



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**

3rd August 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 June 20th 2022, the Secretary of State published a letter requesting further comments and information from National Highways relating to 6 matters arising from the previous period of consultation. National Highways provided submissions in response to these 6 questions on the 11th July 2022. The Secretary of State subsequently invited comments from all interested parties on the information provided by National Highways, in his letter of 13th July 2022.
- 1.3. This submission from Historic England responds to the additional information presented by National Highways in their submissions of 11th July and considers the letters issued by the Secretary of State of 20th June and 13th July 2022. Historic England has reviewed all the documents submitted by National Highways as part of their most recent submission and, in view of our remit on the historic environment, provides comments where appropriate on those documents.
- 1.4. In April 2022, at the invitation of the State Party, the joint UNESCO World Heritage Centre / ICOMOS / ICCROM sent an Advisory Mission to Stonehenge, Avebury and Associated Sites. Historic England understands that the State Party (DCMS) will be submitting the final Advisory Mission Report to the Secretary of State for consideration as part of the redetermination process at which point the report will be in the public domain.
- 1.5. For ease of reference we will use the document names and references as set out in the table included within the Applicant's cover letter dated 11th July 2022.
- 1.6. This response will need to be read in light of previous submissions that Historic England has made.

2. Historic England's Observations on National Highways' response to the Consortium of Stonehenge Experts.

"The Secretary of State notes in response to his consultation letter dated 24 February 2022 that the Consortium of Stonehenge Experts identified that four assets are not included in the Applicant's assessment. The Applicant is asked to confirm to the Secretary of State whether these assets have been included in the assessment and, if so, to specify in the material where the assessment of those assets is set out. If an assessment has not been undertaken, the Applicant is asked

to provide the necessary assessment on these assets so the Secretary of State can appropriately consider them.” (Secretary of State letter dated 20th June 2022)

- 2.1. The assets, as set out by National Highways in their submission in response to the Consortium of Experts, are:
 - (a) Remains of a large Beaker-period settlement with burials
 - (b) Remains of a probable Early Neolithic settlement west of the Beaker-period settlement
 - (c) Remains of a probable Early Neolithic settlement at the eastern portal
 - (d) Remains of a Mesolithic settlement at Blick Mead
- 2.2. In preparing this submission Historic England has referred back to Environmental Statement (ES) Chapter 6, the Heritage Impact Assessment (2018), and additional information provided at examination by National Highways.
- 2.3. Paragraph 1.2.3 of document 4.1 of the current submission by National Highways (11th July 2022) clarifies that the information identifying assets a, b and c above draws on evidence presented in the 2018 archaeological evaluation reports and that they were considered as part of the DCO application assessments (ES Chapter 6: Cultural Heritage 6.9.25). Paragraph 1.2.5 goes on to confirm National Highways’ position, that their responses at Examination have already considered these assets, and therefore their previous assessment still stands (REP5003, paragraphs 34.1.2 – 34.1.5, 34.1.9 and 34.1.26).
- 2.4. Having referred to the 2018 HIA and ES, Historic England confirms that our position in relation to the overall assessment of the impact of the scheme on the WHS within the 2018 Heritage Impact Assessment (HIA) and ES remains unchanged from that stated at Examination, and again in our submission of 4th April 2022. We are satisfied that these heritage assets have been considered by National Highways. We also consider that National Highways 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 (ICOMOS 2011). Finally, we consider that the submitted updates to the heritage baseline do not alter the significance of heritage assets identified in the 2018 Environmental Statement.
- 2.5. In relation to site d, Blick Mead, we maintain our position as stated in Section 7 of our Submissions at Deadline 4, during Examination, “Written summaries of oral submissions put at Issue Specific Hearings held between 4 and 14 June 2019”. On the basis of the most recent evidence we have reviewed relating to the Blick Mead site, Historic England does not consider that the site would meet the Ancient Monuments and Archaeological Areas Act’s (1979) definition of a ‘building, structure or work’. This is because it lacks the physical evidence for the presence of man-made structures necessary for scheduling.

2.6. As a non-designated archaeological site, the assessment of impact and treatment under the Scheme of Blick Mead is a matter for Wiltshire Council's Archaeological Service to advise on as stated in our Submissions during Examination at Deadlines 4 and 9. On this basis we have no further comments to provide on this aspect of the Scheme.

3. Historic England's Observations on National Highways' response to the Conclusion on alternative routes

"The Secretary of State notes that a number of consultees have raised the issue that it is not clear how the Applicant has arrived at the conclusion that the alternative tunnel routes would only have minimal additional heritage benefits over the Development. The Applicant is asked to explain fully the basis on which they reached this conclusion. The explanation should include full detail of reasoning, the matters considered and any methodology that was used and, where applicable, be cross-referenced to the examination material or subsequent information provided to the Secretary of State. The Applicant should also provide any additional documents that are relevant to understand the conclusion that the Applicant reached on this matter. The Applicant is also asked to confirm whether the assessment of the heritage impact of alternative routes has been updated to take into account the 7 additional monuments that were added to the heritage baseline and provide any additional documents that are relevant". (Secretary of State letter dated 20th June 2022)

3.1. In response to this question National Highways have provided the following documents:

- Conclusion on alternative routes – Overarching response Redetermination **4.2**
- Outline Heritage Impact Assessment – Bored Tunnel Extension Redetermination **4.3**
- Outline Heritage Impact Assessment – Bored Tunnel Extension - Figures Redetermination **4.3 Figures**
- Outline Heritage Impact Assessment – Cut and Cover Tunnel Extension Redetermination **4.4**
- Outline Heritage Impact Assessment – Cut and Cover Tunnel Extension – Figures Redetermination **4.4 Figures**
- Environmental Appraisal (Heritage) – Bored Tunnel Extension Redetermination **4.5**
- Environmental Appraisal (Heritage) – Bored Tunnel Extension – Figures Redetermination **4.5 Figures**
- Environmental Appraisal (Heritage) – Cut and Cover Tunnel Extension Redetermination **4.6**
- Environmental Appraisal (Heritage) – Cut and Cover Tunnel Extension – Figures Redetermination **4.6 Figures**
- Environmental Appraisal – Bored Tunnel Extension Redetermination **4.7**
- Environmental Appraisal – Cut and Cover Tunnel Extension Redetermination **4.8**



- 3.2. Historic England has reviewed the outline documents in detail. We note the submission of outline Heritage Impact Assessments and Environmental Appraisals of the bored tunnel and cut and cover alternatives, as part of National Highways 11th July consultation response.
- 3.3. In paragraph 1.2.6 of redetermination document 4.2, National Highways clarify that they are providing *“further detail relating to two tunnel extension alternatives to the DCO Scheme that build on those alternatives appraised and presented during examination and which respond to comments made to the Secretary of State as part of the redetermination process.”* We note that the alternatives presented in these documents are different to those previously presented by National Highways in Chapters 3 and 4 of redetermination document 1.1 (January 2022) and in Chapter 3 of the 2018 ES. Both alternatives now include the relocation of Longbarrow Junction to the West and the bored tunnel is now c.80m longer to the west (beyond the previous extended bored tunnel). National Highways conclude in paragraph 1.10.4 of redetermination document 4.2 that *“the difference in impact between the DCO Scheme and each of the tunnel extension alternatives, in heritage terms, remains that the alternatives are slightly more beneficial than the DCO Scheme”*.
- 3.4. In each outline HIA, National Highways has considered the alternatives at a high level and set out the adverse and beneficial effects and impacts on the Historic Environment. Historic England considers that the outline assessments are consistent with ICOMOS guidance on Heritage Impact Assessments for Cultural World Heritage Properties.
- 3.5. Overall assessments are also provided in each outline HIA for comparison with National Highways assessment of the impacts resulting from the current A303 and those set out in the assessment of the submitted DCO scheme.
- 3.6. Historic England notes National Highways conclusions presented in section 9.5 of documents 4.3 and 4.4 (the outline HIAs) that the Bored Tunnel Extension alternative would result in an overall Moderate beneficial effect and that the Cut and Cover Tunnel Extension alternative would result in an overall Slight/Moderate beneficial effect. This is in comparison to the overall Slight Beneficial Effect of the DCO Scheme presented in the 2018 ES.
- 3.7. Historic England also notes National Highways conclusions presented in section 10 of documents 4.5 and 4.6 (the EAs for heritage) that the Bored Tunnel Extension alternative would result in a Moderate beneficial effect and that the Cut and Cover Tunnel Extension alternative would result in a Slight/Moderate beneficial effect on the OUV of the WHS. This is in comparison to the Slight Beneficial Effect of the DCO Scheme presented in the 2018 ES.
- 3.8. As such, Historic England recognises that the assessments presented by National Highways, in their most recent submission, set out that the amended bored tunnel and cut and cover tunnel alternatives would offer additional potential benefits



for cultural heritage assets and Asset Groups. This is outlined in paragraphs 10.1.7 of document 4.5 and paragraphs 10.1.8 of document 4.6 of National Highways 11th July 2022 submission respectively.

4. Historic England's Observations on National Highways' response on Information on Assessments

"The Applicant is asked to comment on the consultation responses from the consultation of 29 April 2022 where further information and/or assessments are sought. In particular, responses from: Stonehenge Alliance; Consortium of Stonehenge Experts; Wiltshire Council; International Council in Monuments and Sites UK; Historic England. The Applicant is asked to provide additional information and/or assessments or other documents where it is necessary to deal with the matters raised in the consultation responses". (Secretary of State letter dated 20th June 2022)

- 4.1. Section 3 of National Highways Redetermination Document 4.1 "Applicant's response to request for comments Q1, Q3 - Q6 Response document" sets out further information on the methodology and approach applied to the Environmental Information Review (EIR). We have expanded upon this further in sections 6 and 7 below, where specific responses on the cultural heritage assessment provided by National Highways are covered.
- 4.2. In our submission dated April 4th 2022, Historic England concluded in paragraph 5.5 that it was not clear if the asset groups previously assessed within the 2018 ES and HIA, and the 2020 ES addenda, had been reviewed and redefined to reflect the addition of new HER data. This point is raised below as a specific question directed at National Highways from the Secretary of State and we have responded in more detail in section 7 below.

5. National Highways' response to the Stonehenge Alliance

"The Secretary of State notes that Stonehenge Alliance has identified that biodiversity baseline surveys and reports and issues relating to adverse impacts of tunnelling through chalk bedrock have not been provided. The Applicant is asked to respond on the accuracy of this statement, and if the statement is correct, the Applicant is asked to provide the Secretary of State with all relevant information, surveys and reports on this matter." (Secretary of State letter dated 20th June 2022)

- 5.1. Historic England has no observations on this part of National Highways response.



6. Historic England's Observations on National Highways' response on the Environmental Statement on heritage matters

"The Secretary of State notes that Wiltshire Council has sought clarification as to how the Applicant reached its conclusion that the updated baseline assessment does not alter the outcome of the 2018 cultural heritage assessment within the Environmental Statement. The Applicant is asked to provide further information on the methodology of approach that was applied to the newly assessed assets so as to allow interested parties the opportunity to consider and provide further responses on whether the outcome of the assessment set out in the 2018 Environmental Statement on heritage matters has changed. The Applicant is asked to provide any additional evidence and documents that are relevant to fully understand any change in the assessment of heritage assets." (Secretary of State letter dated 20th June 2022)

6.1. In response to these questions National Highways has updated tables 3.1 and 3.5 from the redetermination document 2.1 (submitted 23rd February 2022) and presented revised versions, 3.1A and 3.5A in section 5 of document 4.1 of the current submission, along with updated figures (1.A – 1.E in document 4.1 Figures). This expands the assessment to include non-significant and neutral effects, which were not originally included in the EIR. Table 3.5A also includes feature 7110, now interpreted as a possible Saxon sunken feature building referred to in paragraph 5.2.8 of document 4.1. National Highways concludes that there would be no temporary construction effects or operational effects on any of the 15 additional heritage assets.

6.2. Historic England welcomes the clarification of the methodology employed in the Environmental Information Review (EIR) (Redetermination Document 1.4 submitted 3rd February 2022) contained within section 3.5 of document 4.1 (Cultural Heritage) of the current submission. More specifically, the additional cross references to the detailed methodology used for the assessment in tables 3.1-3.4 of redetermination document 2.1, along with revised tables 3.1A and 3.5A, give additional clarity. Historic England considers that the additional references to the assessment methodology used in tables 3.1-3.4 of redetermination document 2.1, give sufficient clarity to allow us to broadly agree with the conclusions.

7. Historic England's Observations on National Highways' response on Newly assessed assets

"The Secretary of State notes that Historic England in its response to the consultation of 24 February 2022 has asked for clarification on whether the newly assessed assets have been considered where they form part of asset groups. The Applicant is asked to provide clarification on this matter. If the Applicant has undertaken that consideration the Applicant should provide any additional information or documents in relation to that consideration." (Secretary of State letter dated 20th June 2022)



- 7.1. Historic England has reviewed National Highways response in section 6.2 of document 4.1 in conjunction with the Environmental Statement: Appendix 6.9 Cultural Heritage Setting Assessment and the Heritage Impact Assessment (2018).
- 7.2. National Highways states in 6.2.2 that their review has confirmed the following:
- No change is necessary to the definition of the relevant Asset Groups to reflect the new HER data; and
 - There is no change to the significance of any of the relevant Asset Groups, the impact of the proposed Scheme on those Asset Groups, or the significance of effect as assessed in the 2018 ES or HIA or the 2020 ES and HIA Addenda arising from the identification in the new HER data of these additional features.
- 7.3. Having reviewed the current submission against the 2018 ES and HIA, and the 2020 ES and HIA Addenda, Historic England considers that this has now been addressed by the Applicant and that the conclusions of the 2018 ES and 2020 ES and HIA addenda remain unchanged and that the additional information does not alter them.

8. CONCLUDING REMARKS

- If consented through redetermination, Historic England will continue to advise National Highways on the detail of the design and delivery of the Scheme. This will help to ensure that impacts on OUV are minimised and 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.