



Historic England

**SUBMISSION
ON BEHALF OF THE
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HISTORIC ENGLAND)**

**Re-determination of the Application by Highways England for an Order granting
Development Consent for the A303 Amesbury to Berwick Down (“A303
Stonehenge”) PINS Reference No: TR010025**

4th April 2022

1. INTRODUCTION

1.1. Historic England is the government's statutory adviser on all matters relating to the historic environment in England. 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. Historic England is also the government's statutory advisor on relevant international conventions that apply across the UK, including the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention).

1.2. On November 30th 2021 the Secretary of State published a Statement of Matters inviting further representations on various matters for the purposes of redetermination of the application.

1.3. The matters set out in that Statement are:

- 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 to take into account in his re-determination of the application relating to the relative merits of alternatives to the Development;
- 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;
- 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;
- 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; and
- 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.

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 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. This submission from Historic England responds to the Statement of Matters and the Applicant’s further information as per the invitation by the Secretary of State (SoS) in his letter of 24th February 2022. Historic England has reviewed all the documents submitted by the Applicant and in view of our remit on the historic environment, provides comments where appropriate on those documents. We note that representations have been made by other Interested Parties. We do not intend to engage in providing commentary on the documentation submitted by other parties. It should not however be taken that an absence of comment is implicit agreement with comments made.

1.6. For ease of reference we will use the document names and references set out in the table to the Applicant’s response cover letter dated 11 January 2022.

2. HISTORIC ENGLAND’S OBSERVATIONS ON THE FIRST POINT IN THE STATEMENT OF MATTERS

“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 to take into account in his re-determination of the application relating to the relative merits of alternatives to the Development”

2.1. In regard to this Statement of Matters point, we have considered the Applicant’s Redetermination Document 1.1 “The response to Bullet Point One – Alternatives”.

2.2. The Applicant’s Document presents a summary of the consideration of the alternatives set out below, that the Applicant had previously put before the Examining Authority. For each alternative considered within the study area of the current scheme the Applicant has presented available updates to a) the heritage baseline included in the Environmental Information Review, provided in response to bullet point 4 of the Statement of Matters, and b) the supporting archaeological gazetteer. They have also presented updated baseline information relating to these routes as they were discussed at Examination. The updated baseline information has then been used to review the position stated in the 2018 Environmental Statement (ES) and at Examination and further information submitted as addenda in 2020.

- Cut and Cover Tunnel Extension to WHS boundary
- Bored Tunnel Extension to 600m beyond WHS boundary
- FO10 Surface route option to the South



- The “Parker” Route
- New Route to the South of Salisbury
- New Route to the North of the WHS

2.3. The Applicant has stated in this document that the alternatives were subject to a multi-criteria assessment considering the Client Scheme Requirements, national and local policies, and implications with regard to construction and civil engineering, traffic and operation, heritage, environment, programme and cost. Each alternative was previously assessed in the 2018 ES, Chapter 3: Assessment of Alternatives, in Sections 3.1-3.2.

2.4. Further information in relation to heritage collated by the Applicant is summarised below. While these assets are not newly identified, in that they were discovered prior to the Applicant’s original submissions at examination and assessed as part of the HIA for the proposed scheme, it appears that they had not been included within the 2018 assessment of alternatives within Chapter 3 of the ES. As such they are now included within the Applicant’s current submission document as an update to the baseline information for each alternative route discussed.

2.5. Paragraph 7.3.4 of the Applicant’s submission identifies two non-designated long barrows and a hengiform enclosure as part of the review of heritage for the route known as ‘New Route North of Salisbury’. These fall within Corridor G, identified as part of the evaluation work for routes D061 and D062 in 2017. These lie close to the A360 and are part of the Diamond Group, which itself was assessed in the 2018 Environmental Statement Chapter 6 and Heritage Impact Assessment. Historic England therefore considers that these assets also contribute to the OUV of the WHS. Paragraph 7.3.5 then goes on to say that the identification of these assets doesn’t change the assessment conclusions as any route within the corridor could be aligned to avoid them. This route was previously assessed and rejected by the Applicant.

2.6. Paragraph 8.3.3 of the Applicant’s submission identifies the Larkhill Causewayed Enclosure as an asset that contributes to the OUV of the WHS. This falls within the New Route North of the WHS as outlined in section 8 of the Applicant’s submission. This route was previously assessed and rejected by the Applicant.

2.7. The Applicant has reviewed their previous assessments for alternative routes outlined above, that would have an effect on the heritage assets which were not previously assessed in Chapter 3 of the ES. The Applicant has then concluded that their overall conclusions remain unchanged since the Examination. Whilst no new Heritage Impact Assessment has been undertaken on alternatives, these assets have been assessed in relation to the currently proposed scheme as part of the Applicant’s previously submitted HIA.

2.8. Historic England acknowledges the further information with respect to the alternatives presented in sections 3, 4, 7 and 8 in the Applicant’s document



“Response to Bullet Point One – Alternatives”. We note that heritage assets not previously included within the assessment of alternatives have now been considered in the updates to the review identifying any significant changes in the heritage baseline. Having considered the further information provided in the Applicant’s submission, Historic England considers that, while no new HIA has been undertaken for each alternative, this sufficiently addresses the new inclusions on the HER which have updated the known heritage baseline.

3. HISTORIC ENGLAND’S OBSERVATIONS ON THE SECOND POINT IN THE STATEMENT OF MATTERS

“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”

- 3.1. In regard to this Statement of Matters point, we have considered the Applicant’s Redetermination document 1.2 “Response to Bullet Point Two – Policy”. Historic England are satisfied that the Applicant’s response to Bullet Point 2 of the Statement of Matters has noted the latest updates to the NPPF with regard to the historic environment.

4. HISTORIC ENGLAND’S OBSERVATIONS ON THE THIRD POINT IN THE STATEMENT OF MATTERS

“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;”

- 4.1. In regard to this Statement of Matters point, we have considered the Applicant’s Redetermination Document 1.3 “Response to Bullet Point Three -Carbon”.

- 4.2. Historic England has no observations on this response.

5. HISTORIC ENGLAND’S OBSERVATIONS ON THE FOURTH POINT IN THE STATEMENT OF MATTERS

“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”



5.1. In regard to this Statement of Matters point, we have considered the Applicant's Redetermination Document 1.4 "Response to Bullet Point Four – Environmental Information Review". The focus of Historic England's advice is on heritage related matters arising from the Environmental Information Review (EIR).

5.2. Historic England broadly agrees that the Applicant's cultural heritage assessment remains consistent with Historic Environment Good Practice Advice in Planning Note 2 (GPA2) and Note 3 (GPA3), as well as ICOMOS guidance on Heritage Impact Assessments for Cultural World Heritage Properties. It also broadly agrees that the submitted updates to the heritage baseline do not alter the significance of the effects identified in the 2018 Environmental Statement.

5.3. The Applicant has considered updated Historic Environment Record Data, utilising data up to 10th December 2021. This data set includes heritage assets newly included within the Historic Environment Record dataset, which were not available as part of the data considered in the 2018 ES namely;

- Heritage assets excavated and recorded immediately north of the WHS at Larkhill by the Army Basing Programme; and several smaller scale investigations in connection with developments around the southern fringes of the WHS which became available after the 2018 ES.
- The plotting of a series of possible Bronze Age barrows and pits and other possible prehistoric features such as enclosures and ditches, identified by the English Heritage Stonehenge World Heritage Site Mapping Project.

5.4. Reviewing this new information against the 2018 ES and addenda submitted in 2020, the Applicant has concluded that; *"Additional likely significant effects (Large beneficial residual effects) have been identified in respect of a number of possible Bronze Age barrows or ring ditches in the vicinity of Stonehenge Bottom suggested from aerial photographs (see Appendix 3.1). The new assets in the baseline and the new beneficial likely significant effects constitute further environmental information for consideration by the Secretary of State in his redetermination. The baseline information (contained within the 2018 ES and environmental information) remains otherwise comprehensive, and the cultural heritage assessment is otherwise not altered."*

5.5. From reviewing the assessment outlined in Appendix 3.1 of the Applicant's submission, it is not clear if the asset groups previously assessed within the 2018 ES and 2020 addenda, of which the newly identified assets each form a constituent part, have been reviewed and redefined to reflect the addition of new HER data. We consider it unlikely that such a review of these asset groups to include the newly identified assets would significantly alter the existing conclusions of the HIA. However, we would seek clarification that this has been fully considered and that the 2018 ES and 2020 addenda conclusions remain unchanged as a result.



6. HISTORIC ENGLAND'S OBSERVATIONS ON THE FIFTH POINT IN THE STATEMENT OF MATTERS

“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”

- 6.1. In regard to this Statement of Matters point, we have considered the Applicant's Redetermination Document 1.5 –“Any Other Matters”.
- 6.2. Historic England previously set out in section 4 of our Written Representations (Deadline 2 submission) how we advise the Department for Digital, Culture, Media & Sport (DCMS), which acts on behalf of Government as State Party to the World Heritage Convention, on meeting and complying with the requirements of that Convention. The role of the World Heritage Committee (WHC) is also set out in detail in this part of our submission.
- 6.3. The World Heritage Committee, in Decision 44 COM 7B.61, has raised concerns regarding the proposed A303 road improvement scheme at Stonehenge and requested that the State Party submit an updated report on the state of conservation of the property and the implementation of the A303 Stonehenge improvement scheme, for examination by the World Heritage Committee at its 45th session. DCMS, acting as The State Party submitted a State of Conservation Report in February 2022, as requested by the WHC, which seeks to address these concerns along with a detailed explanation of the next steps for the DCO. The report identifies that the heritage bodies, including Historic England, remain in active discussion to ensure that should the DCO be consented under redetermination, the scheme will be designed and delivered in the best way possible for the benefit of the OUV of the WHS.
- 6.4. The State of Conservation Report states, within its Executive summary on page 2, that *“Within the context of the scrutiny by heritage bodies and experts, including Historic England, that will occur at every stage of the detailed design process of the scheme, we believe that there can be greater confidence that the provisions secured for the design and delivery of the proposed scheme will ensure that the OUV of the WHS be maintained and protected, and that the scheme has the potential to deliver considerable enhancements.”*
- 6.5. Historic England are of the opinion that the World Heritage Committee Decision 44 COM 7.B.61 should be a material consideration in the Secretary of State's redetermination of the Scheme, together with the 2022 State of Conservation Report, published subsequent to the Applicant's submission of January 11th 2022.

7. CONCLUDING REMARKS

- Having reviewed the further information that has been provided by the Applicant as part of the redetermination process, we remain confident of the Scheme's potential to deliver benefits for the historic environment. The Scheme proposes a significant reduction in the sight and sound of traffic in the part of the WHS where it will most improve the experience of the iconic Stonehenge monument itself, and enhancements to the experience of the solstitial alignments. It will also facilitate wider access, allowing people to reach and explore this landscape further, reuniting previously severed parts of the WHS. These are all significant benefits for the historic environment.
- If consented through redetermination, Historic England will continue to advise Highways England on the detail of the design and delivery of the Scheme. This will help to ensure that the potential benefits for the historic environment are delivered in practice.
- Should the Secretary of State have any additional queries in relation to our response or responses from others, we would be pleased to continue to offer further assistance.