



ENGLISH
HERITAGE

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Department of Transport
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London
SWIP 4DR

By EMAIL ONLY: A303Stonehenge@planninginspectorate.gov.uk

04 April 2022

Dear Ms Kopala,

Reference: Planning Act 2008 (as amended) and the Infrastructure Planning (Examination Procedure) Rules 2010 Application by National Highways ("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.

REQUEST FOR COMMENTS FROM ALL INTERESTED PARTIES AND THE APPLICANT: The Secretary of State invites Interested Parties to provide any comments on the Secretary of State's Statement of Matters of 30 November 2021, the Applicant's response to the Statement of Matters of 11 January 2022 and 8 February 2022 and all representations that have been published on the Planning Inspectorate website.

Please find below English Heritage Trust's response in relation to the above as requested in your letter of 24th February 2022.

Introduction

As you are aware from previous correspondence, the English Heritage Trust (EHT) cares for over 400 historic buildings, monuments and sites across the country. In our role as an independent charity, our purpose is to conserve these sites to the highest standards possible, in keeping with their status as part of England's national heritage and to maintain access to them for the public. The prehistoric stone circle of Stonehenge is the best known site within our care and as part of the wider Stonehenge and Avebury World Heritage Site (WHS), it is a powerful witness to the once great communities of both the Neolithic and Bronze Age. We also have Woodhenge and part of Durrington Walls in our care, in guardianship for the nation.

The previous removal of the old visitor facilities adjacent to the Stones and the grassing over of the A344 has given undeniable benefits of improved access to the monument, reuniting the monument with the landscape to the north and improvements to the setting of the monument in line with conservation of the Outstanding Universal Value of this part of the World Heritage Site. As a next step in restoring this landscape, English Heritage welcomes the proposal to remove the surface A303 from close proximity to the south of Stonehenge.

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This is one of the most important pre-historic landscapes in the world, but for far too long it has been cut in two by a major road. Placing the road within a tunnel will reunite the ancient landscape and allow everyone to understand Stonehenge better. People will at last be able to explore the wider countryside surrounding the stones, including all its many other fascinating prehistoric monuments.

EHT response to the Statement of Matters

In terms of answering the five questions in the Statement of Matters English Heritage will be answering as one of the land owners and major leaseholders and heritage managers in the WHS.

Bullet Point 1: Alternatives. Redetermination -Document 1.1

Any updates Interested Parties consider to be material to the information relating to alternatives considered by the Examining Authority in section 5.4 of their report (including the relative merits of a longer tunnel option); and any further information that Interested Parties consider to be material for the Secretary of State (SoS) to take into account in his re-determination of the application relating to the relative merits of alternatives to the Development;

EHT comments:

Summary of EHT previous input to the consideration of alternatives.

English Heritage Trust along with other heritage bodies were party to the original suggested route corridors and construction methods on the scheme. EHT also took part in previous consultations as a major stakeholder being represented on a number of National Highways groups particularly the Heritage Monitoring and Advisory Group (HMAG), Stakeholder Strategy Board (SSB) and the International Council on Monuments and Sites (ICOMOS) and UNESCO working group. We have also supported numerous site visits and three ICOMOS Advisory Missions hosted by the Department of Digital Culture Media and Sport (DCMS) and Historic England (HE).

Through participation in HMAG EHT has provided direct advice and support with regard to the archaeological and wider heritage impacts of the A303 project's design, assessment, implementation and mitigation. Where supplementary advice and expertise were required HMAG was joined by members of an expert Scientific Committee which was formed on request of UNESCO.

In particular, EHT advice has contributed to the heritage monitoring of the scheme to ensure that the heritage and archaeology dimensions of the project are clearly and consistently managed for the benefit of the OUV of the WHS and of heritage and archaeology in general.

Conclusion on Bullet Point 1: Alternatives

Whereas EHT has found it useful as part of this exercise to revisit the alternative schemes laid out in Redetermination -Document 1.1 our involvement in consideration of these alternatives was extensive in the first instance and we have no updates that we consider to be material for the Secretary of State to take into account. We still consider that the current proposed A303 road scheme as it stands has the greatest potential to further transform the Stonehenge part of the Stonehenge and Avebury World Heritage Site (WHS) and make significant improvements to the setting of the Stonehenge monument (which is one of the WHS's attributes of Outstanding Universal Value (OUV)) and people's experience of them, provided design development is sensitive and appropriate to the WHS location.

Bullet Point 2 Policy Redetermination -Document 1.2

Any change in whether the Development would be consistent with the requirements and provisions of relevant local or national policies, given the time since the examination closed.



EHT comments:

We note that The National Planning Policy Framework (NPPF) was updated in July 2018 and 2019 with changes in Environmental Policy and in 2021 changed in relation to good design (2.1.15).

National Highways state that these principles were already addressed through the Outline Environmental Management programme (OEMP) including the matters listed below and that as a result the scheme already complies with this updated aspect of the NPPF.

- a) Collaborative approach to design development;
- b) Considering the wider context as well as the detail;
- c) Respecting the World Heritage Site;
- d) One identity for the route, while acknowledging challenging landscapes;
- e) Sustainable design; and
- f) Accessible and connected network.

EHT are satisfied that from their involvement as a consultee to the OEMP, these principles were adhered to and therefore although the NPPF has been updated since the examination closed, we believe the scheme is compliant to those new policy provisions.

Conclusion on Bullet Point 2

As EHT were consultees on the OEMP as it was being drawn up and the changes to national and local policies have been reviewed by National Highways. We do not have any concerns over this section.

Bullet Point 3 Carbon Redetermination -Document 1.3

Any update to the assessment of the impact of the scheme on the carbon budgets to take account of the sixth carbon budget; and the direct, indirect and cumulative likely significant effects of the development with other existing and/or approved projects on climate, including greenhouse gas emissions and climate change adaptation, in light of the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and in light of paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks;

EHT comments:

As a heritage conservation charity, EHT do not feel qualified to comment in detail in respect of climate policy and guidance for the scheme including the updated Design Manual for Roads and Bridges (DMRB).

We note that there will be a review of the National Policy Statement on National Networks in the future, as was announced by the Department of Transport on 22 July 2021 but understand that currently, the scheme falls out of the range of the sixth carbon budget.

At English Heritage we are committed to sustainability throughout our organisation and estate and at Stonehenge, we continue to work to ensure that our operations including the Visitor Centre and associated buildings and the infrastructure necessary to welcome visitors from all over the world are used and maintained with as limited an environmental impact as possible. The award winning Visitor Centre was built to these principles in 2013 with minimum infrastructure and a light environmental footprint on the edge of the WHS.

Conclusion on Bullet Point 3:

EHT welcome the Government's commitment to assuring the scheme has the lowest possible carbon footprint and would expect this commitment to continue through detailed design and delivery stages should the scheme be re-consented.

Bullet Point 4, Environmental Information review. Redetermination -Document I.4

Other than where already covered by the matters set out above, the adequacy of the environmental information produced in support of the application for the Development and whether any further or updated environmental information is now necessary given the time since the examination closed;

EHT comments:

We note from the table of likely significant effects (Table S.1) p1 that there are changes under Cultural Heritage with additional Likely Significant Effects in respect of a number of possible Bronze age barrows or ring ditches in the vicinity of Stonehenge Bottom suggested by aerial photographs.

We also note that National Highways state that further Environmental information is required in order for the Secretary of State to make a decision, but overall the 2018 Environmental Statement along with supporting information are adequate to inform the Secretary of State's redetermination of the application.

Section 3 Cultural Heritage

The changes to the NPPF and the Applicant's response to this are noted above in response to Bullet Point 2. Additionally, we note the Applicant's assertions that the cultural heritage assessment remains consistent with the NPPF (3.1.3) and with the current (2015) WHS Management Plan (3.1.8).

We also note in particular the comments on the ICOMOS Guidance used for the *Heritage Impact Assessment for Cultural World Heritage Properties* and the forthcoming changes expected in 2022 leading to a more multi-disciplinary approach to HIAs but the Applicant does not consider the scheme Environmental Statement Heritage Impact Assessment will need to be updated at this point.

We note the errors that were rectified in the ES gazetteers particularly the Archaeological Gazetteer (6.3) and also the inclusion of new data from, for example, the Stonehenge Hidden Landscapes project and also from recent excavations such as the Larkhill Army rebasing programme.

We note (Redetermination I.4, 3.3.7 and 3.3.8) the addition to the Historic Environment Record close to the Order limits of a series of possible Bronze age barrows or ring ditches in the vicinity of Stonehenge Bottom in close proximity to Stonehenge itself and that these are high value non-designated assets.

We also note that the Cultural Heritage Section has been approved by Neil Macnab as the relevant competent expert for this topic, as set out in Appendix I.1 of the 2018 ES [APP – 185].

Taking all these into consideration, English Heritage are of the view that there is no further information required for the Secretary of State to make a decision on the scheme and that this part of the ES is adequate.

Section 4 Landscape Assessment

EH notes that whilst there are no changes to the landscape or visual baseline, there are multiple small changes made to the Landscape and Visual Impact Assessment (Redetermination I.4, 4.1.1) and have examined these in detail.

The detail of these changes is outlined in the Appendix 4.1 and although there are *slight adverse* changes during construction, English Heritage concur that the outcome will be *moderate beneficial* as the current A303 will be removed.

Sections 5 – 10 inclusive: Biodiversity; Noise and Vibration; Geology and Soils; Water and Road Drainage; Material Assets and Waste; People and Communities

EHT has no further comments on these sections to those given previously.

Section 11: Assessment of Cumulative Effects

We note that at 11.3.9. (b) ii Effects at Stonehenge Cottages remain unchanged since the 2018 ES.

Section 12 Assessment of Alternatives

Please see our response to Bullet Point 1 above.

Section 13 Conclusions and next steps

We note in the final table under Cultural Heritage the inclusion of additional heritage assets in respect of a number of possible Bronze Age barrows or ring ditches in the vicinity of Stonehenge Bottom, but concur with the view that the road scheme is likely to have a beneficial effect on this non-designated asset due to the reduced visual impact of the roads.

Bullet Point 4 Continued: Transport Assessment Redetermination -Document 1.4.1

Other than where already covered by the matters set out above, the adequacy of the environmental information produced in support of the application for the Development and whether any further or updated environmental information is now necessary given the time since the examination closed;

EHT comments:

English Heritage has previously expressed our significant concern on matters affecting ease of travel for visitors to Stonehenge, particularly in the summer months when volumes of traffic increase generally on the local road network. However, we have commented on transport assessments throughout the development of the scheme and now note and are satisfied by National Highways assessment that the changes in the impact of the scheme identified as part of this review are not considered to be material.

Conclusions on both parts of Bullet Point 4:

English Heritage were consultees on the 2018 EIA and having reviewed the changes in detail, we are confident that apart from some slight adverse changes during the construction phase, these are outweighed by the benefit of the scheme overall.

Bullet Point 5 Any other matters Redetermination -Document 1.5

Any other matters arising since 12 November 2020 which Interested Parties consider are material for the Secretary of State to take into account in his re-determination of the application.

EHT comments:

(a) the decision of the 44th session of the World Heritage Committee (WHC) in July 2021.

English Heritage has taken part in three UNESCO fact finding missions that have taken place on the A303 road scheme between Amesbury and Berwick Down and have contributed to the State of Conservation reports requested by UNESCO including the most recent iteration in February 2022.



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We have previously noted with concern the statement by the World Heritage Committee in July 2021 that they have urged the State party not to proceed with the scheme as proposed

Notes moreover that in the event that DCO consent was confirmed by the High Court, the property warrants the inscription on the List of World Heritage in Danger; Finally requests the State Party to submit to the World Heritage Centre, by 1 February 2022, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 45th session, with a view to considering the inscription of the property on the List of World Heritage in Danger if the A303 route upgrade scheme is not modified to deliver the best available outcome for the OUV of the property 1.2. Decision: 44 COM 7B.61 The World Heritage Committee.

We are glad that UNESCO is paying very close attention to this scheme within such an important World Heritage Site. When assessing the impact of the tunnel, the recommended guidance from UNESCO's adviser, ICOMOS, was used and this assessment showed that the scheme can protect and enhance the World Heritage Site, if it is designed well and includes appropriate mitigation. We believe that the current scheme does this. It is true that UNESCO still has concerns and it has asked the Government for an updated conservation report, the contents of which we understand they will discuss at a World Heritage Centre committee meeting this summer. We hope that they will be reassured by the report.

(b) Biodiversity

EHT has no further comments to those given previously.

Summary of Overall Conclusions:

We appreciate this opportunity to comment on the Statement of Matters. English Heritage Trust remain convinced that the current proposed A303 road scheme has the potential to transform the Stonehenge part of the World Heritage Site landscape. Provided that the design development is sensitive and appropriate to the WHS setting, this scheme could greatly enhance the Outstanding Universal Value (OUV) of the World Heritage Site whilst simultaneously improving the setting of Stonehenge itself, and people's experience of the monument, by the removal of the surface road.

EHT are committed to working with partners and National Highways to ensure that, should the scheme be re-consented, the highest standards of design development, construction and excavation are applied. We anticipate that if the scheme goes ahead, much more will be learnt about Stonehenge and its pre-historic environment in the process.



Kate Mavor
Chief Executive