guidance should be applied. Despite differences of opinion regarding the assessment of individual aspects of the Scheme, we broadly concur with the overall assessment.
- Broadly we have no other comments to make on the submissions of other Interested Parties in relation to the SHLP report, or on the representations made on behalf of the Applicant in relation to the DCO other than that which we have previously submitted.

1. INTRODUCTION

- 1.1.** 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.
- 1.2.** We previously responded to the Secretary of State’s consultation exercise on 13 August 2020. We note that the Secretary of State in his letter of 20 August 2020 has requested that the recipients of his letter provide their final comments on the matters raised and representations received.
- 1.3.** In responding to that previous consultation and in this letter we have focused exclusively on the heritage related matters raised in the report and representations received in line with our remit. We did not previously comment in relation to the other matters raised. We have taken the same approach here.
- 1.4.** The Secretary of State’s letter also refers to Other Information. We note that the Secretary of State considers the Applicant’s response to the above consultation on the archaeological find contains other substantive information in relation to the environmental statement (defined as “any other information”) under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. We understand that the Applicant is advertising this as “further information” which we are also invited to comment upon.
- 1.5.** Additionally, the Secretary of State’s letter refers to separate representation from Pinsent Masons who act on behalf of the Applicant. The Secretary of State has also invited comments on this.
- 1.6.** This response will need to be read in light of previous submissions that Historic England has made.

2. HISTORIC ENGLAND'S OBSERVATIONS AND FINAL COMMENTS

2.1. Following the Secretary of State's letter of 16 July 2020 we note that the Applicant has produced the following documents which we have reviewed and comment on in further detail as appropriate in this submission:

- Environmental Statement – Addendum addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020
- Heritage Impact Assessment – Addendum addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020
- Highways England overarching response addressing 'new discovery' responding to Secretary of State letter dated 16 July 2020
- Draft Explanatory Memorandum (close of examination DL10 version with updates for third party rights drafting submitted by the Applicant
- Email in respect of a drafting issue relating to Articles 22 and 50 in the draft Development Consent Order submitted by the Applicant
- Justification for provisions in the draft A303 Stonehenge Order relating to the transfer of the benefit of the power to acquire rights over land – article 22 and article 50 submitted by the Applicant.

2.2. Observations on Matters Raised by the Representations from Other Interested Parties

2.2.1. Historic England has reviewed all the representations that have been submitted. To that end, we do not intend to focus on the detail of the representations from other Interested Parties, but have instead considered the matters raised more holistically in their wider context. This should not however be taken that an absence of comment is implicit agreement with comments made.

2.2.2. We note, however, that within the representation of the Council for British Archaeology (CBA) dated 13 August 2020 they attached a submission dated 27 May 2020. We were not previously aware of this submission and make the following observation.

2.2.3. Our advice in relation to the Secretary of State's proposed changes to the Outline Environmental Management Plan (OEMP) and DAMS remains as set out in our submission dated 18 May 2020. In our submission we sought to focus on those pertinent matters that would assist and inform the Secretary of State's understanding of the implications for the historic environment arising from the Scheme. The OEMP and DAMS were designed to minimise the harm to the Stones and surrounding environment of the World Heritage Site (WHS). We advised that in some instances the proposed changes had potential to provide clarification to address minor inconsistencies between sections of the documents. These inconsistencies might otherwise confuse and impede the successful operation of the processes, procedures and consultation mechanisms set out in the OEMP and DAMS designed to minimise harm to the WHS.

2.2.4. Whilst the CBA has made various comments regarding Historic England's response we consider it would be for the Secretary of State to weigh up the evidence presented to the Examination against key objectives, policy standards and statutory duties.

2.3. Observations on Matters Raised by the Other Information Produced by the Applicant

2.3.1. The Other Information relates to the recent archaeological discovery by the Stonehenge Hidden Landscapes Project interpreted as a series of pits in proximity to Durrington Walls henge. The Other Information is set out in the following documents:

- Highways England's overarching response;
- Environmental Statement (ES) Addendum;

- Heritage Impact Assessment (HIA) Addendum.

2.3.2. Historic England confirms that this submission also serves as our response to the Applicant's consultation regarding the classification of these documents as additional information under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. We can confirm that we have no further comments to make in this regard other than those set out under Sections 2.3.3 – 2.3.7 below.

2.3.3. In our previous response to the Secretary of State (13 August 2020: 2.4.9) Historic England stated that had the SHLP research and its interpretation been available at the time of production of the documentation or during the course of the Examination we consider that it would have been included and taken into account in the assessments produced by the Applicant.

2.3.4. The proposed circuit of pits suggested in the newly published research is located outside of the DCO boundary. Consequently we considered that it would have been considered for potential impacts as a result of changes to its setting [ICOMOS 2011: 5-3] alongside, for example, confirmed heritage assets at Durrington Walls and Larkhill.

2.3.5. Highways England has now submitted addenda to the HIA and the ES to consider the implications of the archaeological discovery for the Scheme. These are stated to take the preliminary conclusions of the publication on the discovery at face value, considering its significance, contribution to the Attributes, Integrity and Authenticity of the WHS, and the impact of the Scheme on the discovery and on the OUV of the WHS as a whole.

2.3.6. At the conclusion of the Examination Historic England confirmed that on the basis of the example criteria and thresholds set out in the ICOMOS 2011 Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, in relation to the overall assessment we

broadly concurred with the assessment in the HIA [REP9-038: 1.7.1-1.7.3]. This was despite differences of opinion between Highways England and Historic England regarding the assessment of individual aspects of the Scheme.

2.3.7. Having reviewed the additional information prepared by the Applicant Historic England confirms that our position in relation to the overall assessment of the HIA and ES on the WHS as a whole remains unchanged on the basis of these addenda.

2.4. DCO Drafting – Articles 22 and 50

2.4.1. Historic England has reviewed the representation submitted on behalf of the Application in respect of the DCO drafting issue relating to Articles 22 and 50 in the draft DCO concerning the compulsory acquisition of rights for the benefit of parties other than Highways England.

2.4.2. We understand from that representation that the drafting regarding those provisions was not accepted in another Development Consent Order and that the representation submitted focuses on why the drafting here is considered to be necessary and justifiable.

2.4.3. We note that no changes are made to the actual provisions themselves, rather the focus is on the justification for the provisions and we make no comments on these.

2.4.4. More generally on provisions with regard to compulsory acquisition, as the Secretary of State will be aware, the proposed compulsory acquisition of land will have a bearing on Historic England land ownership. The English Heritage Trust has led on this on our behalf and our position on this is set out in their representations on this matter.

3. CONCLUDING REMARKS

- 3.1.** The recently published SHLP research findings primarily relate to a series of large features surrounding Durrington Walls outside the DCO boundary. These are interpreted by the authors of the publication as chronologically, spatially and functionally related.
- 3.2.** The additional information submitted by the Applicant includes addenda to the Heritage Impact Assessment (HIA) and Environmental Statement (ES). These apply the methodology of assessment employed under the HIA to the features in the recently published research.
- 3.3.** Historic England remains of the opinion that the A303 assessments are sufficiently rigorous to inform determination of the Scheme and development of an appropriate and proportionate archaeological mitigation strategy informed by the further development of the research strategy and specialist input.
- 3.4.** We also remain of the opinion that the surveys conducted under the Scheme are adequate to detect features of the nature discussed in the report.
- 3.5.** However it is evident that there is a need to ensure that the archaeological mitigation programme under the Scheme engages with the nature of the relationship between natural features, their appreciation and use by human populations, and the surrounding landscape. It must ensure that investigation is able to characterise these relationships by seeking to clarify the pattern of deposition of cultural material and those processes that will subsequently have affected its preservation in the archaeological record.
- 3.6.** The Detailed Archaeological Mitigation Strategy (DAMS) provides for a proportionate approach to sampling with natural features that have been shown to contain archaeological remains to be completely excavated (100%) informed by the further development of the research strategy and specialist input.

3.7. We also consider that provision has been made in the DAMS for dealing with unexpected finds on the Scheme.

3.8. In our opinion safeguards have been included within the Scheme to facilitate the integration of these matters as raised by the preliminary results of the research through the Site Specific Written Schemes of Investigations (SSWSIs).

3.9. We also consider that processes are set up in the DAMS to ensure the continual evolution of the archaeological mitigation throughout the programme for the Scheme. This process is intended to enable the consideration of recent and evolving research, as well as the development of new research questions with a landscape scale approach in recognition of the nature and extent of the Stonehenge WHS.

3.10. The Stonehenge landscape has been severed by the busy A303 trunk road for decades, and we have been involved in helping to find a solution since 1986 when Stonehenge became a World Heritage Site. We believe that the proposed scheme has the potential to deliver a lasting positive legacy for one of the most important prehistoric landscapes in the world, helping to reduce the sight and sound of traffic past the iconic Stonehenge monument. By putting much of the current surface road into a tunnel past Stonehenge, it would help reunite the landscape and allow people to further appreciate and explore the World Heritage Site and its internationally important archaeological remains.

3.11. Due to the specialist nature of this consultation, should the Secretary of State have any additional queries, either in relation to our comments above or final comments from other Interested Parties to the Secretary of State's letter, we would be pleased to continue to offer further assistance.