



ENGLISH
HERITAGE

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

By EMAIL ONLY: A303Stonehenge@planninginspectorate.gov.uk

3 August 2022

Dear Mr O'Hanlon,

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.

Re: REQUEST FOR ADDITIONAL COMMENTS FROM ALL INTERESTED PARTIES

Re: The responses by the Applicant to the Secretary of State's Consultation letter of 20 June 2022

The English Heritage Trust welcomes the invitation in your letter of 13th July 2022 to comment on the further information that National Highways provided to the Secretary of State in response to the six questions he posed on 20th June 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 held in guardianship for the nation. 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, it is a powerful witness to the once great communities of both the Neolithic and Bronze Age. We also have nearby 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 (OUV) of this part of the World Heritage Site (WHS). As a next step in restoring this landscape, EHT 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 prehistoric landscapes in the world, but for far too long it has been cut in two by a major road. Placing the road within a buried tunnel will reunite the ancient landscape and allow everyone to understand and experience Stonehenge better. People will at last be able to explore the wider countryside surrounding the stones, including all its many other fascinating prehistoric monuments.

In terms of commenting on the Applicant's responses to the questions set by the Secretary of State, EHT will be answering as one of the major leaseholders and heritage managers in the WHS.

EHT Comments on National Highways' response to the Secretary of State's questions 1:

EHT are satisfied that National Highways have provided sufficient information to answer the points raised by various parties.

EHT Comments on National Highways' response to the Secretary of State's question 3:

On 3.5 Response to Wiltshire Council, EHT welcomes under Cultural Heritage, the inclusion of 7 additional monuments into the baseline assessment for cultural heritage. On all other aspects of Question 3, EHT are satisfied that National Highways have provided sufficient information to answer the points raised by various parties.

EHT Comments on National Highways' response to the Secretary of State's question 4:

EHT are satisfied that National Highways have provided sufficient information to answer the points raised by various parties.

EHT Comments on National Highways' response to the Secretary of State's question 5:

EHT are satisfied that National Highways have provided sufficient information to answer the points raised by various parties.

EHT Comments on National Highways' response to the Secretary of State's question 6:

EHT are satisfied that National Highways have provided sufficient information to answer the points raised by various parties.

EHT Comments on National Highways' response to the Secretary of State's question 2:

EHT welcomes the new information provided by National Highways in response to this question: please see references below to Re-determination Document 4.2.

EHT notes that in heritage terms alone, National Highway's response to AL.1.29 concluded that each alternative extension proposal would be slightly more beneficial than the DCO Scheme for the following reasons:

- Cut and cover tunnel extension: The heritage benefit of this alternative was assessed as slightly more beneficial than the DCO Scheme overall.
- Bored tunnel extension: The heritage benefit of this alternative was assessed as slightly more beneficial than the DCO Scheme overall.

EHT notes and agrees with the above overall considerations and conclusions.

The Cut and Cover Tunnel Extension:

EHT further note that at 1.9.2 National Highways state: *Overall, it is assessed that the effects of the Cut and Cover Tunnel Extension on OUV, Integrity and Authenticity of the WHS would be Slight to Moderate Beneficial. The effects of the DCO Scheme are assessed as Slight Beneficial.*



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EHT agree with this assessment by National Highways as primarily, the Cut and Cover scheme would provide more visibility between heritage asset groups.

The Bored Tunnel Extension:

EHT note that at 1.8.2 National Highways state: *The Bored Tunnel Extension offers some benefits for heritage assets and asset groups, above those offered by the DCO Scheme. Overall, it is assessed that the effects of the Bored Tunnel Extension on OUV, Integrity and Authenticity of the WHS would be Moderate Beneficial. The effects of the DCO scheme are assessed as Slight Beneficial.*

EHT agree with this assessment by National Highways. A bored tunnel extension of the type assessed would ensure that buried archaeology in the western sector of the WHS remains in situ and would also provide more visibility between heritage asset groups.

Summary of Overall Conclusions

EHT is very aware of the responsibility of our role as guardians of Stonehenge for the nation and so want to see the best possible outcome for the A303 road scheme. We appreciate this opportunity to examine National Highways' responses to the six questions required by the Secretary of State.

EHT has been part of the iterative process of the development of the current scheme not least as members of the Heritage Monitoring Advisory Group and members of the Scientific Committee. We also hosted part of the recent fourth UNESCO Advisory Mission and are aware that the ensuing report will be available shortly which we hope will assist National Highways and the Department for Transport in their decision making.

EHT are supportive of the DCO scheme that is currently presented as, in its present form, it has the potential to transform Stonehenge in its landscape setting. However, having been presented with more information on two alternative extension proposals as part of this process, we note and agree with National Highways' assessment that in heritage terms alone, the impact on the OUV, Integrity and Authenticity of the WHS of the Bored Tunnel extension proposal would be more beneficial (moderately beneficial) than both the Cut and Cover extension proposal (slight to moderate beneficial) and the DCO scheme (slight beneficial).

EHT will continue to work together with National Highways and all the parties concerned to find the best possible solution for Stonehenge and the protection of the Outstanding Universal Value of the World Heritage Site on behalf of everyone both local, national and international who wishes to visit and learn about this global prehistoric icon.

Yours sincerely,



Kate Mavor
Chief Executive